



ATTN: Director, Spent Fuel Project Office
Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

March 28, 2005

Subject: Timely Renewal for Certificate of Compliance
SPEC-150 Transport Package, Certificate Number USA/9263/B(U)-85.

Dear Sirs:

Source Production and Equipment Co., Inc. hereby submits a request for timely renewal of the Certificate of Compliance for the SPEC-150 transport package. We are also submitting an amendment application to provide the information needed to demonstrate that the SPEC-150 meets "-96" requirements. The information consists of:

1. Details of SPEC's Quality Assurance Program.
2. Analysis of 10 CFR Part 71 changes per 01/26/2004 Final Rule.
3. Analysis of how changes affect the SPEC-150.

The SPEC-150 is currently certified by the NRC as meeting Type B(U)-85 requirements. There are no changes to the Type B(U)-96 requirements within the 10 CFR or 49 CFR rules that are applicable to the SPEC-150 package. In order to meet -96 requirements, no changes are required and no changes have been made to the SPEC-150 transport package design or the consolidated USNRC Type B(U)-85 Certificate of Compliance application previously submitted in support of our current Certificate of Competent Authority. Therefore, the SPEC-150 qualifies as a Type B(U)-96 transport package. The SPEC-150 has received a "-96" Certificate of Competent Authority from the DOT.

Please do not hesitate to contact me if you need any additional information.

Sincerely,

Kelley Richardt
Regulatory and Quality Manager

Enclosure: Amendment Application for SPEC-150 -96 Certificate of Competent Authority

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Source Production & Equipment Co., Inc.

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SOURCE PRODUCTION AND EQUIPMENT CO., INC.
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AMENDMENT APPLICATION
for
"-96" IAEA CERTIFICATE OF COMPETENT AUTHORITY
USA/9263/B(U)-85

Model SPEC-150
Type B(U) - 85 Radioactive Material Package
March 28, 2005

1.0 Requirement for a Quality Assurance Program

SPEC continues to maintain a Quality Assurance Program based on the requirements of 10 CFR Part 71 and approved by the Nuclear Regulatory Commission, approval number 0102. It is a systematic program of controls and inspections applicable to all SPEC personnel to ensure that the standard of safety and quality prescribed by regulation and internal requirements are met. The Program is applicable to the design, manufacture, testing, documentation, use, maintenance and inspection of all special form radioactive material and packages and for transport and in-transit storage operations to ensure compliance with the relevant provisions of national and international regulations. Certification that the specifications of the design of the SPEC-150 have been fully implemented is available. SPEC is prepared to provide for inspection of our facilities during manufacture and use to demonstrate that:

- (a) The manufacturing methods and materials used are in accordance with design specifications.
- (b) All packagings are periodically inspected and, as necessary, repaired and maintained in good condition so that they continue to comply with all relevant requirements and specifications, even after repeated use.

2.0 Type B(U) Package Requirements

The SPEC-150 continues to meet the requirements for a Type B(U) package as defined in 10 CFR part 71.

The SPEC-150 is a packaging designed to transport greater than an A_1 quantity of special form radioactive material that, together with its radioactive contents, is designed to retain the integrity of containment and required shielding when subjected to the normal conditions of transport and hypothetical accident test conditions as set forth in 10 CFR part 71.

In Certificate of Compliance USA/9263/B(U)-85, the SPEC-150 was approved for use by the USNRC by meeting the applicable requirements for Type B(U) packages. The only changes to 10 CFR Part 71 that affect approval of transport packages are contained in Subpart E: Package Approval Standards and Subpart F: Package, Special Form, and LSA-III Tests. These changes would not affect approval of the SPEC-150 as a "-96" transport package. The SPEC-150 is designed and approved for the transport of a maximum of 150 curies of iridium 192 as sealed sources providing primary containment and meeting the requirements of special form radioactive material. The SPEC-150 is not designed for the transport of greater than $10^5 A_2$ fissile material, plutonium or irradiated nuclear fuel shipments.

Details of the changes to Subparts E and F are covered in the following sections.

3.0 Details of Changes to 10 CFR Part 71 Subpart E

The sections of the package approval standards, changes and their impact on the approval of the SPEC-150 as a "-96" transport package are as follows:

Subpart E - Package Approval Standards		Impact on SPEC-150
71.41 Demonstration of Compliance	Added provisions for packages containing more than 10^5 A ₂ and packages requiring special package authorization.	Not applicable
71.43 General standards for all packages	No change	None
71.45 Lifting and tie-down standards for all packages	No change	None
71.47 External radiation standards for all packages	No change	None
71.51 Additional requirements for Type B packages	Remove reference to expired requirement	Not applicable
71.53 Fissile material exemptions	Not applicable	Not applicable
71.55 General requirements for fissile material packages	Not applicable	Not applicable
71.59 Standards of arrays of fissile material packages	Not applicable	Not applicable
71.61 Special requirement for irradiated nuclear fuel shipments	Not applicable	Not applicable
71.63 Special requirements for plutonium shipments	Not applicable	Not applicable
71.64 Special requirements for plutonium air shipments	Not applicable	Not applicable
71.65 Additional requirements	No change	None

4.0 Details of Changes to 10 CFR Part 71 Subpart F

The sections of the package testing standards, changes and their impact on the approval of the SPEC-150 as a "-96" transport package are as follows:

Subpart F - Package, Special Form and LSA-III Tests		Impact on SPEC-150
71.71 Normal conditions of transport	No change	None
71.73 Hypothetical accident conditions	Added criteria for fissile material.	None
71.74 Accident conditions for air transport of plutonium	Not applicable	Not applicable
71.75 Qualification of special form radioactive material	Not applicable	Not applicable
71.77 Qualification of LSA-III Material	Not applicable	Not applicable

5.0 Summary:

There are no changes to the Type B(U)-96 requirements within the 10 CFR or 49 CFR rules that are applicable to the SPEC-150 package because it is not designed for the transport of greater than 10^5 A₂ fissile material, plutonium or irradiated nuclear fuel shipments and does not require special package authorization. Therefore, the SPEC-150 qualifies as a Type B(U)-96 transport package.