



Global Nuclear Fuel

A Joint Venture of GE, Toshiba, & Hitachi

Global Nuclear Fuel

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May 19, 2017

ATTN: Document Control Desk
Director, Division of Spent Fuel Management
Office of Nuclear Material Safety and Safeguards
US Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Quality Assurance Program Approval for Radioactive Material Packages

References: 1) NRC Revised QAP Approval Form No. 0254, Revision 10, Docket 71-0254,
Dated 8/28/15
2) GEH Nuclear Energy Quality Assurance Program Description (QAPD), NEDO-
11209-A, Revision 13, Dated 8/4/16

Since 2009, GE Hitachi has prepared, submitted, and obtained NRC approval for several revisions to its QAPD. Most recently, NEDO-11209-A, Revision 13 (Reference 2), was approved for use on August 18, 2016 (ML16228A262) and is based upon GEH commitments to 10 CFR 50, Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants", ASME Nuclear Quality Assurance (NQA) Standard NQA-1-2008, "Quality Assurance Requirements for Nuclear Facility Applications", and NQA-1a-2009 Addenda. As noted in the GEH QAPD Part IV, Regulatory Commitments, GEH continues to satisfy Part 71 Subpart H Quality Assurance packaging requirements.

The first of these GEH QAPD revisions (Revision 9) was to upgrade from ANSI N45.2 (including applicable Daughter Standards) to NQA-1 in accordance with NRC Regulatory Guide 1.28, Revision 4, dated June 2010. The remaining revisions (through 13) have simply involved administrative improvements and clarifications but all have occurred without a corresponding update to the Quality Assurance Program Approval for Radioactive Material Packages No. 0254, which is currently based upon the July 31, 2009 version of the GEH QAPD. This appears to be due to an oversight in the document submittal and review process between GEH and NRC Office of Nuclear Material Safety and Safeguards.

Pursuant to 10 CFR 71.106(b), a list of changes made to the GEH QAPD since Revision 9 are provided as an Attachment to this letter. As noted above, all of these changes have been reviewed and approved by NRC Office of Nuclear Reactor Regulation and thus satisfy the requirements of a previously approved program (10CFR71.101(f)). Global Nuclear Fuel – Americas, LLC (GNF-A) facility in Wilmington, North Carolina hereby requests the current NRC Quality Assurance Program Approval for Radioactive Material Packages (Reference 1) be updated to reflect the currently approved GEH QAPD, NEDO-11209-A, Revision 13, dated August 4, 2016. Future revisions to the GEH QAPD will be processed in accordance with 10 CFR Part 71.106.

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If you have any questions regarding this matter, please contact me at (910) 819-5950.

Sincerely,


Scott Murray, Manager
Facility Licensing

Attachment: GEH Quality Assurance Program Description – Revision History

Commitment: None

Cc: J. Kirgan, NRC NMSS, Washington, DC
P. Silva, NRC NMSS, Washington, DC
E. Love, NRC NMSS, Washington, DC
SPM 17-020