

neutron products, inc.

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June 20, 2013

Attn: Document Control Desk
Director, Division of Spent Fuel Storage and Transportation
Office of Nuclear Material Safety and Safeguards
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555-0001

Ref. NRC Inspection Report 71-0121/2012-201

To whom it may concern:

On February 4, 2013 we submitted our response to the Notice of Violation dated January 11, 2013. In implementing some of the actions described in that response, a few modifications were made. During the follow-up inspection on May 22, 2013, the NRC inspection team suggested that we document these modifications with an additional letter. This letter is intended to serve that purpose and a similar purpose for 71.95 reports dated January 25, 2013.

Violation C.3

This violation involved incorrect steel angles on TC-4, TC-5 and TC-6. Those TCs were removed from service as nonconforming, and all other TCs were inspected and found to have the correct angles.

In our 71.95 report dated January 25, 2013 concerning this issue, we said that we would modify procedures and checklists to confirm that the TC being used had the correct steel angle. We made similar comments in our response letter dated February 4, 2013. In retrospect, we believe this approach to be ill-advised. The TC either has the correct angle or it does not. That is not something which is going to change with package use. The ones with the incorrect angles have been segregated and will not be used until they are conforming. Thus, we decided that it would not be appropriate to include this item on our checklist.

As part of our CAPA, we have conducted training and modified inspection procedures and checklists to emphasize the importance of identifying components which do not conform to the referenced drawings. We believe these actions will help to improve our overall quality program.

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Violation C.4

The violation involved the metal lids on the outer steel shells which were found to have steel angles welded to the top of the lids which were the wrong dimension and were oriented differently from the orientation shown on the approved drawing for the package. OP-12, OP-13 and OP-14 were removed from service upon discovery of the defect and have not been used since. All other metal lids on the remaining outer metal shells were inspected and none were found to have the same defect. Similar to the situation described above, we have not added a requirement on our checklists to inspect for this specific defect. Rather, we have conducted training and implemented other modifications to procedures and checklists.

Violation D.2

In our February 4, 2013 response, we included a reference to R-2014-G, Unloading and Loading Procedure for USA/9215/B(U) Package as part of an example of procedures to be reviewed that are subject to NRC approval as part of the Certificate of Compliance for the package. It should not have been included in our response for this violation. Although Procedure R-2014-G has been revised, it was not revised as part of the corrective action for this specific violation. Rather R-2019/R-2019-G, Maintenance and Storage Procedure for USA/9215/B(U) were revised to correct the specific violation, and were properly referenced in our response.

Categories on Approved Vendors List

The categories for items and services have been added to the Master List of Approved Vendors for Radioactive Materials Transportation.

We believe these clarifications to be responsive to your request during the May 22, 2013 inspection.

Sincerely,

Neutron Products, Inc.



Jerry L. Fogle, QAMRT

Copy to Jim Pearson via electronic mail