



QSA GLOBAL

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17 July 2013

ATTN: Document Control Desk
Huda Akhavannick
Spent Fuel Project Office
Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
11555 Rockville Pike, Mailstop: EBB-3D-02M
Rockville, MD 20852

RE: Type B(U) Application for the Model 360 Series Transport Package Designs

Dear Ms Akhavannick:

The following is provided in response to your request for additional information dated 28 June 2013.

Item 1-1

After discussions with you regarding the application of proprietary control of submitted documentation, we have re-assessed our submission and identified additional pages from the SAR which can be released as non-proprietary at this time. The remaining proprietary pages in this submission were reviewed and found to include information which:

- Reveals distinguishing aspects of the design (including its design function in the package), and/or
- Reveals testing, assessment, or other evaluations (including calculations) that demonstrates and/or justifies compliance of the design/design component to the transport requirements.

Public disclosure of this information is likely to cause substantial harm to QSA Global, Inc.'s competitive position because:

- Similar products are manufactured and sold by competitors of QSA Global, Inc.
- The development of this information by QSA Global, Inc., including test/evaluation documentation supporting these package designs, is the result of significant expenditure of staff effort and a considerable amount of money. It is our belief that a competitor would have to undertake similar effort and expense to generate equivalent information.
- In order to generate such information, a competitor would also require considerable time (e.g., in excess of 1 year).
- If a competitor used this information and did not have to undertake the work required to generate this information, they are likely to have lower overall costs and potentially enter the market in significantly less time than that experienced by QSA Global. This would place the competitor at an unfair economic advantage over QSA Global, Inc. in offering a similar product to the market.

QSA Global has spent considerable commercial and technical resources to design and build this innovative family of source changers that is unique in its ability to store and transport a wide range of industrial radiography sources that are used worldwide. Accordingly, QSA Global, Inc. requests that the designated information be withheld from public disclosure pursuant to 10 CFR §2.390(a)(4) (see Affidavit in Attachment 1 to this letter).

Item 2-1

Testing was performed on all test specimens without the use of the optional foam fill referenced in Figure 3.1 of Test Plan 199. Testing without the foam fill was a worst case condition as the foam, if present, would have acted as an impact limiter, slowing the deceleration upon impact and diminishing the shock wave traveling through the package.

Item 2-2

The shallow angle, lid down orientation was not considered to be more damaging than the tested configurations because both the shallow angle-bottom down and the lid (cover) edge drop orientations bound the stress condition to the cover attachment bolts during the HAC drop sequence.

The cover assembly weighs approximately 10 pounds while the remainder of the test package weighs no more than 180 pounds. The 10 pound force along with the impact multiplier would be only a fraction of a load condition imposed by the cover edge orientation of test specimen TP199D. The combination of high bending and shear stresses from the TP199D cover edge drop induced the worst stress condition to the cover attachment bolts, therefore, a shallow angle lid down drop configuration would not be more damaging than those orientations tested under Test Plan 199.

The SAR was revised to respond to the change in proprietary page designations and to the minor revisions to the descriptive drawings (See Revision 1 included in Attachments 2 and 3). Attachment 1 to this letter is an updated Affidavit required for proprietary documentation under §2.390. Attachment 2 includes all submission documents covered by the proprietary request for withholding under the affidavit in Attachment 1. Attachment 3 includes all submission documents that can be released for public disclosure related to these packages.

As noted in our original submission, QSA Global, Inc. requests Type B(U) review and approval for the Model 360 Series transport container designations (360-2, 360-4, 360-4W, 360-10 and 360-10W). These package designs are of similar construction and fabrication and as such are considered a "family" of packages that we request be reviewed and approved under a single Type B(U) certification.

It is noted that this package submission includes two drawings, one submitted for use by NRC staff in evaluation of the package designs and containing proprietary information; and the second submitted for reference under the Type B(U) package certification for use by preparers of the package for transport and open for public disclosure.

The SAR included with this submission has been formatted to comply with the recommended guidance in NUREG 1886 (Final – March 2009). These package designs will be submitted to the Canadian Nuclear Safety Commission to allow Type B(U) transport in Canada after obtaining USNRC and USDOT approval for Type B(U) transport. Please contact me should you have any additional questions or wish to discuss this submission after receipt.

Sincerely,



Lori Podolak
Manager, Regulatory Affairs/Quality Assurance
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Regulatory Approval

11 JUL 2013
Date


Engineering Approval

17 JUL 2013
Date

Enclosures: (1-Hard Copy Original to Document Control Desk and 6 CDs containing copies of this letter and the following files to Addressee):

- Attachment 1: Affidavit Pursuant to §2.390
- Attachment 2: Proprietary Documents
- Attachment 3: Non-Proprietary Documents

Attachment 1: Affidavit Pursuant to 10 CFR §2.390

AFFIDAVIT Pursuant to 10 CFR §2.390


I, Mike Fuller, Director Regulatory Affairs/Quality Assurance of QSA Global, Inc. hereby affirm and state:

1. I have been specifically delegated the function of reviewing the information sought to be withheld and am authorized to apply for its withholding on behalf of QSA Global, Inc.
2. QSA Global, Inc. is providing NRC with a detailed drawing (R36000 Rev C) and technical details, specifications and product related information as parts of the SAR Revision 1 for the Model 360 Series transport packages. These documents contain proprietary commercial information.
3. The information sought to be withheld pursuant to the provisions of 10 CFR §2.390(a)(4) are marked as follows in Attachment 2 of our application letter “*Proprietary information submitted under 10 CFR §2.390 to be withheld from public disclosure under 10 CFR §2.390.*”
4. These documents should be held in confidence by the NRC per 10 CFR §2.390(a)(4) based on the following justifications:
 - a. This information is owned and been held in confidence by QSA Global, Inc.
 - b. This information is of a type that QSA Global, Inc. has determined should be held in confidence since its release for public disclosure could result in a loss of an existing or potential competitive advantage as follows:
 - i. The information reveals the distinguishing aspects of the design and the prevention of its use by QSA Global, Inc. competitors gives QSA Global, Inc. a competitive economic advantage.
 - ii. The information, if used by a competitor, is likely to reduce the competitor’s expenditure of resources or improve their advantage in design, quality and manufacture of a similar product.
 - c. This information is being transmitted to the NRC voluntarily and in confidence for use in evaluation and approval of these package designs for Type B(U) transport certification.
 - d. This information is not available in public sources.
 - e. Public disclosure of this information is likely to cause substantial harm to the competitive position of QSA Global, Inc. because of the reasons outlined below:
 - i. Similar products are manufactured and sold by competitors of QSA Global, Inc.
 - ii. The development of this information by QSA Global, Inc., including test/evaluation documentation supporting these package designs, is the result of significant expenditure of staff effort and a considerable amount of money. It is our belief that a competitor would have to undertake similar effort and expense to generate equivalent information
 - iii. In order to generate such information, a competitor would also require considerable time (e.g., in excess of 1 year).

- iv. If a competitor used this information and did not have to undertake the work required to generate this information, they are likely to have lower overall costs and so are likely to have an unfair economic advantage over QSA Global, Inc. in offering a similar product to the market.

- 5. QSA Global has spent considerable commercial and technical resources to design and build this innovative family of source changers that is unique in its ability to store and transport a wide range of industrial radiography sources that are used worldwide. Access to the technical information for this unique design would give a competitor an unfair advantage in expanding their domestic and international market without having to perform their own research and development of the market needs and the ideal configuration of the transport package to meet a wide variety of customer needs. Accordingly, QSA Global, Inc. requests that the designated information be withheld from public disclosure pursuant to 10 CFR §2.390.

Executed on 10 JULY 2013


Mike Fuller, Director
Regulatory Affairs/Quality Assurance

Subscribed and sworn to (or affirmed) before me on this 10 day of July, 2013 by Mike Fuller, proved to me on the basis of satisfactory evidence to be the person who appeared before me.

Signature Melissa J. Fortuna Seal

My Commission Expires 19 day of July, 2013.