

July 17, 2013

Ms. Mary F. Shepherd
Vice President, Licensing and Special Projects
JL Shepherd and Associates
1010 Arroyo Ave
San Fernando, CA 91340-1822

SUBJECT: RESPONSE TO JUNE 24, 2013, LETTER REGARDING POTENTIAL USE OF
THE MODEL NO. NPI-20WC6 MKII PACKAGE

Dear Ms. Shepherd:

This letter is in response to your letter dated June 24, 2013, to Michele Sampson of the U.S. Nuclear Regulatory Commission (NRC), regarding potential use of the Model No. NPI-20WC6 Mk II package by JL Shepherd and Associates. In your letter, you expressed concern that the certificate of compliance (CoC) does not permit the shipment of pencil-type Cobalt-60 and Cesium-137 sources. You specifically asked "Can various C0-60 and Cs-137 pencil type source capsules be shipped in this CoC and can pencil type source capsules be shipped without source holders in this CoC?" and "Can more than one source capsule be shipped per drum assembly cavity insert in this CoC?"

The underlying shielding analyses in the safety analysis report (SAR), Revision 4, Agencywide Documents Access and Management System number ML070090318, are point source analyses. As such, any Cobalt-60 or Cesium-137 source transported in the Model No. NPI-20WC6 Mk II package must be one that is accurately represented by such an analysis. Unless the shape of such sources fit exactly into the drums so as to restrict the movement to the CoC specified limits of 0.25 inch in any direction, the sources should be shipped with source holders.

Regarding the number of sources allowed in a drum assembly cavity, there is no restriction on the number; however, the configuration should be one that is accurately represented by the SAR point source analyses. In addition, the configuration should also restrict the source movement to the CoC specified limits of 0.25 inch in any direction.

If any changes to these conditions are needed to ship intended sources, an amendment to the certificate would be required. In order to determine whether the sources you intend to ship are appropriate for the Model No. NPI-20WC6 Mk II package, we recommend you consult directly with the certificate holder, Neutron Products, Inc.

If you have any questions regarding this matter, I may be contacted at (301) 287-9165.

Sincerely,

/RA/

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

Docket No. 71-9215

If any changes to these conditions are needed to ship intended sources, an amendment to the certificate would be required. In order to determine whether the sources you intend to ship are appropriate for the Model No. NPI-20WC6 Mk II package, we recommend you consult directly with the certificate holder, Neutron Products, Inc.

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John Vera, Project Manager
Licensing Branch
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