



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

August 31, 2018

Ms. Lori Podolak  
Senior Regulatory Affairs Specialist  
Regulatory Affairs Department  
QSA Global, Inc.  
40 North Avenue  
Burlington, MA 01803

SUBJECT: REVISION NO. 20 OF CERTIFICATE OF COMPLIANCE NO. 6613 FOR THE  
MODEL NO. 702 TRANSPORTATION PACKAGE

Dear Ms. Podolak:

As requested in your application dated August 8, 2018, (Agencywide Documents Access and Management System Accession No. ML18226A089), enclosed is Certificate of Compliance No. 6613, Revision No. 20, for the Model No. 702 transportation package. Changes to the enclosed certificate are indicated by vertical lines in the margin. The staff's safety evaluation report is also enclosed.

The approval constitutes authority to use the package for shipment of radioactive material and for the package to be shipped in accordance with the provisions of Title 49 of the *Code of Federal Regulations* (CFR) 173.471 "Requirements for U.S. Nuclear Regulatory Commission Approved Packages," and 10 CFR 71.17, "General license: NRC-approved package."

Upon removal of Enclosure 3, this  
document is uncontrolled.

L. Podolak

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If you have any questions regarding this certificate, please contact me or Bernard White of my staff at (301) 415-6577.

Sincerely,

/RA/

John McKirgan, Chief  
Spent Fuel Licensing Branch  
Division of Spent Fuel Management  
Office of Nuclear Material Safety  
and Safeguards

Docket No. 71-6613

EPID No. L-2018-LLA-0211

Enclosures:

1. Certificate of Compliance  
No. 6613 Revision No. 20
2. Safety Evaluation Report
3. List of Registered Users

cc w/encls. 1 & 2: R. Boyle, U.S. Department  
of Transportation  
J. Shuler, U.S. Department  
of Energy, c/o L. F. Gelder  
Registered Users

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L. Podolak

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SUBJECT: REVISION NO. 20 OF CERTIFICATE OF COMPLIANCE NO. 6613 FOR THE  
MODEL NO. 702 TRANSPORTATION PACKAGE, DOCUMENT DATE: August  
31, 2018

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G:\SFST\PART 71 CASEWORK\Model 702 Docket 71-6613\6613.R20.Letter&SER.docx

**Closes EPID No. L-2018-LLA-0211**

**ADAMS PKG: ML18243A495**

**Ltr & SER: ML18243A497**

**Encl. 1: ML18243A496**

*\*via e-mail*

OFC	DSFM	*DSFM	*DSFM	*DSFM	DSFM
NAME	BWhite	WWheatley	RTorres	MRahimi	JMcKirgan
DATE	8/29/2018	8/29/2018	8/29/2018	8/ 31/2018	8/31/2018

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**SAFETY EVALUATION REPORT  
Docket No. 71-6613  
Model No. 702 Package  
Certificate of Compliance No. 6613  
Revision No. 20**

**EVALUATION**

By application dated August 8, 2018 (ADAMS Accession No. ML18226A089), QSA Global, Inc., (QSA) requested an amendment to Certificate of Compliance (CoC) No. 6613 for the Model No. 702 package. QSA proposed drawing changes to remove the American Society of Mechanical Engineers (ASME) B18 standards and three other minor clarifying changes to the drawings.

The staff reviewed the application for the Model 702 Type B package. The application identified a discrepancy in the material certification requirements for hardware detailed in Drawing No. R70290, Revision X. The requirement stated that all hardware should meet ASME B18 standards. However, the applicant clarified that ASTM certification requirements provide the necessary performance criteria control for the hardware to meet the requirements in Title 10 of the *Code of Federal Regulations* (10 CFR) CFR Part 71. Therefore, the need for conformance with ASME B18 standards is not needed for safe performance of the package. The applicant also discussed the root cause for the discrepancy and defined corrective actions, including the revision of Drawing No. R70290, Revision X.

The applicant clarified that Drawing No. R70290, Revision X also required not-important-to-safety hardware (washers, eyebolt) to conform to ASME B18 standards. The applicant clarified that this requirement is not necessary as general material requirements are identified, as needed, in the bill of material descriptions.

The staff reviewed the justification provided by the applicant, as summarized above. Further, the staff reviewed the revised Drawing No. R70290, Revision Y to confirm that the removal of the requirement for conformance with ASME B18 standards was consistent with the applicant's justification. The staff confirmed that other changes made to Drawing No. R70290, Revision Y, did not result in changes to the package design and were merely for clarification purpose.

The staff finds that (1) the removal of the requirement for conformance with ASME B18 is adequately justified, and that (2) Drawing No. R70290, Revision Y, properly identifies ASTM materials certification requirements for important-to-safety hardware. The staff, therefore, finds that Drawing No. R70290, Revision Y, complies with 10 CFR 71.33(a)(5).

Based on the statements and representations in the application, the staff concludes that the changes do not affect the ability of the package to meet the requirements of 10 CFR Part 71.

## **CONDITIONS**

The conditions specified in the certificate of compliance have been revised to incorporate several changes as indicated below:

Condition 5(a)(3) updates Drawing No. R70290 to Revision Y.

Condition 8 was added to authorize use of Revision No. 19 of the certificate for a period of 1 year.

Conditions No. 8 and 9 were renumbered.

The References section has been updated to include this amendment request as a supplement.

## **CONCLUSION**

Based on the statements and representations in the application, as supplemented, and the conditions listed above, the staff concludes that the changes do not affect the ability of the package to meet the requirements of 10 CFR Part 71.

Issued with Certificate of Compliance No. 6613, Revision No. 20.