

71-9290



April 21, 2006

Mr. Robert A. Nelson  
Section Chief  
Licensing Section  
Spent Fuel Project Office  
Office of Nuclear Material Safety and Safeguards  
Mail Stop: 13 D13  
United States Nuclear Regulatory Commission  
One White Flint North  
11555 Rockville Pike  
Rockville, MD  
20852-2738

**RE: Amendment to the Certificate of Compliance USA/9290/B(U)-85  
F-430 Transport Package**

Dear Mr. Nelson:

MDS Nordion is requesting an amendment to the Certificate of Compliance USA/9290/B(U)-85 to update table 5.2 of the MDS Nordion report IN/TR 1608 F430 (2f), "Safety Analysis Report for F430/GC-40 Transport Package."

The only change to table 5.2 is in the third column where the compressive strength values were revised for the testing performed in the direction perpendicular to the foam rise. From our experience in manufacturing the first production units, we learned that the high-density foam is essentially isotropic. This is reflected in the revised table. The revised specification will be easier to achieve with future manufacturing.

This change does not impact the performance of the F-430 overpack. The high-density foam, referred to in table 5.2, serves as a protective barrier against fire, and the fire retardant properties of the foam have not been changed. Testing on the prototype F-430 showed that the high-density foam was not affected by the drop tests. Instead, all of the energy of the drop tests as absorbed by the light density foam, referred to in table 5.1, and the stainless steel skins. Therefore the safety of the F-430 is unaffected by the proposed change.

UNSSO1

Attached are seven proprietary and two non-proprietary copies of the revised page number 108 of the MDS Nordion report IN/TR 1608 F430, "Safety Analysis Report for the F430 Transport Package." I have attached an affidavit to support MDS Nordion's request to withhold parts of the above-mentioned document from public disclosure. The document contains parts, which are specific to the design and fabrication of the F-430 transport packages and would enable a third party to manufacture a similar transport packages. Please note that the proprietary parts have been highlighted in yellow in the proprietary version.

If you have any questions or require further information please feel free to contact me by telephone at (613) 592-3400 extension 2421 or by email at [mcharette@mds.nordion.com](mailto:mcharette@mds.nordion.com).

Yours sincerely

A handwritten signature in black ink, reading "Marc-André Charette". The signature is fluid and cursive, with a long horizontal stroke extending from the end.

Marc-André Charette  
International Transport & Nuclear Initiatives  
Manager, Regulatory Affairs

Attached: revised page number 108 of IN/TR 1608 F430

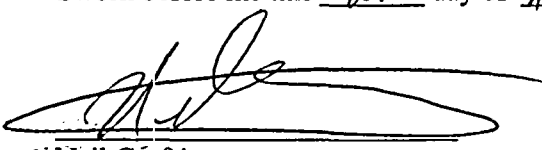
Copy to: Rick Boyle, US Department of Transportation  
Blair Menna, Luc Desgagne, MDS Nordion

## AFFIDAVIT

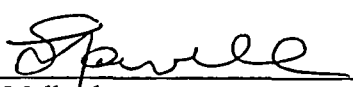
I, G.R. Malkoske, in my capacity as Vice President, Technology, having been duly authorized to apply for withholding from disclosure of proprietary information by and on behalf of MDS Nordion, a division of MDS (Canada) Inc., ("MDS Nordion"), do depose and say:

1. I, G.R. Malkoske, am the Vice President, Technology, of MDS Nordion.
2. The information contained in the MDS Nordion's document No. IN/TR 1608 F430 (2f), "Safety Analysis Report for the F-430 Transportation Package" is the property of MDS Nordion. The document contains proprietary information related to the design of the F-430 transport package.
3. MDS Nordion, has expended extensive funds and manpower in developing the aforementioned document and any release for disclosure of such information to third parties would enable and assist third parties to use the information to fabricate and register similar transport packages without incurring any development costs. This could compromise MDS Nordion's, ability to compete in the marketplace. Therefore, MDS Nordion, submits that parts of page 108 of the MDS Nordion document IN/TR 1608 F430 (2f), "Safety Analysis Report for the F-430 Transportation Package," should be withheld from public disclosure.
4. The information has been held in confidence by MDS Nordion, and any disclosure thereof for developmental purposes, has been accompanied by a confidentiality agreement protecting the trade secrets contained herein.
5. The information has been transmitted to and received by the Nuclear Regulatory Commission in the United States in confidence.
6. This information is not available in public sources.
7. The information contained in this affidavit is to the best of my knowledge true and correct.

Sworn before me this 21<sup>st</sup> day of April, 2006 in the City of Ottawa, Ontario, Canada.

  
Neil Gotfrit  
Notary Public in and  
for the Province of Ontario, Canada

per:

  
G.R. Malkoske  
V.P., Technology  
MDS Nordion, a division of MDS (Canada) Inc.

# Safety Analysis Report for **F430/GC-40** Transport Package



IN/TR 1608 F430 (2f)

**Non-Proprietary Information**

---

Safety Analysis Report for  
**F430/GC-40 Transport Package**  
IN/TR 1608 F430 (2f)

**Non-Proprietary Information**



## IN/TR 1608 F430 (2f)

Effective Date: 12 APR 2006

Page No.: 1 of 111

**Safety Analysis Report for F430/GC-40 Transport Package****Signatures**Prepared by: B. Menna Date: 06/04/11

B. Menna, Package Engineering

Reviewed by: M. A. Charette Date: 06/04/11

M. A. Charette, Regulatory Affairs

Approved by: J. Ramsay Date: 06/04/11

J. Ramsay, Technical Design Authority, Package Engineering

**Document History**

Date	Version	Comments	Prepared by	Reviewed by	Approved by
Sept. 2000	1	A1297-C-00A	J. Krupka	M.A. Charette	M. Krzaniak
Oct. 2001	1a	DCN: A1297-D-10A Updates to: Append. 1.3.2, Chap. 2, Chap. 3, Append. 3.6.1	B. Menna	M.A. Charette	M. Krzaniak
Jul. 2002	2	DCN: A1297-D-12A	B. Menna	M.A. Charette	M. Krzaniak
Feb. 2003	2a	DCN: A1297-D-15A Updated Chapters 1, 2, 3, 7 and Appendices 1.3.1, 1.3.2, and 2.10.3	B. Menna	M.A. Charette	M. Krzaniak
Mar. 2003	2b	DCN: A1297-D-18A Updated: Chapters 1 and 2 and Appendix 1.3.2	B. Menna	M.A. Charette	M. Krzaniak
Aug. 2003	2c	DCN: A1297-D-31A Updated: Chapters 1 and 2 and Appendices 1.3.2 and 2.10.3	B. Menna	M.A. Charette	M. Krzaniak
Dec. 2003	2d	DCN: A1297-D-38A Updated: Chapters 1, 2 and 7 and Appendices 1.3.2 and 2.10.3	B. Menna	M.A. Charette	M. Krzaniak
Jan. 2004	2e	DCN: A1297-D-42A Updated p. 20 and Appendix 2.10.3	B. Menna	M.A. Charette	M. Krzaniak
Apr. 2006	2f	DC19932 Updated p. 108			

This document contains information proprietary to MDS Nordion Inc. Any disclosure or use of this information or any reproduction of this document other than the specified purpose for which it is intended is expressly prohibited except as MDS Nordion may otherwise agree in writing.

**NOTE:** The portion of this text affected by changes is indicated by a vertical line in the margin.

**Safety Analysis Report for F430/GC-40 Transport Package**

The paint and primer used shall be approved by MDS Nordion. Paint and primer shall be applied in accordance with the manufacturer's instructions and the engineering drawings. The Vendor shall allow at least 12 hours of drying time prior to handling and 48 hours of drying time prior to delivery. Allow at least 7 days before exposing to water.

**5.4****5.4.1 Specification****Table 5.1:**


**Table 5.2:**
