

## **SAFETY EVALUATION REPORT**

**Docket No. 71-9365**  
**Model No. RT-100**  
**Certificate of Compliance No. 9365**  
**Revision No. 2**

### **SUMMARY**

By letter dated January 4, 2019, as supplemented on March 22, 2019, (Agencywide Documents Access and Management System (ADAMS) Accession Nos. ML19028A307 and ML19098A844 respectively), Robatel Technologies, LLC requested renewal of certificate of compliance (CoC) for the Model No. RT-100 package. The applicant also updated the safety analysis report to reference the 2014 version of the American National Standards Institute (ANSI) N14.5 as well as modified the operating and maintenance instructions. NRC staff reviewed the application using the guidance in NUREG-1609, "Standard Review Plan for Transportation Packages for Radioactive Material." Based on the statements and representations in the application, as supplemented, the staff agrees that these changes do not affect the ability of the package to meet the requirements of 10 CFR Part 71. The certificate has been renewed for a five-year term.

### **1.0 GENERAL INFORMATION**

The NRC staff reviewed the proposed change and determined that it did not impact the staff's previous SER findings regarding the description of the package. Therefore, the NRC staff finds that a new evaluation is not needed.

### **2.0 STRUCTURAL**

The NRC staff reviewed the proposed change and determined that it did not impact the staff's previous SER findings regarding the structural design of the package. Therefore, the NRC staff finds that a new evaluation is not needed.

### **3.0 THERMAL EVALUATION**

The NRC staff reviewed the proposed change and determined that it did not impact the staff's previous SER findings regarding the thermal design of the package. Therefore, the NRC staff finds that a new evaluation is not needed.

### **4.0 CONTAINMENT EVALUATION**

The update of ANSI N14.5(1997) to ANSI N14.5 (2014) is considered a routine change to the specific consensus standard used as a means to demonstrate compliance with the regulations. The NRC staff finds this change to be adequate.

## 5.0 SHIELDING EVALUATION

The NRC staff reviewed the proposed change and determined that it did not impact the staff's previous SER findings regarding the shielding design of the package. Therefore, the NRC staff finds that a new evaluation is not needed.

## 6.0 CRITICALITY EVALUATION

The package is not authorized to transport fissile material subject to the requirements of 10 CFR Part 71, Sections 71.55 or 71.59. Therefore, the NRC staff did not review the changes nor additional clarification language added by the applicant with regard to criticality safety.

## 7.0 PACKAGE OPERATIONS

The NRC staff reviewed the proposed clarification language for various sections of Chapter 7, Operations. The NRC staff concluded that neither the changes nor additional clarification language added by the applicant alter previous safety determinations because merely adding clarifying language with additional detail regarding package preparation does not result in an identifiable reduction of safety.

## 8.0 ACCEPTANCE TESTS AND MAINTENANCE PROGRAM REVIEW

The NRC staff reviewed the proposed clarification language for various sections of Chapter 8, Maintenance and Acceptance Test. The NRC staff concluded that neither the changes nor additional clarification language added by the applicant alter previous safety determinations because they only provided additional clarifying detail with respect to activities demonstrating regulatory compliance and did not result in an identifiable reduction of safety in the leak testing outcomes.

The applicant provided the following note in the Chapter 8 of the SAR:

*Note Regarding Test Personnel Qualifications*

*Detailed procedures following the instructions below are to be approved by personnel certified in ASNT NDT or COFREND Level III leak testing. The use of COFREND certified personnel instead of ASNT certified personnel is accepted for leakage testing for the RT-100, based on the equivalence note 102885 EQN 001 Rev. C [Ref. 12].*

As communicated to the applicant on May 30, 2019 (ADAMS Accession No. ML19161A117), the NRC is not drawing any conclusions on the equivalency of the ASNT NDT or COFREND Level III leak testing qualifications as part of this licensing safety review. The NRC staff determined that ASNT and COFREND are the appropriate entities to provide an equivalence determination between their consensus standards.

## CONDITIONS

The CoC includes the following condition(s) of approval:

Condition No. 11 was revised to authorize the use of Revision 1 of the certificate of compliance until July 31, 2020.

Condition No. 12 was revised to reflect the new expiration date of July 31, 2024.

The references section has been updated to include this request.

Minor editorial corrections were made.

## **CONCLUSIONS**

Based on the statements and representations contained in the application, as supplemented, and the conditions listed above, the staff concludes that the design has been adequately described and evaluated, and the Model No. RT-100 package meets the requirements of 10 CFR Part 71.

Issued with Certificate of Compliance No. 9365, Revision No. 2  
on July 29, 2019.