NRC FORM 618 U.S. NUCLEAR REGULATORY COMMISSION (8-2000) 10 CFR 71 CERTIFICATE OF COMPLIANCE FOR RADIOACTIVE MATERIAL PACKAGES a. CERTIFICATE NUMBER b. REVISION NUMBER c. DOCKET NUMBER d. PACKAGE IDENTIFICATION NUMBER PAGE PAGES USA/9185/B(U)-96 OF 3 9185 14 71-9185 1

2. PREAMBLE

- a. This certificate is issued to certify that the package (packaging and contents) described in Item 5 below meets the applicable safety standards set forth in Title 10, Code of Federal Regulations, Part 71, "Packaging and Transportation of Radioactive Material."
- b. This certificate does not relieve the consignor from compliance with any requirement of the regulations of the U.S. Department of Transportation or other applicable regulatory agencies, including the government of any country through or into which the package will be transported.
- 3. THIS CERTIFICATE IS ISSUED ON THE BASIS OF A SAFETY ANALYSIS REPORT OF THE PACKAGE DESIGN OR APPLICATION
- a. ISSUED TO (Name and Address)
 Industrial Nuclear Company, Inc.
 14320 Wicks Blvd.
 San Leandro, CA 94577
- b. TITLE AND IDENTIFICATION OF REPORT OR APPLICATION Industrial Nuclear Company application dated July 1, 1999, as supplemented.

4. CONDITIONS

This certificate is conditional upon fulfilling the requirements of 10 CFR Part 71, as applicable, and the conditions specified below.

5.

- (a) Packaging
 - (1) Model No.: OP-100
 - (2) Description

The Model No. OP-100 package consists of either an IR-50 source changer, or an IR-100 exposure device, which is positioned within a 10 gallon drum. The drum is made of 20 gauge steel, and is closed with a 12 or 13 gauge closure ring and a 5/8 inch diameter steel bolt. A plywood or polyurethane foam support structure centrally locates either the Model IR-50 or the Model IR-100 within the steel drum overpack.

The IR-50 source changer and the IR-100 exposure device are approximately 8.87 inches long, 4.5 inches wide, and 8.5 inches high. The radioactive material contents consist of iridium-192 or selenium-75 in source assemblies that meet the requirements for special form material. The source assemblies are positioned within a zircalloy or titanium "S" tube within the IR-50 or IR-100. The "S" tube is surrounded by a shield assembly made of depleted uranium. The uranium shield assembly is encased in a stainless steel housing. The space between the uranium shield assembly and the stainless steel casing is filled with a rigid polyurethane foam. The maximum weight of the IR-50 source changer is 55 pounds; the maximum weight of the IR-100 exposure device is 53 pounds, and the maximum gross weight of the Model No. OP-100 package is 77 pounds.

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(3) **Drawings**

> The packaging is constructed in accordance with Industrial Nuclear Company Drawing Nos.: OP 100-1, Rev. 5; OP-100-1-2, Rev. 0; IR 50-1A, Rev. 4; IR 50-1B, Rev. 1; IR 100-1A, Rev. 5; and IR 100-1B, Rev. 2.

5. (b) Contents

(1) Type and form of material

> Iridium-192 or selenium-75 as sealed sources that meet the requirements of special form radioactive material.
>
> Maximum quantity of material per package

(2)

120 Ci (4.44 TBq) (output)

Output curies are determined in accordance with American National Standard N432-1980, "Radiological Safety for the Design and Construction of Apparatus for Gamma Radiography."

- The source shall be secured in the shielded position of the packaging by the source assembly lock, 6. lock cap, and the shipping plug (IR-100 only). The source assembly lock, lock cap, and the shipping plug (IR-100 only), must be fabricated of materials capable of resisting a 1475°F fire environment for one-half hour and maintaining their positioning function. The ball stop of the source assembly must engage the source assembly lock. The flexible cable of the source assembly and shipping plug must be of sufficient length and diameter to provide positive positioning of the source in the shielded position.
- 7. The name plate on the overpack must be fabricated of materials capable of resisting a 1475°F fire environment for one-half hour and maintain its legibility. The two vent holes in the side of the overpack must be covered with tape or rubber (plastic) plugs to prevent entry of rain water.
- 8. In addition to the requirements of Subpart G of 10 CFR Part 71:
 - The package shall be prepared for shipment in accordance with the Operating Procedures of (a) Chapter 7 of the application and
 - (b) Each package must meet the Acceptance Tests and Maintenance Program of Chapter 8 of the application.
- 9. The package authorized by this certificate is hereby approved for use under the general license provisions of 10 CFR 71.17.

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- 10. Revision No. 13 of this certificate may be used until February 29, 2024.
- 11. Expiration date: February 28, 2029.

REFERENCES

Industrial Nuclear Company application dated July 1, 1999.

Supplements dated: September 14 and December 29, 1999; October 24, 2003; March 22, and July 12, 2007; November 25, 2008, January 24, 2014; July 21, August 6, 13, 17, September 22, 23, and 30, 2015; August 10, 2017; October 22, 2018.

FOR THE U.S. NUCLEAR REGULATORY COMMISSION

Signed by Diaz-Sanabria, Yoira on 02/08/24

Yoira K. Diaz-Sanabria, Chief Storage and Transportation Licensing Branch Division of Fuel Management Office of Nuclear Material Safety and Safeguards

Date: February 8, 2024



UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION REPORT
Docket No. 71-9185
Model No. OP-100
Certificate of Compliance No. 9185
Revision No. 14

EVALUATION

By letter dated January 8, 2024, Industrial Nuclear Company, Inc. requested renewal of Certificate of Compliance (CoC) No. 9185, for the Model No. OP-100 package.

All conditions and drawings listed in Revision No. 13 of the certificate remain unchanged and Industrial Nuclear Company, Inc. did not request any change to the package design, operations or maintenance procedures.

The certificate has been updated to Revision No. 14.

CONDITIONS

The following changes have been made to the CoC:

Condition No. 10 limits the validity of Revision No. 13 of the certificate to February 29, 2024.

Condition No. 11 was updated to reflect the February 28, 2029, expiration date of Revision No. 14 of the certificate.

CONCLUSION

Based on the statements and representations in the renewal request, the staff finds that these changes do not affect the ability of the package to meet the requirements of Title 10 of the *Code of Federal Regulations* Part 71.

Issued with CoC No. 9185, Revision No. 14.