



E-25286  
July 12, 2007

U.S. NUCLEAR REGULATORY COMMISSION  
ATTN: Document Control Clerk  
Washington, DC 20555

SUBJECT: REPLY TO A NOTICE OF VIOLATION

To Whom It May Concern:

**As required, Packaging Technology, Inc. provides our response to the Notice of Violation (NOV) included in NRC Inspection Report No. 71-0250/2007-201, which reads as follows:**

*10 CFR 71.111, "Instructions, Procedures and Drawings," states, in part, that the certificate holder shall prescribe activities affecting quality by documented procedures and shall require that these procedures be followed. Transnuclear Implementing Procedure (TIP) 3.1, Rev. 4, "Design Control," a quality affecting procedure applicable to Packaging Technology design activities, Section 5.1.1 states that a Design Criteria Document shall be prepared for a design project. Also, Section 5.4 requires the performance of a Design Review that shall be documented on a Design Review Checklist (Form 3.1-1).*

*Contrary to the above requirements, Packaging Technology failed to prepare a Design Criteria Document and to conduct a Design Review for the TN-55 (Certificate of Compliance 71-9328) packaging design project conducted during the 2005/2006 time frame.*

**In response to the above, Packaging Technology, Inc. offers the following:**

Corrective Action Report (CAR) No. 2007-040 was initiated to document the NOV and provide for its resolution in accordance with our Corrective Action Program, as detailed in TIP 16.1, "Corrective Action." Upon completion of our evaluation of the identified condition, corrective actions and actions to prevent recurrence will be implemented and fully documented in the associated CAR. All documentation will be available for review in our offices at your convenience.

It should be noted that the identified condition represents a failure to follow procedural requirements regarding the documentation found to be lacking and is of no safety significance since all safety considerations were validated during performance testing of the Certified Test Units. This is fully documented in the applicable Safety Analysis Report. Furthermore, a formal Design Review will be conducted and documented prior to fabrication of any TN-55 packages under the referenced Certificate of Compliance.

**PACKAGING TECHNOLOGY, INC.**

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*MMSS*

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Please do not hesitate to contact me should you require any additional information or have any questions regarding this response.

Very truly yours,

A handwritten signature in black ink, appearing to read 'S. White', with a long horizontal flourish extending to the right.

Steven C. White,  
Director, Corporate Quality Assurance

C:

D. Duncan  
G. Field  
R. Flinn  
B. Hargis  
D. Hillstrom  
D. Kurtz