

71-9310
71-0943

November 15, 2016

**Subject: 10 CFR 71.95 Reporting – Conditions of approval in Certificate of Compliance
9310 not observed in making a shipment**

To Whom it May Concern,

Best Theratronics Ltd has been making shipments in violation of the CoC 9310 requirements in sentence 6(b) by not maintaining the packaging in accordance with the Maintenance Program in Chapter 8 of the application (SARP) with regards to two items. First, the inner brace and plywood base inside the transport cavity being subjected to regular visual inspections. Although these components are removed from the overpacks and verified at every shipment, we do not have a sign off on any of the documentation to show the verification. Secondly, the screws on the tie down collar are to be retightened annual to the specified torque, however the calibration of the torque wrench has not been recorded.

This situation was brought to light in the USNRC audit of September 20, 2016 and has been ongoing. CAPA 160908 was issued to address this violation and the corrections are being forwarded as a part of the reply to report 71-0943/2016-201. Best Theratronics is the only user of this packaging, no other registered users exist.

Please find below an itemized list of all shipments where the CofC was not met. Please note there were no incidents noted in any of these shipments.

Sales Order	From	To	F431 Serial Number	Shipment Date (month and year)
100582	Fayetteville, AR	Fayetteville, AR	006	Aug-2008
100680	Marshfield, WI	Marshfield, WI	008	Sep-2008
41617	Boston, MA	Boston, MA	003	Dec-2009
43587	Johnstown, PA	San Antonio, TX	001	Jan-2010
41699	Rahway, NJ	Rahway, NJ	005	Jan-2010
43776	Albuquerque, NM	Albuquerque, NM	001	Feb-2011
43689	Greenville, NC	San Antonio, TX	008	Feb-2011
42907	Bethlehem, PA	San Antonio, TX	007	Mar-2011
44218	Valencia, CA	San Antonio, TX	010	Jun-2011
44971	Rockville, MD	Rockville, MD	010	Sep-2011
46874	Spring House, PA	Spring House, PA	009	Apr-2013
49318	Rockville, MD	Rockville, MD	004	Mar-2014
50151	Seattle, WA.	San Antonio, TX	001	Oct-2014
50155	San Antonio, TX	San Antonio, TX	008	Oct-2014
51428	Lakeland, FL	San Antonio, TX	003	Sep-2015

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Sales Order	From	To	F431 Serial Number	Shipment Date (month and year)
51133	Portland, OR.	San Antonio, TX	006	Oct-2015
51638	San Diego, CA	San Antonio, TX	011	Nov-2015
52637	Atlanta, GA	San Antonio, TX	011	Jun-2016
52449	York, PA	San Antonio, TX	009	Jul-2016
41417	Eugene, OR	Eugene, OR	010	Sep-2016
53277	Springfield, OR	San Antonio, TX	009	Sep-2016

If you require any further information, please do not hesitate to contact me.



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