March 8, 2011

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. 880 PACKAGE

Dear Ms. Podolak:

On November 22, 2010, QSA Global, Inc., (QSA) submitted an application for a Certificate of Compliance (CoC) for the Model No. 880 Packaging Systems. QSA also requested that the package review include consideration of NUREG-1886, "Joint Canada – United States Guide for Approval of Type B(U) and Fissile Material Transportation Packages."

In connection with the staff's review, we need the information identified in the enclosure to this letter. We request that you provide this information by March 30, 2011. Please inform us at your earliest convenience, but no later than March 15, 2011, 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. 71-9296 and TAC No. L24489 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. 71-9296
TAC No. L24489

Enclosure: Request for Additional Information

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. 71-9296
Certificate of Compliance No. 9296
Model No. 880

By letter dated November 22, 2010, QSA Global, Inc., (QSA) submitted an application for a Certificate of Compliance (CoC) for the Model No. 880 Packaging Systems. QSA also requested that the package review include consideration of NUREG-1886, "Joint Canada – United States Guide for Approval of Type B(U) and Fissile Material Transportation Packages."

This request for additional information (RAI) identifies information needed by the U.S. Nuclear Regulatory Commission staff to complete its review of the Model No. 880 package and to determine whether the applicant has demonstrated compliance with the regulatory requirements of 10 CFR Part 71 and 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.

1. Specify the material listed for the copper used as spacers shown on sheet 2 of 6 of the Model 880 Series Drawing R88000, Rev. M.

   Table No. 2.2.A of the application lists copper material and references the American Society for Metals (ASM) Metals Handbook, as the source. A material specification is required for traceability and composition in evaluating reactions such as chemical, galvanic, or other.

   This information is required to determine compliance with 10 CFR 71.33(a)(5)(iii) and 71.39.

2. Provide the material specification listed for the Depleted Uranium (DU) used as shielding shown on sheet 5 of 6 of the Model 880 Series Drawing R88000, Rev. M.

   Table No. 2.2.A of the application lists DU and references the ASM Metals Handbook as the source. A material specification is required for traceability and composition in evaluating reactions such as chemical, galvanic, or other.

   This information is required to determine compliance with 10 CFR 71.33(a)(5)(iii) and 71.39.

3. Provide the material specification listed for the Aluminum used as a lock mount and a lock cover shown on sheet 3 of 6 of the Model 880 Series Drawing R88000, Rev. M.

   No material specification is listed on either Table No. 2.2.A of the application or on the Notes shown on sheet 6 of 6 of the Model 880 Series Drawing R88000, Rev. M.

A material specification is required for traceability and composition in evaluating reactions such as chemical, galvanic, or other.

This information is required to determine compliance with 10 CFR 71.33(a)(5)(iii) and 71.39.

4. Provide a material specification listed for the Brass used as ball dent, knob shaft and slider shown on sheet 4 of 6 of the Model 880 Series Drawing R88000, Rev. M.

   No material specification is listed either on Table No. 2.2.A of the application or on the notes shown on sheet 6 of 6 of the Model 880 Series Drawing R88000, Rev. M. A material specification is required for traceability and composition in evaluating reactions such as chemical, galvanic, or other.

   This information is required to determine compliance with 10 CFR 71.33(a)(5)(iii) and 71.39.

5. Clarify the discrepancy between the source description, in paragraph 2 of the USDOT Special Form Certificate USA/0392/S-96, Rev. 10, stating that the cylindrical single encapsulation is made from Type 304 or 304L stainless steel, and the note listing only Type 304L stainless steel as the material on the associated Drawing R875 Inner, Rev. C.

   This information is required to determine compliance with 10 CFR 71.33(a)(5)(iii), and 71.39.

6. Describe both welding processes shown on Drawing R875 Inner, Rev. C, in terms of requirements for filler material, joint design, depth of weld, weld symbol, nondestructive testing (NDT), NDT criteria, and final weld contour.

   USDOT Special Form Certificate USA/0392/S-96, Rev. 10 (IAEA Certificate of Competent Authority Special Form Radioactive Materials Certificate USA/0392/S-96, Rev. 10) states that construction shall be in accordance with Drawing R875 Inner, Rev. C. It appears that inconsistencies exist between the certificate and the drawing in addition to basic welding information required to complete construction.

   This information is required to determine compliance with 10 CFR 71.33(a)(5)(iii) and 71.39.

7. Clarify the discrepancy between the source description from paragraph 2 of the USDOT Special Form Certificate USA/0335/S-96, Rev. 9 (IAEA Certificate of Competent Authority Special Form Radioactive Materials Certificate USA/0335/S-96, Rev. 9), stating that the inner capsules, when present, are made of either stainless steel or titanium, and the listing of only Type 304L stainless steel as the material on the associated Drawing R875 Inner, Rev. C.

   Provide the type and material specification for titanium, if utilized in construction.

Describe the titanium welding process, if titanium is utilized in fabrication as shown on Drawing R875 Inner, Rev. C, in terms of requirements for filler material, joint design, depth of weld, weld symbol, required nondestructive testing (NDT), NDT criteria and final weld contour.

Provide the welding and inspection code and or standard to be used if titanium is utilized in fabrication. Note 1 of Drawing R88000, Rev. M, sheet 6 of 6, states welding requirements for sheet steel and stainless steel only.

Describe the welding processes utilized in fabrication shown on Drawing R875 Outer, Rev. C, in terms of requirements for filler material, joint design, depth of weld, weld symbol, required nondestructive testing (NDT), NDT criteria and final weld contour.

USDOT Special Form Certificate USA/0335/S-96, Rev. 9 (IAEA Certificate of Competent Authority Special Form Radioactive Materials Certificate USA/0335/S-96, Rev. 9) states that construction shall be in accordance with Drawing R875 Inner, Rev C. Inconsistencies appear to exist between the certificate and the drawing in addition to basic welding information required for package fabrication.

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

8. Clarify the discrepancy between the source description from the USDOT Special Form Certificate USA/0502/S-96, Rev. 7 (IAEA Certificate of Competent Authority Special Form Radioactive Materials Certificate USA/0502/S-96, Rev. 7), paragraph 2, stating that the outer encapsulation is made of Titanium or Stainless Steel, and the stainless steel listing (no type) mentioned as the material on the associated Drawing A10369, Issue C, capsule X54.

   Provide the material specifications and the type of stainless steel and titanium, if utilized in the fabrication.

   Describe the titanium welding process if titanium is utilized in the fabrication, as shown on Drawing A10369, Issue C, capsule X54, in terms of requirements for filler material, joint design, depth of weld, weld symbol, nondestructive testing (NDT), NDT criteria and final weld contour.

   Provide the welding and inspection code and or standard to be used if titanium is utilized in fabrication. Note 1 of Drawing R88000, Rev. M, sheet 6 of 6, states welding requirements for sheet steel and stainless steel only.

   Describe the welding processes utilized in fabrication shown on Drawing A10369, Issue C, capsule X54, in terms of requirements for filler material, joint design, depth of weld, weld symbol, nondestructive testing (NDT), NDT criteria and final weld contour.

   Include Drawings A10636 and A10638 in the application. Drawing A10369, Issue C, capsule X54, shows material and references these drawings which do not appear to have been included in the application.

Include Drawing A62615 in the application. Drawing A10369, Issue C, capsule X54, shows engraving required and references this drawing which does not appear to have been included in the application.

Explain the weld symbol information “TIG.WELD/QCP.111” and clarify if such information is presented in the application. Drawing A10369, Issue C, capsule X54, weld symbol, only references this information.

USDOT Special Form Certificate USA/0502/S-96, Rev. 7 (IAEA Certificate of Competent Authority Special Form Radioactive Materials Certificate USA/0502/S-96, Rev. 7) states that construction shall be in accordance with Drawing A10369, Issue C, capsule X54. Inconsistencies exist between the certificate and the drawing in addition to the basic welding information missing and required to complete construction.

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

9. Clarify the discrepancy between the source description in the USDOT Special Form Certificate USA/0502/S-96, Rev. 7 (IAEA Certificate of Competent Authority Special Form Radioactive Materials Certificate USA/0502/S-96, Rev. 7), paragraph 2, stating that the inner encapsulation, if used, shall be made of titanium, stainless steel, or aluminum and the listing of only stainless steel, Type 316L, (X540) and titanium (no type) (X540/1) as the material in the associated Drawing R87527, Rev. G, X540 capsule.

   Provide the material specifications and the type of titanium or aluminum utilized in the construction. Describe the titanium or aluminum welding process if titanium or aluminum is utilized in the fabrication shown on Drawing R87527, Rev. G, X540 capsule, in terms of requirements for a filler material, joint design, depth of weld, weld symbol, nondestructive testing (NDT), NDT criteria and final weld contour.

   Specify the welding and inspection code or standard to be used if titanium or aluminum is utilized in the fabrication. Note 1 of Drawing R88000, Rev. M, sheet 6 of 6, states welding requirements only for sheet steel and stainless steel.

   USDOT Special Form Certificate USA/0502/S-96, Rev. 7 (IAEA Certificate of Competent Authority Special Form Radioactive Materials Certificate USA/0502/S-96, Rev. 7) states that construction shall be in accordance with Drawing R87527, Rev. G, X540 capsule. Inconsistencies exist between the certificate and the drawing in addition to basic welding information missing and required to complete construction.

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

10. Correct the typographical error Drawing R88000, Rev. M, sheet 4 of 6, Section F-F.

    The description on Drawing R88000, Rev. M, sheet 4 of 6, Section F-F, refers to sheet 2 of 5. This is incorrect and should read sheet 2 of 6.

    This information is required to determine compliance with 10 CFR 71.39.