

**CERTIFICATE OF COMPLIANCE
FOR RADIOACTIVE MATERIAL PACKAGES**

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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

- a. ISSUED TO (*Name and Address*)
Department of Energy
Washington, DC 20585
- b. TITLE AND IDENTIFICATION OF REPORT OR APPLICATION
Washington TRU Solutions LLC application dated
October 4, 2004, 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.: TRUPACT-II

(2) Description

A stainless steel and polyurethane foam insulated shipping container designed to provide double containment for shipment of contact-handled transuranic waste. The packaging consists of an unvented, 1/4-inch thick stainless steel inner containment vessel (ICV), positioned within an outer containment assembly (OCA) consisting of an unvented 1/4-inch thick stainless steel outer containment vessel (OCV), a 10-inch thick layer of polyurethane foam and a 1/4 to 3/8-inch thick outer stainless steel shell. The package is a right circular cylinder with outside dimensions of approximately 94 inches diameter and 122 inches height. The package weighs not more than 19,250 pounds when loaded with the maximum allowable contents of 7,265 pounds.

The OCA has a domed lid which is secured to the OCA body with a locking ring. The OCV containment seal is provided by a butyl rubber O-ring (bore seal). The OCV is equipped with a seal test port and a vent port.

The ICV is a right circular cylinder with domed ends. The outside dimensions of the ICV are approximately 73 inches diameter and 98 inches height. The ICV lid is secured to the ICV body with a locking ring. The ICV containment seal is provided by a butyl rubber O-ring (bore seal). The ICV is equipped with a seal test port and vent port. Aluminum spacers are placed in the top and bottom domed ends of the ICV during shipping. The cavity available for the contents is a cylinder of approximately 73 inches diameter and 75 inches height.

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5.(a)(3) Drawings

The packaging is constructed in accordance with Packaging Technology, Inc., Drawing No. 2077-500 SNP, Sheets 1 through 11, Rev. V. The contents are positioned within the packaging in accordance with the Contact-Handled Transuranic Waste Authorized Methods for Payload Control (CH-TRAMPAC), Rev. 2, Section 2.9, "Payload Container/Assembly Configuration Specifications." The standard pipe overpack is constructed and assembled in accordance with Packaging Technology, Inc., Drawing No. 163-001, Rev. 6. The S100 pipe overpack is constructed and assembled in accordance with Packaging Technology, Inc., Drawing No. 163-002, Rev. 4. The S200 pipe overpack is constructed and assembled in accordance with Packaging Technology, Inc., Drawing No. 163-003, Rev. 3. The S300 pipe overpack is constructed and assembled in accordance with Packaging Technology, Inc., Drawing No. 163-004, Sheet 1, Rev. 1. The compacted puck drum spacers needed for the purpose of maintaining subcriticality in 55-, 85-, and 100-gallon drums are constructed and assembled in accordance with Drawing No. 163-006, Rev. 0.

(b) Contents

(1) Type and form of material

Dewatered, solid or solidified transuranic and tritium-contaminated materials and wastes. Materials must be packaged in one of the following payload containers: a 55-gallon drum, an 85-gallon drum, a 100-gallon drum, a standard waste box (SWB), a standard pipe overpack, an S100 pipe overpack, an S200 pipe overpack, an S300 pipe overpack, or ten-drum overpack (TDOP). The payload containers are described in CH-TRAMPAC, Rev. 2, Section 2.9, "Payload Container/Assembly Configuration Specifications." Materials must be restricted to prohibit explosives, corrosives, nonradioactive pyrophorics and pressurized containers. Within a payload container, radioactive pyrophorics must not exceed 1 percent by weight, and free liquids must not exceed 1 percent by volume. Flammable organics and methane are limited along with hydrogen to ensure the absence of flammable gas mixtures in TRU waste payloads as described in Chapter 5.0 of CH-TRAMPAC, Rev. 2. For payloads of content code LA 154 and SQ 154, the absence of flammable gas mixtures is ensured as described in Appendix 6.12 of the CH-TRU Payload Appendices, Rev. 1. For payload configurations with an unvented heat-sealed bag layer, the absence of flammable gas mixtures is ensured as described in Appendix 6.13 of the CH-TRU Payload Appendices, Rev. 1.

(2) Maximum quantity of material per package

Contents not to exceed 7,265 pounds including shoring and secondary containers. The maximum gross weight for a payload container not to exceed the following:

- (i) 1,000 pounds per 55-gallon drum,
- (ii) 328 pounds per 6-inch standard pipe overpack,
- (iii) 547 pounds per 12-inch standard pipe overpack,
- (iv) 550 pounds per S100 pipe overpack,
- (v) 547 pounds per S200 pipe overpack,
- (vi) 547 pounds per S300 pipe overpack,
- (vii) 1,000 pounds per 85-gallon drum,

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- (viii) 1,000 pounds per 100-gallon drum,
- (ix) 4,000 pounds per SWB, or
- (x) 6,700 pounds per TDOP.

5.(b)(2) Maximum quantity of material per package (continued)

Maximum number of payload containers per package and authorized packaging configurations are as follows:

- (i) 14 55-gallon drums,
- (ii) 14 standard pipe overpacks,
- (iii) 14 S100 pipe overpacks,
- (iv) 14 S200 pipe overpacks,
- (v) 14 S300 pipe overpacks,
- (vi) 8 85-gallon drums,
- (vii) 6 100-gallon drums,
- (viii) 2 SWBs, or
- (ix) 1 TDOP.

Fissile material not to exceed the limits specified in CH-TRAMPAC, Rev. 2, Section 3.1, "Nuclear Criticality."

The S100, S200, and S300 pipe overpack payloads shall meet the curie limits specified in CH-TRAMPAC, Rev. 2, Section 3.3, "Activity Limits."

Maximum decay heat per package not to exceed 40 watts. Decay heat per payload container not to exceed the values given in CH-TRAMPAC, Rev. 2, Table 5.2-1, "List of Approved Alpha-numeric Shipping Categories, Maximum Allowable Hydrogen Gas Generation Rates, and Maximum Allowable Wattages," or calculated for approved shipping categories in accordance with the methodology specified in Section 5.2.3 of CH-TRAMPAC, Rev. 2. For content code LA 154 and SQ 154 payloads, decay heat per payload container not to exceed the values specified in Appendix 6.12 of CH-TRU Payload Appendices.

5. (c) Criticality Safety Index: 0.0
6. Physical form, chemical properties, chemical compatibility, configuration of waste containers and contents, isotopic inventory, fissile content, decay heat, weight, center of gravity, and radiation dose rate must be determined and limited in accordance with CH-TRAMPAC, Rev. 2.
7. Each payload container must be assigned to a shipping category in accordance with CH-TRAMPAC, Rev. 2, Section 5.1, "Payload Shipping Category." For a payload assembly made up of payload containers with the same shipping categories, each payload container and payload assembly must not exceed the allowable wattage in accordance with CH-TRAMPAC, Rev. 2, Section 5.2.3, "Hydrogen Gas Generation Rate and Decay Heat Limits for analytical category" or must be tested for gas generation in accordance with CH-TRAMPAC, Rev. 2, Section 5.2.5, "Unified Flammable Gas Test Procedure." For a payload made up of payload containers with different (nonequivalent) shipping categories, the flammability index of each payload container must not exceed 50,000 in accordance with CH-TRAMPAC, Rev. 2, Section 6.2.4, "Mixing of Shipping Categories," and Appendix 2.4 of the CH-TRU Payload Appendices, "Mixing of Shipping Categories"

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and Determination of the Flammability Index.” Each content code LA 154 and SQ 154 payload container must be assigned to a shipping category in accordance with Appendix 6.12 of CH-TRU Payload Appendices. Content code LA 154 and SQ 154 payload containers may only be assembled with other payload containers belonging to content code LA 154 and SQ 154, respectively, or dunnage in accordance with Appendix 6.12 of CH-TRU Payload Appendices. For a payload of content code LA 154 or SQ 154 containers with different shipping categories, the flammability index of each payload container must not exceed 50,000 in accordance with Appendix 6.12 of CH-TRU Payload Appendices.

8. Payload containers within a package shall be selected in accordance with CH-TRAMPAC, Rev. 2, Section 6.0, "Payload Assembly Requirements." Payload containers of content code LA 154 and SQ 154 shall be assembled in accordance with Appendix 6.12 of CH-TRAMPAC, Rev. 2.
9. Each payload container must be vented in accordance with Section 2.5, "Filter Vents," of the CH-TRAMPAC, Rev. 2. Drums which were not equipped with filtered vents during storage must be aspirated in accordance with CH-TRAMPAC, Rev. 2, Section 5.3, "Venting and Aspiration."
10. For close-proximity and controlled shipments meeting the conditions specified in Appendices 3.5 and 3.6, respectively, of CH-TRU Payload Appendices, shipping periods of 20 days and 10 days may be applicable. The shipping period for any mode of transport is not to exceed 60 days. For content code LA 154 and SQ 154 shipments, the shipping period as defined in Appendix 6.12 of the CH-TRU Payload Appendices is not to exceed 5 and 10 days, respectively.
11. In addition to the requirements of Subpart G of 10 CFR Part 71:
 - (a) Each package must be prepared for shipment and operated in accordance with the procedures described in Chapter 7.0, "Operating Procedures," of the application, as supplemented. For content code LA 154 and SQ 154 payloads, each package must be prepared for shipment and operated in accordance with the procedures described in Chapter 7.0 of the application, as modified by Appendix 6.12 of CH-TRU Payload Appendices.
 - (b) Each package must be tested and maintained in accordance with the procedures described in Chapter 8.0, "Acceptance Tests and Maintenance Program," of the application, as supplemented.
 - (c) Prior to each shipment, the lid and vent port seals on the inner and outer containment vessels must be leak tested in accordance with Sections 7.1.5 and 7.1.6 of the Safety Analysis Report.
 - (d) All free standing water must be removed from the inner containment vessel cavity and the outer containment vessel cavity before shipment.
12. The package authorized by this certificate is hereby approved for use under the general license provisions of 10 CFR 71.17.
13. Expiration date: August 31, 2009.

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REFERENCES

Washington TRU Solutions, LLC, October 4, 2004 and March 4 and June 8, 2005.

FOR THE U.S. NUCLEAR REGULATORY COMMISSION

/RA/

Michael T. Markley, Acting Chief
Licensing Section
Spent Fuel Project Office
Office of Nuclear Material Safety
and Safeguards

Date: 07/19/2005

