



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

December 9, 2014

Ms. Lori Podolak
Regulatory Affairs Department
QSA Global, Inc.
40 North Avenue
Burlington, MA 01803

SUBJECT: REVISION NO. 7 OF CERTIFICATE OF COMPLIANCE NO. 9269 FOR THE
MODEL NO. 650L SERIES OF TRANSPORTATION PACKAGES

Dear Ms. Podolak:

As requested by your application dated December 8, 2014, enclosed is Certificate of Compliance (CoC) No. 9269, Revision No. 7, for the Model No. 650L transportation package. Changes made to the enclosed certificate are indicated by vertical lines in the margin. The staff's safety evaluation report is also enclosed.

Those on the attached list have been registered as users of the package under the general license provisions of 10 CFR 71.17 or 49 CFR 173.471. This approval constitutes authority to use the package for shipment of radioactive material and for the package to be shipped in accordance with the provisions of 49 CFR 173.471.

NRC licensees are required to submit a written report to the Commission of instances in which the conditions of approval in the CoC were not observed in making a shipment, in accordance with 10 CFR 71.95(a)(3). QSA Global Inc., has identified in the application instances where the components of the package were not in conformance with Drawing No. R65006, Rev. J, identified in CoC No. 9269, Condition No. 5(a)(3). Staff notes that shipments completed by NRC licensees after September 30, 2011, should be evaluated to determine if the reporting requirement of 10 CFR 71.95 may apply.

L. Podolak

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If you have any questions regarding this certificate, you may contact me or Huda Akhavannik of my staff at 301-287-9241.

Sincerely,

/RA/

Michele Sampson, Chief
Spent Fuel Licensing Branch
Division of Spent Fuel Management
Office of Nuclear Material Safety
and Safeguards

Docket No. 71-9269
TAC No. L24971

Enclosures: 1. CoC No. 9269, Rev. No. 7
2. Safety Evaluation Report
3. Registered Users

Upon removal of Enclosure 3, this
document is uncontrolled

cc w/encls. 1 & 2: R. Boyle, Department of Transportation
J. Shuler, Department of Energy, c/o L. F. Gelder
Registered Users



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**SAFETY EVALUATION REPORT
Docket No. 71-9269
Model No. 650L
Certificate of Compliance No. 9269
Revision No. 7**

SUMMARY

By application dated December 8, 2014, QSA Global, Inc. (QSA) requested amendment to Certificate of Compliance (CoC) No. 9269, for the Model No. 650L transportation package. QSA requested revising the CoC to include the ability to use a previously approved version of the drawings, Revision H, for a period of a year while their packagings will be retrofitted to the currently approved version of their licensing drawings, Revision J. Additionally, QSA requested the continued use of components and finishes omitted from their licensing drawings. Staff reviewed these changes and concludes that they do not affect the ability of the package to meet the requirements of 10 CFR Part 71.

EVALUATION

By application dated December 8, 2014, QSA requested amendment to CoC No. 9269 for the Model No. 650L transportation package. In a letter dated September 14, 2010 (ML102590076), staff issued Revision 6 of CoC No. 9269 for the Model No. 650L. As part of that revision, the licensing drawings were updated to Revision J which included the addition of specific codes and standards for some of the materials to ensure the quality of replacement components. The components affected by Revision J are the top and bottom plate flanges, stainless steel through bolts, and lock assembly screws. Prior to this drawing revision, these components were in compliance with Revision H of the drawings. The packages should have been retrofitted at that time to ensure compliance with the added detail but this was not completed. Despite this oversight, staff believes that the packages continue to be safe for use as the prototype testing for package approval was completed with the same material without these added specifications.

Additionally, the licensing drawings omit titanium sleeves found on the shield assemblies and zinc plate, yellow chromate, and paint that is found on the outer surface of the carbon steel outer sleeve. Though omitted from the drawings, staff believes that as the prototype testing for package approval was completed with these omissions included, the package continues to be safe for use.

Staff has conditioned the CoC to allow for the packages to be compliant with the previous version of the drawings for one year. However, any welding, inspection, and replacement components would be completed with the latest revision of the drawings. Additionally, staff has conditioned the CoC to allow for the packages to be compliant despite the components and finishes omitted from the drawings. In that one year period, QSA would also need to evaluate the need to incorporate the omissions to the drawings and develop an application.

NRC licensees are required to submit a written report to the Commission of instances in which the conditions of approval in the CoC were not observed in making a shipment, in accordance

with 10 CFR 71.95(a)(3). QSA has identified in the application instances where the components of the package were not in conformance with drawing no. R65006, Rev. J, identified in CoC No. 9269, Condition No. 5(a)(3). For shipments that occurred after September 30, 2011, QSA should evaluate to determine any instances in which the shipment was made as an NRC licensee and the reporting requirement of 10 CFR 71.95 applies. Although Revision No. 6 of the CoC is dated in 2010, the CoC includes a condition which allowed continued use of Revision No. 5 of the CoC until September 30, 2011. Staff also recommends that registered users of the package review their shipping records to determine if reporting is required.

CONDITIONS

Condition No. 9 has been updated to allow for the continued use of Revision H for one year. Condition No. 9 now includes:

- (a) Packagings and replacement components fabricated in accordance with Drawing No. R65006, Rev. H, sheets 1-4, may continue to be used until November 30, 2015.
- (b) Replacement components installed after December 31, 2014, shall be fabricated in accordance with Drawing No. R65006, Rev. J, sheets 1-5.
- (c) All welding and inspection shall be performed in accordance with Drawing No. R65006, Rev. J, sheets 1-5.

Condition No. 10 has been replaced to include and allow for the continued use of the titanium sleeves omitted from the drawings. Condition No. 10 states, "Packages with titanium sleeves on the outside of the titanium source tubes not shown on the drawing may be used until November 30, 2015."

Condition No. 11 has been replaced to include and allow for the continued use of any outer sleeve finishes. Condition No. 11 states, "Packages with surface finish details on the outer carbon steel sleeve not shown on the drawing may be used until November 30, 2015."

Previous Condition No. 11, which allowed use of the prior revision of the CoC for approximately one year has been deleted. Based on the issues identified by QSA with Revision 6 of the CoC, it is being superseded in its entirety by Revision No. 7.

Condition No. 12 is the previous Condition No. 10.

Condition No. 13 is the previous Condition No. 12.

The references section has been updated to include this request.

CONCLUSION

Based on the statements contained in the application, and the conditions listed above, the staff concludes that the changes indicated do not affect the ability of the package to meet the requirements of 10 CFR Part 71.

Issued with Certificate of Compliance No. 9269, Revision No. 7,
On December 9, 2014.

OFFICIAL USE ONLY – SECURITY RELATED INFORMATION

If you have any questions regarding this certificate, you may contact me or Huda Akhavannik of my staff at 301-287-9241.

Sincerely,

/RA/

Michele Sampson, Chief
Spent Fuel Licensing Branch
Division of Spent Fuel Management
Office of Nuclear Material Safety
and Safeguards

Docket No. 71-9269
TAC No. L24971

- Enclosures: 1. CoC No. 9269, Rev. No. 7
- 2. Safety Evaluation Report
- 3. Registered Users

Upon removal of Enclosure 3, this document is uncontrolled

cc w/encs. 1 & 2: R. Boyle, Department of Transportation
J. Shuler, Department of Energy, c/o L. F. Gelder
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