



QSA GLOBAL

QSA Global, Inc.

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13 January 2015

Ms. Michele Sampson, Chief
Spent Fuel Licensing Branch
U.S. Nuclear Regulatory Commission
Office of Nuclear Material Safety and Safeguards
Division of Spent Fuel Management
Mailstop 3WFN-14A44
11555 Rockville Pike
One White Flint
Rockville, MD 20852

RE: Amendment to CoC number USA/9371/B(U)-96

Dear Ms. Sampson:

During a review of the package drawings for the Model 360 Series, QSA Global noted some computer generated errors in the referenced drawings. These errors were unintentional and were made to parts of the drawing that were not intended to be affected with the revisions submitted in support of this approval (e.g., no drawing change notations were included). To correct these issues we have included revisions to drawings R360-USER and R36000 which correct these typographical errors and return the drawings to the approved design configuration. There are also some minor changes made to the drawings at this time. All drawing changes are identified on the attached comparison table.

Lastly, QSA Global, Inc. would like to correct an error in the revision references for appendices 3.6.1 and 3.6.2 on page 3-8 of the SAR. The revision reference for these appendices were unintentionally changed from Revision 1 to Revision 2 at revision 3 of the SAR. Enclosed with this letter is SAR Revision 3, page 3-8 which correct the revision references and returns this page to compliance with all other references to these appendices in the SAR.

Drawing R36000 and page 3-8 of SAR Revision 3 are considered proprietary documents by QSA Global Inc. Enclosed is the Affidavit required for proprietary documentation under §2.390. Should you have any additional questions, or wish to discuss this issue or our amendment request, please contact me.

MM5001


Sincerely,



Lori Podolak
Manager,
Regulatory Affairs/Quality Assurance
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RA/QA Approval

14 JAN 2015
Date


Engineering Approval

13 JAN 2015
Date

Enclosures: Drawing R36000 Revision E
 Drawing R360-USER Revision C
 Drawing Change Table
 List of Affected Pages
 SAR Revision 3 page 3-8
 Affidavit Pursuant to §2.390

cc: ATTN: Document Control Desk
 Director, Division of Spent Fuel Storage and Transportation
 Office of Nuclear Material Safety and Safeguards
 U.S. Nuclear Regulatory Commission
 11555 Rockville Pike
 One White Flint
 Rockville, MD 20852

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 E) and technical details, specifications and product related information as parts of the SAR Revision 3 page 3-8 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 14 JANUARY 2015


 Mike Fuller, Director
 Regulatory Affairs/Quality Assurance

Subscribed and sworn to (or affirmed) before me on this 14 day of January, ²⁰¹⁵~~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