

May 23, 2019

Director, Division of Spent Fuel Management
Office of Nuclear Materials Safety & Safeguards
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Attn: Document Control Desk

Subject: Request for Renewal of Certificate of Compliance No. 9310

References: 1) CoC USA/9310/B(U)-96, Revision 6, 71-9310
2) MDS Nordion application dated May 27, 2003
Supplements dated [Nordion]:
2004 – April 16, July 16, July 21, July 23
2009 – March 31
3) Supplements dated [Best Theratronics Ltd.]:
2009 – February 27, March 31, May 29
2011 – October 21
2012 – February 15, March 9
2014 – March 5
2015 – June 8

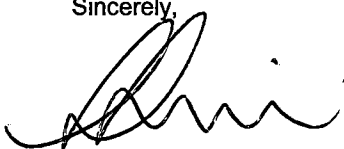
Pursuant to 10 CFR 71.38, Best Theratronics would like to request a renewal to the Certificate of Compliance No. 93.10, which will expire June 30, 2019. All information supporting this renewal is enclosed, with an Affidavit (Enclosure 1) requesting to withhold proprietary information from public disclosure.

Prior to 2009, the original application and supplemental information was provided to the USNRC by Nordion, the previous owner of Best Theratronics Ltd. operations. All information provided during that time to the USNRC has been incorporated into the current version of the Safety Analysis Reports (Enclosures 2 & 3). A summary of changes regarding the F-431 Transport Package Safety Analysis Report is provided (Enclosure 4). Supplementary information provided by Best Theratronics since 2009 was provided in a supplementary document submitted to the USNRC on March 9, 2012 (IN/TR 6087 F431 (B), March 9, 2012 - Supplementary Safety Analysis Report for the F431 Transport Package).

Issue of the new certificate is requested by June 17, 2019 to enable Best Theratronics to obtain an endorsement certificated from the US DOT before expiry of the current certificate.

Thank you for your consideration on this matter. If you have any further questions please contact me at the telephone number or email address provided below.

Sincerely,



Mojgan Soleimani
Director of Quality & Regulatory Affairs, RSO
Phone: 613-591-2100 x2766

Enclosures:

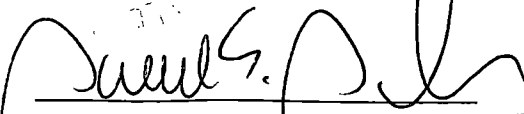
1. Affidavit
2. IN/TR 1913 F-431 (C), May 9, 2019 – F-431 Transport Package Safety Analysis Report – Proprietary Information
3. IN/TR 1913 F-431 (C), May 9, 2019 – F-431 Transport Package Safety Analysis Report – Non-proprietary Information
4. SAR IN/TR 1913 F-431, Issue 2 Update to Issue 3 Under DC 31445

Affidavit in Support of Withholding Information from Public Disclosure Request

I, *Victor Moga*, the undersigned, being duly sworn, hereby make the following statements in conformance with the provisions of 10 CFR 2.390:

1. I am over the age of 18 and am a resident of Ottawa, Ontario Canada. I have personal knowledge of the facts herein and I suffer no legal disabilities.
2. I am the *Manager of Technical Services* for Best Theratronics Ltd. and in this role I am authorized to review the information provided and make these statements.
3. Best Theratronics is providing the USNRC documents in support of a Request for Renewal of USNRC Certificate of Compliance USA/9310/B(U)-96 (Certificate No. 9310, expiring June 30, 2019) and the listed sections, as per attachment, contain information that should be withheld from public disclosure.
4. Best Theratronics Ltd. is the owner of these documents.
5. The basis for this withholding request is that the information contained within the documents is proprietary and commercial confidential. The documents provide in-depth manufacturing and servicing information pertaining to products sold by Best Theratronics. Additionally, document IDs denoted with an asterisk are considered security related information, based on content revealing access to source drawers and detailed drawings.
6. These documents are held in confidence by Best Theratronics Ltd. and has been transmitted to and received by the United States Nuclear Regulatory Commission in confidence.
7. Document contents are not available through public means. Documents are only provided to Best Theratronics' subcontracts and regulators on an as-needed basis.
8. Release of the documents to the public could result in commercial harm to Best Theratronics for the following reasons:
 - a. Best Theratronics has spent considerable funding on developing the products and servicing procedures,
 - b. Public release of the information would provide competitors inside knowledge to Best Theratronics' products and servicing procedures, and
 - c. Best Theratronics currently holds the majority market share within this specific product area and could lose that competitive advantage if the information contained within the documents is publicly available.
9. The information contained in this affidavit is to the best of my knowledge true and correct.

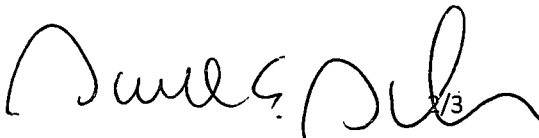
Sworn before me this 23rd day of May, 2019 in the City of Ottawa, Ontario, Canada.


per:
Samuel Edgar Schwisberg
Notary Public


Victor Moga
Manager of Technical Services
Best Theratronics Ltd.

**IN/TR 1913 F431 rev C - Information to be Withheld
From Public Disclosure**

- Pg 1 Signatures blacked out
- Pg 3 Appendix 2.10.5 title blacked out
Section 3.3.2 title blacked out
Appendix 3.7.3 title blacked out
- Pg 5/6 Information in Section 1.2.1 related to the detailed construction of the overpack, including the use of polyurethane foam blacked out
- Pg 7 Information in section 1.2.2 related to the detailed construction of the overpack blacked out
- Pg 8 Figure 1.1 Drawing detailing the construction of the container and contents blacked out
- Pg 9 Figure 1.2 Drawing detailing the construction of the container and contents
- Pg 10 Spec sheet referenced in Appendix 1.3.1 has been removed
- Pg 11 Engineering drawing referenced in Appendix 1.3.2 has been removed
- Pg 12 Various areas in section 2.1.1 detailing the structural components have been blacked out
- Pg 14 Most of the information in sections 2.1.2.2.1 and 2.1.2.2.2 related to Brittle Fracture and Fatigue blacked out
- Pg 15 Section 2.3, including Table 2.1, Info related to material components used in construction of container blacked out
- Pg 16 Figure 2.1 blacked out
- Pg 17 Section 2.4.1 blacked out
- Pg 18 In Section 2.4.2, number and type of fasteners has been blacked out
- Pg 19 In section 2.5.1, info related to the yield stress of the stainless steel and safety factor blacked out
- Pg 23 Info in sections 2.6.4.2 and 2.6.4.3 blacked out
- Pg 25 Table 2.3, the number and type of fasteners has been blacked out
- Pg 26 Info in section 2.7.1.4 regarding foam crush blacked out
- Pg 27 Section 2.7.1.5, info regarding g's and deceleration blacked out
- Pg 28 Section 2.7.2 info related to tearing of the outer skin and the polyurethane foam blacked out
Section 2.7.3 info related to the foam, foam compression, and its ability to provide thermal protection blacked out
- Pg 29 Section 2.7.4 justification number 1. Blacked out
- Pg 32 Section 2.10, Appendix 2.10.5 title blacked out
- Pg 33 Reference number [7] blacked out
- Pg 35 Section 3.1, the packages components have been blacked out.
Section 3.2 specific stress values have been blacked out
- Pg 36 The type and yield strength of the bolts has been blacked out
- Pg 38 Section 3.3 the yield strength of the 304L stainless steel blacked out
- Pg 39 Section 5 has yield strength info blacked out
- Pg 41 In the document IN/TR 1691 GC3000 (1) referenced in Appendix 2.10.4, the following pages have been blacked out:
Figure 1, Figure 2, Figures 6 – 17
All pictures in Appendix E blacked out
Appendix F, pages 1 and 2 of 3 page engineering drawing removed
- Pg 42 Appendix 2.10.5 Title blacked out, and entire Appendix removed
- Pg 44 In section 3.2 info regarding Stainless steel and its shear strength blacked out
- Pg 45 In section 3.2.1 info regarding welds and stresses blacked out
In section 3.2.2 info regarding shear stress blacked out
- Pg 46 Info in sections 3.3 and 3.4 blacked out
- Pg 47 Info in Sections 3.5.1, 3.5.2, and 3.5.3 blacked out
- Pg 48 In section 3.6 info blacked out
- Pg 49 Table A2.10.7-1 blacked out, and two components in Figure A2.10.7-1 blacked out
- Pg 50 Figure A2.10.7-2 blacked out
- Pg 51 Section 3.1.1 blacked out
- Pg 53 Some specific info in Table 3.1 blacked out
- Pg 54 Section 3.3.2 and part of Table 3.2 blacked out
- Pg 55 Last 2 paragraphs of section 3.4.1.2 blacked out
- Pg 56 Section 3.4.6, Temperature sensitive materials blacked out
Section 3.5.1.1, last two paragraphs blacked out
Section 3.5.1.2, last two paragraphs blacked out


2/3

Pg 57 Section 3.5.2 entire section blacked out

Pg 58 Table 3.3, entire table blacked out, and detail about thermal conductivity of crushed foam blacked out

Section 3.5.4, second paragraph blacked out

Section 3.5.5, reference to ductility of SS type 304L blacked out

Pg 61 Reference [3] in section 3.6 blacked out

Appendix 3.7.3 title in section 3.7 blacked out

Pg 64 Appendix 3.7.3 title blacked out and entire Appendix removed

Pgs 82/83 C-1001 Special Form Certificate blacked out

Pgs 86/87 C-3001 Special Form Certificate blacked out

Pgs 95/96 C-1001 Sealed Source Test Certificate blacked out

Pgs 97/98 C-3001 Sealed Source Test Certificate blacked out

Pg 111 Section 7.3, number and type of fasteners blacked out

Pg 113 Figure 7.1 blacked out

Pg 114 In section 7.4.2, number and type of fasteners blacked out

In section 7.5, the type and torque value of fasteners blacked out

Pg 116 Entire paragraph of section 8.1.4.3 blacked out

In section 8.1.6, the last sentence regarding polyurethane foam blacked out

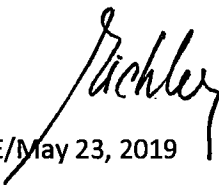
Pg 121/122 The contents of both Appendices 9.3.2 and 9.3.3 have been removed

Paul G. Smith

SAR IN/TR 1913 F-431, Issue 2 update to Issue C under DC 31445

The following is a summary of changes:

- a) Changed name from MDS Nordion to Best Theratronics - Front page, Chapter 9, page 10 Appendix 1.3.1 (replaced Issue 2 with Best Theratronics Issue C) and others as applicable.
- b) Added accompanying plywood bracing for units with hardening kit - Page 11 Appendix 1.3.2 F431 Information Drawing F643101-001 changed page 1 of 2 from E to K and page 2 of 2 from B to F
- c) Added text for addition of the C3100 source – pages 30 Special Form and Para 2.8.1, page 31 Table 2-4 and page 32 Para2.8.7. Page 72 Chapter 4 added Figure 4.9. Page 73 Tables 4.1 and 4.2 text added. Page 76 Para 4.5 added Appendix 4.4.13 Special Form Certificate CDN/035/S-96 (Rev. 0).
- d) Replaced MDS QA documents with Best Theratronics QA documents Appendix 9.3.1, 9.3.2 and 9.3.3
- e) Page 33 - added to the list of references International Standard ISO 2919:2012 (E).


VE/May 23, 2019