

September 11, 2008

ATTN: Document Control Desk Director, Division of Spent Fuel Storage and Transportation Office of Nuclear Material Safety and Safeguards U.S. Nuclear Regulatory Commission Washington, DC 20555-001

ATTN: Special Permits, PHH-31 Associate Administrator for Hazardous Material Safety Pipeline and Hazardous Materials Safety Administration U.S. Department of Transportation 1200 New Jersey Ave., SE Washington, DC 20590

Subject: Request Extended Use of Expiring Transportation Packages

Dear Sirs,

The purpose of this letter is to request extended use of our U.S. DOT Specification 20WC for a shipment originally scheduled in September 2008.

Package Information: 20WC

<u>Identification of Shipment:</u> One shipment of one 20WC serial number 2 containing Cobalt 60 for use in the fabrication of industrial radiography sealed sources. The shipment will originate at International Isotopes in Idaho, and will be trucked to Source Production and Equipment Co., Inc. in the fourth quarter of 2008. The shipment should be completed by 12/31/2008.

Reason for Requesting Extended Use: There are no replacement packages for the 20WC that are suitable for use to transport radioactive material in our Type A package. The material will not have completed the irradiation process until after the end of September. SPEC will not be able to supply much needed Cobalt 60 sources that are critical to the gamma radiography industry without this material.

Safety Justification for Continued Use: The 20WC has been used for many years without incident, and will be inspected prior to use to ensure that it is in unimpaired physical use. The 20WC conforms in all respects to the requirements of 49 CFR Subchapter C in effect on October 1, 2003. Plan to Acquire Replacement Package: SPEC plans to explore the feasibility of utilizing a replacement package whenever a replacement package has been designed, tested and approved for





use for the transport of radioactive material. It is not practicable for SPEC to develop a replacement package as we only have an occasional need to use the 20WC.

Sincerely,

Kelley Richardt

Regulatory and Quality Manager