

March 15, 2019

Mr. Dominique Sanchette
Chief Operating Officer
Robatel Technologies
5115 Bernard Drive
Suite 304
Roanoke, VA 24018

SUBJECT: APPLICATION FOR AMENDMENT TO CERTIFICATE OF COMPLIANCE FOR
THE MODEL NO. RT-100 PACKAGE – SUPPLEMENTAL INFORMATION
NEEDED

Dear Mr. Sanchette:

By letter dated January 4, 2019, (Agencywide Documents Access and Management System (ADAMS) Accession No. ML19028A307) Robatel Technologies, LLC requested renewal of Certificate of Compliance No. 9365. In addition, Robatel Technologies, LLC made changes to the Operations and Maintenance sections of the safety analysis report as well as submitted an updated Quality Assurance Plan. The U.S. Nuclear Regulatory Commission (NRC) staff performed an acceptance review of the application to determine if the application contains sufficient information to allow the NRC staff to complete the detailed technical review.

This letter is to advise you that, based on our acceptance review, the application does not contain sufficient information. The information needed to continue our review is described in the enclosure to this letter as a request for supplemental information (RSI). In order to schedule our technical review, the RSI response should be provided by March 29, 2019. If the RSI response is not received by this date, the review of this application may be delayed. Please reference Docket No. 71-9365 and EPID L-2019-LLA-0042 in future correspondence related to this action. If you have any questions regarding this matter, please contact me at (301) 415-6877.

Sincerely,

/RA/

Chris Allen, Project Manager
Spent Fuel Licensing Branch
Division of Spent Fuel Management
Office of Nuclear Material Safety
and Safeguards

Docket No. 71-9365
EPID. L-2019-LLA-0042

Enclosure:
Request for Supplemental Information

SUBJECT: APPLICATION FOR AMENDMENT TO CERTIFICATE OF COMPLIANCE FOR THE MODEL NO. RT-100 PACKAGE – SUPPLEMENTAL INFORMATION NEEDED, DOCUMENT DATE: March 15, 2019

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ADAMS No.: ML19074A229

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Request for Supplemental Information
Docket No. 71-9365
Model No. RT-100 Package

By letter dated January 4, 2019 (ADAMS Accession No. ML19028A307), Robatel Technologies, LLC submitted an application to renew Certificate of Compliance No. 9365 for the Model No. RT-100 package. In addition, Robatel Technologies, LLC revised the operating and maintenance procedures and submitted an updated Quality Assurance Plan. This request for supplemental information (RSI) letter identifies information needed by the staff in connection with its review of the application. NUREG-1609, "Standard Review Plan for Transportation Packages for Radioactive Material," was used by the staff in its review of the application.

Each individual RSI describes information needed by the U.S. Nuclear Regulatory Commission (NRC) staff to complete its review of the application to determine whether the applicant has demonstrated compliance with the regulatory requirements.

Quality Assurance Review

1. Clarify the purpose for submitting Revision 2 of the Quality Assurance Plan and provide supporting documents if necessary.

Per the Revisions Table of the Quality Assurance Plan submitted with the Robatel Technologies, LLC renewal application for the Model No. RT-100, Revision 2 became effective September 1, 2017, and the changes made in Revision 2 were clerical in nature. Because a revised Quality Assurance Plan is not required to be submitted in accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) 71.38 for a renewal application, and because the renewal application transmittal letter was silent as to the purpose for submitting the Quality Assurance Plan, NRC staff needs clarification as to the purpose for submitting the revised Quality Assurance Plan. If the purpose of submitting the revised Quality Assurance Plan is to satisfy 10 CFR 71.106(b), Robatel Technologies, LLC should submit a letter similar to that submitted by Alpha-Omega Services on June 30, 2017 (ADAMS Accession No. ML17186A205) and reference this letter requesting supplemental information in its response. Otherwise, since Revision 2 of the Quality Assurance Plan does not identify the specific changes made, Robatel Technologies, LLC should submit Revision 1 of the Quality Assurance Plan to allow NRC staff to ensure the changes satisfy the applicable requirements of 10 CFR Subpart H.

This information is necessary to satisfy the requirements in 10 CFR 71.106.