



Director, Office of International Programs  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

5 August 2020

Reply to a Notice of Violation (EA-20-082)

Dear Director:

QSA Global, Inc. has received the subject NOV regarding the timeliness of the 19 May 2020 advance notification for import.

We provide the following response specific to the NOV:

Violation: Failure to file a submittal containing the notification with the NRC at least 7 days prior to the shipment of radioactive material listed in Appendix P to 10 CFR Part 110, as required by 10 CFR 110.50(c)(4).

Apparent cause: Due to the Covid-19 pandemic, routing of inbound shipments to QSA Global, Inc. have been in a state of flux. The inconsistency in ability to book shipments to the United States had caused QSA Global's foreign supply reactors to run behind schedule and notifications to QSA Global were being made with less lead time. QSA Global was attempting to ensure the import notifications were as accurate as possible, and so notifications of Category 1 raw material imports to the NRC were also being made with less than normal lead time. In this instance the raw material supplier shipped two cycles at one time without prior notification of the second cycle shipment to QSA Global, and the notification for the second cycle to the NRC had not yet been completed.

Corrective action: QSA Global has modified our Category 1 import notification process to make 10 CFR 110.50(c)(4) notifications at least one month in advance, ensuring two cycles of pending imports from our supply reactors are notified at any given time well in advance of the minimum 7 day requirement.

QSA Global feels that we have addressed the subject violation as warranted. Please feel free to contact me if there are any questions.

Sincerely,

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Michael Fuller, Director,  
Regulatory Affairs/Quality Assurance