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March 06, 2020

Attn: Document Control Desk  
Director, Division of Fuel Management,  
Office of Nuclear Material Safety and Safeguards,  
U.S. Nuclear Regulatory Commission,  
Washington, DC 20555-0001

**Subject:** Docket 71-9036 : Application for Letter of Authorization

Reference 1: Photo “Nordion” Nameplate

Reference 2: ISO-RAD Nameplate Drawing

Reference 3: Previously submitted 10 CFR 71.95 Notification Investigation Report Dated February 23, 2020 (Not Attached)

Reference 4: Redacted 10 CFR 71.95 Notification Investigation Report Dated February 23, 2020. (Attached)

Document Control Desk:

ISOFLEX Radioactive LLC (ISO-RAD) is a Louisiana Department for Environmental Quality (LDEQ) licensee. As discussed with Mr. Bernard White, Senior Project Manager, Division of Fuel Management, ISO-RAD is submitting the following application for a Letter of Authorization for a variance to the nameplate for the USA/9036/B(U)-96 Type B(U) package Docket Number 71-9036.

**Summary:**

An initial 10 CFR Part 71.95 Notification was submitted (ID# 29788) to the USNRC on February 14, 2020. Subsequently, a detailed investigation was submitted (ID# 29883) to the USNRC on February 24, 2020 explaining the circumstances surrounding an export shipment that is halted at JFK airport. The investigation revealed a variance in the nameplate attached to the 71-9036 transport packages being used. ISO-RAD’s fleet of transport containers were voluntarily removed from service pending the investigation and resolution of this matter. ISO-RAD is suffering economic hardship as a result of not being able to transport sources using the 71-9036 transport containers.

**Conditions:**

The ISO-RAD application is requesting the following conditions for a nameplate variance:

- 1) Allow the transportation of the two 71-9036 containers S/N 146 and S/N 153 with Nordion nameplates (see attached photo) from JFK to ISO-RAD’s facility in St. Rose, LA. The above containers are in a secure dangerous goods cage at JFK airport and the airline would like to have these out of their warehouse as soon as practicable. The transportation of the

containers is to be accomplished immediately after issuance of the Letter of Authorization and no later than four (4) weeks of issuance of the Letter of Authorization.

- 2) Allow the continued use of the “Nordion” nameplate on the drum for a maximum period of four (4) months (see attached photo) from the issuance of the Letter of Authorization. This will enable ISO-RAD to have the proposed new nameplates manufactured and installed. ISO-RAD will notify the USNRC once this task is completed.
- 3) Allow the use of an ISOFLEX Radioactive LLC nameplate until the current expiration date of the USA/9036/B(U)-96 certificate on October 31, 2021. The proposed ISOFLEX Radioactive LLC nameplate drawing is attached.

**Conclusion:**

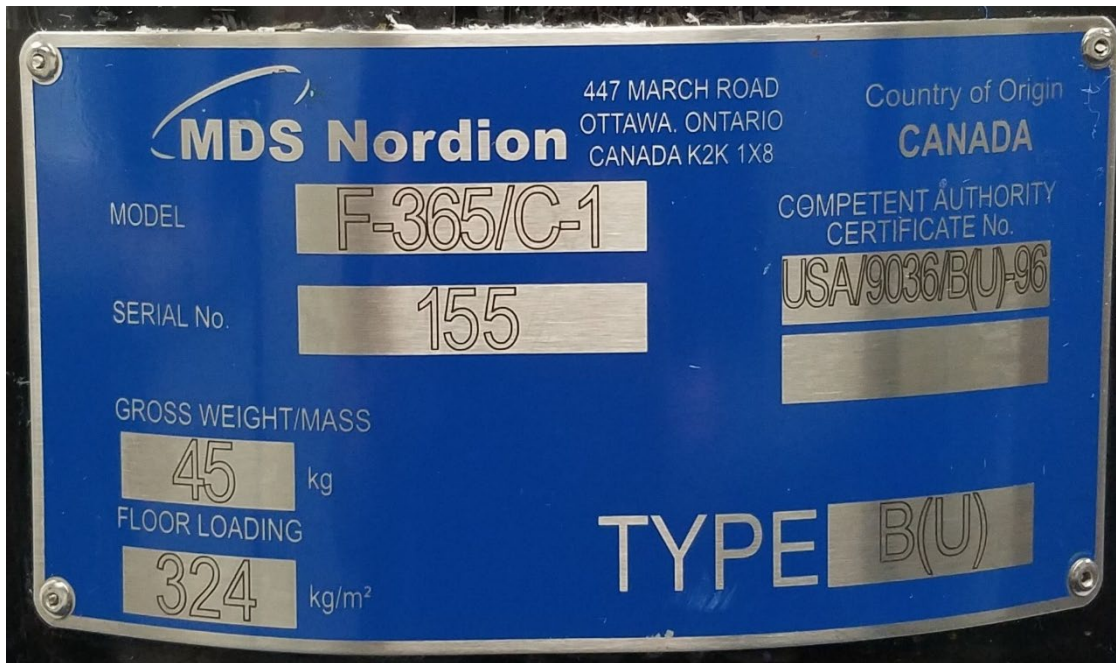
The subject 71-9036 packages in ISO-RAD’s possession fully comply with current USA/9036/B(U)-96 certificate of compliance in all aspects of safety, integrity, and security. The current affixed nameplate has the required regulatory information as referenced in 10 CFR 71.85. The 71-9036 transport containers in ISO-RAD’s possession are inspected according to the conditions stated in the Certificate of Compliance items 7 and 8 with reference to the 71-9036 SAR Sections 7 and 8. The structural elements of the package are identical, with the exception of the nameplates. The request for a nameplate variance does not affect or degrade the safety, security, or integrity of the Type B package.

Thank you and ISO-RAD is ready to respond to any additional requests for information concerning this matter.

ISOFLEX Radioactive LLC



Kevin J. Schehr, DBA  
President & RSO



Current Nameplate on the drums in ISO-RAD's possession

203.20mm <sup>+1.50</sup><sub>-1.50</sub>  
[8.000in <sup>+0.059</sup><sub>-.059</sub>]

RQ, UN2916,  
Radioactive Material,  
Type B(U) Package  
USA/9036/B(U)-96 Type B(U)

127mm <sup>+1.50</sup><sub>-1.50</sub>  
[5.000in <sup>+0.059</sup><sub>-.059</sub>]

88.90mm <sup>+5</sup><sub>-5</sub>  
[3.500in <sup>+0.197</sup><sub>-.197</sub>]

Model: C-1 S/N: XXX Made in USA

Maximum Gross Weight: 100 lbs. (45.35 kg)

Package Sole Responsibility of

ISOFLEX RADIOACTIVE LLC  
St. Rose, LA USA +1-504-305-4320

4 x Ø 3.30mm [.130in]  
THRU

175.85mm <sup>+5</sup><sub>-5</sub>  
[6.923in <sup>+0.197</sup><sub>-.197</sub>]

203.20mm <sup>+1.50</sup><sub>-1.50</sub>  
[8.000in <sup>+0.059</sup><sub>-.059</sub>]

1mm  
[.039in]



REVISIONS

| REV. | DESCRIPTION     | DATE       | APPROVED      |
|------|-----------------|------------|---------------|
| 0    | INITIAL RELEASE | 03/06/2020 | Kevin J. John |

NOTE 1: Large lettering is 12.01 mm (0.476") high and etched, engraved or laser engraved  
0.25 mm (0.0098") deep.

NOTE 2: Medium lettering is 7.14 mm (0.281") high and etched, engraved or laser engraved  
0.25 mm (0.0098") deep.

NOTE 3: Small lettering is 6.15 mm (0.242") high and etched, engraved, or laser engraved  
0.25 mm (0.0098") deep.

NOTE 4: All lettering is filled with black paint, black powder coat, or similar permanent black marking.

NOTE 5: Background is either polished stainless steel, yellow paint, or yellow powder coat.

NOTE 6: Rivet hole pattern may vary

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**ISORAD™**

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DESCRIPTION:

Model C-1 Nameplate  
ISOFLEX Radiatactive LLC

|   |                             |               |
|---|-----------------------------|---------------|
| DRAWN   | KJS                         | 03/06/2020    |
| UNLESS OTHERWISE SPECIFIED<br>DIMENSIONS ARE IN MILLIMETERS |                             |               |
| ANGLES  | .XX ± .10                   | .XXX ± .100   |
|   |                             | .XXXX ± .0500 |
| MATERIAL:   | AISI 316<br>Stainless Steel |               |
| SIZE  | DWG. NO.                    | REV           |
| <b>B</b>  | <b>200306-100</b>           | <b>0</b>      |

SCALE: 1:1 WEIGHT: g SHEET 1 OF 2