



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

August 27, 2018

Ms. Lori Podolak  
QSA Global, Inc.  
Regulatory Affairs Department  
40 North Avenue  
Burlington, MA 01803

SUBJECT: APPROVAL OF QSA GLOBAL, INC. REQUEST FOR WITHHOLDING  
INFORMATION FROM PUBLIC DISCLOSURE OF RENEWAL APPLICATION  
DATED APRIL 25, 2018, RELATED TO MODEL NO. 360 SERIES

Dear Ms. Podolak:

During the review of the renewal of the Model No. 360 series transportation package, you submitted an affidavit dated April 23, 2018, [Agencywide Documents Access and Management System (ADAMS) Accession No. ML18149A025] requesting that the information contained in the following documents be withheld from public disclosure pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) Part 2, Section 2.390:

1. detailed drawing R36000, Revision G, and
2. technical details, specifications, and parts of the SAR Revision 5 for the Model 360 series transport packages.

A non-proprietary copy of these documents, as appropriate, were placed in the U.S. Nuclear Regulatory Commission's (NRC's) Public Document Room and added to the ADAMS Public Electronic Reading Room.

In general, the affidavit notes that the information submitted should be considered exempt from mandatory public disclosure for the following reasons:

- Information that discloses descriptions of the design and analysis of the 360 series radioactive material transportation packaging, where prevention of its use by competitors of QSA Global, Inc., without license from QSA Global, Inc., constitutes a competitive economic advantage over other companies.
- Information that, if used by a competitor, would reduce their expenditure of resources or improve their competitive position in the design, manufacture, shipment, installation, assurance of quality or licensing of a similar product.
- Information that includes certain portions of the safety analysis report, computer files, and documents containing calculations related to the design of the 360 series radioactive material transportation packaging, which are owned and are held in confidence by QSA Global, Inc.

- Information that QSA Global, Inc. has devoted a significant amount of time and money in the research, development, engineering, analytical, and other costs to develop the information. This information contains detailed descriptions of analytical approaches, methodologies, technical data, and/or evaluation results.

Therefore, the version(s) of the submitted information marked as proprietary will be withheld from public disclosure pursuant to 10 CFR 2.390(b)(5) and Section 103(b) of the Atomic Energy Act of 1954, as amended.

If the basis for withholding this information from public inspection should change in the future such that the information could then be made available for public inspection, you should promptly notify the NRC. You also should understand that the NRC may have cause to review this determination in the future, for example, if the scope of a Freedom of Information Act request includes your information. In all review situations, if the NRC makes a determination adverse to the above, you will be notified of the date of public disclosure, in advance which will be a reasonable time thereafter.

If you have any questions regarding this matter, you may contact me at 301-415-6999.

Sincerely,

**/RA/**

Norma García Santos, Project Manager  
Spent Fuel Licensing Branch  
Division of Spent Fuel Management  
Office of Nuclear Material Safety  
and Safeguards

Docket No. 71-9371  
EPID L-2018-RNW-0008

L. Podolak

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**DISTRIBUTION:** SFST\RF

**ADAMS Accession No.:**

G:\SFST\Garcia\Casework\_NGS\Radioactive Source or Material  
Packages\QSA\_360\Proprietary\_Determination\_QSA\_Renewal.doc

**ADAMS Accession Number: ML18240A359**

<b>OFFICE:</b>	DSFM	DSFM	DSFM
<b>NAME:</b>	NGarcia Santos	SFiguroa by email	JMcKirgan
<b>DATE:</b>	8/24/2018	8/24/2018	8/27/2018

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