



QSA GLOBAL

QSA Global, Inc.

40 North Avenue

Burlington, MA 01803

Telephone: (781) 272-2000

Toll Free: (800) 815-1383

Facsimile: (781) 273-2216

13 March 2009

Mr. Pierre Saverot
Licensing Branch
Division of Spent Fuel Storage and Transportation
Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
11555 Rockville Pike
Rockville, MD 20852

Docket No.: 71-9187 & TAC No.s L24229 & L24230

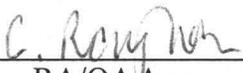
Subject: RAI Response for Model 865 Type B Container

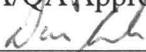
Dear Mr. Saverot:

The following is provided in response to your email dated 13 March 2009 regarding the 865 Type B container. The Model 865 SAR Section 8 has been revised to add clarification requiring the package be brought into compliance if it fails any of the maintenance related inspections or if compliance cannot be achieved then the package will be removed from service as a Type B transport package. Changes are shown in the Model 865 SAR Revision 12 on pages 8-3 and 8-4 (enclosed). Also enclosed is the list of affected pages to the SAR. Should you have any questions prior to the submission of our response, please feel free to contact me.

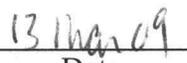
Sincerely,

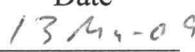
Lori Podolak
Senior Regulatory Affairs Specialist
Regulatory Affairs Department
Ph: (781) 505-8241
Fax: (781) 359-9191
Email: Lori.Podolak@qsa-global.com



RA/QA Approval


Engineering Approval



Date


Date

Enclosures:

- A- SAR Revision 12 pages 8-3 and 8-4
- B- List of affected pages

Enclosure A – SAR Revision 12 pages 8-3 and 8-4

8.1.8 Miscellaneous Tests

Not applicable.

8.2 Maintenance Program

8.2.1 Structural and Pressure Tests

Not applicable. Material certification, or equivalent dedication process, is obtained for Safety Class A components used in the transport package prior to their initial use. Based on the construction of the design, no additional structural testing during the life of the package is necessary if the container shows no signs of defect when prepared for shipment in accordance with the requirements of Section 7 of the SAR.

The 865 packaging system is not designed to require increased or decreased operating pressures to maintain containment during transport, therefore pressure tests of package components prior to individual shipment is not required.

8.2.2 Leakage Tests

As described in Section 8.1.4, "Leakage Tests," the radioactive source assembly is leak-tested at manufacture. In addition, the sources are leak tested in accordance with that Section at least once every six months thereafter if being transported to ensure that removable contamination is less than 0.005 microcuries. Also a contamination wipe is performed of the shield source tubes whenever the shield is returned to the manufacturer (typically the shield is shipped to a customer with new sources and may be returned directly to the manufacturer with decayed sources for disposition).

8.2.3 Component and Material Tests

The transport package is inspected for tightness of fasteners, proper seal wires, and general condition prior to each use as described in Section 7 of this SAR. No additional component or material testing is required prior to shipment. Failure of these inspections will prevent use of the package until the cause of the failure is corrected.

8.2.4 Thermal Tests

Not applicable. The source content of the Model 865 package has minimal effect on the package surface temperature and therefore no additional testing is necessary to evaluate thermal properties of the packaging prior to shipment.

8.2.5 Miscellaneous Tests

It is recommended that inspection and maintenance of the Model 865 container and the Model 86550 control unit be performed at intervals not to exceed three months. This inspection and maintenance includes the following:

Safety Analysis Report for the Model 865 Transport Package

QSA Global Inc.
Burlington, Massachusetts

13 March 2009 - Revision 12
Page 8-4

- 8.2.5.1 Check the operation of the survey meter and check to assure that the source is properly stored by measuring the radiation intensity at the surface of the container and at one meter from the surface. The radiation level should not exceed 200 mR/hr at the surface nor 10 mR/hr at one meter from the surface.
- 8.2.5.2 Inspect the container for any signs of damage or excessive wear. Check to assure that there are no loose fasteners or broken safety wires. Assure that the container is properly labeled.
- 8.2.5.3 Inspect all welds for signs of corrosion and/or cracks.
- 8.2.5.4 Ensure that all labels are securely attached and legible.
- 8.2.5.5 Inspect the condition of all bolts and screws. If there is any sign of strain present on the bolt or damage to the threads discard and replace.
- 8.2.5.6 Inspect the outer shell of the container for cracks, pitting and dents. The damaged component or assembly should be replaced. Denting of the outer shell is acceptable so long as the performance of the container is not affected and measured dose rates are within regulatory limits.
- 8.2.5.7 If the device is used in an environment that would be conducive to the creation of crevice corrosion (i.e. salt water splash zone, oil rig work, etc.), the device should be rinsed after use with clean water to remove any residue which could contribute to corrosion.
- 8.2.5.8 If the device is routinely used for underwater radiography, then the projector should be tested by a non-destructive examination (NDE) technique such as dye penetrant at source changes. The NDE should be performed on all external shield container surfaces, particularly under the label. Evidence of pitting, cracking or corrosion indicate the need for repair or scrapping of the component or assembly.
- 8.2.5.9 In addition, the radioactive source should be wipe tested for leakage of radioactive contamination every six months.
- 8.2.5.10 Prior to each use, a radiation survey of the package should be made to assure radiation levels do not exceed 200 mR/hr at the surface or 10 mR/hr at 3 ft from the surface of the package.
- 8.2.5.11 Failure of any of the checks in 8.2.5.1 through 8.2.5.10 will prevent use of the package until the cause of the failure is corrected. If correction cannot be made under the approved Type B certificate, the device will be removed from use as a transport container.

8.3 Appendix

Not applicable.

Enclosure B – List of Affected Pages

