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22 February 2010

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

Docket No. 71-9027 (Model 741-OP Type B Package)
TAC No. L24366

Dear Mr. Saverot:

The following is submitted to address inconsistencies and formatting issues raised by your office regarding our 08 February 2010 amendment in entirety. This submission replaces the application made on 08 February 2010 as QSA Global Inc.'s response to your RAI letter dated 1 October 2009 and to provide changes in relation to our 21 September 2009 notification under 10 CFR 71.95 regarding the package overpack box steel construction issues.

Enclosed with this letter is a copy of Revision 8 of the SAR (minus appendices) that was previously submitted to your office. (The appendices for Revision 8 are omitted since they are included in total as part of Revision 9 of the SAR which is also enclosed with this letter.) Changes from Revision 7 to Revision 8 of the SAR are detailed in an enclosed SAR revision change table titled "Revision Description for the Model 741-OP SAR from Revision 7 to Revision 8".

Enclosed with this letter is Revision 9 of the SAR, complete with all reference appendices and with updated descriptive drawings. This revision of the SAR makes minor format changes to comply with the recommended guidance in NUREG 1886 (Final Report – March 2009). Changes to the SAR are detailed in the enclosed SAR revision change table titled "Revision Description for the Model 741-OP SAR from Revision 8 to Revision 9". Changes in the enclosed drawings are described in a table included with this letter titled "Summary Table of Changes to Drawings R741-OP Rev G to Rev H and R74190 Rev H to Rev J".

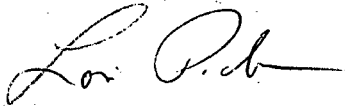
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Specific responses to your RAI letter are as follows:


- 1-1 Section 7.1.1.2.a.3 of the SAR now requires that users ensure replacement hardware meets all applicable specification listed on the drawings referenced on the Type B transport certificate. Any requirements for hardware important to safety to be compliant to a specific industry standard will appear on the drawings for this package.
- 1-2 The drawings have been revised to specify the welding codes used for the welding, inspection and repair of the overpacks. This information is shown on page 2 of drawing R741-OP Rev H. We confirm that there will be no future welding, including weld repairs, performed for the 741 radiography device described on drawing R74190 Rev J. The 741 device is now an obsolete design and no new fabrication of 741 Series devices will be performed. Only service and repair of existing 741 Series devices will continue and this service/repair will exclude welding. A summary of additional changes based on email correspondence and 10 CFR 71.95 notifications with your office are as follows:
- In response to September 2009 emails regarding the detail associated with service components important to safety (ITS), we have added material details for ITS items on drawings R74190 and R741-OP. See the drawing changes table included in Section 1.3 of the SAR for additional detail regarding material specification changes and safety determinations.
 - The material specifications for the lock slide and locking pin components on the 741 Series devices (both Quality Class A components that are important to safety) have been added to sheets 6 & 7 of drawing R74190 Rev J.
 - A statement has been added to Section 2.3.1 of the SAR to clarify that component safety classification is based on NUREG/CR-6407 and that Quality Class A components on the package are considered to be important to the package safety.
 - In response to our notification letter dated 21 September 2009:
 - The material specifications for the steel components of the overpack box have been further specified on sheet 2 of drawing R741-OP. (Note: At this time, these material specifications have also been updated on our production drawings for fabrication of the overpack box components.)
 - The material properties referenced in Section 2.2.1 of the SAR has been revised to more accurately reflect all applicable steel material specifications used in the package.

As noted in our 21 September 2009 notification letter, we have ceased fabrication of new overpack boxes until receipt of an amendment to the Type B certificate incorporating the changes described in this amendment request. Please advise if we can provide any assistance to expedite review of this request so that we can begin manufacture and distribution of new overpack box components to support users of this transport package. Should you have any questions, please feel free to contact me.

Sincerely,



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RA/QA Approval

24 Feb 10
Date


Engineering Approval

26 Feb 10
Date

Enclosures (6 CDs, each CD containing copies of the following Files:

- Revision Description for the Model 741-OP SAR from Revision 7 to Revision 8
- Revision Description for the Model 741-OP SAR from Revision 8 to Revision 9
- Summary Table of Changes to Drawings R741-OP Rev N to Rev X and R74190 Rev H to Rev J
- List of Affected Pages
- 741-OP SAR Revision 9
- 741-OP SAR Revision 8 (minus appendices)

G H
LR 26 Feb 10
26 Feb 10