



QSA GLOBAL

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29 February 2016

Mr. Steve Ruffin, Acting Branch Chief
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U.S. Nuclear Regulatory Commission
Office of Nuclear Material Safety and Safeguards
Division of Spent Fuel Management
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Rockville, MD 20852

RE: 10 CFR 71.95(a)(3) report for CoC number USA/9357/B(U)-96 and Certificate Renewal Request

Dear Mr. Ruffin:

QSA Global, Inc. is making a report under 10 CFR 71.95(a)(3) concerning the Model Sentry Series Type B packages (CoC 9357). In addition, we are requesting renewal of the Type B CoC which expires on 30 July 2016.

As part of the Type B package reviews initiated after issues identified on the Model 702 container, we noted some similar instances on the Model Sentry packages where the design was not adequately implemented across the production and descriptive drawings referenced under the CoC. This 71.95 notification identifies the issues found and, includes root cause analysis and corrective actions intended to prevent recurrence.

1. Nameplate Rivets

The production drawing for the nameplate attachment rivets on these packages specifies the material as "300 Series stainless steel". The descriptive drawing for these rivets specifies the material as "302, 303, 304, 304L or 316 stainless steel". Based on the production drawing specification, it is possible, although not confirmed on any existing package, that rivets meeting a 300 series material grade not specified on the descriptive drawing were used to attach the nameplate to the package. The addition of any 300 series stainless steel for these rivets will not adversely impact the package integrity and will not create a substantial safety hazard under 10 CFR 21. All 300 series stainless steels will withstand the hypothetical accident fire test as well as all other normal and hypothetical accident condition tests by retaining the nameplate to the package for identification and warning purposes.

We request amendment to descriptive drawings R86000 to change the material requirement for the nameplate rivets to allow any 300 Series stainless steel. This change will cover all potential packages in use which may have been fabricated using a 300 series stainless steel not currently specified on the descriptive drawing.

NM5501

2. Weld on Sentry 110 Shield Rings

Drawing R86000 on sheet 2, specifies that the shield rings are welded to the endplates by a 1/16 fillet weld. The production drawing for this assembly calls for the shield rings to be tack welded to the endplates, if needed. To date, all Sentry 110 packages have each shield ring tack welded to the endplate in 4 places. (No shield rings are used on the Sentry 330 or Model 867 package designs.)

The purpose of the shield rings is to elevate the Sentry 110 shield during assembly and to fill the upper and lower void space between the shield and the endplates after assembly. Once assembled, the shield rings are kept from shifting laterally by the tack welds, the polyurethane foam fill surrounding the entire shield envelope, and compression of the parts within the assembly. As such, fillet welding all around the shield rings provides no structural necessity in ensuring the package integrity under normal or hypothetical accident condition transport.

Drawing R86000 revision P enclosed show the change to the shield ring weld specification on sheet 2 to allow tack welding the rings in 4 places or a 1/16 fillet weld all around the rings. This change will reflect production welding for units in use and will have no adverse impact on the package integrity and will not create a substantial safety hazard under 10 CFR Part 21.

3. Dust Cover Lanyard Material

The dust cover lanyard is shown on sheet 10 of drawing R86000. Currently the material requirement for this component specifies nylon coated 302 or 304 series stainless steel cable. The production drawing for this component allows the cable to be any nylon covered 300 Series stainless steel cable. This requirement has the potential to allow material other than 302 or 304 series stainless steel in the component construction.

This cable is not important to the safety of the transport package and is used only as a convenience aid to prevent loss of the dust cover assembly when the dust cover assembly is not secured to the lock assembly. Removal of this component from the package will have no adverse impact on the package safety or integrity during transport. Revision P to drawing R86000 on sheet 10, changes the material specification for this component to allow "Nylon Coated Stainless Steel". This change reflects units in use and will not adversely impact the transport package integrity and will not create a substantial safety hazard under 10 CFR Part 21.

4. Front Plate Slider/Shaft Spring Material

The front plate assemblies on the Sentry 110 and 330 packages utilize the same spring for the slider spring and shaft spring components identified on sheet 7 of R86000. The drawing R86000 material for the slider spring requires it to meet "Type 301, 302, 304 or 17-7PH stn stl per ASTM A313 or A666". The material for the shaft spring is the same except the part is not required to meet the ASTM standards referenced for the slider spring. The production drawing for the spring component used for the slider spring and shaft spring only requires the spring to be stainless steel with no additional material requirements.

These springs are of minor safety importance to the Sentry Series packages. The springs keep the rotor shield in place for low radiation levels at the front plate under normal conditions of transport. However, other parts in the front plate assembly also perform the same function, rendering the springs redundant for package safety/integrity during transport. As such, we have revised the material requirements for these springs on sheet 7 of R86000 Revision P to list the material as "Any Stainless Steel". This change reflects units in use and will not adversely impact the transport package integrity and will not create a substantial safety hazard under 10 CFR Part 21.

5. Front Plate Retainer Screw

The front plate assemblies on the Sentry 110 and 330 packages utilize a retainer disc that is attached to the front plate assembly by two retainer screws (reference sheet 7 of R86000). The material for the retainer screw is currently specified as "Type 302Cu stn stl". The production drawing for this screw requires the part to meet "ASTM F837 – Alloy Group 1 – Condition CW". Although 302Cu stainless steel is included in Alloy Group 1 of ASTM F837, there are other alloys included in that group that are not currently included on drawing R86000.

Like the springs referenced in item 4, the front plate retainer screws are of minor safety importance to the Sentry transport package. The screws keep the rotor shield in place for low radiation levels at the front plate under normal conditions of transport. However, other parts in the front plate assembly also perform the same function rendering the screws redundant for package safety. Failure of the screws in transport would not adversely affect the safety and/or integrity of the Sentry transport package.

The screw material specified on R86000 Revision N sheet 7 is overly restrictive for transport package safety. Therefore, drawing R86000 revision P enclosed changes the screw material to "Any Stainless Steel". This change reflects units in use and will not adversely impact the transport package integrity and will not create a substantial safety hazard under 10 CFR Part 21.

6. Front Plate Knob Set Screw Material

The front plate assemblies on the Sentry 110 and 330 packages utilize a front knob that is attached to the front plate assembly by a set screw (reference sheet 7 of R86000). The material for the set screw is required to meet "Type 303 stn stl". The production drawing for this screw requires the part to meet "ASTM F593-02 – Alloy Group 1 – Condition CW, 303 Alloy may be used". Although 303 stainless steel is included in this specification, there are other alloys included that are not currently approved on drawing R86000.

The set screw keeps the knob attached to the front plate shaft. The set screw is of minor safety importance to the Sentry transport package. The set screws keep the knob in place preventing the ingress of dirt and foreign materials from entering the front plate assembly. The knob is also used to index the rotor for use in radiography. Failure of the set screw in transport would not adversely affect the safety and/or integrity of the Sentry transport package.

Use of set screws meeting any 300 Series stainless steel will have no adverse impact on the package integrity or safety. The material requirements of any stainless steel are sufficient to meet the material performance requirements for this part in the front plate assembly. As such, we have revised the material requirements for the front plate knob set screw to list the material as "Any Stainless Steel".

7. Sentry 867 Lock Cover Assembly Spring Plunger Material

Sheet 10 of drawing R86000 specifies the spring plungers used on the Model 867 lock cover assembly as 300 Series stainless steel. The production drawing for this plunger specifies the material as 300 Series stainless steel, but allows an optional for the nose material to be 400 Series stainless steel. This option is not currently reflected on drawing R86000 Revision N.

The two spring plungers allow the dust cover to spring off the rear plate after it is unlocked. The spring plungers are not important to safety for the Sentry transport package. Failure of the spring plungers in transport would not adversely affect the safety and/or integrity of the Sentry transport package. Subsequently, the optional use of 400 Series stainless steel for the nose material of these spring plungers will have no adverse impact on the security or integrity of the Sentry 867 transport package. As such, we have made a revision to the enclosed R86000 to allow "optional 400 Series stainless steel nose material" for this part. This change reflects units in use and will not adversely impact the transport package integrity and will not create a substantial safety hazard under 10 CFR Part 21.

10 CFR 71.95 Root Cause Analysis and Corrective Actions to Prevent Recurrence

The issues identified for the Sentry Series packages are similar in nature and cause to the issues identified for the 650L, 770, 702, 680-OP, 741-OP, 976 Series and 880 Series transport packages addressed with your office under their respective CoCs. Actions taken to prevent recurrence in response to these previously identified issues are considered adequate to prevent recurrence for the Sentry Series packages and no additional corrective actions are considered necessary at this time specific to the Sentry package review.

The issues identified in this letter did not contribute to any incidents or package failures related to the safe use of the Model Sentry Series packages in transport. The corrective actions identified in previous Type B CoC reviews for QSA Global, Inc. packages are considered sufficient to prevent recurrence of the issues identified for the Model Sentry Series. Continued compliance will be verified as part of our routine Quality Assurance internal audits which include performance of Type B container processing for production staff.

Until amendment can be received, domestic package users will be advised of the need to stop shipment until the Type B Certificate of Conformance until an amended to address the identified issues is obtained.

In addition to the changes already described in this letter, we request some minor changes to the certificate, package drawings and the safety analysis report (SAR) to more accurately specify the package. In summary the additional R86000 drawing changes include:

- a. The material specification for the large rivnuts referenced on sheet 2 of drawing R86000 is "NAS 1330N8E-326, Type 316/316 stn stl". The NAS description contains a typographical error as the -326 should be -426. There is also a typographical error in the quantity of large rivnuts specified on the Sentry assemblies. Currently the descriptive specifies 32 large rivnuts when in actuality, the quantity for the large rivnuts is 24 not 32. This was an oversight that was missed during review and approval of the descriptive drawing. These issues are revised on drawing R86000 Revision P enclosed.

Currently, drawing R86000 Revision N identifies two different components on sheets 2, 3 and 8 as "Large Rivnut". To eliminate confusion with the parts referenced on sheets 3 and 8, we have changed the rib attachment rivnuts description on sheet 2 to "Shell Rivnut". Drawing R86000 revision P enclosed revises the rivnut designation on sheet 2 from "LARGE RIVNUT" to "SHELL RIVNUT". In addition, the "TYPE 316/316L STN STL" is removed from the material description for this part since this information is already included in the NAS1330 standard. We have, however, added a material option of compliance to ASTM A493. Rivnuts made to 316/316L per ASTM A493 will meet the ultimate thread strength values needed for lifting and tie-down requirements, and therefore will have no negative impact on the safety and/or integrity of the Sentry packages under normal or accident conditions of transport.

- b. The material specification for the small rivnuts referenced on sheets 3 and 8 of drawing R86000 is "NAS 1330N5E-256, Type 316/316 stn stl per ASTM A276". The small rivnuts are used for attaching the security screws through the front and rear plate assemblies at the access ports. The security screws help prevent unauthorized access to the source assembly and contribute to attaching the front and rear plates to the package along with the four hex head bolts.

We have revised this material specification to remove reference to Type 316/316L stainless steel per ASTM A276 and have added a material option of compliance to ASTM A493. The removal of 316/316L and ASTM A276 was removed because this information is included as part of the NAS standard reference. The addition of allowing rivnuts made to 316/316L per ASTM A493 will meet the ultimate thread strength values needed for meeting the functional requirements of the security screw attachments. These changes will have no negative impact on the safety and/or integrity of the Sentry packages under normal or accident conditions of transport.

- c. The material specification for the rear plate large rivnuts referenced on sheets 3 and 8 of drawing R86000 is "NAS 1330N8E-326, Type 316/316 stn stl per ASTM A276". These large rivnuts pertain to the eight rivnuts used for attaching the hex head bolts in the front and rear plate assemblies at the access ports.

We have revised this material specification to remove reference to Type 316/316L stainless steel per ASTM A276 and have added a material option of compliance to ASTM A493. The removal of 316/316L and ASTM A276 was removed because this information is included as part of the NAS standard reference. The addition of allowing rivnuts made to 316/316L per ASTM A493 will meet the ultimate thread strength values needed for front/rear plate screw attachments requirements, meeting or exceeding the currently specified NAS requirements. These changes will have no negative impact on the safety and/or integrity of the Sentry packages under normal or accident conditions of transport.

- d. Revised sheets 2 and 3 to remove the year reference of the AWS welding codes in the Note 1 entries. This change has no significant impact on the performance of the package, and is consistent with a similar change that was approved under USA/9269/B(U)-96 as part of a request made in letter dated 1/13/15 which was incorporated at Revision 8 of the CoC.
- e. On sheets 5 and 6, Notes 2, the application of lubricant is now shown as "optional". This lubrication is not required for the function of the lock assembly but is added as an aid only. As such its use should be identified on the drawing as optional. This change is made for clarification only.

- f. On Sheet 10, threadlocker has been added to the materials table and its use listed as optional for a number of components on this sheet. The presence or absence of threadlocker on these components will not adversely impact the integrity of the Sentry Series packages during transport. Its use is an aid when the packages are used as radiography exposure devices and source changers. The addition of this option is for flexibility and completeness.
- g. On Sheet 2, threadlocker has been added for optional use on the Large set screws. The presence or absence of threadlocker on this component will not adversely impact the integrity of the Sentry Series packages during transport. The addition of this option is for flexibility and completeness. We have also revised the material specification for this component from "ASME B18.3 Type 302/302HQ/303/304/304L/305/384 Stn Stl" to "Any Type 300 Series Stainless Steel". Their function is to block the foam fill holes after filling. Their intent is to prevent air circulation during the hypothetical accident thermal test and limit introduction of foreign material. So long as the screw material is fire proof to pass the hypothetical accident condition thermal test, they will be sufficient to maintain the package integrity. As such, the material requirements of any 300 Series stainless steel are sufficient to meet the material performance requirements for this part on the Basic Configuration units.
- h. Sheet 9 revised to indicate dimensions 10", 3.9", 1.0", 9", 4.7", 0.9", 11" and R3.25" are now listed as "REF" dimensions. These dimensions are based on final assembly component stack up and change after the depleted uranium pouring operation. As such they may vary over time and the dimensions shown are based on initial s-tube bend radius prior to pouring and shield mold modeling. Acceptance of Sentry series shields is based on direct radiation survey inspection after device manufacture where the shielding is confirmed compliant on the finished assembly. Note 7 has also been added to further clarify this requirement. As such, this change will have no adverse impact on the package integrity.
- i. The 3/8 body assembly seam weld shown on sheet 2 is revised to reflect that the weld finish can be achieved by machining in addition to grinding. The method of finish will not affect the weld integrity and this change is made for flexibility purposes only.
- j. Sheet 2, the material requirement for the body weldment set screws (24) has been changed from "ASME B18.3 Type 316 Stn Stl" to "Any Type 300 Series Stainless Steel". These set screws are only present on the Basic Configuration units when the optional rib assemblies are not present. Their function is to fill the attachment holes to prevent air circulation during the hypothetical accident thermal test and limit introduction of foreign material on the Basic Configuration styles. So long as the screw material is fire proof to pass the hypothetical accident condition thermal test, they will be sufficient to maintain the package integrity. As such, the material requirements of any 300 Series stainless steel are sufficient to meet the material performance requirements for this part on the Basic Configuration units. We have revised the material requirements for these set screws to list the material as "Any Type 300 Series Stainless Steel".
- k. On Sheets 2 and 3, the material description for the shield disc, shield bracket and shield cup have been revised to remove the Condition H02 or H04 requirement from these specifications. The function of these components is to provide a barrier between the depleted uranium and stainless steel components on the Sentry package designs. The use of any Condition C101 or C110 copper to ASTM B152 or B187 as applicable is adequate to meet this function and will have no adverse impact on package integrity.

- l. On Sheet 2, an optional material is added for the shell to allow use of material compliant to ASTM A182 in addition to materials compliant to ASTM A240, A276 or A666. The material requirements of ASTM A182 are as good, or better than, those currently approved for the shell material. This change is made to add manufacturing flexibility and will have no adverse impact on package structural integrity.
- m. On sheet 3, the material specification for the cotter pin is changed from "ASME B18.8.1 Type 302/304/316 Stn Stl" to allow "Type 300 Stainless Steel". These cotter pins are used to secure the shield pin in place prior to the addition of the polyurethane foam in the interior of the body weldment. Once the polyurethane foam is added, the foam, shield pins maintain the shield attachment to the port tube assemblies. The material requirements of any 300 Series stainless steel are sufficient to meet the component performance requirements for this part.
- n. Sheet 4, the material requirement for the lockwasher and the washer has been changed from "Type 302/303/304/304L/316/17-4PH Stn Stl" to "Type 300 Series or 17-4PH Stainless Steel". This lockwasher, when used, is only present when the optional rib assemblies are present as a replacement to the use of threadlocker on the rib assembly attachment hex bolts. The washer is used in the optional rib component assembly. These parts do not perform a structural purpose in maintaining the package integrity. Based on function, the material requirements of any 300 Series stainless steel, in addition to the currently approved 17-4PH stainless steel, are sufficient to meet the material performance requirements for these parts.
- o. Sheet 4, the material requirement for the rib nut and rib bolt has been changed from "Type 302/303/304/304L/316 Stn Stl" to "Type 300 Series Stainless Steel". These parts are intended only for use to secure the Sentry packages to a secondary cart to facilitate mobility at radiography jobsites. These parts do not perform a structural purpose in maintaining the package integrity during transport. Based on function, the material requirements of any 300 Series stainless steel are sufficient to meet the material performance requirements for these parts.
- p. The slide spring on sheet 5, and the lock pin spring on sheet 6 material requirements are changed from "Type 301/302/304/316 Stn Stl per ASTM A313 or A666". The slide spring material is revised to "Type 300 Series Stn Stl per ASTM A313 or A666". The lock pin spring material is revised to allow "Any Stainless Steel". These parts are not functional during transport (only during device operation) and they are not relied upon for maintaining package integrity during transport. Based on function, the material requirements changes noted are sufficient to meet the transportation performance requirements for these parts.
- q. Sheet 5 and 6, the material requirement for the collar roll pin is changed from "ASME B18.8.2, SAE 30302 or 30304 Stn Stl" to "Any Stainless steel". These roll pins are redundant safety features to prevent/slow unauthorized access to the source assembly inside the package. From a material performance requirement need, roll pins made of any stainless steel will meet the intended secondary function of these parts without loss of package integrity.
- r. The fitting material on sheet 6 has been revised to remove reference to the brass material requirements. The fitting material in use on current packages is tungsten and it is our intent not to manufacture or use any brass fittings on these packages.
- s. Sheet 6, the material requirement for the plate roll pin is changed from "ASME B18.8.2, SAE 51420 Stn Stl" to "Any Stainless steel". These pins limit rotation of the selector ring during operational use. Based on their function, compliance to additional material requirement standards will not enhance the component, or the transport package, performance.

- t. On sheet 7 the material requirements for the flat washer and slider have been revised to allow “Any Brass” material without additional specification. During transport these components can at best contribute minimal additional shielding. Based on their function, compliance to additional material requirement standards will not enhance these components, or the transport package, performance.
- u. On sheet 7 the material requirements for the shaft is revised to remove the bronze condition H04 requirement. Based on the components function, compliance to the ASTM B96 standard is sufficient to ensure its intended function of attaching the knob to the front plate assembly during transport.
- v. The shaft roll pin and shield roll pin on sheet 7 are passive components whose failure, once installed, will have no adverse impact on the front plate assembly or package integrity. As such, compliance to a specific grade of stainless steel for these components is unnecessary to ensure the design performance of the package. This drawing revision changes the material requirements for both these components to “Any Stainless Steel”.
- w. The retainer disc and knob from sheet 7 contribute some additional shielding during transport. This function can be achieved, without loss of package integrity, by allowing the material specifications for these parts to be any “Type 300 Series Stainless Steel” instead of limiting these components to specific grades of 300 Series stainless steel. To increase flexibility for these components we have made this material change on sheet 7.
- x. Sheet 10 adds “2 optional” to the Large Link call out on the exploded view of the dust cover assembly. This option has no adverse impact on the package integrity and allows for a secondary method of attaching a tamper indicating seal to the packages. This change is made for flexibility purposes only.
- y. On sheet 10, based on component function, the current specifications for the lock cover set screw, plunger lock screw, lanyard screw, large link and lock cover roll pin components are overly restrictive limiting them to material compliant to an ASTM standard or specific grades of 300 Series stainless steel. Similarly, the current specification for the threaded insert, lock cover lock washer, sleeve, and spring plunger which now specify “Any 300 Series Stainless Steel” are also overly restrictive based on the function of these components.

For all items listed above, we request revision to allow “Any Stainless steel” as this specification will be sufficient to ensure the components function as intended during transport without any adverse impact on package integrity.

In addition the material requirement for the cover screw, which had been “Stainless steel”, is now grouped in with these other components and specified as “Any Stainless steel.” This change is equivalent to the previous specification and is made for drawing simplicity purposes only.

- z. On sheet 11, the description for the addition of the supplemental shields is revised slightly from “Location shown is arbitrary” to “Location arbitrary see notes”. In addition, Note 3 was revised to replace “if needed” with “if used”. Further Note 4 was revised to slightly to describe the supplemental shield material as “...99% depleted uranium (DU) and Painted.” Instead of “...painted 99% depleted uranium (DU).” These changes are made to increase clarity of the note/reference intent.
- aa. On sheet 10, based on component function, the current specification for the plunger lock is overly restrictive limiting it to specific brass alloys. This plunger lock is a secondary lock mechanism and is

not relied upon for source security in the Sentry Series transport packages. Revision of the material requirements to allow "Any Brass Alloy" will be sufficient to ensure the component function as intended during transport without any adverse impact on package integrity.

- bb. On sheet 1, the cover bracket and nameplate components are currently specified as Type 302/303/204/304L/316 stainless steel. We are requesting to change this specification to allow "Any Type 300 Series Stainless Steel". The cover bracket is a functional component for attachment of the dust cover assembly when not installed for transport and the cover bracket has no impact on the structural integrity of the package in transportation. Changing to allow greater flexibility in the material specification for this component will have no adverse impact on the package security or integrity.

The nameplate function is to ensure identification on the package during normal and hypothetical accident condition transport. All 300 Series stainless steels will meet the hypothetical accident thermal test conditions so this change will have no adverse impact on the components ability to meet its intended function during transport.

The drawing revisions and affected documents associated with these issues are included as enclosures to this letter. Should you have any additional questions, or wish to discuss this issue or our amendment request, please contact me.

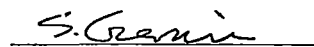
Sincerely,



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RA/QA Approval

26 FEB 2016
Date



Engineering Approval

26 Feb 2016
Date


Enclosures: Drawing R86000 Revision P

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
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Rockville, MD 20852


Security-Related Information Figure Withheld Under 10 CFR 2.390.

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	<i>PT</i>	<i>11/15/16</i>	A	SCALE: NONE		SHEET 1 OF 11
		February 12, 2018	<small>© 2018 QSA GLOBAL <small>16-0000001 by Lori Padala on 2018-02-12 08:23:59 GMT</small></small>			


Security-Related Information Figure
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
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