		Page 1	
C FORM 699 U.S. NUCLEAR REGULATORY COMMISSION DATE		DATE	
		12/22/2008	
CONVERSATION RECORD		TIME	
		3:00pm	
NAME OF PERSON(S) CONTACTED OR IN CONTACT WITH YOU	TELEPHONE NO.	TYPE OF CONVERSATION	
Kate Roughan, Lori Podolak, Paul Rice	781-505-8210	VISIT	
ORGANIZATION		CONFERENCE	
SUBJECT			
Legacy Packages			
SUMMARY (Continue on Page 2)			
NRC Staff: Matthew Gordon, Pierre Saverot			
Staff advised QSA Global Inc. that it will loosen current restrictions concerning welding codes and materials of construction for "legacy packages," provided that the Certificate of Compliance states the approximate date of the end of construction and also specifies that no new fabrication of such packages is permitted. Staff said that, while there is a consensus on using substitute materials, it cannot convey such results until a guidance document is finalized. Staff advised QSA that strong restrictions will still hold for both replacement fasteners and maintenance operations, and that changes to the licensing drawings and application may be needed to reflect these restrictions. QSA stated that (i) packages such as the Model No. 702 have routine maintenance, (ii) there is no need to inspect bolts every time for hand carried packages, (iii) inspecting a package every 3 months is an accepted practice, (iv) there is no expectation of repairing any weld (in reference to staff's question if the welding code used in the original package fabrication was foreign or non active). With respect to depleted uranium (DU) shields with no minimum weight, the Staff stated that QSA should put a note on the licensing drawings which referred to hardware inspections of the DU shields described in Chapter 8 of the application. QSA said that specifying classes or grades of ASTM fasteners rather than a particular alloy (e.g., ASTM 304 stainless steel) would be beneficial from a fabrication standpoint. The Staff made no commitments on the issue, but found there may be potential with such an approach. The Staff cautioned, however, that drop testing of prototypes constructed with bolts from a particular grade or class. The Staff also informed QSA that the possibility of using "18-8" fasteners for "important to safety" (ITS) components is being reviewed, but a regulatory judgment is difficult, since there is no pedigree guaranteeing the minimum mechanical properties or compositional limits on such fasteners. The possibility of using of "			
(Continued on next page.)			
Continue on Page 2			
ACTION REQUIRED			
None			
NAME OF PERSON DOCUMENTING CONVERSATION SIGNATURE		DATE	
Pierre Saverot	m	12/29/2008	
ACTION TAKEN			

TITLE OF PERSON	TAKING ACTION
-----------------	---------------

DATE

NRC FORM 699 (9-2003)

PRINTED ON RECYCLED PAPER

## **CONVERSATION RECORD (Continued)**

SUMMARY (Continue on Page 3)

Staff advised QSA (i) not to create a situation that would render drop test invalid (by not choosing the weakest and most brittle material from an particular class or grade of ASTM bolts and (ii) to ensure that it does not invalidate any currently operating packages by specifying incorrect manufacturing dates. Staff mentioned that specifying what is "important to safety" (ITS) or "not important to safety" on the licensing drawings of legacy packages may be a path forward, even if such a wording is not included in Part 71 regulations.