

September 16, 2016

Mr. Sameer Jetly, President  
Industrial Nuclear Company, Inc.  
14320 Wicks Boulevard  
San Leandro, CA 94577

SUBJECT: SAFETY ANALYSIS REPORT REVIEW CHARGES FOR DOCKET 07109157,  
INVOICE LFB 16-0586, AND DOCKET 07109185, INVOICE LFB 16-0587

Dear Mr. Jetly:

This is in response to your letter dated July 20, 2016, requesting a review of the invoice charges for U.S. Nuclear Regulatory Commission (NRC) staff work on two amendment requests to the Certificates of Compliance (CoCs) for the IR100 and OP100 Type B transportation packages, Agencywide Documents Access and Management System (ADAMS) Accession Number ML16243A086. Your letter indicates that the NRC review should have been limited to a simple radiation shielding calculation because the amendments only included some updating to the Safety Analysis Reports (SAR) formatting and an addition of a new radioactive source as a payload.

Based upon our review of the work performed by the NRC in processing the amendment requests, we confirmed that the invoices should be adjusted on the reviews as requested. Specifically, Invoice LFB 16-0586 will be reduced from 94 hours to 83 hours, and Invoice LFB 16-0587 will be reduced from 81.5 hours to 71.5 hours. These revised hours are appropriate and cover all technical disciplines, including the project manager for review, approval, and issuance of Safety Evaluation Reports (SERs) and COCs for the IR100 and OP100 packages. This reduction is consistent with the 21 hours of charges that were identified to be reversed in response to your previous request for a review in your December 1, 2015, letter to Michelle Sampson (ML16243A087). This conclusion is based on the number of changes, scope of the changes, the number of requests for additional information, and the preparation and issuance of the two SERs along with the updated CoCs.

With regard to the number and scope of the changes, the amendment requests included adding Selenium 75 as a radiation source and updating the SARs to the format and content in accordance with NRC Regulatory Guide 7.9, Revision 2, "Standard Format and Content of Part 71 Applications for Approval of Packages for Radioactive Material," for both packages that resulted in changes throughout the SARs. Adding Selenium 75 to the approved contents required review and evaluation of the package designs. Our review focused primarily on thermal and shielding analyses. During the technical review, there were requests for additional information from the NRC on five different dates (August 14, August 16, September 21, September 22 and September 28, 2015), which focused on clarifying radiation dose measurements from prior drop tests for the package containing Iridium 192 that were used as the basis for the addition of Selenium 75 to the approved content. These clarification requests were transmitted to Industrial Nuclear Company, Inc., through e-mails from William Allen to Mike Rose as captured in ADAMS at Accession Numbers ML15237A279, ML15266A141,

ML15266A354 and ML15279A224. Responses to the requested information were evaluated and the NRC prepared two separate SERs and updated CoCs for the two amendment requests.

The SAR is a key licensing document and the NRC had to ensure the reformatting did not result in an inadvertent omission of any necessary information. The SARs were reviewed in detail by the NRC for any possible technical changes or omissions from updating to the format and content of the Regulatory Guide 7.9, Revision 2.

If you have any further concerns regarding this matter, please contact Meraj Rahimi of my staff at (301) 415-6802.

Sincerely,

**/RA/**

Marc L. Dapas, Director  
Office of Nuclear Material Safety  
and Safeguards

Docket Nos. 71-9157  
71-9185

ML15266A354 and ML15279A224. Responses to the requested information were evaluated and the NRC prepared two separate SERs and updated CoCs for the two amendment requests.

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**/RA/**

Marc L. Dapas, Director  
Office of Nuclear Material Safety  
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**DISTRIBUTION:**

**ADAMS Package No.: ML16243A078**

<b>OFC:</b>	DSFM	DSFM	DSFM	PMDA	PMDA	DSFM
<b>NAME:</b>	M. Rahimi	J. Piotter	J. McKirgan	C. Barror	C. Schum	T. Hsia
<b>DATE:</b>	8/24/2016	8/25/2016	8/25/2016	8/26/16 9/15/16	9/1/16	8/30/16
<b>OFC:</b>	NMSS	OCFO	NMSS			
<b>NAME:</b>	W. Moore (Tech. Ed.)	M. Wylie 9/15/16	M. Dapas			
<b>DATE:</b>	9/1/16	9/02/16	9/16/16			

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