

July 25, 2006

Ms. Lori Podalak
Product Licensing Specialist
Regulatory Affairs Department
QSA Global, Inc.
40 North Avenue
Burlington, MA 01803

SUBJECT: CERTIFICATE OF COMPLIANCE NO. 9283 FOR THE MODEL NO. OP-660
AND OPL-660 PACKAGE

Dear Ms Podalak:

As requested by your letter dated May 30, 2006, enclosed is Certificate of Compliance No. 9283 Revision No. 2 for the Model No. OP-660 and OPL-660 transportation package. Changes to the enclosed certificate are indicated by vertical lines in the margin. The staff's Safety Evaluation Report is also enclosed.

The approval constitutes authority to use the package for shipment of radioactive material and for the package to be shipped in accordance with the provisions of 49 CFR 173.471. Those on the attached list have been registered as users of the package under the general license provisions of 10 CFR 71.17 or 49 CFR 173.471. Registered Users may request by letter to remove their names from the Registered Users List.

If you have any questions regarding this certificate, please contact me or Jill Caverly of my staff at 301-415-8500.

Sincerely,

/RA/ by Meraj Rahimi for/

Christopher M. Regan, Acting Chief
Licensing Section
Spent Fuel Project Office
Office of Nuclear Material Safety
and Safeguards

Docket No. 71-9283
TAC No. L23981

Enclosures: 1. Certificate of Compliance
No. 9283, Rev. No. 2
2. Safety Evaluation Report
3. Registered Users List

cc w/encls 1 & 2: R. Boyle, Department of Transportation
J. Shuler, Department of Energy
RAMCERTS

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SAFETY EVALUATION REPORT

Docket No. 71-9283
Model No. OP-660 and OPL-660 Packages
Certificate of Compliance No. 9283
Revision No. 2

SUMMARY

By application dated May 30, 2006, QSA Global, Inc. (QSA) requested that the Certificate of Compliance (CoC) No. 9283 for the Model No. OP-660 and OPL-660 packages be reviewed by the U.S. Nuclear Regulatory Commission (NRC) for consistency with the requirements of Title 10 Code of Federal Regulations (CFR) Part 71 as revised in a final rule effective October 1, 2004 (69 FR 3786). In addition, the application was reformatted to match guidance from NRC Regulatory Guide 7.9. QSA also requested the CoC to be updated with its new name. The CoC has been revised to reflect its new name and the package identification number has been amended to include the "-96" designation identifying that it meets the updated regulations as described in the package application.

EVALUATION

By letter dated May 30, 2006, the applicant, QSA, requested an amendment to Certificate of Compliance (CoC) No. 9283 for its Model No. OP-660 and OPL-660 packages to include the "-96" in the identification number, as specified in 10 CFR 71.19(e). The Model No. OP-660 and OPL-660 packages are currently certified by NRC as meeting Type B(U)-85 requirements.

In addition to updating the Certificate of Compliance to meet the new rule, a consolidated package application for the Model No. OP-660 and OPL-660 package was submitted to NRC. This version of the application is essentially a full revision. The basic format has been revised to match the suggested format in Regulatory Guide 7.9, Revision 2. There have been no significant changes to the contents.

Staff evaluated the information provided by the applicant and assessed the impacts of issues identified in the final rulemaking for 10 CFR Part 71, effective October 1, 2004. Nineteen issues were considered in the rulemaking process that led to the revised rule. Five of these issues were not adopted into the final rule. The remaining 14 issues were evaluated for applicability to the Model No. OP-660 and OP-660L package. No issues associated with the revised rule pertained to this package.

In addition to updating the Certificate of Compliance to meet the new rule, a consolidated package application for the Model No. OP-660 and OPL-660 package was submitted to NRC. The generic format changes to the application include minor grammatical changes and format changes to match the regulatory guide. Other additions to the SAR can be categorized by the chapters of the application that contain them. A consolidated discussion of the specific changes follows.

Section 1 to the application contains general information. The changes to this section are grammatical changes and updates references to the former name of the CoC holder (AEA Technology QSA, Inc.) to the current name of QSA Global, Inc. Revision C to drawing R66050 has been updated for consistency with the SAR.

Changes to Section 2 of the application include adding the following: discussion of effects of radiation on materials, a fabrication and evaluation of material section, summary of temperatures, stress evaluation, demonstration of capsule integrity, stress evaluation, temperature and pressure tables, and deep water immersion test requirements.

Revisions to Section 3 include a correction to the correction factor used for output activity from 1.8 watts for Ir-192 to 2.8 watts. Also, the revised decay heat assumption changed from 25% to 100% deposition on smallest face to demonstrate compliance.

Sections 4 through 8 updates add details for consistency with Regulatory Guide 7.9.

Staff has reviewed the requirements of the revised Part 71 rule and the changes to the application identified by the CoC holder and concludes that the package meets the requirements for a "-96" designation and the revisions to the application are not significant to the design and performance of the package.

Changes to Certificate of Compliance

The following changes are included in Revision 2 to CoC 9283:

- The Package Identification Number was updated with "-96" to USA/9283/B(U)-96.
- Condition No. 3(a) was updated with the new name of QSA Global, Inc.
- Condition No. 5 was updated to provide clarity concerning the reference to the American National Standard N432-1980.
- Condition No. 9 was revised to reflect the change in the section numbers of the general license requirements as set forth in the new Part 71 ruling that became effective October 1, 2004.
- Condition No. 10 of the certificate allows a package to be marked with the previous package identification number, USA/9283/B(U)-85, until July 31, 2007. This is to allow time to replace the packaging nameplate that shows the revised package identification number, USA/9283/B(U)-96.
- Condition No. 11 was revised to authorize use of the previous revision of the certificate for a period of approximately one year.
- The May 30, 2006, submittal was included in the References section.

CONCLUSION

Based on the statements and representation in the application, the staff concludes that the Model No. OP-660 and OPL-660 meets the requirements of the revised 10 CFR Part 71 and can be designated with "-96" in the identification number and that the revisions to the SAR are not significant to the design of the package.

Issued with Certificate of Compliance No. 9283, Revision No. 2
on July 25, 2006.