



QSA GLOBAL

QSA Global, Inc.
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8 August 2013

Ms. Huda Akhavannik
Licensing Branch
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

RE: Application for Model 360 Series Transport Package Designs

Dear Ms. Akhavannik:

Enclosed please find drawing R36000 Revision D which makes some minor changes to the detailed drawing provided to support the NRC approval review for these containers. This drawing, and the table describing the changes and their impact on the package design, are considered proprietary under 10 CFR §2.390 for the same reasons applied for R36000 Revision C in our letter dated 17 July 2013. Please see the attached Affidavit which is applicable to drawing R36000 Revision D and the descriptive change table information. Should you have any additional questions or wish to discuss this submission after receipt please feel free to contact me.

Sincerely,

Lori Podolak
Manager,
Regulatory Affairs/Quality Assurance
Ph: (781) 505-8241
Fax: (781) 359-9191
Email: Lori.Podolak@qsa-global.com


Regulatory Approval

9 AUG 2013
Date


Engineering Approval

8 AUG 13
Date

Enclosure:

Affidavit Pursuant to §2.390
Proprietary documents: R36000 Revision D and Drawing Revision Table for R36000 Revision C to D

HMSS24

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 9 AUG 2013


Mike Fuller, Director
Regulatory Affairs/Quality Assurance

Subscribed and sworn to (or affirmed) before me on this 9 day of August, 2013 by Mike Fuller, proved to me on the basis of satisfactory evidence to be the person who appeared before me.

Signature Melissa J. Wolfe

Seal

My Commission Expires 3 day of July, 2020

MELISSA J. WOLFE
NOTARY PUBLIC
My commission expires July 3, 2020