

71-9371



QSA GLOBAL

QSA Global, Inc.

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Burlington, MA 01803

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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.

NMSS01


Sincerely,



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


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

Safety Analysis Report for the Models 360 Series Transport Packages

QSA Global, Inc.
Burlington, Massachusetts

January 2015 - Revision 4
Page 3-8

Security-Related Information
Text Withheld Under 10 CFR 2.390

3.5.5 Fuel/Cladding Temperatures for Spent Nuclear Fuel


3.5.6 Accident Conditions for Fissile Material Packages for Air Transport

3.6 Appendix


Security-Related Information
Text Withheld Under 10 CFR 2.390

Security-Related Information
Figure Withheld Under 10 CFR 2.390


ERF #	APPROVALS	DATE
3198	<i>S. G. [Signature]</i>	19 Dec 14
	<i>[Signature]</i>	8/20/15

 QSA GLOBAL		DESCRIPTIVE DRAWING	
40 NORTH AVE, BURLINGTON, MA 01803			
TITLE MODEL 360 TRANSPORT PACKAGE			
SIZE	DWG. NO. R36000	REV	
A	SCALE: NONE	SHEET 1 OF 10	E


Security-Related Information
Figure Withheld Under 10 CFR 2.390

UNLESS OTHERWISE SPECIFIED: ALL DIMENSIONS ARE INCHES, TOLERANCE $\pm 1/16$		
	QSA GLOBAL	DESCRIPTIVE DRAWING
40 NORTH AVE, BURLINGTON, MA 01803		
TITLE MODEL 360 TRANSPORT PACKAGE		
SIZE	DWG. NO. R36000	REV
A	SCALE: NONE	E
		SHEET 2 OF 10


Security-Related Information
Figure Withheld Under 10 CFR 2.390

UNLESS OTHERWISE SPECIFIED: ALL DIMENSIONS ARE INCHES, TOLERANCE $\pm 1/16$		
	QSA GLOBAL	DESCRIPTIVE DRAWING
40 NORTH AVE, BURLINGTON, MA 01803		
TITLE MODEL 360 TRANSPORT PACKAGE		
SIZE	DWG. NO. R36000	REV
A	SCALE: NONE	E
		SHEET 3 OF 10


Security-Related Information
Figure Withheld Under 10 CFR 2.390

UNLESS OTHERWISE SPECIFIED: ALL DIMENSIONS ARE INCHES, TOLERANCE $\pm 1/16$		
	QSA GLOBAL	DESCRIPTIVE DRAWING
40 NORTH AVE, BURLINGTON, MA 01803		
TITLE MODEL 360 TRANSPORT PACKAGE		
SIZE	DWG. NO. R36000	REV
A	SCALE: NONE	E
		SHEET 4 OF 10


Security-Related Information
Figure Withheld Under 10 CFR 2.390

UNLESS OTHERWISE SPECIFIED: ALL DIMENSIONS ARE INCHES, TOLERANCE $\pm 1/16$		
	QSA GLOBAL	DESCRIPTIVE DRAWING
40 NORTH AVE, BURLINGTON, MA 01803		
TITLE MODEL 360 TRANSPORT PACKAGE		
SIZE	DWG. NO. R36000	REV
A	SCALE: NONE	E
	SHEET 5 OF 10	


Security-Related Information
Figure Withheld Under 10 CFR 2.390

UNLESS OTHERWISE SPECIFIED: ALL DIMENSIONS ARE INCHES, TOLERANCE $\pm 1/16$	
 QSA GLOBAL 40 NORTH AVE., BURLINGTON, MA 01803	DESCRIPTIVE DRAWING
TITLE MODEL 360 TRANSPORT PACKAGE	
SIZE A	DWG. NO. R36000
SCALE: NONE	REV E
SHEET 6 OF 10	


Security-Related Information
Figure Withheld Under 10 CFR 2.390

UNLESS OTHERWISE SPECIFIED: ALL DIMENSIONS ARE INCHES, TOLERANCE $\pm 1/16$		
	QSA GLOBAL	DESCRIPTIVE DRAWING
40 NORTH AVE, BURLINGTON, MA 01803		
TITLE MODEL 360 TRANSPORT PACKAGE		
SIZE	DWG. NO. R36000	REV
A	SCALE: NONE	E
		SHEET 7 OF 10


Security-Related Information
Figure Withheld Under 10 CFR 2.390

UNLESS OTHERWISE SPECIFIED: ALL DIMENSIONS ARE INCHES, TOLERANCE $\pm 1/16$	
 QSA GLOBAL 40 NORTH AVE, BURLINGTON, MA 01803	DESCRIPTIVE DRAWING
TITLE MODEL 360 TRANSPORT PACKAGE	
SIZE A	DWG. NO. R36000
SCALE: NONE	
SHEET 8 OF 10	
REV E	


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	QSA GLOBAL	DESCRIPTIVE DRAWING
40 NORTH AVE, BURLINGTON, MA 01803		
TITLE MODEL 360 TRANSPORT PACKAGE		
SIZE	DWG. NO. R36000	REV
A	SCALE: NONE	E
		SHEET 9 OF 10

Security-Related Information
Figure Withheld Under 10 CFR 2.390


UNLESS OTHERWISE SPECIFIED: ALL DIMENSIONS ARE INCHES, TOLERANCE $\pm 1/16$		
	QSA GLOBAL	DESCRIPTIVE DRAWING
40 NORTH AVE, BURLINGTON, MA 01803		
TITLE MODEL 360 TRANSPORT PACKAGE		
SIZE A	DWG. NO. R36000	REV E
	SCALE: NONE	SHEET 10 OF 10

Security-Related Information
Figure Withheld Under 10 CFR 2.390

UNLESS OTHERWISE SPECIFIED: ALL DIMENSIONS ARE INCHES, TOLERANCE $\pm 1/16$							
 40 NORTH AVE, BURLINGTON, MA 01803							
TITLE MODEL 360 TRANSPORT PACKAGE DESCRIPTIVE DRAWING							
ERF #	APPROVALS	DATE	SIZE	DWG. NO.	SCALE	SHEET	REV
3198	<i>S. G. [Signature]</i>	8/20/15	A	R360-USER	NONE	1 OF 2	C

Security-Related Information
Figure Withheld Under 10 CFR 2.390

UNLESS OTHERWISE SPECIFIED:
ALL DIMENSIONS ARE INCHES, TOLERANCE $\pm 1/16$

 **QSA GLOBAL**
40 NORTH AVE., BURLINGTON, MA 01803

**DESCRIPTIVE
DRAWING**

TITLE **MODEL 360 TRANSPORT PACKAGE**

SIZE	DWG. NO.	SCALE:	REV
A	R360-USER	NONE	C

SHEET 2 OF 2

Summary Table of Changes to 360 Series Drawings

Change Location	Summary Change	Impact of Change on Units Previously or Currently in Use under the Certificate	Action Taken By QSA Regarding Affected Units
<p>Security-Related Information Text Withheld Under 10 CFR 2.390</p>			

