



Department of Energy
Washington, DC 20585

September 4, 2020

Mr. Brad Greene
Vice President, Quality
NAC International
3930 East Jones Bridge Road, Suite 200
Norcross, GA 30092

Dear Mr. Greene:

In response to your email dated July 6, 2020, enclosed is Department of Energy (DOE) Quality Assurance Program Approval (QAPA), Approval Number 0004, Revision 4, for NAC International (NAC). This approval for amendment of QAPA 0004 is based on DOE Packaging Certification Program's (PCP) previous endorsement of Nuclear Regulatory Commission (NRC) Approval Number 0018, Revision 10, dated August 6, 2015, and DOE PCP review of NAC Quality Assurance Manual (QAM), 2nd Edition, Revision 10, issue date July 6, 2020. DOE PCP concurs that changes to the QAM do not reduce the commitments previously approved by NRC, and provide reasonable assurance to meet the requirements of 10 CFR Part 71 Subpart H while implementing a 25% extension of audit and survey frequencies during exigent conditions.

This DOE QAPA satisfies DOE Order 460.1D, *Hazardous Materials Packaging and Transportation Safety*, and therefore complies with the provisions in 49 CFR 173.7(d) for DOE to maintain packaging standards equivalent to those specified in 10 CFR Part 71.

The expiration date of DOE QAPA 0004, Revision 4, is December 31, 2024. If you wish to renew, revise, or terminate approval of the QAPA 0004, please request this action in writing. Any revisions to the NAC QAM, except for spelling corrections and nonsubstantive changes to punctuation or editorial items, must be submitted and approved by DOE PCP prior to implementation of the proposed changes. Revisions to the NAC QAM for spelling corrections and nonsubstantive changes to punctuation or editorial items should be submitted to DOE PCP for reference.

If you have any questions, please contact me or Dr. Shuler of my staff at (301) 903-5513.

Sincerely,

Julia C. Shenk
Headquarters Certifying Official
Director
Office of Packaging and Transportation

Digitally signed by Julia C. Shenk
Date: 2020.09.04 09:16:15 -04'00'

Enclosure

cc: James Shuler, EM-4.24
QA Docket 2010-005



U.S. Department of Energy
QUALITY ASSURANCE PROGRAM APPROVAL
 For Type B and Fissile Radioactive Material Packages

1. APPROVAL NUMBER 0004
REVISION 4

Pursuant to DOE Order 460.1D, *Hazardous Materials Packaging and Transportation Safety*, subparagraph 4.a.(3), *Quality Assurance (QA)* directs that each Departmental element that participates in the use, design, purchase, fabrication, handling, shipping, storing, cleaning, assembly, inspection, testing, operation, maintenance, repair, and modification of Type B or fissile materials packaging must have and maintain a quality assurance (QA) program in accordance with 10 CFR Part 71, Subpart H that is approved by the NRC or the DOE Certifying Official, prior to the performance of those operations. The Contractors Requirements Document in Attachment 1 of Paragraph 5.a. of the Order imposes the same requirement on DOE contractors. Based on the reliance on statements and representations heretofore made in Block 5 by the organization named in Block 2, the Quality Assurance Program Description identified in Block 5 is hereby approved. This approval is issued to satisfy the requirements of the Order, 49 CFR 173.7.(d), and 10 CFR 71.101. This approval is subject to all applicable rules, regulations, and orders of the U.S. Department of Energy now or hereafter in effect and to any conditions specified below .

2. ORGANIZATION NAME NAC International			3. EXPIRATION DATE December 31, 2024
STREET ADDRESS 3930 East Jones Bridge Road, Suite 200			4. DOCKET NUMBER 2010-005
CITY Norcross	STATE GA	ZIP CODE 30092	

5. QUALITY ASSURANCE PROGRAM DESCRIPTION, REVISION, and DATE
DOE approval based on (a) endorsement of NRC Form 311, Approval Number 0018, Revision 10, August 6, 2015 of NAC QA Manual, 2nd Edition, Revision 8, April 2, 2014, and (b) NAC QA Manual, 2nd Edition, Revision 10, July 6, 2020

6. CONDITIONS

- Activities conducted regarding Type B and fissile material transportation packagings are to be executed under applicable criteria of 10 CFR Part 71 Subpart H. Authorized activities include: design, procurement, fabrication, assembly, testing, modification, maintenance, repair and use of transportation packagings.
- Records shall be maintained in accordance with the provisions of 10 CFR Part 71. Specifically:
 - Records of each shipment of licensed material shall be maintained for 3 years after that shipment [10 CFR 71.91(a)].
 - Records providing evidence of packaging quality shall be maintained for 3 years after the life of the packaging [10 CFR 71.91(d)].
 - Records describing activities affecting packaging quality shall be maintained for 3 years after this Quality Assurance Program Approval is terminated [10 CFR 71.135].
- Planned and periodic audits of all aspects of the Quality Assurance Program shall be conducted in accordance with written procedures or checklists, by appropriately trained personnel not having direct responsibility in the areas being audited, in accordance with 10 CFR 71.137.
- In addition to the requirements of Subparts G and H of 10 CFR 71, and except as specified in Section 5(d), "Conditions," of applicable Certificates of Compliance, each package must be designed, fabricated, acceptance tested, operated, and maintained in accordance with applicable Safety Analysis Report for Packaging requirements; specifically, Chapter 7, "Operating Procedures," Chapter 8, "Acceptance Tests and Maintenance Program," and Chapter 9, "Quality Assurance."

FOR THE U.S. DEPARTMENT OF ENERGY

SIGNATURE Julia C. Shenk Digitally signed by Julia C. Shenk Date: 2020.09.04 09:19:49 -04'00'	DATE OF ISSUANCE September 4, 2020
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Julia C. Shenk
 DOE Headquarters Certifying Official
 Director, Office of Packaging and Transportation