



QSA GLOBAL

QSA Global, Inc.
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25 April 2018

Branch Chief
Spent Fuel Licensing Branch
U.S. Nuclear Regulatory Commission
Office of Nuclear Material Safety and Safeguards
Mailstop: 3WFN-14A44
11555 Rockville Pike
One White Flint
Rockville, MD 20852

RE: Renewal Application for the Model 360 Series Transport Package Designs - USA/9371/B(U)-96

Dear Sir or Madam:

QSA Global, Inc. requests renewal of the certificate referenced above for the Model 360 Series Type B(U) containers. The current certificate expires on 31 January 2019. This renewal submission makes minor modifications to the Safety Analysis Report (SAR) related to administrative/corrective changes as applicable. These changes are documented in a Table describing the SAR changes and they have no significant impact on the package performance or continued compliance for Type B transport.

This submission is being provided as a full revision to the SAR at Revision 5. This submission contains proprietary documentation for which we request withholding from public disclosure under the provisions of 10 CFR §2.390(a)(4). The attachments to this letter include Attachment 1 which is the affidavit required for proprietary documentation under §2.390; Attachment 2 which includes all submission documents covered by the proprietary request for withholding under the affidavit in Attachment 1; and Attachment 3 which includes all submission documents that can be released for public disclosure related to these packages. Should you have any additional questions or wish to discuss this submission after receipt please feel free to contact me.

Sincerely,

Lori Podolak
Senior RA/QA Specialist
Regulatory Affairs/Quality Assurance
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Regulatory Approval

23 APR 2018
Date

Engineering Approval

23 APR 2018
Date

Enclosures:

- Attachment 1: Affidavit Pursuant to §2.390
- Attachment 2: Proprietary documents
- Attachment 3: Non-Proprietary documents

NM5501

cc: Document Control Desk
U.S. Nuclear Regulatory Commission
11555 Rockville Pike
One White Flint
Rockville, MD 20852

Attachment 1: Affidavit Pursuant to 10 CFR §2.390

AFFIDAVIT Pursuant to 10 CFR §2.390

I, Mike Fuller, Director Regulatory Affairs/Quality Assurance of QSA Global, Inc. hereby affirm and state:

1. I have been specifically delegated the function of reviewing the information sought to be withheld and am authorized to apply for its withholding on behalf of QSA Global, Inc.
2. QSA Global, Inc. is providing NRC with a detailed drawing (R36000 Rev G) and technical details, specifications and product related information as parts of the SAR Revision 5 for the Model 360 Series transport packages. These documents contain proprietary commercial information.
3. The information sought to be withheld pursuant to the provisions of 10 CFR §2.390(a)(4) are marked as follows in Attachment 2 of our application letter *"Proprietary information submitted under 10 CFR §2.390 to be withheld from public disclosure under 10 CFR §2.390."*
4. These documents should be held in confidence by the NRC per 10 CFR §2.390(a)(4) based on the following justifications:
 - a. This information is owned and been held in confidence by QSA Global, Inc.
 - b. This information is of a type that QSA Global, Inc. has determined should be held in confidence since its release for public disclosure could result in a loss of an existing or potential competitive advantage as follows:
 - i. The information reveals the distinguishing aspects of the design and the prevention of its use by QSA Global, Inc. competitors gives QSA Global, Inc. a competitive economic advantage.
 - ii. The information, if used by a competitor, is likely to reduce the competitor's expenditure of resources or improve their advantage in design, quality and manufacture of a similar product.
 - c. This information is being transmitted to the NRC voluntarily and in confidence for use in evaluation and approval of these package designs for Type B(U) transport certification.
 - d. This information is not available in public sources.
 - e. Public disclosure of this information is likely to cause substantial harm to the competitive position of QSA Global, Inc. because of the reasons outlined below:
 - i. Similar products are manufactured and sold by competitors of QSA Global, Inc.
 - ii. The development of this information by QSA Global, Inc., including test/evaluation documentation supporting these package designs, is the result of significant expenditure of staff effort and a considerable amount of money. It is our belief that a competitor would have to undertake similar effort and expense to generate equivalent information
 - iii. In order to generate such information, a competitor would also require considerable time (e.g., in excess of 1 year).

- iv. If a competitor used this information and did not have to undertake the work required to generate this information, they are likely to have lower overall costs and so are likely to have an unfair economic advantage over QSA Global, Inc. in offering a similar product to the market.
5. QSA Global has spent considerable commercial and technical resources to design and build this innovative family of source changers that is unique in its ability to store and transport a wide range of industrial radiography sources that are used worldwide. Access to the technical information for this unique design would give a competitor an unfair advantage in expanding their domestic and international market without having to perform their own research and development of the market needs and the ideal configuration of the transport package to meet a wide variety of customer needs. Accordingly, QSA Global, Inc. requests that the designated information be withheld from public disclosure pursuant to 10 CFR §2.390.

Executed on 23 APRIL 2018


Mike Fuller, Director
Regulatory Affairs/Quality Assurance

Subscribed and sworn to (or affirmed) before me on this 23 day of April, 2018 by Mike Fuller, proved to me on the basis of satisfactory evidence to be the person who appeared before me.

Signature Melissa J Wolfe

Seal

My Commission Expires 3 day of July, 2020.

MELISSA J. WOLFE
NOTARY PUBLIC
My commission expires July 3, 2020