

10 CFR 71.95 REPORT EVALUATION FORM

Docket No.: 71-9357
Package Model No.: Model No. SENTRY
Report Submitted By: Lori Podolak, QSA Global, Inc.
Report Date: February 29, 2016
Report ADAMS Accession No.: ML16068A051

Review the incoming report to determine if additional Commission or staff action is warranted. The review should consider whether the report identifies a generic defect or problem with the package design and the safety significance of the issue. Note that a high safety significance represents a potential for significant radiation exposure, medium safety significance represents a potential for some moderate radiation exposure, and low safety significance represents little or no potential for radiation exposure.

1. The report identifies:

- ☐ Significant reduction in the effectiveness of a package during use;
- ☐ Defect with a safety significance;
- ☒ Shipment in which conditions of the approval were not observed.

2. What is the safety significance? ☐ High ☐ Medium ☒ Low

3. Summary of the report:

This report is regarding shipments made using the Model No. SENTRY transportation package for which shipments were made in a package that did not meet the drawings referenced in the certificate of compliance. There were several items that either didn't meet the drawings or it isn't clear that based on the production drawings, the materials of construction meet the drawings in the certificate. In particular items that are out of compliance include the:

- Rivets holding the nameplate on the package,
- Tack weld to hold shield ring in place instead of 1/6th inch fillet weld,
- Dust cover lanyard,
- The shaft spring for the front slider plate,
- Front plate retainer screw,
- Front plate knob set screw, and
- Spring plunger on the lock cover assembly.

The issues identified for the SENTRY package are similar in nature and cause as the ones identified for other QSA packages, including the Model Nos. 650L, 770, 702, 680-OP, 741-OP, 976 Series and the 880 Series packages. QSA stated that the root cause is that the package design was not adequately implemented across the production and descriptive drawings referenced under the CoC, i.e., changes were made to the production drawings that were never carried through to the descriptive drawings referenced in the certificate of compliance.

4. Corrective actions taken by the licensee:

QSA submitted an amendment to correct these deficiencies which was approved under Rev. No. 5 of the CoC. QSA stated that continued compliance will be verified as part of its routing quality assurance internal audits.

QSA stated that it would advise users to stop shipments until the certificate is revised to address the issues identified.

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5. Staff comments:

The staff has reviewed the certificate holder's report, and its evaluation of the incident, and it agrees that the safety significance of the event is minor. The staff finds that the certificate holder's corrective actions should be sufficient to prevent future occurrences.

QSA Global, Inc. is certificate holder of the package. The regulations specify in 10 CFR Part 71.95(a) that the licensee, after requesting the certificate holder's input, shall submit the written report. To date the U.S. Nuclear Regulatory Commission has not received any reports pursuant to 10 CFR 71.95 from its licensees rather the certificate holder submitted the written report.

6. Staff conclusion:

☐ The report does NOT identify generic design or license/certificate issues that warrant additional Commission or staff action. This report is considered closed.

☒ There is a need to take additional action. Provide a summary of the bases and recommended actions:

- By its own admission, QSA has had the same systemic issues for essentially all of its package designs. In its report pursuant to 10 CFR 71.95, QSA stated that "The issues identified for the SENTRY Series packages are similar in nature and cause to the issues identified for the 650L, 770, 702, 680-OP, 741-OP, 976 Series and the 880 Series packages..."

Recommend performing an inspection at QSA in the first quarter of FY18 to determine whether QSA has corrected and adequately implemented its proposed changes.

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