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By Recall Management division at 12:18 pm, Feb 25, 2014

Rapiscan® systems
An OSI Systems Company

VIA E-MAIL (RMD.ODI@DOT.GOV) AND FEDEX

Ms. Nancy Lewis
Associate Administrator for Enforcement
National Highway Traffic Safety Administration
Attention: Recall Management Division (NVS–215)
1200 New Jersey Avenue, SE
Washington, DC 20590

Re: Part 573 Report

Dear Ms. Lewis:

Rapiscan Systems, Inc. ("Rapiscan") submits this letter pursuant to 49 C.F.R. Part 573 (the "Part 573 Report"), to provide information relating to a potential safety-related defect. Rapiscan develops, manufactures and sells security inspection equipment, such as X-ray machines and metal detectors, primarily to domestic and international government agencies. This matter involves Rapiscan's M60 model mobile cargo and vehicle inspection system ("M60 Mobile Units").[1] The M60 Mobile Units deploy an X-ray imaging system on a heavy-duty truck chassis allowing for drive by scanning of stationary, unoccupied vehicles and containers. Only eleven (11) M60 Mobile Units operate in the United States and all are owned by the United States Customs and Border Protection ("CBP").

The attached initial Part 573 Report involves a potential safety-related defect in the mounting of Rapiscan's linear particle accelerator (LINAC) carriage on the truck chassis of the M60 model Mobile Unit. The LINAC is a type of high-energy particle accelerator that is used to generate X-rays. The LINAC carriage is a mechanical, articulating platform that is secured to the truck chassis, which the LINAC is mounted to for operation and transport. The LINAC carriage enables the deployment and positioning of the LINAC for X-ray scanning, and stowage of the LINAC for vehicle transport.

Rapiscan agrees to conduct a recall in cooperation with NHTSA to address this potential safety-related defect.

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[1] Rapiscan manufactures different types of mobile units and, in the M60 product line, also has two other models, the M45 and T60. There are no M45 or T60 models in the United States.

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In accordance with 49 C.F.R. § 573.6(b), Rapiscan will update the attached Part 573 Report should additional information become available.

Sincerely,

Robert Gibson
Vice President, Global Quality Assurance & Regulatory Affairs

Enclosure: Part 573 Report for Rapiscan Systems, Inc.

Part 573 Report for Rapiscan Systems, Inc.

Submission date: February 25, 2014

49 C.F.R. § 573.6(c)(1): Manufacturer's name

The manufacturer is Rapiscan Systems, Inc.

49 C.F.R. § 573.6(c)(2): Items of equipment

The equipment at issue is the roll pin assembly and lock nuts on the LINAC carriage assembly.

49 C.F.R. § 573.6(c)(3): Total Number of Affected Equipment

The total number of affected units is eleven (11) M60 Mobile Units equipped with the LINAC carriage.

49 C.F.R. § 573.6(c)(4): Percentage of Affected Equipment

All eleven units could potentially be affected should the lock nut be overtightened.

49 C.F.R. § 573.6(c)(5): Description of Defect or Noncompliance

The roll pin in the LINAC carriage unit can be stressed and fail when the adjuster lock nut is overtightened. This can cause the LINAC to fall from its stored position to the ground. If the LINAC were to fall while the Mobile Unit was operating on the road, it could distract the driver or other drivers. If the LINAC were to detach, it could create a safety risk.

49 C.F.R. § 573.6(c)(6): Chronology of Principal Events Leading to a Determination of a Safety Defect

On January 9, 2014, the LINAC came out of its mounting and fell onto the rear bumper of a model Mobile Unit as the truck was being driven on the property of the Port of Los Angeles/Long Beach. The remaining ten M60 Mobile Units, all of which are owned by CBP, have been grounded until they can be repaired to mission capable status. A preliminary root cause analysis was prepared with the assistance of CBP engineering staff and submitted to CBP in late January 2014. On February 3, 2014, Rapiscan issued a draft Technical Service Bulletin to CBP for CBP's review and approval regarding the LINAC support assembly roll pin and the proper securing of the lock nut with correctly calibrated equipment. Although the final root cause analysis and proposal for engineering design change will not be completed for CBP until the end of February, Rapiscan submits this Part 573 report indicating the existence of a potential safety-related defect now, in advance of the conclusion of the root cause analysis.

49 C.F.R. § 573.6(c)(8): Manufacturer's Program for Remedy

The February 3, 2014 draft Technical Service Bulletin, which is attached, shows the work instruction for replacing the roll pin and ensuring the lock nuts on the LINAC carriage assembly are properly tightened. Should any additional engineering design changes prove necessary upon final completion of the root cause analysis and continuing design work, Rapiscan will update this Part 573 Report.

49 C.F.R. § 573.6(c)(10): Owner Notification

CBP is the only owner of the vehicles with affected equipment. CBP staffed an engineer on-site at Rapiscan's manufacturing facility during the root cause analysis work. CBP received the draft February Technical Service Bulletin for its review and approval and will continue to participate in the evaluation and approval of any engineering changes. Rapiscan will also work with NHTSA on any additional communications deemed necessary.