



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

December 21, 2018

Mr. Philip W. Noss
Licensing Manager
Orano Federal Services LLC
505 S. 336th St., Suite 400
Federal Way, WA 98003

SUBJECT: APPLICATION FOR THE MODEL NO. 1105-SD TRANSPORT PACKAGE –
SUPPLEMENTAL INFORMATION NEEDED

Dear Mr. Noss:

By letter dated July 19, 2018 [Agencywide Documents Access and Management System (ADAMS) Package Accession No. ML18215A243], Orano Federal Services LLC (the applicant) submitted an application to the United States (U.S.) Nuclear Regulatory Commission (NRC) for a new certificate of compliance (CoC) corresponding to the Model No. 1105-SD transport package.

The NRC staff performed an acceptance review of your application to determine whether the application contains sufficient technical information in scope and depth to allow the NRC staff to complete a detailed technical review. This letter is to advise you that based on our acceptance review, the application does not contain sufficient technical information. The additional information needed to begin our review is described in the enclosed document containing the request for supplemental information (RSI) and observations. You may or may not choose to respond to the observation at this time. However, an observation may be issued as an RAI later during the review of the application.

In order to start our technical review, this information should be provided within 2 weeks from the date of this letter. Upon receiving the RSI responses, the NRC staff will evaluate the information to determine and inform you whether the supplementary information is sufficient for the NRC staff to proceed with its formal review of the application.

The staff is available for a public meeting if you wish to discuss these issues in more detail prior to deciding on your course of action. Please reference Docket No. 71-9379 and EPID L-2018-NEW-0002 in future correspondence related to this action.

P. Noss

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If you have any questions regarding these matters, please contact me at (301) 415-6999.

Sincerely,

/RA/

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

Docket No. 71-9379
EPID L-2018-NEW-0002

Enclosure:
Request for Supplemental Information

SUBJECT: APPLICATION FOR THE MODEL NO. 1105-SD TRANSPORT PACKAGE –
SUPPLEMENTAL INFORMATION NEEDED, DATE: December 21, 2018

DISTRIBUTION: SFST r/f NMSS r/f

http://fusion.nrc.gov/nmss/team/sfst/sfst-licensing/10_cfr_71/1105-SD/Shared Documents/1105-SD_RSI.doc

ADAMS P8 Accession No.: ML18360A572

OFFICE:	DSFM	DSFM	DSFM	DSFM	DSFM	DSFM	DSFM
NAME:	NGarcía Santos	SFiguroa by email	JPiotter by email	Jireland by email	HLindsay In Sharepoint	TAhn by email	WAllen by email
DATE:	11/9/18	11/30/18	11/28/18	11/16/18	11/19/18	11/19/18	11/16/18
OFFICE:	DSFM	DSFM	DSFM	DSFM	DSFM	DSFM	DSFM
NAME:	DForsyth by email	ELove by email	PSilva by email	CBajwa by email	MRahimi by email	DChung for TTate	JMcKirgan
DATE:	11/28/18	11/16/18	12/19/18	11/20/18	11/30/18	12/20/18	

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Request for Supplemental Information and Observation
Orano Federal Services LLC
Docket No. 71-9379
Model No. 1105-SD Package
Revision 0

REQUEST FOR SUPPLEMENTAL INFORMATION

RSI-1 Provide the following information for the Model No. 1105-SD:

- a. a list of documents that constitute the licensing basis (e.g., structural evaluation and analyses, thermal evaluation, analysis input and output files, etc.) that are available for staff's review. For each document, or group of analysis files, include the following information, as applicable:
 - i. applicable discipline(s),
 - ii. identification number,
 - iii. title (or file name),
 - iv. revision number,
 - v. date last modified,
 - vi. brief description of document's content, and
 - vii. Agencywide Documents Accession and Management System (ADAMS) Accession numbers (Nos.) (for documents submitted as part of the Docket for the Model No. 435-B and applicable to the Model No. 1105-SD).
- b. A description of the quality assurance program (QAP) applicable to the Model No. 1105-SD. Include this information in the safety analysis report.

The applicant submitted the Safety Analysis Report (SAR) as the application of the Model No. 1105-SD, Revision 0. In its submittal, the applicant stated the following:

“The 1105-SD package is to be understood as the commercial version of the NNSA's 435-B package. The 1105-SD package is identical to the 435-B package defined by the 435-B SAR, Revision 4.3, NRC Docket 71-9355. Revision 4.3 of the 435-B SAR corresponds to NRC Certificate of Compliance USA/9355/B(U)-96, Revision 2. The 1105-SD SAR, Revision 0 was created by making only the changes to the 435-B SAR, Revision 4.3, which were necessary to change its identity and to update some references.”

The applicant noted the differences between the Model No. 1105-SD and Model No. 435-B SARs in attachment A to its submittal. The certificate of compliance (CoC), Revision 2, for the Model No. 435-B was approved by the NRC on January 26, 2018 (ADAMS Package Accession No. ML18026A874).

Enclosure

Based on the applicant's submittal, the staff assumed that the documents that would constitute the licensing basis for Revision 0 of the certificate of compliance (CoC) Model No. 1105-SD are the same documents as for Revision 2 of the CoC for the Model No. 435-B, Revision 2. The 10 CFR Part 71 regulation requires that:

1. an application includes a description and evaluation of the package and a description or reference of the applicable QAP, and
2. the applicant establishes design control measures to ensure the adequacy of the design.

The staff is requesting the applicant to provide the information requested in this RSI in order to have reasonable assurance that the future certificate holder has control over the design and quality of the package in order to ensure the adequacy of the design.

This information is needed to determine compliance with the requirements in 10 CFR 71.31(a) and (c) and 71.35(a).

OBSERVATION

Containment Evaluation

OBS-Co-1 Provide the following descriptions in the Model No. 1105-SD safety analysis report (SAR):

- a. standards used to certify personnel that develops and approves written leakage rate testing procedures;
- b. qualifications of personnel that develops and approves written leakage rate testing procedures;
- c. standards used to certify personnel that performs leakage rate testing; and
- d. qualifications of personnel that performs leakage rate testing.

Sections 7.4, 8.1.4, and 8.2.2 of the Model No. 1105-SD application includes a description of leakage rate testing procedures. In these sections, the staff noted that the applicant does not mention the following regarding nondestructive testing (NDT) personnel:

1. if only personnel certified as an ASNT Level III examiner for leakage testing shall develop and approve written leakage rate testing procedures, and;
2. if personnel performing leakage rate testing shall be qualified and certified in accordance with Recommended Practice No. SNT-TC-1A, "Personnel Qualification and Certification in Nondestructive Testing."

Please specify whether the written leakage rate testing procedures are developed, approved, and performed by qualified and certified NDT personnel for leakage testing in accordance with industry standards to ensure that the package

is designed, constructed, and prepared for shipment to comply with the requirements in 10 CFR Part 71.

This information is needed to determine compliance with the requirements in 10 CFR 71.31(c), 71.51(a)(1), and 71.51(a)(2).