March 24, 2009

Ms. Lori Podolak
Senior Regulatory Affairs Specialist
Regulatory Affairs Department
QSA Global, Inc.
40 North Avenue
Burlington, MA 01803

SUBJECT: REVISION NO. 4 OF CERTIFICATE OF COMPLIANCE NO. 9283 FOR THE MODEL NOS. OPL-660 AND OP-660 PACKAGES

Dear Ms. Podolak:

As requested by your application dated September 23, 2008, supplemented February 19, 2009, enclosed is Certificate of Compliance No. 9283, Revision No. 4, for the Model Nos. OPL-660 and OP-660 packages. 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 Pierre Saverot of my staff at (301) 492-3408.

Sincerely,

/RA/

Eric J. Benner, Chief
Licensing Branch
Division of Spent Fuel Storage and Transportation
Office of Nuclear Material Safety
and Safeguards

Docket No. 71-9283
TAC No. L24256

Enclosures:
1. Certificate of Compliance No. 9283, Rev. No. 4
2. Safety Evaluation Report
3. Registered Users

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

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Distribution: **(Closes TAC No. L24256)**

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Package Accession Number: ML090830477 **Accession Number:**

OFC:	SFST		SFST		SFST							
NAME:	PSaverot		MDeBose		EJBenner							
DATE:	03/23/2009		03/23/2009		03/24/2009							

C = COVER **E = COVER & ENCLOSURE** **N = NO COPY** **OFFICIAL RECORD COPY**

SAFETY EVALUATION REPORT
Model Nos. OPL-660 and OP-660 Packages
Certificate of Compliance No. 9283
Revision No. 4

SUMMARY

By application dated September 23, 2008, and supplemented February 19, 2009, QSA Global, Inc., (QSA) submitted an amendment request for the Model Nos. OPL-660 and OP-660 series of overpacks and projectors. QSA did not request any changes to the package design or its contents but requested minor clarifications regarding wording, welding criteria, and materials of construction. The certificate has been revised for clarification purposes to include revisions to the licensing drawings.

EVALUATION

By application dated September 23, 2008, and supplemented February 19, 2009, QSA submitted an amendment request for Certificate of Compliance (CoC) No. 9283 for the Model Nos. OPL-660 and OP-660 series of overpacks and projectors. The applicant did not request any design changes to the package. The applicant had identified minor discrepancies in the referenced drawings which were found to have no significant adverse effect on the safety or integrity of the package. The amendment made no change to the tested construction of components. The staff reviewed the drawing revisions included in the amendment request and determined that there is no safety significance associated with either the corrections on the drawings or use by the registered users of the certificate.

The applicant described the inspection of the projector hardware, prior to shipment, for readily visible signs of fatigue cracking without hardware removal or disassembly. The applicant also described a more detailed inspection of the fasteners in the packaging maintenance and inspection program. A reference to an alternative, but “equivalent,” loading procedure in Section 7.1.1 of the application was removed and the alloy designation for the titanium s-tube was specified on the licensing drawing. The applicant clarified that, after initial fabrication, the efficacy of the depleted uranium shield was tested by a radiation survey. In a communication with the staff, the applicant also stated that the shipping plug and associated fitting were both classified as Class B safety items. The applicant confirmed that no future repair or replacement of the 660 shell will be performed for any Type B package currently in use.

Under the Division of Spent Fuel Storage and Transportation (SFST) review procedures, the staff would normally require a greater level of detail in the licensing drawings for approval of a Part 71 Type B(U)-96 package. For example, the American Iron and Steel Institute (AISI) designation is generally not acceptable for safety-related materials because it establishes no requirements for material properties, heat treatment, form, or quality. The Model Nos. OPL-660 and OP-660 series of overpacks and projectors, however, were previously approved and have been safely operated for over 30 years. In addition, the licensing drawings clearly state that the Model Nos. OPL-660 and OP-660 are no longer manufactured and that no future repairs on any of the welds of the Model Nos. OPL-660 and OP-660 shells will be performed. QSA also confirmed that no service or repair operations will include replacement of the depleted uranium shield.

Therefore the staff finds that neither the changes requested by the applicant to the Model Nos. OPL-660 and OP-660 packages nor their continued use as previously approved are a concern to public health or safety.

The required documentation is available and complete.

Changes to Certificate of Compliance

The following changes are included in Revision No. 4 to CoC No. 9283:

Condition No. 5 (a)(3) was updated to include revision D of drawings R 66050 and revision D of drawings R 66060.

Condition No. 8(c) was included to specify that the package can no longer be used if it necessitates repair or replacement of welds on the existing packages.

Condition No. 10 of the certificate was revised to authorize use of the previous revision of the certificate for a period of approximately one year.

Condition No. 12 of the certificate Revision No. 3 was renumbered Condition No. 11 in the certificate Revision No. 4 for clarity purposes. The expiration date of the certificate was not modified.

The September 23, 2008, submittal, supplemented February 19, 2009, was included in the References section.

CONCLUSION

Based on the statements and representations in the application, the staff has reviewed the proposed changes for the Model No. 660 series of overpacks and projectors. The staff concludes that the changes indicated do not affect the ability of the packages to meet the requirements of 10 CFR Part 71.

Issued with Certificate of Compliance No. 9283, Revision No. 4,
on March 24, 2009.