

**CERTIFICATE OF COMPLIANCE
FOR RADIOACTIVE MATERIAL PACKAGES**

a. CERTIFICATE NUMBER	b. REVISION NUMBER	c. DOCKET NUMBER	d. PACKAGE IDENTIFICATION NUMBER	PAGE	PAGES
9187	12	71-9187	USA/9187/B(U)-96	1 OF	3

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 (<i>Name and Address</i>)
QSA Global, Inc.
40 North Avenue
Burlington, MA 01803 | b. TITLE AND IDENTIFICATION OF REPORT OR APPLICATION
QSA Global, Inc. application dated March 6, 2006, 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.: 865
- (2) Description

A steel encased, uranium shielded radiographic exposure device 5" OD x 12.25" long. The device is provided with 0.88" OD x 9.25" long handle and two 1.38" x 5.5" long triangular shaped legs. Primary components consist of an outer steel shell, internal bracing, depleted uranium shield, and a source tube. The contents are securely positioned in the source tube by a source holder assembly and actuator and locking assembly. Tamper-indicating seals are provided on the packaging and a 0.12-inch thick steel outer cover is bolted over the source actuator and locking assembly for additional protection during transport. The total weight of the package is approximately 59 pounds.

(3) Drawings

The packaging is constructed in accordance with QSA Global Drawing No. R86590, Sheets 1 through 7, Rev. L.

The package user should reference QSA Global, Inc., Drawing No. R865-User, Revision A, sheets 1-2.

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9187	12	71-9187	USA/9187/B(U)-96	2 OF	3

5.(b) Contents

(1) Type and form of material:

Iridium-192 as sealed source must meet the requirements of special form radioactive material.

(2) Maximum quantity of material per package:

240 curies (8.9 TBq) (output)

Output curies are determined by measuring the source output at 1 meter and expressing its activity in curies derived from the following: 0.48 R/(h-Ci) Iridium-192 at 1 meter, (Ref: American National Standard N432-1980, "Radiological Safety for the Design and Construction of Apparatus for Gamma Radiography").

6. In addition to the requirements of Subpart G of 10 CFR Part 71:

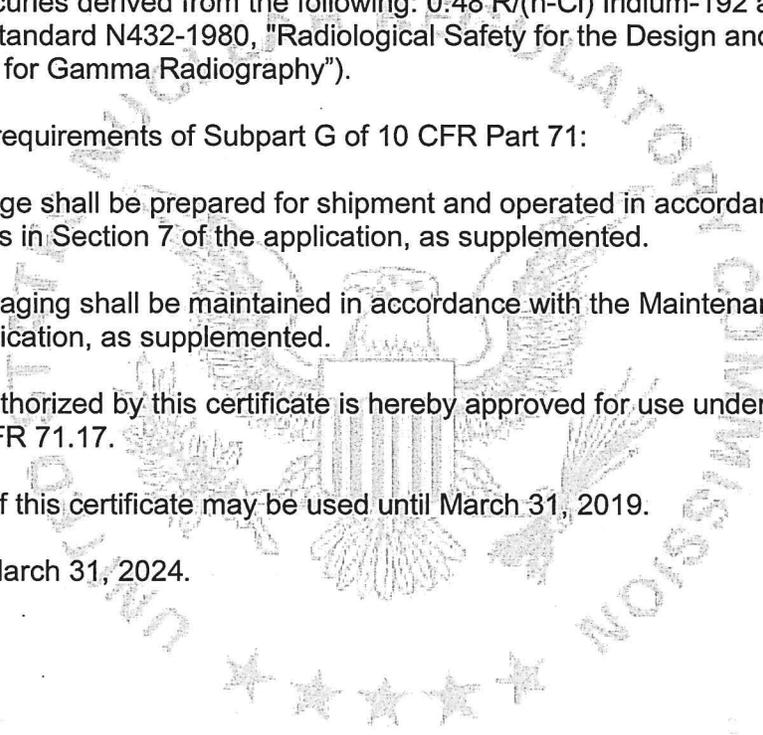
(a) The package shall be prepared for shipment and operated in accordance with the Operating Procedures in Section 7 of the application, as supplemented.

(b) Each packaging shall be maintained in accordance with the Maintenance Program in Section 8 of the application, as supplemented.

7. The packaging authorized by this certificate is hereby approved for use under the general license provision of 10 CFR 71.17.

8. Revision No. 10 of this certificate may be used until March 31, 2019.

9. Expiration date: March 31, 2024.



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9187	12	71-9187	USA/9187/B(U)-96	3 OF	3

REFERENCES

QSA Global, Inc., application dated March 6, 2006.

Supplement(s) dated: August 24, 2006; September 28, 2006; July 14, 2008; February 9, 2009 and March 13, 2009; July 16, 2013; February 1, and April 14, 2017; and July 24, 2018.

FOR THE U.S. NUCLEAR REGULATORY COMMISSION



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



Date: 10/2/18



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

SAFETY EVALUATION REPORT
DOCKET NO. 71-9187
MODEL NO. 865
CERTIFICATE OF COMPLIANCE NO. 9187
REVISION NO. 12

SUMMARY

By application dated July 24, 2018 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML18212A225), QSA Global, Inc. (QSA), requested renewal of Certificate of Compliance (CoC) No. 9187 for the Model 865 Type B(U) container. The applicant requested changes to delete Conditions 6(c) and 6(d) from the CoC pursuant to the requirements of Title 10 of the *Code of Federal Regulations* (10 CFR) 71.95 to the U.S. Nuclear Regulatory Commission (NRC). On September 24, 2018, the NRC issued a CoC No. 9187, Revision No. 11 by deleting Conditions 6. (c) and 6. (d) to allow the future manufacturing of new Model 865 package and/or future weld repairs on the existing Model 865 (ADAMS Accession No. ML18269A063). However, we did not extend the CoC expiration date to additional five years. As a result, enclosed please find an updated CoC with Revision No. 12 that extended the expiration date from March 31, 2019 to March 31, 2024. Further, at the applicant's request, we have also added a Condition to CoC to allow the use of Revision No. 10 until March 31, 2019.

EVALUATION

The applicant requested for the renewal of the CoC in addition to deleting Conditions 6. (c) and 6. (d), however, NRC overlooked on extending the expiration date. The updated CoC with a new expiration date has no effect on our previous safety evaluation issued on September 24, 2018. The extension of the CoC expiration date does not affect the ability of the package to meet the requirements of 10 CFR Part 71. Therefore, the NRC staff found the expiration date change and allowing the use of CoC Revision No. 10 until March 31, 2019, to be acceptable, and issued the updated CoC.

CONDITIONS

The conditions specified in the Certificate of Compliance No. 9187 has been revised as indicated below:

Existing Condition No. 8, "Expiration date: March 31, 2019" was made as Condition No. 9, and was revised as "Expiration date: March 31, 2024."

Condition No. 8 was added as "Revision No. 10 of this certificate may be used until March 31, 2019."

CONCLUSION

Based on the statements and representations in the application, the staff finds that the package continues to meet the requirements of 10 CFR Part 71.

Issued with Certificate of Compliance No. 9187, Revision No. 12,
on 10/9/18