



ATTN: Document Control Desk
Director, Spent Fuel Project Office
Office of Nuclear Material Safety and Safeguards

Date: May 4, 2006

71-9036

Dear Sir,

In accordance with 10 CFR 71.95(a)(3), Source Production and Equipment Co., Inc. (SPEC) is hereby reporting an instance in which the conditions of approval in Certificate of Compliance number 9036 were not observed in making a shipment. In this case SPEC was both the shipper and the certificate holder.

One condition of certificate number 9036 is that the Model C-1 transport package be prepared for shipment in accordance with the Operating Procedures located in Section 7.0 of the application dated February 28, 2001. Section 7.1.3 of those procedures entitled "Loading of Contents" requires that the doors to the SPEC C-1 source changer be secured together by a padlock or similar fastener. SPEC's QA procedures and checklist for shipping require that the C-1 be locked with a padlock. On April 21, 2006 we discovered that a SPEC employee neglected to secure the doors together prior to shipment as required by SPEC's QA documentation.

There were absolutely no safety consequences from this omission, there were no component or system failures, no inoperable components or systems. The padlock is a security measure, not a locking mechanism. (See section 2.4.3 of the 02/28/01 Consolidated Application.)

In the C-1, the sealed source assemblies are retained in the depleted uranium shield by spring loaded lock plungers. The design of the locking plungers requires that they be fully engaged before the front door can be fully closed. The design of the door brackets prevents partial opening of the front door regardless of the size and design of any padlock or similar fastener devices used during shipping. The front door provides a redundant mechanism to maintain the lock plungers in the secure position. The C-1 source changer must be shipped inside an overpack / drum. During fabrication, high density foam is poured into the drum forming a snug fitting cavity for the C-1 source changer. The drum lid and closure ring hold the SPEC C-1 source changer inside the cavity inside the overpack / drum during shipping.

Corrective / Preventative Action Report 06002 was initiated on 04/21/06. All personnel were retrained in SPEC's requirements that all QA procedures, Work Instructions, drawings, travelers and forms are mandatory. Records of the incident will be maintained on file at SPEC.

Sincerely,

Kelley Richardt
Regulatory and Quality Manager

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