



May 14, 2007
E-25043

ATTN: Document Control Desk
Director, Division of Spent Fuel Storage and Transportation
Office of Nuclear Material Safety and Safeguards
U. S. Nuclear Regulatory Commission
One White Flint North
11555 Rockville Pike, M/S 6003-3DO2M
Rockville, MD 20852

Subject: Report of Non-Compliance to Certificate of Compliance No. 9233 for TN-RAM Package Pursuant to 10 CFR 71.95 (b), Docket No. 71-9233

Dear Sir:

This report is made on behalf of the registered users of the TN-RAM Package pursuant to 10 CFR 71.95 (b) with respect to Certificate of Compliance (CoC) No. 9233, Revision 7 for the Model No. TN-RAM Package, Docket No. 71.9233. The TN-RAM package was used for shipments prior to April, 2007 where the conditions of the certificate were not followed during these shipments. The TN-RAM package was being used for the transportation of irradiated nuclear hardware.

CoC No. 9233, Revision 7 incorporates by reference the package drawings which specified that the containment O-ring seals (including port seals) were Parker O-rings made of silicone compound number S604-70. Transnuclear has determined that equivalent silicone o-ring seals were used in lieu of the Parker seals.

This is not a public health and safety issue but strictly a compliance issue. None of the components and systems of the TN-RAM package were affected by this incidence. No individual received any exposure to radiation or to radioactive materials as a result of this non compliance.

The non compliance was discovered during the evaluation of an audit finding by a Transnuclear customer. Based on this evaluation, Transnuclear submitted an application to NRC for revision to CoC 9233 on May 4th 2007 to make consistent the requirements for the O-ring seal materials called out on the SAR drawings and SAR section. NRC approved the revision request on May 7th 2007 and issued CoC 9233 Revision 8.

The apparent cause of this non compliance was that the SAR for the TN-RAM package allowed the use of equivalent O-rings. This was not consistent with the package drawings referenced from the CoC. Transnuclear is addressing this error through the Transnuclear NRC approved Quality Assurance Program in CAR 2007-019.

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Phone: 410-910-6900 ♦ Fax: 410-910-6902

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Transnuclear is providing this information on behalf of the TN-RAM Package users during the period 2005 to 2007. Should you have any questions or need additional information please contact me at 410-910-6930 or Jayant Bondre at 410-910-6881.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert Grubb", written in a cursive style.

Robert Grubb
Senior Vice President - Engineering

cc: Nancy L. Osgood (NRC)