

71-9290
71-9310

July 16, 2004

Mr. John D. Monninger
Section Chief
Licensing Section
Spent Fuel Project Office
Office of Nuclear Material Safety and Safeguards
Mail Stop: 13 D13
United States Nuclear Regulatory Commission
One White Flint North
11555 Rockville Pike
Rockville, MD
20852-2738

RE: Amendment to the Certificate of Compliance USA/9290/B(U)-85 for the F-430 and USA/9310/B(U)-96 for the F-431 Transport Package

Dear Mr. Monninger:

As per my discussion with Ms. Barto on July 14, 2004, MDS Nordion is requesting an amendment to the following two Certificates of Compliance USA/9290/B(U)-85 and USA/9310/B(U)-96 to allow the increase in length to the four bolts used to secure the tiedown collars on the model F-430 and F-431 transport packages.

The increase in bolt length is required to ensure that the proper thread engagement is maintained when the tiedown collar is assembled. Please find below a description of the changes.

Attached are seven proprietary copies of the revised drawings F643001-001 and F643101-001. I have attached an affidavit to support MDS Nordion's request to withhold the above-mentioned drawings from public disclosure. These drawings are specific to the design and fabrication of the F-430 and F-431 transport packages and would enable a third party to manufacture similar transport packages.

F-430

The current configuration approved by the Certificate of Compliance USA/9290/B(U)-85 is described on engineering drawing F643001-001(J). The requested change is to item 19. The current drawing indicates:

SCREW CAP HVY HEX HEAD 0.88-9 UNC 2A x3.5 LG ASTM A193 GRB8 CL2
STRAIN HARDENED

umss01

The revised item 19 on the drawing will indicate:

BOLT HVY HEX HEAD 0.88-9 UNC 2A x 4 LG (MIN) ASTM A193 GRB8 CL2
STRAIN HARDENED

F431

The current configuration approved by the Certificate of Compliance USA/9310/B(U)-96 is described on engineering drawing F643101-001(E). The requested change is to item 19. The current drawing indicates:

BOLT HVY HEX HEAD 0.88-9 UNC 2A x3.5 LG ASTM A193 GRB8 CL2 STRAIN
HARDENED

The revised specification is:

BOLT HVY HEX HEAD 0.88-9 UNC 2A x 4 LG (MIN) ASTM A193 GRB8 CL2
STRAIN HARDENED

MDS Nordion has a planned shipment of the F-431, Certificate of Compliance USA/9310/B(U)-96, for July 31, as a result we are requesting an expedited review of this amendment to allow the shipment to occur.

If you have any questions or require further information please feel free to contact me by telephone at (613) 592-3400 extension 2421 or by email at mcharette@mds.nordion.com.

Yours sincerely



Marc-André Charette
International Transport & Nuclear Initiatives
Manager, Regulatory Affairs

Attached: F643001-001 sheet 1 Issue K sheet 2 Issue D, F643101-001 sheet 1 Issue F
sheet 2 Issue B

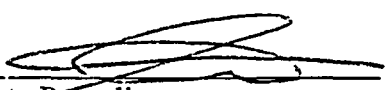
Copy to: Rick Boyle, US Department of Transportation
Mike Krzaniak, Blair Menna, Luc Desgagne, MDS Nordion

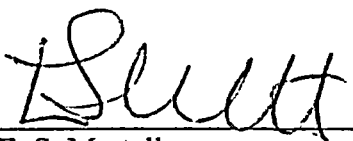
AFFIDAVIT

I, E. S. Martell, in my capacity as Vice President, Quality & Regulatory Affairs, having been duly authorized to apply for withholding from disclosure of proprietary information by and on behalf of MDS Nordion, a division of MDS (Canada) Inc., ("MDS Nordion"), do depose and say:

1. I, E.S. Martell, am the Vice President, Quality & Regulatory Affairs, of MDS Nordion.
2. The information contained in the MDS Nordion's document No. F643001-001 sheet 1 Issue K and sheet 2 Issue D, "F-430/GC-40 Transportation Package Information Drawing" and F643101-001 sheet 1 Issue F and sheet 2 Issue B, "F-431/GC-1000/3000 Transportation Package Information Drawing," are the property of MDS Nordion. These documents contain proprietary information related to the design of the F-430 and F-431 transport packages.
3. MDS Nordion, has expended extensive funds and manpower in developing the aforementioned document and any release for disclosure of such information to third parties would enable and assist third parties to use the information to fabricate and register similar transport packages without incurring any development costs. This could compromise MDS Nordion's, ability to compete in the marketplace. Therefore, MDS Nordion, submits that the following MDS Nordion document No. . F643001-001 sheet 1 Issue K and sheet 2 Issue D, "F-430/GC-40 Transportation Package Information Drawing" and F643101-001 sheet 1 Issue F and sheet 2 Issue B, "F-431/GC-1000/3000 Transportation Package Information Drawing," should be withheld from public disclosure.
4. The information has been held in confidence by MDS Nordion, and any disclosure thereof for developmental purposes, has been accompanied by a confidentiality agreement protecting the trade secrets contained herein.
5. The information has been transmitted to and received by the Nuclear Regulatory Commission in the United States in confidence.
6. This information is not available in public sources.
7. The information contained in this affidavit is to the best of my knowledge true and correct.

Sworn before me this 16th day of July, 2004 in the City of Ottawa, Ontario, Canada.


Renato Pontello
Notary Public in and
for the Province of Ontario, Canada


per: E. S. Martell
V.P., Quality and Regulatory Affairs
MDS Nordion, a division of MDS (Canada) Inc.