

U.S. NUCLEAR REGULATORY COMMISSION  
**CERTIFICATE OF COMPLIANCE**  
For Radioactive Materials Packages

1.(a) Certificate Number	1.(b) Revision No.	1.(c) Package Identification No.	1.(d) Pages No.	1.(e) Total No. Pages
6400	10	USA/6400/B( )F	1	6

2. PREAMBLE

- 2.(a) This certificate is issued to satisfy Sections 173.393a, 173.394, 173.395, and 173.396 of the Department of Transportation Hazardous Materials Regulations (49 CFR 170-189 and 14 CFR 103) and Sections 146-19-10a and 146-19-100 of the Department of Transportation Dangerous Cargoes Regulations (46 CFR 146-149), as amended.
- 2.(b) The packaging and contents described in Item 5 below, meets the safety standards set forth in Subpart C of Title 10, Code of Federal Regulations, Part 71, "Packaging of Radioactive Materials for Transport and Transportation of Radioactive Material Under Certain Conditions."
- 2.(c) 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—

3.(a) Prepared by (Name and address): Westinghouse Electric Corporation P.O. Box 355 Pittsburgh, PA 15230	3.(b) Title and identification of report or application: Westinghouse Electric Corporation application dated August 7, 1981, as supplemented.
3.(c) Docket No. 71-6400	

4. CONDITIONS

This certificate is conditional upon the fulfilling of the requirements of Subpart D of 10 CFR 71, as applicable, and the conditions specified in Item 5 below.

5. Description of Packaging and Authorized Contents, Model Number, Fissile Class, Other Conditions, and References:

(a) Packaging

(1) Model No.: 6400

(2) Description

A protective overpack which provides impact and thermal protection for its contents. The inner shell (cavity) is approximately 76" x 76" x 172" constructed of 3/16" thick and 10-gauge mild steel. Closure of the cavity is by a 1/4" thick aluminum plate with silicone rubber gasket which is bolted to the main inner shell. The cavity is centered and supported in an outer 3/16" thick steel jacket by approximately 32" of polyurethane foam insulation at the end and 10" on the sides. A removable section or cap consisting of approximately 34" of polyurethane foam insulation encased in steel with a silicone rubber gasket is bolted to the main outer steel jacket. The overall dimensions of the package are approximately 8' x 8' x 20'. Vent holes are provided on the sides and ends of the container. Set into each corner of the outer container are standard I.S.O. steel castings. The total weight including weight of the contents is 45,000 pounds.

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(3) Drawings

Packaging is constructed in accordance with one of the following sets of drawings: (1) Protective Packaging, Inc, Drawing Nos. 32106, Sheet 1, Rev. F and 32106, Sheet 2, Rev. 0; or (2) Westinghouse Electric Corporation Drawing No. 2020D08, Sheet 1 and 2, Rev. 0; or (3) Babcock and Wilcox Company Drawing No. 11-D-2130, Rev. 0; or (4) Protective Packaging, Inc., Drawing Nos. 32106-1, Sheet 1, Rev. F and 32106, Sheet 2, Rev. 0, as modified by Nuclear Packaging Inc. Drawing No. EG-60-01D, Sheets 1 and 2, Rev. 0; or (5) Protective Packaging, Inc. Drawing No. 32395, Sheets 1 through 9, Rev. B, as modified by Sandia Laboratories letter dated May 8, 1980; or (6) Lawrence Livermore National Laboratory Drawing Nos. AAA81-108683-00, Rev. 0 and AAA81-110194-00, Rev. 0.

(b) Contents

- (1) Large, decontaminated equipment waste of such size as not to fit into a 55-gallon drum (with legs or other readily removable appendages removed). Not to exceed 200 grams plutonium within the package.

Equipment waste surfaces containing more than 0.5 Ci must be decontaminated to a smearable level of no more than 150,000 dpm/100 cm<sup>2</sup> prior to fixation or until successive decontamination cleaning operations do not reduce the smearable contamination levels by more than ten percent. After fixation, equipment waste surfaces must have a smearable level of contamination of no greater than 10,000 dpm/100 cm<sup>2</sup>. Outer surfaces must have a smearable level of contamination of no greater than 20 dpm/100 cm<sup>2</sup>. Prior to fixing of contamination, large equipment waste must be inspected to insure that: (a) all sharp or protruding objects have been removed, blunted or protected with packaging material, and (b) pipe caps, gasketed blind flanges, covers, etc., have been installed wherever possible. Following such inspection, the inner surfaces containing more than 0.5 Ci must be fixed with "strip" or "clear" coating. The inner surface(s) may alternatively be fixed with a polyurethane foam.

The large equipment waste must be enclosed in a tight-fitting, 1-inch thick plywood box constructed in accordance with Westinghouse Electric Corporation's Drawing No. 1620E43, Sheets 1, 2, 3, and 4, Rev. 3; a tight fitting 3/16" thick corrugated steel box constructed in accordance with Rockwell Hanford Operations' Drawing No. H-2-91888, Sheet 1, Rev. 0 (modified or unmodified); enclosed in a tight fitting box constructed of 1-inch thick plywood; enclosed in a tight fitting box constructed in accordance with General Electric Company Drawing Nos. 908E614, Rev. 1, and 908E619, Rev. 2 or 908E648, Rev. 0 or 908E649, Rev. 0; or enclosed in a tight fitting box constructed in accordance with Babcock and Wilcox Company Drawing No. LRC-70019 H, Rev. 2. The space between the equipment and the box must be filled with foam (1" minimum foam thickness) and between equipment (1/2" minimum foam thickness).

Alternatively, gloveboxes contaminated and fixed as described above may be broken down as follows:

Glovebox windows are removed and separately packaged in 12-mil thick PVC bags and sealed. The inner bag is tape sealed and the outer bag is heat sealed.

Glovebox panels are cut to dimensions to fit inside the 3/16" thick corrugated steel burial crates constructed in accordance with Rockwell Hanford Operations' Drawing No. H-2-91888, Sheet 1, Rev. 0 (modified or unmodified). All sharp or protruding objects are removed, blunted, or protected with packaging material. The glovebox panels are bundled such that internal box surfaces are facing inward. Cut glovebox panels from not more than one glovebox are banded with metal strap banding such that two metal strap bands in each direction are placed around the length and width of the glovebox sections. The glovebox window and cut panel packages are enclosed and foamed in place within the box.

Blocking or dunnage is placed within the box to ensure a one inch foam barrier on the sides and bottom of the box. Likewise, dunnage is provided between the banded glovebox sections to maintain a 1/2" thick foam barrier between banded packages.

- (2) Decontaminated hard waste items, such as equipment, metal cans, tools, etc., must be double bagged within 12-mil thick PVC with each bag heat sealed. The total fissile quantity of all the sealed packages in one container must not exceed 200 grams.

Hard waste surfaces must be decontaminated to a smearable level of no more than 150,000 dpm/100 cm<sup>2</sup> prior to fixation or until successive decontamination cleaning operations do not reduce the smearable contamination levels by more than 10 percent. After fixation, hard waste surfaces must have a smearable level of contamination of no greater than 10,000 dpm/100 cm<sup>2</sup>. Prior to fixing of contamination, hard waste must be inspected to insure that sharp or protruding objects have been removed, blunted, or protected with packaging material. Following such inspection, the outer surfaces must be fixed with "strip" or "clear" coating. Hard waste items such as furnace shells, muffles, or other items with large cavities not accessible for decontamination must be filled with foam within the cavities. Surfaces that are not easily accessible, e.g., interiors of small diameter tubing and piping which were in contact with process materials, must have been swabbed or immersed in cleaning solution to insure removal of residual material. Open ends of the tubing and piping must be sealed using mechanical fittings.

Alternately, large heavy walled process glassware must be painted inside and outside to fix contamination and double bagged in 12-mil thick PVC with each bag heat sealed. The glassware must be secured in a box constructed in accordance with General Electric Company Drawing No. 272E81-4, Rev. 0. The box must be filled with foam and total activity limited to less than two (2) Ci in a box.

Alternately, stainless steel transfer tubes and HEPA filters must be double bagged in 12-mil thick PVC with each bag heat sealed. The tubes/filters must be secured in a box constructed in accordance with General Electric Company Drawing No. 272E81-28, Rev. 0. The box must be filled with foam and total activity limited to less than 0.5 Ci in a box.

Alternately, round steel ducting must be capped and secured in a box constructed in accordance with General Electric Company Drawing No. 272E81-29, Rev. 0; 272E81-30, Rev. 0; or 272E81-31, Rev. 0. Outer surfaces ducting will have a smearable level of contamination no greater than 20 d/m/100 cm<sup>2</sup>. The box must be filled with foam and total activity limited to less than 0.5 Ci in a box.

Sealed packages and boxes of hard waste must be enclosed in a tight-fitting, 1-inch thick plywood box constructed in accordance with Westinghouse Electric Corporation's Drawing No. 1620E43, Sheets 1, 2, 3, and 4, Rev. 3; a tight-fitting 3/16" thick corrugated steel box constructed in accordance with Rockwell Hanford Operations' Drawing No. H-2-91888, Sheet 1, Rev. 0 (modified or unmodified); enclosed in a tight fitting box constructed in accordance with General Electric Company Drawing Nos. 908E614, Rev. 1 and 908E619, Rev. 2 or 908E648, Rev. 0 or 908E649, Rev. 0; or enclosed in a tight fitting box constructed in accordance with Babcock and Wilcox Company Drawing No. LRC-70019 H, Rev. 2. The space between the packages and the box must be filled with foam to a minimum thickness of 1 inch. Void spaces between the sealed packages must be filled with foam (1/2" minimum foam thickness).

- (3) Glove box absolute (HEPA) filters must be double bagged within 12-mil thick PVC, with each bag heat sealed and packaged within DOT Specification 17H or 17C steel drums (maximum size of 55 gallons). Each drum must be lined with a sealed plastic liner and equipped with a standard drum closure. Each drum must not exceed a fissile quantity of 60 grams.

Sealed drums must be enclosed in a tight-fitting 1-inch thick plywood box constructed in accordance with Westinghouse Electric Corporation's Drawing No. 1620E43, Sheets 1, 2, 3, and 4, Rev. 3; a tight-fitting 3/16" thick corrugated steel box constructed in accordance with Rockwell Hanford Operations' Drawing No. H-2-91888, Sheet 1, Rev. 0 (modified or unmodified); enclosed in a tight fitting box constructed in accordance with General Electric Company Drawing Nos. 908E614, Rev. 1 and 908E619, Rev. 2 or 908E648, Rev. 0 or 908E649, Rev. 0; or enclosed in a tight fitting box constructed in accordance with Babcock and Wilcox Company Drawing No. LRC-70019 H, Rev. 2. The space between the drums and the box must be filled with foam to a minimum thickness of 1 inch. Void spaces between drums must be filled with foam (1/2" minimum foam thickness).

- (4) Soft waste items such as sheeting, gloves, paper, prefilter media, polyethylene bottles, shoe covers, etc., must be double bagged in 12-mil thick PVC, with each bag heat sealed (bag size must not exceed 22" x 16" x 10") and packaged within DOT Specification 17H or 17C steel drums (maximum size of 55 gallons). Each drum must be lined with a sealed plastic liner and equipped with a standard drum closure. Each drum must not exceed a fissile quantity of 60 grams.

Sealed drums must be enclosed in a tight-fitting 1-inch thick plywood box constructed in accordance with Westinghouse Electric Corporation's Drawing No. 1620E43, Sheets 1, 2, 3, and 4, Rev. 3; a tight-fitting 3/16" thick corrugated steel box constructed in accordance with Rockwell Hanford Operations' Drawing No. H-2-91888, Sheet 1, Rev. 0 (modified or unmodified); or enclosed in a tight fitting box constructed in accordance with Babcock and Wilcox Company Drawing No. LRC-70019 H, Rev. 2. The space between the drums and the box must be filled with foam to a minimum thickness of 1 inch. Void spaces between drums must be filled with foam (1/2" minimum foam thickness).

- (5) Liquid waste must be solidified in concrete in a 30-gallon drum which must be sealed in a plastic bag and centered and supported in a DOT Specification 17H or 17C 55-gallon steel drum by absorbent material. The 55-gallon drum must be lined with a sealed plastic liner and equipped with a standard drum closure. Each drum must not exceed a fissile quantity of 60 grams.

Alternatively, liquid waste is solidified in concrete in maximum size one (1) gallon packages which are double bagged and heat sealed in 12-mil thick PVC and placed with a DOT Specification 17H or 17C steel drum (maximum size of 55 gallons). The drum is lined with a sealed plastic liner and equipped with a standard drum closure. Each 55-gallon drum must not exceed a fissile quantity of 60 grams. For drums smaller than 55-gallons, the total fissile quantity of all the sealed packages (drums) in one container must not exceed 200 grams.

Sealed drums must be enclosed in a tight-fitting 1-inch thick plywood box constructed in accordance with Westinghouse Electric Corporation's Drawing No. 1620E43, Sheets 1, 2, 3, and 4, Rev. 3; or a tight-fitting 3/16" thick corrugated steel box constructed in accordance with Rockwell Hanford Operations' Drawing No. H-2-91888, Sheet 1, Rev. 0 (modified or unmodified); enclosed in a tight-fitting box constructed in accordance with General Electric Company Drawing Nos. 908E614, Rev. 1 and 908E619, Rev. 2 or 908E648, Rev. 0 or 908E649, Rev. 0; or enclosed in a tight fitting box constructed in accordance with Babcock and Wilcox Company Drawing No. LRC-70019 H, Rev. 2. The space between the drums and the box must be filled with foam to a minimum thickness of 1 inch. Void spaces between drums must be filled with foam (1/2" minimum foam thickness).

(c) Fissile Class	III
Maximum number of packages per shipment	One (1)

6. The polyurethane foam must be Instapak 200 or equivalent.
7. The maximum weight of the contents including secondary packaging, dunnage, shoring and bracing must not exceed 30,000 pounds.
8. Sufficient dunnage, shoring and/or bracing must be utilized to minimize secondary impact of the secondary packaging within the cavity under normal and accident conditions.
9. Protrusions from secondary packaging such as lifting eyes, etc., must be positioned such that they will not contact the cavity walls, or shoring must be provided to prevent puncture of the cavity walls by the protrusions under the normal and accident conditions.
10. Contents must be positioned in the cavity such that the center of gravity of the loaded package is substantially the same as the center of gravity of an empty package.
11. The cavity of the overpack must be vented through an absolute filter to equalize pressure between the outside and inside of the overpack.
12. Package Model No. 6400 is exempt from the requirements of 10 CFR §71.42 only for the purpose of making these shipments.
13. The package authorized by this certificate is hereby approved for use under the general license provisions of 10 CFR §71.12(b).
14. Expiration date: November 30, 1986.


REFERENCES

Westinghouse Electric Corporation application dated August 7, 1981.

General Electric Company supplement dated October 1, 1981.

Babcock and Wilcox Company supplement dated March 8, 1982.

FOR THE U.S. NUCLEAR REGULATORY COMMISSION

  
Charles E. MacDonald, Chief  
Transportation Certification Branch  
Division of Fuel Cycle and  
Material Safety, NMSS


Date: MAR 11 1982

U.S. Nuclear Regulatory Commission  
Transportation Certification Branch  
Approval Record  
Model No. 6400 Packaging  
Docket No. 71-6400

By application dated February 10, 1982, as supplemented March 8, 1982, the Babcock and Wilcox Company requested an amendment to the Model No. 6400 package to permit use of an additional steel container and use of smaller than 55-gallon steel drums to enclose solidified liquid wastes.

The applicant has requested approval to load 1-gallon packages of solidified liquid waste into drums smaller than 55-gallons. Because containment of the material is based on solidification and double bagging (heat sealed) in metal drums, reducing the size of the drum will not decrease the effectiveness of the containment. The criticality limits have been adjusted from 60 grams per drum to 200 grams fissile per container of drums.

In addition, a new container to hold waste materials will have no effect on the packaging. Containment is based upon relatively non-dispersible forms of the contents, the effectiveness of surface coatings and polyurethane foam for fixing in place the residual contamination and the impact and thermal protection afforded by the overpack.

  
Charles E. MacDonald, Chief  
Transportation Certification Branch  
Division of Fuel Cycle and  
Material Safety, NMSS

Date: MAR 11 1982