



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

October 9, 2018

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

SUBJECT: REVISION NO. 12 OF CERTIFICATE OF COMPLIANCE NO. 9187 FOR THE
MODEL NO. 865 TRANSPORTATION PACKAGE

Dear Ms. Podolak:

On September 24, 2018, the U.S. Nuclear Regulatory Commission (NRC) issued a Certificate of Compliance (CoC) No. 9187, Revision No. 11 by deleting Conditions 6. (c) and 6. (d) to allow the future manufacturing of new Model 865 package and/or future weld repairs on the existing Model 865. This CoC was in response to your application dated July 24, 2018. It was discovered that we did not extend the CoC expiration date to additional five years. As a result, enclosed please find a revised CoC extending the expiration date from March 31, 2019 to March 31, 2024. Further, at your request, we have also added a Condition to CoC to allow the use of Revision No. 10 until March 31, 2019. The NRC staff's revised safety evaluation report (SER) justifying the extension of the CoC expiration date is also enclosed. This was an oversight on our part, and does not affect the NRC staff's conclusions of the SER.

This approval constitutes authority to use the package for shipment of radioactive material and for the package to be shipped in accordance with the provisions of Title 49 of the *Code of Federal Regulations* (49 CFR) 173.471. Those on the attached list have been registered as users of the package under the general license provisions of 10 CFR 71.17 or 49 CFR 173.471.

We regret for any inconvenience this may have caused.

L. Podolak

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If you have any questions regarding this certificate, please contact me or Siva P. Lingam of my staff at (301) 415-1564.

Sincerely,

/RA/

John McKirgan, Chief
Spent Fuel Licensing Branch
Division of Spent Fuel Management
Office of Nuclear Material Safety
and Safeguards

Docket No. 71-9187
CAC No. A33010

Upon removal of Enclosure 3, this document is uncontrolled.

Enclosures:

1. CoC No. 9187, Rev. No. 12
2. Safety Evaluation Report
3. Registered Users

cc w/encls. 1&2: R. Boyle, DOT
J. Shuler, DOE-SRNL c/o L. Gelder
Registered Users

L. Podolak

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SUBJECT: REVISION NO. 12 OF CERTIFICATE OF COMPLIANCE NO. 9187 FOR THE
MODEL NO. 865 TRANSPORTATION PACKAGE, DOCUMENT
DATE: October 9, 2018

DISTRIBUTION: (CAC No. A33010)

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G:\SFST\Part 71 Casework\ Model 865 Docket 71-9187\71-9187.R12 (CoC).docx

ADAMS Package No.: ML18283A030 ADAMS Letter and SER ML No.: ML18283A031

Enclosure 1: CoC: ML18283A032 Enclosure 3: Registered Users: ML18283A033

OFFICE	DSFM	DSFM	DSFM	
NAME	SLingam	SFigueroa via email	JMcKirgan	
DATE	10/5/18	10/5/18	10/09/18	

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

**SAFETY EVALUATION REPORT
DOCKET NO. 71-9187
MODEL NO. 865
CERTIFICATE OF COMPLIANCE NO. 9187
REVISION NO. 12**

SUMMARY

By application dated July 24, 2018 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML18212A225), QSA Global, Inc. (QSA), requested renewal of Certificate of Compliance (CoC) No. 9187 for the Model 865 Type B(U) container. The applicant requested changes to delete Conditions 6(c) and 6(d) from the CoC pursuant to the requirements of Title 10 of the *Code of Federal Regulations* (10 CFR) 71.95 to the U.S. Nuclear Regulatory Commission (NRC). On September 24, 2018, the NRC issued a CoC No. 9187, Revision No. 11 by deleting Conditions 6. (c) and 6. (d) to allow the future manufacturing of new Model 865 package and/or future weld repairs on the existing Model 865 (ADAMS Accession No. ML18269A063). However, we did not extend the CoC expiration date to additional five years. As a result, enclosed please find an updated CoC with Revision No. 12 that extended the expiration date from March 31, 2019 to March 31, 2024. Further, at the applicant's request, we have also added a Condition to CoC to allow the use of Revision No. 10 until March 31, 2019.

EVALUATION

The applicant requested for the renewal of the CoC in addition to deleting Conditions 6. (c) and 6. (d), however, NRC overlooked on extending the expiration date. The updated CoC with a new expiration date has no effect on our previous safety evaluation issued on September 24, 2018. The extension of the CoC expiration date does not affect the ability of the package to meet the requirements of 10 CFR Part 71. Therefore, the NRC staff found the expiration date change and allowing the use of CoC Revision No. 10 until March 31, 2019, to be acceptable, and issued the updated CoC.

CONDITIONS

The conditions specified in the Certificate of Compliance No. 9187 has been revised as indicated below:

Existing Condition No. 8, "Expiration date: March 31, 2019" was made as Condition No. 9, and was revised as "Expiration date: March 31, 2024."

Condition No. 8 was added as "Revision No. 10 of this certificate may be used until March 31, 2019."

CONCLUSION

Based on the statements and representations in the application, the staff finds that the package continues to meet the requirements of 10 CFR Part 71.

Issued with Certificate of Compliance No. 9187, Revision No. 12,
on 10/9/18