

QSA Global, Inc.

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23 February 2017

Mr. Steve Ruffin, Acting Branch 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: 10 CFR 71.95(a)(3) report for CoC number USA/9269/B(U)-96 and Certificate Amendment Request

Dear Mr. Ruffin:

QSA Global, Inc. is making a report under 10 CFR 71.95(a)(3) to identify a minor discrepancy in the package configuration for the Model 650L Type B package. A recent review of our production drawings identified an inconsistency in the number of rivets specified for attachment of the package nameplate when compared to the descriptive drawing (R65009 Revision N).

The descriptive drawing specifies attachment of the nameplate by (4) stainless steel rivets. The production drawing currently calls for the use of five stainless steel rivets to attach the nameplate. The presence of an additional rivet has no adverse impact on the package integrity or safety during transport. Labels attached in this manner will comply with the requirements of 71.85(c) ensuring the durable marking of the package as required.

Included with this letter we have submitted drawing R65006 Revision P to address the issue and change the rivet reference to remove the quantity designation. The drawing now requires attachment of the nameplate by stainless steel rivets as attachment by more than one rivet will meet the durability requirements of 10 CFR 71.85(c).

The issue was caused by a combination of human error during document review and the use of a nonstandard method for nameplate attachment where the standard is the use of four rivets and not five. In addition, the specification on the descriptive drawing is overly restrictive since two stainless steel rivets satisfies the durably marked requirement for nameplate information under 10 CFR 71. By revising the descriptive drawing to more accurately reflect the level of detail required to meet the intent of 10 CFR 71.85(c), this issue is now corrected.

NNNSSO

The issue identified in this letter did not contribute to any incidents or package failures related to the safe use of the Model 650L in transport. The corrective action taken, in conjunction with our revised program controls for drawing changes, is considered sufficient to prevent recurrence of the issue at this time.

Should you have any additional questions, or wish to discuss this issue or our amendment request, please contact me.

Sincerely,

e-Signed by Lori Podolak on 2017-02-23 19:29:24 GMT Lori Podolak Manager, Regulatory Affairs/Quality Assurance Ph: (781) 505-8241 Fax: (781) 359-9191 Email: Lori.Podolak@qsa-global.com

Signed by Michael Fuller on 2017-02-23 21:03:46 GMT

RA/QA Approval e-Signed by Steve Grenier on 2017-02-23 19:37:44 GMT

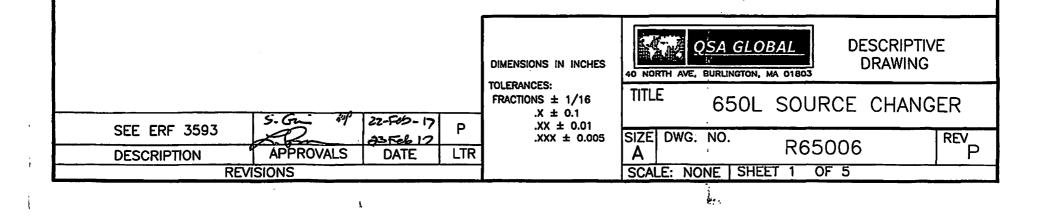
Eman. <u>Lon.Podolak(@qsa-giobal.com</u>

Engineering Approval

Enclosures: Drawing R65006 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 11555 Rockville Pike One White Flint Rockville, MD 20852

> Mr. Bernie White Office of Nuclear Material Safety and Safeguards U.S. Nuclear Regulatory Commission 11555 Rockville Pike One White Flint Rockville, MD 20852





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	DIMENSIONS IN INCHES	SIZE DWG. NO.	REV
1	TOLERANCES: FRACTIONS $\pm 1/16$.X ± 0.1	<u>QSA GLOBAL</u> A RE	S5006 P
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DIMENSIONS IN INCHES		SIZE	DWG. NO.	REV
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