



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

February 8, 2019

Mr. Ahmad M. Al-Daouk, Director
Office of Packaging and Transportation
U.S. Department of Energy
National Nuclear Security Administration
P.O. Box 5400
Albuquerque, NM 87185

**SUBJECT: APPLICATION FOR THE MODEL NO. 435-B TRANSPORT PACKAGE,
REVISION 3 – ACCEPTED FOR REVIEW (EPID: L-2018-LLA-0314)**

Dear Mr. Al-Daouk:

By letter dated November 19, 2018 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML19038A112), you submitted an application for revising Certificate of Compliance No. 9355, for the Model No. 435-B transport package. The package design allows transport of beta sources, gamma sources, and very small neutron sources. Among the changes to the design of the Model No. 435-B package, the application proposes adding contents, changing the version of the ANSI N14.5 (from 1997 to 2014), and additional changes to Chapters 7, 8, and 9 of the application. The package is designed with a leaktight containment that can be transported singly by air, ground, or water in non-exclusive use. For the content in disposal canisters, the package is transported in quantities of one or two in a closed conveyance as exclusive use.

The staff performed an acceptance review of your application to determine if the application contained sufficient technical information in scope and depth to allow the staff to complete a detailed technical review. The enclosure includes a staff's observation related to the containment evaluation. The staff included an observation to allow you to start earlier on items containing the potential to be asked at a later date. Responses to observations are not required for staff to begin a detailed technical review. Observations are not the result of a detailed technical review and may be resolved once staff begins a detailed review.

This letter acknowledges acceptance of your application. The application appears to contain the information needed for our technical review. We have established a schedule for the review and estimated that the staff may need approximately 400 hours to complete its review. The schedule allows for the staff to issue the first request for additional information (RAI) in April 2019 and, if a second RAI is not needed, a certificate of compliance in June 2019, based on you responding to the first RAI in early May 2019. In general, no additional changes to the application should be submitted except for changes resulting from your response to an RAI.

Please reference Docket No. 71-9355 in future correspondence related to this action. The staff is available to meet and discuss your proposed responses. If you have any questions regarding this matter, 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. 71-9355
EPID: L-2018-LLA-0314

Enclosure:
Observation Related to the
Proposed Revision to Model No. 435-B.

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 DOCUMENT DATE: February 8, 2019

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ADAMS Accession No.: ML19039A254

OFFICE	DSFM	DSFM	DSFM	DSFM	DSFM
NAME	NGarcía-Santos	SFiguroa	JIreland by email	YDíaz-Sanabria	JMcKirgan
DATE	2/7/19	2/8/19	2/8/19	2/8/19	2/8/19

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NATIONAL NUCLEAR SECURITY ADMINISTRATION

DOCKET NO. 71-9355

OBSERVATIONS

RELATED TO THE PROPOSED REVISION TO MODEL NO. 435-B

Containment Evaluation

OBS-Co-1 Provide the following descriptions in the Model No. 435-B safety analysis report:

- 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. 435-B application include 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 Title 10 of the *Code of Federal Regulations* (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).