

10 CFR 71.95 REPORT EVALUATION FORM

Docket No.: 71-9296
Package Model No.: Model No. 880
Report Submitted By: Lori Podolak, QSA Global, Inc.
Report Date: December 21, 2015
Report ADAMS Accession No.: ML15363A208

Review the incoming report to determine if additional Commission or staff action is warranted. The review should consider whether the report identifies a generic defect or problem with the package design and the safety significance of the issue. Note that a high safety significance represents a potential for significant radiation exposure, medium safety significance represents a potential for some moderate radiation exposure, and low safety significance represents little or no potential for radiation exposure.

1. The report identifies:

- Significant reduction in the effectiveness of a package during use;
- Defect with a safety significance;
- Shipment in which conditions of the approval were not observed.

2. What is the safety significance? High Medium Low

3. Summary of the report:

This report is regarding shipments made using the Model No. 880 transportation package due to a change in their internal processes, the fabrication drawings did not match the licensing drawings. The licensing drawings are referenced in Condition No. 5(a)(3), "Drawings" of the certificate of compliance.

Specifically, QSA discovered errors on the Model No. 880 transportation package licensing drawings on the shell used on the body assemblies and the front plate set screw. On the shell, the tolerance on the production drawings was 0.001 inches different than the tolerance on the licensing drawings. The tolerance on the production drawings, per ASTM A249 which includes a permissible variation of $\pm 10\%$, was ± 0.006 inches. On the licensing drawings, the tolerance was ± 0.005 inches. The front plate set screw, which can be either a roll pin or set screw, is identified as "not important to safety." The licensing drawing describes the set screw differently than the production drawing, therefore it is possible that screws accepted under the production drawing are 0.03 inches shorter in length than those allowed by the licensing drawing. QSA requested an amendment which staff reviewed and approved on December 23, 2015. The safety evaluation report contains the details of the non-compliances.

4. Corrective actions taken by the licensee:

5. Staff comments:

The staff has reviewed the certificate holder's report, and its evaluation of the incident, and it agrees that the safety significance of the event is minor. The staff finds that the certificate holder's corrective actions should be sufficient to prevent future occurrences.

QSA Global, Inc. is certificate holder of the package. The regulations specify in 10 CFR Part 71.95(a) that the licensee, after requesting the certificate holder's input, shall submit the written report. In this case, the licensees did not submit written reports, and the CoC holder has submitted the report. The CoC holder is aware that the licensees should be contacted about submitting the reports.

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6. Staff conclusion:

- The report does NOT identify generic design or license/certificate issues that warrant additional Commission or staff action. This report is considered closed.
- There is a need to take additional action. Provide a summary of the bases and recommended actions:

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R. Boyle and M. Conroy, Department of Transportation
R. Sun and A. McIntosh, Project Manager

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