May 17, 2010

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

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION FOR REVIEW OF THE MODEL NO. 680-OP PACKAGE

Dear Ms. Podolak:

By letter dated April 15, 2010, QSA Global, Inc. (QSA) submitted responses to the staff's first Request for Additional Information dated March 17, 2010.

In connection with the staff's review of QSA responses, we need the information identified in the enclosure to this letter. We request that you provide this information by June 25, 2010, along with a revised consolidated application including your correspondence dated March 26 and 29, 2010. Please inform us at your earliest convenience, but no later than June 2, 2010, if you are not able to provide the information by that date. To assist us in re-scheduling your review, you should include a new proposed submittal date and the reasons for the delay.

Please reference Docket No. 71-9035 and TAC Nos. L24423 and L24425 in future correspondence related to this request. The staff is available to meet to discuss your proposed responses. If you have any questions regarding this matter, I may be contacted at (301) 492-3408.

Sincerely,

/RA/

Pierre Saverot, Project Manager
Licensing Branch
Division of Spent Fuel Storage and Transportation
Office of Nuclear Material Safety
and Safeguards

Docket No. 71-9035
TAC Nos. L24423, L24425

Enclosure: Request for Additional Information

cc w/encl: E. Redmond, NEI

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

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Request for Additional Information
QSA Global, Inc.
Docket No. 71-9035
Certificate of Compliance No. 9035
Model No. 680-OP

By letter dated April 15, 2010, QSA Global, Inc. (QSA) submitted its responses to the U.S. Nuclear Regulatory Commission staff's first Request for Additional Information dated March 17, 2010.

This second Request for Additional Information (RAI) identifies information needed by the U.S. Nuclear Regulatory Commission staff in connection with its review of the Model No. 680-OP package to determine whether the applicant has demonstrated compliance with 10 CFR Part 71 and the International Atomic Energy Agency, "Regulations for the Safe Transport of Radioactive Material," TS-R-1, 1996 Edition (as amended 2003).

NUREG-1609, "Standard Review Plan for Transportation Packages for Radioactive Material," and NUREG-1886, "Joint Canada – United States Guide for Approval of Type B(U) and Fissile Material Transportation Packages," were used by the staff in its review of the application.

RAI-1 Specify an appropriate welding code for fabricating the Model No. 680 projector.

American Welding Society (AWS) welding code D1.3 is for sheet steel (equal to or less than 3/16 inches thick), but the welded steel on the 680 projector is 1/4 inch thick or greater. American Welding Society code D1.1 is an appropriate welding code for structural welding of carbon steel thicker than 3/16 inches.

In response to RAI No. 3, dated March 17, 2010, the applicant specified the use of AWS welding code D1.13, but this code is not applicable to steel thicker than 3/16 inches thick.

This information is needed to determine compliance and 10 CFR 71.73(c)(1).

RAI-2 Clarify or specify a widely recognized industry standard for the structural steel components intended for use on future Model No. 680 projectors (e.g., the shell weldment and retaining bar on sheet 5 of Drawing 68090).

It is not clear from the licensing drawings if the structural steel components used to construct the Model No. 680 projector meet the requirements of A1008, A1011, A1018, or any widely recognized industry standard. The staff understands that the overpack and depleted uranium shield are primarily responsible for the package surviving the overpack, but other components on the projector are also related to the structural integrity of the projector.

RAI No. 6, dated March 17, 2010 requested the applicant clarify or specify a widely recognized industry standard for the structural steel components on the projector.

This information is needed to determine compliance with 10 CFR 71.33(a)(5)(iii) and 10 CFR 71.73(c)(1).

RAI-3 Justify the classification of “Not Important to Safety” (NITS) for the1/4-20 Hex HD fasteners on the front of the Model No. 680 projector, the 1-1/8 lead-filled hex nut, and the fasteners which help keep the depleted uranium shield in place. Alternatively, specify a safety classification or a widely recognized industrial standard associated for these fasteners as they are replaced for maintenance, and for new projectors.

In the response, the applicant should confirm that any new or replacement fasteners will have the same (or superior) minimum properties as the fasteners, which were used on the package during drop testing. In response to the staff’s RAI No. 7 dated March 17, 2010, the applicant specified that the only fasteners which are important to safety are the 1/4-20 fasteners on the back of the projector attaching the lock assembly, but the argument presented by the applicant did not discuss why the other fasteners were NITS.

This information is needed to determine compliance with 10 CFR 71.33(a)(5)(iii).

RAI-4 Clarify why the steel and stainless components used to fabricate the Posilock style lock assembly shown on sheet 7 on Drawing R69090 are NITS. Alternatively, specify the Safety Classification and/or industrial standards (e.g., the American Society for Testing and Materials) associated for these components.

It would appear that the Posilock, in conjunction with the fasteners on the rear of the package are responsible for keeping the source inside the depleted uranium shield. Therefore, the material for future Posilock assemblies should be procured in a manner consistent with a Safety Classification under the guidance found in NUREG/CR-6407, “Classification of Transportation Packaging and Dry Spent Fuel Storage System Components According to Importance to Safety.” For future Posilock assemblies, the Safety Classification or an industry standard should be specified for the Posilock on the licensing drawings.

The justification given in response to RAI No. 9, dated March 17, 2010, stated that the fasteners attaching the Posilock to the Model No. 680 projector casing were important to safety, but did clearly explain why the Posilock itself was NITS.

This information is needed to determine compliance with 10 CFR 71.33(a)(5)(iii) and 10 CFR 71.73(c)(1).