

56G-16-0003  
GOV-01-55-04  
ACF-16-0074

March 3, 2016

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

References: 1) Docket No. 71-0249, "Quality Assurance Program Approval"  
2) Letter 56G-15-0013, Submittal of Revision 15 to the NFS "Quality Assurance Program for Shipping Packages for Radioactive Material," dated August 19, 2015  
3) E-mail from NRC to NFS, "QA Manual Approval Inquiry," dated February 11, 2016

**Subject: NFS Response to NRC Inquiry Regarding Revision 15 of the NFS QA Program**

Nuclear Fuel Services, Inc. (NFS) submitted in Reference 2 a revision to its Quality Assurance Program for Shipping Packages for Radioactive Material to describe recent changes to organizational and functional responsibilities. As a result of a telephone conversation on February 11, 2016, Mr. Earl Love of your staff requested (Reference 3) clarification of a change made in Section 7.0, "Control of Purchased Material, Equipment, and Services." Attached is our response to Mr. Love's inquiry.

If you or your staff have any questions, require additional information, or wish to discuss this matter further, please contact me, or Mr. Robert C. Dotson, Quality Section Manager, at (423) 735-5527. Please reference our unique document identification number (56G-16-0003) in any correspondence concerning this letter.

Sincerely,

**NUCLEAR FUEL SERVICES, INC.**



Richard J. Freudenberger, Director  
Safety and Safeguards

RPD/pdj

Attachment: NFS Response to NRC Inquiry Regarding Revision 15 of the NFS QA Program

NMS524

Copy:

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**ATTACHMENT**

**NFS Response to NRC Inquiry  
Regarding Revision 15 of the NFS QA Program**

**(1 page to follow)**

**NFS Response to NRC Inquiry  
Regarding Revision 15 of the NFS QA Program**

**NRC Inquiry:**

"Concerning your inquiry over the status of your QA Manual submittal as well as our conversation today, I have one question that needs resolution before I process your request. Section 7.0 states that the prime contractor has the responsibility for procurement, maintenance, and repair of the LR-230 containers. I understand previously it was Westinghouse. I ask that you clarify this statement as it appears to be a departure from commitments to your current program in that you do not identify who that contractor is. Is the work performed as apart of annual maintenance? Will the contractor's work be performed under your program utilizing NFS's procedures? If not, have you audited and approved your contractor for these services? Does the contractor have an NRC approved QA program?"

**NFS Response:**

Item 1: WesDyne is the prime contractor; they issue a subcontract to Westinghouse for certain aspects of the scope of work, including procurement, maintenance, and repair of the LR-230 containers.

Item 2: Westinghouse does perform annual inspections and maintenance on the LR-230 containers. Parts for the containers are procured under their program.

Item 3: The Westinghouse scope of work regarding the LR-230 containers is not performed under our program and does not utilize our procedures. That work is performed under the Westinghouse QA Program. NFS is a registered user of the LR-230 containers which allows us to load and ship them.

Item 4: NFS is a subcontractor to WesDyne, as is Westinghouse. Since Westinghouse is not our subcontractor, we have not audited or approved Westinghouse for these services. However, NFS is on the Approved Suppliers List for WesDyne and Westinghouse.

Item 5: Westinghouse does have an NRC-approved QA Program, Docket No. 71-0708.