



**QSA GLOBAL**

**QSA Global, Inc.**

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19 December 2007

ATTN: Document Control Desk  
Director, Spent Fuel Project Office  
Office of Nuclear Material Safety and Safeguards  
U.S. Nuclear Regulatory Commission  
11555 Rockville Pike  
One White Flint  
Rockville, MD 20852

RE: Type B Certificate USA/9296/B(U)-96

Dear Director:

During the NRC QA audit, a difference of interpretation was identified regarding the method QSA Global Inc. uses to report measurement accuracy for the 880 shield weights and the NRC's interpretation of how the weight limitations should be applied to the shield measurement process. This letter also serves as the required reporting under 10 CFR 71.95

In March of 2002, the shield tolerance on the production drawing for the 880 Delta and 880 Sigma depleted uranium shields was revised to specify  $33.8 \pm 0.5$  lbs. This value on the production drawing was chosen to allow a shield weight measurement taken to one decimal place to be rounded to the accuracy specified on the descriptive drawing which was to the nearest whole number. A decision was made for the production drawing to allow tolerancing and measurement to one decimal place which would then be rounded to the required accuracy to the nearest whole number prior to making a determination of the shield weight compliance to the certificate of compliance.

Under this interpretation, a shield weight measured to 34.2 lbs would be rounded to the nearest whole number of 34 lbs and be accepted for use in the transport package under the descriptive drawing and the current certificate of compliance. A shield weighing 34.5 lbs would be rounded to the nearest whole number of 35 lbs and would be rejected for use in the Model 880 Delta or 880 Sigma transport packages. We viewed this process as acceptable, as it was in line with standard rounding practises for whole numbers. In addition, the largest possible weight increase accepted under the production drawing (34.3 lbs) was less than 0.9% greater of the total whole number shield weight which would have no significant safety impact on the transport package's ability to comply with the requirements of 10 CFR 71.

NMSSOI

At this time, it appears that our use of the word "maximum" in relation to the shield weight on the descriptive device drawings is interpreted by your office without accounting and correcting for the measurement process accuracy. As such, we have revised our descriptive assembly drawing to increase the maximum shield weight to allow shields weighing a maximum of 34.4 lbs for the Models 880 Delta and 880 Sigma transport packages. For consistency we have stated the maximum shield weights on sheet 1 of 5 and sheet 5 of 5 for the 880 Elite transport packages as 25.0 lbs (previously specified as 25 lbs).

A review of our other transport packages has confirmed that there are no other transport package shields that would be accepted based on a rounding of the shield weight to the nearest whole number. All 880 Elite packages are fully compliant to the package weight requirements on the CoC for both the shield and the overall package weight. Further, a review of our records for the 880 Delta and 880 Sigma devices has confirmed that no rounding has been performed or required to ensure those transport packages are not greater than 52.0 lbs. Based on the current maximum transport package weights, allowing this slight increase in the 880 Delta/Sigma shield weights will have no adverse or significant safety impact on these transport packages.

In future we will ensure values specified on descriptive drawings as "maximum" are assessed under our production and quality program without the application of standard rounding techniques to determine their acceptance in Type B transport container fabrication. Should you have any questions regarding this amendment request please contact me at (781) 505-8241.

Sincerely,



Lori Podolak  
Senior Regulatory Affairs Specialist  
Regulatory/Health Physics Department



RA/QA Approval

19 Dec 07  
Date



Engineering Approval

19 Dec 07  
Date

Enclosures: Drawing R88000 Revision K

CC: Mr. Robert Nelson  
Division of Spent Fuel Storage and Transportation  
Office of Nuclear Material Safety and Safeguards  
U.S. Nuclear Regulatory Commission  
11555 Rockville Pike, Mailstop: EBB-3D-02M  
Rockville, MD 20852

Figure Withheld Under 10 CFR 2.390



**QSA GLOBAL**

40 NORTH AVE, BURLINGTON, MA 01803

DESCRIPTIVE  
DRAWING

TITLE MODEL 880 PROJECTOR

SIZE <b>A</b>	DWG. NO.	R88000	REV <b>K</b>
	SCALE:	NONE	

Figure Withheld Under 10 CFR 2.390


		<b>QSA GLOBAL</b>		DESCRIPTIVE DRAWING	
40 NORTH AVE, BURLINGTON, MA 01803					
TITLE		MODEL 880 PROJECTOR			
SIZE	DWG. NO.			REV	
A	R88000			K	
SCALE:		NONE		SHEET 2 OF 5	

Figure Withheld Under 10 CFR 2.390


		<b>QSA GLOBAL</b>		DESCRIPTIVE DRAWING	
40 NORTH AVE, BURLINGTON, MA 01803					
TITLE                      MODEL 880 PROJECTOR					
SIZE	DWG. NO.    R88000				REV K
A	SCALE:    NONE		SHEET    3    OF    5		

Figure Withheld Under 10 CFR 2.390



		<b>QSA GLOBAL</b>		DESCRIPTIVE DRAWING	
40 NORTH AVE, BURLINGTON, MA 01803					
TITLE MODEL 880 PROJECTOR					
SIZE	DWG. NO.			REV	
A	R88000			K	
	SCALE: NONE		SHEET 4 OF 5		

Figure Withheld Under 10 CFR 2.390

		<b>QSA GLOBAL</b>		DESCRIPTIVE DRAWING	
40 NORTH AVE, BURLINGTON, MA 01803					
TITLE		MODEL 880 PROJECTOR			
SIZE	DWG. NO.			REV	
A	R88000			K	
SCALE: NONE			SHEET 5 OF 5		