QSA GLOBAL

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71-9357

18 May 2016

Mr. Steve Ruffin, Acting Branch Chief
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U.S. Nuclear Regulatory Commission
Office of Nuclear Material Safety and Safeguards
Division of Spent Fuel Management
Mailstop 3WFN-14A44
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Rockville, MD 20852

RE: Amendment Request to USA/9357/B(U)-96 Type B(U) Certificate

Dear Mr. Ruffin:

QSA Global, Inc. is requesting some minor changes to the certificate package drawing to allow increased manufacturing flexibility and to more accurately specify the package. In summary the additional R86000 drawing changes include:

1. On sheet 1, we are requesting a change the material specification for the cover bracket and the nameplate from "Type 302, 303, 304, 304L or 316 Stainless Steel" to "Type 300 Series Stainless Steel". This change provides a wider range of materials to select from without adversely impacting the SENTRY series transport package safety and integrity.

   The cover bracket has no function during transport. It is a convenient holder for the dust cover during radiography. The bracket is not important to the safety or the structural integrity of the package during transport.

   The nameplate provides package safety and identification information during transport. The mechanical and thermal properties of all type 300 series stainless steels will allow the nameplate to continue to provide the information after the hypothetical accident test sequence.

   Also on sheet 1, the word "any" has been omitted from the material specification for the open-end rivets. The word any is implied with the description "Type 300 Series Stainless Steel".

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2. On sheet 2, we are requesting two changes to the large set screws. One change is to revise the screw material specification from "ASME B18.3 Type 302, 302HQ, 303, 304, 304L, 305 or 384 Stn Stl" to "Type 300 Series Stainless Steel". The second change is to include thread locker for optional use on the screws. These changes allow increased manufacturing flexibility without compromising the safety or integrity of the SENTRY series of packages.

   The large set screws block the foam fill holes after filling. They keep foreign material from entering the body and prevent air circulation through the package during the hypothetical accident thermal test. The minimum mechanical properties and chemical composition of sets screws made from type 300 series stainless steel materials will perform the same as the currently approved materials and will not adversely impact the safety or integrity of the SENTRY series of packages under normal and hypothetical accident conditions in accordance to 10 CFR Part 71.

   The presence or absence of thread locker on the sets screws will not adversely impact the safety or integrity of the SENTRY series of packages under normal and hypothetical accident conditions in accordance to 10 CFR Part 71.

3. On sheet 2, we are requesting a change to the weld finish of the shell groove weld symbol to allow machining as well as grinding. A machined weld finish for this weld will not change the weld integrity and will not adversely impact the safety or integrity of the SENTRY series of packages under normal and hypothetical accident conditions in accordance to 10 CFR Part 71.

4. On sheet 2, we are requesting two changes to the 24 set screws installed in the body weldment when the package is shipped in the Basic Configurations. One change is to revise the screw material specification from "ASME B18.3 Type 316L Stn Stl" to "Type 300 Series Stainless Steel". The other change is to include thread locker for optional use on the screws. These changes allow increased manufacturing flexibility without compromising the safety or integrity of the SENTRY series of packages.

   The 24 set screws are installed in the unused rivet nuts to keep foreign material from entering the body and prevent air circulation through the package during the hypothetical accident thermal test. The minimum mechanical properties and chemical composition of sets screws made from type 300 series stainless steel materials will perform the same as the currently approved materials and will not adversely impact the safety or integrity of the SENTRY series of packages under normal and hypothetical accident conditions in accordance to 10 CFR Part 71.

   The presence or absence of thread locker on the sets screws will not adversely impact the safety or integrity of the SENTRY series of packages under normal and hypothetical accident conditions in accordance to 10 CFR Part 71.

5. On sheets 2 and 3, we are requesting a change to the copper shield disc, shield bracket and shield cup to remove the material hardness "Condition H02 or H04" requirement for these items. This change allows increased manufacturing flexibility without compromising the safety or integrity of the SENTRY series of packages.

   These components provide a non-structural barrier between the depleted uranium and stainless steel components on the SENTRY package designs. The barrier material hardness has no influence on the items function. Any hardness condition given in ASTM B152 or B187 is sufficient for the design intent and will not adversely impact the safety or integrity of the SENTRY series of packages under normal and hypothetical accident conditions in accordance to 10 CFR Part 71.

6. On sheet 2, we request a change to the shell material to include the option of allowing 304/304L stainless steel material complaint to ASTM A182 in addition to the ASTM standards already specified. This change allows increased manufacturing flexibility without compromising the safety or integrity of the SENTRY series of packages.

   The minimum mechanical properties for 304/304L stainless steel given in ASTM A182 are equivalent to or superior to the mechanical properties given in ASTM A240, A276, and A666. The option to use ASTM A182 material for the shell will not adversely impact the safety or integrity of the SENTRY series of packages under normal and hypothetical accident conditions in accordance to 10 CFR Part 71.

7. On sheets 2 and 3, note 1 is revised to remove the year reference of the AWS welding codes. This change has no significant impact on the performance of the package and is consistent with a similar change that was approved under USA/9269/B(U)-96 as part of a request made in letter dated 1/13/15 which was incorporated at Revision 8 of the Certificate of Conformance (CoC).

8. On sheet 2, the 24 shell rivnuts material is changed to include "and optionally per ASTM A493". This change allows increased manufacturing flexibility without compromising the safety or integrity of the SENTRY series of packages.

   The 24 rivnuts are the captive nuts in the body weldment used for attaching the optional rib assemblies to the package. The thread strength of the nuts must be sufficient enough to retain the rib assemblies to the package for lifting and tie-down during transport.

   The thread strength of rivuts made to the NAS standard and ASTM A493 continues to meet the lifting and tie-down requirements and will not adversely impact the safety or integrity of the SENTRY series of packages under normal and hypothetical accident conditions in accordance to 10 CFR Part 71.

9. On sheet 3, we request a change to the cotter pin material specification from "ASME B18.8.1 Type 302, 304 or 316 Stn Stl" to "Type 300 Series Stainless Steel". This change allows increased manufacturing flexibility without compromising the safety or integrity of the SENTRY series of packages.

   The cotter pins secure the shield pin in place prior to filling the polyurethane foam within the interior of the body weldment. The foam, along with the shield pins, maintains the shield attachment within the port tube assemblies. The minimum mechanical properties and chemical composition of cotter pins made from type 300 series stainless steel materials will perform the same as the currently approved materials and will not adversely impact the safety or integrity of the SENTRY series of packages under normal and hypothetical accident conditions in accordance to 10 CFR Part 71.

10. On sheet 3, the material information for the small rivnuts is moved from sheet 8. Sheet 8 now shows this as referenced. The small rivnut material is changed to remove "Type 316/316L Stainless Steel per ASTM A276". This information is already included in the NAS standard, NAS 1330N5E-256. In addition, we request to add "and optionally per ASTM A493" to the NAS standard. This change allows increased manufacturing flexibility without compromising the safety or integrity of the SENTRY series of packages.

The small rivnuts attach the security screws through the front and rear plate assemblies at the access ports. The security screws help prevent unauthorized access to the source assembly and contribute to attaching the front and rear plates to the package along with the four hex head bolts. The thread strength of rivuts made to the NAS standard and ASTM A493 will continue to perform the same as the currently approved material and will not adversely impact the safety or integrity of the SENTRY series of packages under normal and hypothetical accident conditions in accordance to 10 CFR Part 71.

11. On sheet 3, the material information for the rear plate large rivnuts is moved from sheet 8. Sheet 8 now shows this as referenced. The rear plate large rivnut material is changed to remove "Type 316/316L Stainless Steel per ASTM A276". This information is already included in the NAS standard, NAS 1330N8E-326. In addition, we request to add "and optionally per ASTM A493" to the NAS standard. This change allows increased manufacturing flexibility without compromising the safety or integrity of the SENTRY series of packages.

    The rear plate large rivnuts attach the hex head bolts through the front and rear plate assemblies at the access ports. The rear plate secures the source assembly in its fully shielded position. The thread strength of rivuts made to the NAS standard and ASTM A493 will continue to perform the same as the currently approved material and will not adversely impact the safety or integrity of the SENTRY series of packages under normal and hypothetical accident conditions in accordance to 10 CFR Part 7.

12. On sheet 4, the material for the washers and lock washers is changed from "Type 302, 303, 304, 304L, 316 or 17-4PH Stn Stl" to "Type 300 Series or 17-4PH Stainless Steel". This change allows increased manufacturing flexibility without compromising the safety or integrity of the SENTRY series of packages.

    In addition, the lock washers are changed to optional and only used when thread locker is not used. The thread locker is changed to optional and only used when the lock washers are not used. Note 3 changed to state "Thread locker applied to all screws & rib bolts unless lock washers are installed."

    The lock washers, when used, and the washers are used to attach the optional rib inserts. Four lock washers, when used, attach under the head of the rib bolt. The minimum mechanical properties and chemical composition of lock washers and washers made from type 300 series or 17-4PH stainless steel materials will perform the same as the currently approved materials and will not adversely impact the safety or integrity of the SENTRY series of packages under normal and hypothetical accident conditions in accordance to 10 CFR Part 71.

13. On sheet 4, the material for the rib nut and rib bolt has been changed from "Type 302, 303, 304, 304L or 316 Stn Stl" to "Type 300 Series Stainless Steel". This change allows increased manufacturing flexibility without compromising the safety or integrity of the SENTRY series of packages.

    The rib nut and rib bolt have dual functions; to assist in lifting the package and to secure the package to a secondary cart to facilitate mobility at radiography jobsites. The minimum mechanical properties and chemical composition of rib nut and rib bolt made from type 300 series stainless steel materials will perform the same as the currently approved materials and will not adversely impact the safety or integrity of the SENTRY series of packages under normal and hypothetical accident conditions in accordance to 10 CFR Part 71.

14. On sheet 4, the material for thread locker is changed from "Dimethacrylate Ester" to "Dimethacrylate Ester or Cyanoacrylate". This change allows increased manufacturing flexibility without compromising the safety or integrity of the SENTRY series of packages.

    The Cyanoacrylate thread locker material is compatible with all fastener items but more compatible with the plastic items like the optional rib inserts than the Dimethacrylate Ester material. The Cyanoacrylate thread locker will perform the same as the currently approved thread locker and will not adversely impact the safety or integrity of the SENTRY series of packages under normal and hypothetical accident conditions in accordance to 10 CFR Part 71.

15. On sheets 5 and 6, Notes 2, the application of lubricant is now shown as "optional". This lubrication is not required for the function of the lock assembly but is added as an aid only. As such its use should be identified on the drawing as optional. This change is made for clarification only.

16. On sheet 5, the slide spring material is changed from "Type 301, 302, 304 or 316 Stn Stl per ASTM A313 or A666" to "Music Wire or Stainless Steel". This change allows increased manufacturing flexibility without compromising the safety or integrity of the SENTRY series of packages.

    The spring is not functional during transport (only during device operation) and it is not relied upon for maintaining package integrity during transport. Based on function, this part is not important to safety during transport and the material requirement change noted is sufficient to meet the transportation performance requirements for this part.

17. On sheet 5, the lug spring material is changed from "Music Wire per ASTM A228 to "Music Wire or Stainless Steel". This change allows increased manufacturing flexibility without compromising the safety or integrity of the SENTRY series of packages.

    The springs are not functional during transport (only during device operation) and are not relied upon for maintaining package integrity during transport. Based on function, these springs are not important to safety during transport and the material requirement change noted is sufficient to meet the transportation performance requirements for this part.

18. On sheet 5 and 6, the collar roll pin material is changed from "ASME B18.8.2, SAE 30302 or 30304 Stn Stl" to "Stainless steel". This change allows increased manufacturing flexibility without compromising the safety or integrity of the SENTRY series of packages.

    The roll pins are a redundant safety feature to prevent and/or slow unauthorized access to the source assembly inside the package. The minimum mechanical properties and chemical composition of collar roll pins made from any stainless steel will perform the same as the currently approved materials and will not adversely impact the safety or integrity of the SENTRY series of packages under normal and hypothetical accident conditions in accordance to 10 CFR Part 71.

19. On sheet 5, the anti-rotation lug material is changed from "Type 303 Stainless Steel" to "Type 300 Series Stainless steel". This change allows increased manufacturing flexibility without compromising the safety or integrity of the SENTRY series of packages.

    The anti-rotation lugs are not functional during transport (only during device operation) and they are not relied upon for maintaining package integrity during transport. Based on function, this part is not important to safety during transport and the material requirements for this part.

20. On sheet 6, the lock pin spring material is changed from "Type 301, 302, 304 or 316 Stn Stl per ASTM A313 or A666 (NITS)" to "Stainless Steel". This change allows increased manufacturing flexibility without compromising the safety or integrity of the SENTRY series of packages.

    The lock pin springs are not functional during transport (only during device operation) and they are not relied upon for maintaining package integrity during transport. Based on function, this part is not important to safety during transport and the material requirement change noted is sufficient to meet the transportation performance requirements for this part.

21. On sheet 6, the fitting material is changed to remove reference to the brass material requirements. The fitting material in use on current packages is tungsten and it is our intent not to manufacture or use any brass fittings on these packages.

22. On sheet 6, the plate roll pin material is changed from "ASME B18.8.2, SAE 51420 Stn Stl" to "Stainless steel". This change allows increased manufacturing flexibility without compromising the safety or integrity of the SENTRY series of packages.

    The plate roll pin is not functional during transport (only during device operation) and it is not relied upon for maintaining package integrity during transport. Based on function, this part is not important to safety during transport and the material requirement change noted is sufficient to meet the transportation performance requirements for this part.

23. On sheet 7, the flat washer material is changed from "Type C200 Series Brass" to "Brass". This change allows increased manufacturing flexibility without compromising the safety or integrity of the SENTRY series of packages.

    The flat washers are not functional during transport (only during device operation) and they are not relied upon for maintaining package integrity during transport. Based on function, this part is not important to safety during transport and the material requirement change noted is sufficient to meet the transportation performance requirements for this part.

24. On sheet 7, the shaft roll pin, and shield roll pin material is changed from "Type 302, 303, 304, or 316 Stainless Steel" to Type 300 Series Stainless Steel". This change allows increased manufacturing flexibility without compromising the safety or integrity of the SENTRY series of packages.

    The shaft and shield roll pins in combination with the knob, set screw, and slider prevents the rotor shield from pivoting away from the source tube. The rotor shield keeps low level radiation at the front plate within normal conditions of transport dose limits. The minimum mechanical properties and chemical composition of shaft and shield roll pins made from any stainless steel materials will perform the same as the currently approved materials and will not adversely impact the safety or integrity of the SENTRY series of packages under normal and hypothetical accident conditions in accordance to 10 CFR Part 71.

25. On sheet 7, the shaft spring material is changed from "Type 301, 302, 304, or 17-4 PH Stainless Steel" to "Stainless Steel". This change allows increased manufacturing flexibility without compromising the safety or integrity of the SENTRY series of packages.

The shaft spring is not functional during transport (only during device operation) and it is not relied upon for maintaining package integrity during transport. Based on function, this part is not important to safety during transport and the material requirement change noted is sufficient to meet the transportation performance requirements for this part.

26. On sheet 7, the retainer disc and knob materials are changed from "Type 303 Stainless Steel" and "Type 304 Stainless Steel" respectively to "Type 300 Series Stainless Steel". This change allows increased manufacturing flexibility without compromising the safety or integrity of the SENTRY series of packages.

    The retainer disc and knob are not functional during transport (only during device operation) and they are not relied upon for maintaining package integrity during transport. Based on function, this part is not important to safety during transport and the material requirement change noted is sufficient to meet the transportation performance requirements for this part.

27. On sheet 9, the shield dimensions, 10", 3.9", 1.0", 9", 4.7", 0.9", 11", and R3.25" are now listed as "REF" dimensions indicating no tolerance associated with these. This change allows increased manufacturing flexibility without compromising the safety or integrity of the SENTRY series of packages.

    The shield dimensions can vary over time due to changes in the aging molds from which the shields are cast. Typically, the result is an increase in shield size adding more shielding but still within the maximum weight limit. Every SENTRY series shield is measured in the package during manufacture by direct radiation survey inspection. Note 7 is added to further clarify the inspection requirement. Changing the shield size dimensions to reference will not adversely impact the safety or integrity of the SENTRY series of packages under normal and hypothetical accident conditions in accordance to 10 CFR Part 71.

28. On sheet 10, thread locker has been added to the materials table and its use listed as optional for a number of components on this sheet. This change increases fastener retention when the package is used as a radiography device or source changer and does not compromise the safety or integrity of the SENTRY series of packages.

29. On sheet 10, the large link callout now has a note indicating "2 Optional". This option allows for a secondary method of attaching the tamper indicating seal without compromising the safety or integrity of the SENTRY series of packages.

30. On sheet 10, the material specified for the following items are changed to "Stainless Steel"; lock cover set screw, plunger lock screw, lanyard screw, lanyard lock washer, large link, small link, lock extension, and lock cover roll pin.

    These items are not functional during transport (only during device operation) and they are not relied upon for maintaining package integrity during transport. Based on function, these parts are not important to safety during transport and the material requirement change noted is sufficient to meet the transportation performance requirements for these parts.

31. On sheet 10, the plunger lock material is changed from "Any C200, C300, C400, C664, or C698 Brass Alloy" to "Brass". This change allows increased manufacturing flexibility without compromising the safety or integrity of the SENTRY series of packages.

    The plunger lock is a secondary lock mechanism and is not relied upon for source security in the SENTRY series of packages. Changing the plunger lock material to any "Brass" alloy will not adversely impact the safety or integrity of the SENTRY series of packages under normal and hypothetical accident conditions in accordance to 10 CFR Part 71.

32. On sheet 11, Note 3 is revised to replace "if needed" with "if used" and Note 4 is changed from ".... painted 99% depleted uranium (DU)." to ".... 99% depleted uranium (DU) and painted." These changes are made to clarify the note and intent without compromising the safety or integrity of the SENTRY series of packages.

33. On sheet 11, the last statement in Note 2 is revised from ".... or over 2-mRem/hr but not over 20-mRem/hr." to ".... or over 5-mRem/hr but not over 20-mRem/hr."

    The supplemental shield 1-meter dose limit is set by an operational requirement of the package when used as a radiography device. The SENTRY series of transport packages are mobile devices with a 1-meter dose limit of 5-mRem/hr. The 2-mRem/hr limit is for a portable radiography device which does not apply to the SENTRY series. This correction will not adversely impact the safety or integrity of the SENTRY series of packages under normal and hypothetical accident conditions in accordance to 10 CFR Part 71.

34. Note 6 on sheet 11 was revised to add "at any one location". We have also changed the specified thickness from "0.57 inch" to read "0.5 inch". The description addition as to location is intended to more clearly reflect the application of the stack thickness requirement. Since some shields may require the addition of supplemental shielding in more than one location where the added shielding thicknesses does not overlap, this revision will allow the application of supplemental shielding to multiple locations on the shield while still limiting the maximum added supplemental shield thickness in any one location on the depleted uranium shield to the maximum specified thickness.

    The maximum thickness revision is being made for consistency with condition 9 on the current certificate of conformance (CoC). During review of the descriptive drawing, a discrepancy in the maximum supplemental shield thickness allowed on the drawing was identified with the limit in condition 9 of the CoC. This correction to the descriptive drawing brings it into conformance with the limit on the CoC. A review of all production documentation supporting use of supplemental shielding on these assemblies confirmed that manufactured packages conform to the CoC maximum limit of 0.5 inch. This change has no impact on product accepted and in use as transport packages, and is only being made to avoid any future confusion as to the applicable limit for the addition of these supplemental shields.

35. On sheet 11, Note 9 is changed to reflect the requirements imposed in the certificate of conformance, condition 9. This condition states:

    "Supplemental shielding shall not exceed 5% of the maximum weight of the depleted uranium casting, with a thickness not to exceed 0.5 inch."

Since the descriptive drawing is used by us as the primary supplemental reference during compliance reviews associated with production documentation on QSA Global, Inc. transport packages, we have added this note to the descriptive drawing to further ensure that any design changes/product acceptance reviews include these requirements.

Note 9 was added to read:

Supplemental shielding shall not exceed 5% of the maximum DU weight on sheet 9. Total combined thickness of supplemental DU shielding in any one location not to exceed 0.5 inch.

The slight wording revision from Condition 9 of the CoC was made for additional clarification for use on drawing R86000. This change does not impose any new requirements for these packages but just ensures that this requirement is clearly reflected on drawing R86000.

The drawing revision associated with these issues is enclosed with this letter. Should you have any additional questions, or wish to discuss this issue or our amendment request, please contact me.

Sincerely,

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Regulatory Affairs/Quality Assurance
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Email: Lori.Podolak@qsa-global.com

RA/QA Approval	17 May 2016 Date
S. Gramm Engineering Approval	17 May 2016 Date

Enclosures: Drawing R86000 Revision S

cc: ATTN: Document Control Desk
Director, Division of Spent Fuel Storage and Transportation
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Rockville, MD 20852

Security-Related Information Figure
Withheld Under 10 CFR 2.390.

ERF #	APPROVALS	DATE
3457	S. Gr	12 May 16
		17 May 16
		17 May 16

QSA GLOBAL
40 NORTH AVE, BURLINGTON, MA 01803

DESCRIPTIVE DRAWING

TITLE: SENTRY TRANSPORT PACKAGE

SIZE	DWG. NO.	REV
A	R86000	S
	SCALE: NONE	SHEET 1 OF 11

Security-Related Information Figure
Withheld Under 10 CFR 2.390.

QSA GLOBAL 40 NORTH AVE, BURLINGTON, MA 01803			DESCRIPTIVE DRAWING
TITLE	SENTRY TRANSPORT PACKAGE		
SIZE A	DWG. NO. R86000		REV S
	SCALE: NONE	SHEET 2 OF 11	

Security-Related Information Figure
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QSA GLOBAL 40 NORTH AVE, BURLINGTON, MA 01803			DESCRIPTIVE DRAWING
TITLE	SENTRY TRANSPORT PACKAGE		
SIZE A	DWG. NO. R86000		REV S
	SCALE: NONE	SHEET 3 OF 11	

Security-Related Information Figure
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QSA GLOBAL 40 NORTH AVE, BURLINGTON, MA 01803			DESCRIPTIVE DRAWING
TITLE	SENTRY TRANSPORT PACKAGE		
SIZE A	DWG. NO. R86000		REV S
	SCALE: NONE	SHEET 4 OF 11	

Security-Related Information Figure
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QSA GLOBAL 40 NORTH AVE, BURLINGTON, MA 01803		DESCRIPTIVE DRAWING
TITLE	SENTRY TRANSPORT PACKAGE	
SIZE A	DWG. NO. R86000	REV S
	SCALE: NONE	SHEET 5 OF 11

Security-Related Information Figure
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QSA GLOBAL 40 NORTH AVE, BURLINGTON, MA 01803			DESCRIPTIVE DRAWING
TITLE	SENTRY TRANSPORT PACKAGE		
SIZE A	DWG. NO. R86000		REV S
	SCALE: NONE	SHEET 6 OF 11	

Security-Related Information Figure
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QSA GLOBAL 140 NORTH AVE, BURLINGTON, MA 01803		DESCRIPTIVE DRAWING
TITLE	SENTRY TRANSPORT PACKAGE	
SIZE A	DWG. NO. R86000	REV S
	SCALE: NONE	SHEET 7 OF 11

Security-Related Information Figure
Withheld Under 10 CFR 2.390.

QSA GLOBAL 40 NORTH AVE, BURLINGTON, MA 01803			DESCRIPTIVE DRAWING
TITLE	SENTRY TRANSPORT PACKAGE		
SIZE A	DWG. NO. R86000		REV S
	SCALE: NONE	SHEET 8 OF 11	

Security-Related Information Figure
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QSA GLOBAL 40 NORTH AVE, BURLINGTON, MA 01803		DESCRIPTIVE DRAWING
TITLE	SENTRY TRANSPORT PACKAGE	
SIZE A	DWG. NO. R86000	REV S
	SCALE: NONE	SHEET 9 OF 11

Security-Related Information Figure
Withheld Under 10 CFR 2.390.

QSA GLOBAL 40 NORTH AVE, BURLINGTON, MA 01803			DESCRIPTIVE DRAWING
TITLE	SENTRY TRANSPORT PACKAGE		
SIZE A	DWG. NO. R86000		REV S
	SCALE: NONE	SHEET 10 OF 11	

Security-Related Information Figure
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QSA GLOBAL 40 NORTH AVE, BURLINGTON, MA 01803		DESCRIPTIVE DRAWING
TITLE	SENTRY TRANSPORT PACKAGE	
SIZE A	DWG. NO. R86000	REV S
	SCALE: NONE	SHEET 11 OF 11