

February 7, 2011

MEMORANDUM TO: Michael Waters, Acting Deputy Director
Division of Spent Fuel Storage and Transportation, NMSS

FROM: Pierre Saverot, Project Manager */RA/*
Licensing Branch
Division of Spent Fuel Storage and Transportation, NMSS

SUBJECT: SUMMARY OF JANUARY 4, 2012, MEETING WITH ROBATEL
TECHNOLOGIES, LLC

Background

Robatel Technologies, LLC (Robatel) will soon be requesting NRC approval for a new package design, the Model No. RT-100 package. This meeting, the second in a series of pre-application meetings that began in November 2011, was requested to discuss Robatel's Quality Assurance Program (QAP).

Discussion

Robatel advised staff that the application for the Model No. RT-100 package, designed for transport of spent resins and filters, will be submitted in the Spring of 2012. Robatel will be hiring a QA manager, most of the engineering work will be done in the U.S. through subcontractors, while package fabrication will be performed in France under Robatel supervision, including the performance of audits of the fabricator's QAP.

Staff advised Robatel of its expectations regarding their QAP submittal. An applicant can provide a QAP description addressing all 18 criteria specified in Part 71. Such a description is considered to be an "umbrella" document, giving the applicant more flexibility and allowing changes to be made. A QAP description represents a commitment from the applicant, i.e., it is not an enforcement document. Staff also underlined the fact that no lateral changes are accepted in a QAP, once approved.

Staff advised Robatel of a pending visit, about 1 to 2 months after submittal of a QAP description, to verify that everything that is described in the program is in place and matched by facts "on the ground." Once the package application is submitted, staff will perform a full programmatic inspection later in 2012, which will be followed in 2013 by a package fabrication inspection.

Staff also advised Robatel of changes to be made to their draft QAP before submittal: i.e., (i) organization chart, statement of policy; (ii) statement regarding Type A packages on page 5; (iii) clearing up the apparent contradiction between Section 3.6, "Design Verification" and Section 3.8, "Design Responsibilities" to address issues of independence; (iv) the applicability of Part 21 to Robatel as a U.S. entity for components bought in the U.S.; (v) the fact that a corrective action program shall discriminate between conditions adverse to quality and significant conditions adverse to quality (SCAQ) which do require a root cause analysis.

Robatel agreed with staff suggestions and said that a QAP description will be submitted mid-January. Robatel also agreed with staff for a minimum of two additional pre-application meetings to present detailed information and results from the package technical evaluations, particularly regarding shielding and structural topics. The staff did not make any regulatory commitments at the meeting.

Docket No. 71-9365
TAC No. L24587

Enclosure 1: Meeting Attendees

M. Waters

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Enclosure 1: Meeting Attendees

Distribution: R. Temps, J. Pearson, M. Waters, M. Sampson, M. Rahimi, D. Pstrak

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**Meeting Between ROBATEL and the
Nuclear Regulatory Commission
January 4, 2012
Meeting Attendees**

NRC/NMSS/SFST

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Enclosure 1