

**CERTIFICATE OF COMPLIANCE  
FOR RADIOACTIVE MATERIAL PACKAGES**

1. a. CERTIFICATE NUMBER	b. REVISION NUMBER	c. DOCKET NUMBER	d. PACKAGE IDENTIFICATION NUMBER	PAGE	PAGES
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## 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

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| <p>a. ISSUED TO (<i>Name and Address</i>)</p> <p>Westinghouse Electric Company, LLC<br/>(WELCO)<br/>P.O. Box 355<br/>Pittsburgh, PA 15230-0355</p> | <p>b. TITLE AND IDENTIFICATION OF REPORT OR APPLICATION</p> <p>Westinghouse Electric Corporation application<br/>dated August 7, 1981, as supplemented.</p> |
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## 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.: 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.

## (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. E.G.-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.

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5.(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); or 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.

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## 5.(b) Contents (continued)

- (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.

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## 5.(b) Contents (continued)

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).

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## 5.(b) Contents (continued)

- (5) Liquid waste (decontamination solutions only) 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).

- (6) Uranium 233 oxide and thorium oxide in the form of intact LWBR-type fuel rods with the following limitations:
- (i) Rods must be packaged within the Model No. 6400 packaging as described in Section 1 of WAPD-LP(FE)-220, Rev. 3 (February 1983);
  - (ii) The fuel content must not exceed 50 kg U-233 per shipment;
  - (iii) All rod storage containers must be filled to capacity (at least 70% of cross-sectional area) with rods or aluminum shim stock;
  - (iv) Each rod storage container must contain not more than one sub-container of 5/9 or 12 w/o BMU seed rods;
  - (v) Each rod storage container must weigh not more than 2,000 pounds;
  - (vi) The fuel rod heat generation must not exceed 30 watts; and
  - (vii) Operating Procedures and Acceptance Tests and Maintenance Program must be modified to meet the requirement of Item 11 of this approval.

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## 5.(b) Contents (continued)

- (7) Liquid analytical residues from the dissolution of spent reactor fuel rods, solidified in cement (see table, p. 3 of application\*). The cement is contained in 1.5-gal steel can closed with a slip cover lid. The two primary cans are packed in a secondary steel can sealed with a press fit lid (see Figure 2 of application\*). The secondary containment package contents are placed within a radiation shield (lid secured with six (6), 1/2"-13UNC bolts with welds in accordance with application\*) centered in a DOT Specification 17-C 55-gal steel drum (see Figure 1 of application\*). The drums are sealed with styrene-butadiene rubber gasket contained with a standard drum closer. Total weight of the drum will be less than 1,450 lb, and each drum will not exceed a fissile quantity of 12 g and 435 Ci of fission products.

Six (6), 55-gal sealed drum assemblies will be enclosed in a tight-fitting 3/16-in thick corrugated steel box constructed in accordance with Rockwell-Hanford Operations' Drawing No. H-2-91888, Sheet 1, Rev. 0 (modified or unmodified). 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 fitted with foam to a minimum thickness of 1/2 inch. Two (2) corrugated steel box assemblies may be transported in the packaging.

\* U.S. Department of Energy letter dated April 15, 1983.

- (8) Uranium 233 oxide and thorium oxide in the form of intact LWBR-type fuel rods with the following limitations:
- (i) Rods must be packaged as shown in Figure 4, Application dated July 8, 1983, and contained within the Model No. NNFD-SA-2 packaging (Certificate of Compliance No. 5910);
  - (ii) The fuel content must not exceed 2.0 kg U-233 per shipment;
  - (iii) Each loaded LWBR Rod Transport Box must weigh not more than 99 pounds;
  - (iv) The fuel rod heat generation rate must not exceed 2 watts; and
  - (v) Operating Procedures and Acceptance Tests and Maintenance Program must be modified to meet the requirement of Item 11 of this approval.

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## 5.(b) Contents (continued)

- (9) Maximum of four (4) Cf-252 sources with the following limitations:
- (i) Each source must be doubly encapsulated with the inner capsule meeting the requirements for special form radioactive material;
  - (ii) The total Cf-252 content must not exceed 6.1 mg;
  - (iii) The sources must be packaged in a shielded container as described in Chapter 1 of WAPD-LP(CE)POB-591 (January 1984); and
  - (iv) The decay heat generation from the source material must not exceed one watt.
- (10) Compressed krypton-85 gas in mixture with other non-radioactive gases that are chemically compatible with the 3AA2015 cylinder. No fissile material (Requirement of 5.(c) does not apply). Shipment of krypton-85 gas is subject to the following limitations:
- (i) Radioactivity not to exceed 2,700 curies. Maximum internal decay heat not to exceed 15 watts. Maximum volume of krypton-85 and other non-radioactive gases shall not exceed 1480 liters at STP (1 atm, 25°C);
  - (ii) The maximum initial fill pressure shall not exceed 500 psig at 25°C;
  - (iii) The DOT Specification 3AA2015 gas cylinder shall be certified for an operating load of 2,015 psig, at least once every 5 years by testing to 3,360 psig;
  - (iv) A minimum of 24 hours after loading with krypton-85 gas the krypton packaging primary containment shall have a leak rate of less than 0.0014 microcuries per second. The leak test shall be performed with the containment vessel within the lead shield container prior to placement within its thermal overpack;
  - (v) Content of the package shall be verified by mass spec analysis;
  - (vi) Acceptance, maintenance and use of the krypton package shall be in accordance with the procedures and requirements of Chapter 7 and 8 of Westinghouse Idaho Nuclear Company, Inc. Report No. WIN-236, Revision 1, March 1988. The retaining ring shall be tightened around the gas cylinder to a 40 to 50 inch-pound torque;
  - (vii) The position and securement of the krypton package within the Model No. 6400 is as specified in Westinghouse Idaho Nuclear Company, Inc. Drawing No. 059888;
  - (viii) Krypton package must be enclosed within a tight fitting plywood box constructed in accordance with Westinghouse Idaho Nuclear Company, Inc. Drawing No. 059886.

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## 5.(c) Transport Index for Criticality Control (Criticality Safety Index)

Minimum transport index to be shown on  
label for nuclear criticality control: 100

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 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 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. Contents packaged under the conditions of this certificate of compliance are exempt from the requirements of 10 CFR 71.63. This condition expires on October 1, 2004.
13. Condition 5(c) of this certificate of compliance is not applicable where the fissile material is excluded as provided by 10 CFR 71.53 until October 1, 2004, and 10 CFR 71.15, thereafter.
14. In addition to the requirements of Subpart G of 10 CFR Part 71, the package must be prepared for shipment, operated, and maintained in accordance with "Operating Inspection and Maintenance Procedure No. CSK-003, Rev. 0," included in the Westinghouse Electric Corporation supplement dated April 14, 1992.
15. The package authorized by this certificate is hereby approved for use under the general license provisions of 10 CFR 71.12 until October 1, 2004, and 10 CFR 71.17, thereafter.
16. Expiration date: November 30, 2007.

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REFERENCES

Westinghouse Electric Corporation application dated August 7, 1981.

General Electric Company supplement dated: October 1, 1981.

Babcock and Wilcox Company supplements dated: March 8, 1982; and January 10, 1985.

Department of Energy, Division of Naval Reactors, supplements dated: April 22, and July 8, 1983; and March 5, 1984.

Department of Energy, Chicago Operations Office, supplement dated: April 15, 1983.

Department of Energy, Washington, DC, supplement dated: June 6, 1988.

Westinghouse Electric Corporation supplements dated: April 14, 1992; and April 14, 1997.

Westinghouse Electric Company, Division of CBS Corporation supplements dated: December 22, 1997; September 28, 1998; and February 22, 1999.

Westinghouse Electric Company, LLC supplement dated: June 14, 2002.

FOR THE U.S. NUCLEAR REGULATORY COMMISSION

/RA/

John D. Monninger, Chief  
Licensing Section  
Spent Fuel Project Office  
Office of Nuclear Material Safety  
and Safeguards

Date: August 27, 2004