

From: Shuler, James [James.Shuler@em.doe.gov]
Sent: Wednesday, January 13, 2010 5:19 PM
To: Rahimi, Meraj
Cc: Lorson, Raymond; Weaver, Doug; Benner, Eric; Saverot, Pierre;
O'Connor,
Stephen; Bennett, Marvin
Subject: FW: Update - S300 Packagings Control

Info below per your request.

Jim Shuler
Manager, DOE Packaging Certification Program

U.S. Department of Energy
Office of Packaging and Transportation
EM-45, CLOV-2047
1000 Independence Ave., SW
Washington, DC 20585
301-903-5513
301-903-9770 (fax)
James.Shuler@em.doe.gov
<http://rampac.energy.doe>

-----Original Message-----

From: Justin M. Griffin [mailto:jgriffin@lanl.gov]
Sent: Wednesday, January 13, 2010 5:17 PM
To: Shuler, James
Subject: RE: Update - S300 Packagings Control

The shipment includes four special form capsules and four S300 containers holding a total of seven Pu-239/Be sealed sources. Each sources in the shipment was constructed with a tantalum inner cladding layer and stainless steel secondary cladding, as confirmed by NMMSS records and/or the source manufacturer's data sheets. Also, no single source nor package contains more than 160 g Plutonium.

-----Original Message-----

From: Shuler, James [mailto:James.Shuler@em.doe.gov]
Sent: Wednesday, January 13, 2010 2:45 PM
To: Justin M. Griffin
Subject: FW: Update - S300 Packagings Control

See below

Jim Shuler
Manager, DOE Packaging Certification Program

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-----Original Message-----

From: Rahimi, Meraj [mailto:Meraj.Rahimi@nrc.gov]
Sent: Wednesday, January 13, 2010 1:16 PM
To: Shuler, James
Cc: Lorson, Raymond; Weaver, Doug; Benner, Eric; Saverot, Pierre;
O'Connor, Stephen;
Bennett, Marvin
Subject: RE: Update - S300 Packagings Control

What I was asking indirectly is about the number of actual packages in that shipment.

thanks,

Meraj Rahimi
Senior Project Manager
Licensing Branch
Division of Spent Fuel Storage and Transportation U.S. Nuclear
Regulatory Commission
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Phone: 301-492-3338
Fax: 301-492-3348
e-mail: meraj.rahimi@nrc.gov

-----Original Message-----

From: Shuler, James [mailto:James.Shuler@em.doe.gov]
Sent: Wednesday, January 13, 2010 12:05 PM
To: Rahimi, Meraj
Cc: Lorson, Raymond; Weaver, Doug; Benner, Eric; Saverot, Pierre;
O'Connor, Stephen;
Bennett, Marvin
Subject: FW: Update - S300 Packagings Control

Please see e-mail below.

Jim Shuler
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-----Original Message-----

From: Justin M. Griffin [mailto:jgriffin@lanl.gov]

Sent: Wednesday, January 13, 2010 11:50 AM
To: Shuler, James
Subject: RE: Update - S300 Packagings Control

Hi Jim, my message was referring to the same shipment that you and Julia discussed previously and was not intended to go to NRC.

I'm not sure what Meraj means, under the current S300 certificate, the CSI for any S300 is 0.0. Therefore, the total CSI for this shipment from the eastern Mediterranean (which began its voyage in early December) is still zero.

Justin

-----Original Message-----

From: Shuler, James [mailto:James.Shuler@em.doe.gov]
Sent: Wednesday, January 13, 2010 9:44 AM
To: Justin M. Griffin
Cc: Rahimi, Meraj
Subject: FW: Update - S300 Packagings Control

Do you know the CSI for the shipment?

Jim Shuler
Manager, DOE Packaging Certification Program

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-----Original Message-----

From: Rahimi, Meraj [mailto:Meraj.Rahimi@nrc.gov]
Sent: Wednesday, January 13, 2010 10:35 AM
To: Shuler, James
Cc: Lorson, Raymond; Weaver, Doug; Benner, Eric; Saverot, Pierre; O'Connor, Stephen; Bennett, Marvin
Subject: RE: Update - S300 Packagings Control

Please keep us informed on the pending "eastern Mediterranean" shipment. What is the actual CSI for this shipment?

thanks,

Meraj Rahimi
Senior Project Manager
Licensing Branch
Division of Spent Fuel Storage and Transportation U.S. Nuclear
Regulatory Commission

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Rockville, MD 20852
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-----Original Message-----

From: Shuler, James [mailto:James.Shuler@em.doe.gov]
Sent: Tuesday, January 12, 2010 6:05 PM
To: Rahimi, Meraj
Cc: Lorson, Raymond; Weaver, Doug; Benner, Eric; Saverot, Pierre;
O'Connor, Stephen;
Bennett, Marvin
Subject: FW: Update - S300 Packagings Control

Just got this updated message from LANL.

Jim Shuler
Manager, DOE Packaging Certification Program

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-----Original Message-----

From: Justin M. Griffin [mailto:jgriffin@lanl.gov]
Sent: Tuesday, January 12, 2010 5:27 PM
To: Shuler, James
Cc: Bennett, Marvin
Subject: RE: S300 Packagings Control

Hey guys, I'm really sorry that I said we had no planned S300 shipments in the works. In all honesty, we had no indication that loaded S300 containers from the 'eastern Mediterranean' had gone anywhere. They were packaged in 2008, and we weren't expecting them anytime soon. In fact we are still scrambling here to make arrangements to get them into our storage area.

Of course, Murphy's Law prevailed in this situation and now all I can do is apologize. Okay. Now on to the solution:

We are preparing a revision of the S300 Safety Analysis Report to specifically alleviate the concerns of the German Competent Authority (among other things).

This new revision will demonstrate the maximum critical reactivity by modeling the fissile material without either tantalum or stainless steel cladding. Both

these encapsulation materials
act as a criticality poison, so by modeling the fissile material without
any cladding in the criticality
analysis we feel it will give the most conservative result.

In addition, the fissile content will be modeled as a big lump of
material instead of as discrete
sources with specific physical dimensions as shown in the current
Chapter 6.

When using the same plutonium content limits as currently stated on the
certificate, the draft
calculations indicate that making the criticality analysis with the
above changes will increase the
Criticality Safety Index
(CSI) from its current value of 0.0 to 0.3. [This is not a big increase
and will still allow more S300
packages in a single conveyance than we expect to ever see in the real
world.]

In addition to providing a revised SAR, we will prepare a Change Summary
Document that you
(and NRC) can use to see what/where/why changes to the SAR were made.
We hope to get
this ready by the end of this month or perhaps by early Feb. I don't
think a pre-submission
meeting with the NRC is needed.

If you have any questions or concerns about the above approach, just
give me a ring as usual.

Thank you!
Justin

-----Original Message-----

From: Shuler, James [mailto:James.Shuler@em.doe.gov]
Sent: Monday, January 04, 2010 7:59 AM
To: Justin M. Griffin
Cc: Bennett, Marvin
Subject: RE: S300 Packagings Control

Yes, you have been trained well, Grasshopper!

You are correct. They are fine as a USA DOT 7A Type A (non-fissile)
packaging. Just make
sure the markings reflect that. The "USA/9329/AF"
can not be shown, but instead "USA DOT 7A Type A" must be marked.

Happy New Year!

Jim Shuler
Manager, DOE Packaging Certification Program

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-----Original Message-----

From: Justin M. Griffin [mailto:jgriffin@lanl.gov]
Sent: Monday, January 04, 2010 9:53 AM
To: Shuler, James
Cc: Bennett, Marvin
Subject: RE: S300 Packagings Control

Jim,

The S300 does not have to be used with the USA/9329/AF designation when used as a DOT 7A Type A container as originally designed; and as such may be in use by various entities for Type A (non-fissile) radioactive shipments. [They are built/sold by Washington TRU Solutions in Carlsbad, NM.]

However, as far as I know, we're the only guys using the S300 as an AF container for plutonium under the NRC certificate. Yes, we are in control of all of our S300 containers and do not have any pending shipments anyway.

Instead of saying to "stop all use of S300 packaging" it would perhaps be more clear to revise the statement to say that use of the S300 under certificate USA/9329/AF shall be stopped... this will allow continued use of the S300 configuration for non-fissile Type A shipments.

We will comply either way of course. If the above doesn't make sense or if you have questions let me know. The other option we could discuss with NRC is allowing the S300 to be used with plutonium/beryllium sources that we know for sure have tantalum cladding since that seems to be the problem.

We'll revise the S300 SAR to fix this as soon as we can. FYI-The next impending use of the S300 under the Type AF certificate would be for recovery of plutonium neutron sources from France, Germany, Austria, and Switzerland later this fall.

Sorry this had to happen over the holidays, but thank you guys for your help again.

Justin

-----Original Message-----

From: Shuler, James [mailto:James.Shuler@em.doe.gov]
Sent: Tuesday, December 29, 2009 2:45 PM
To: Justin M. Griffin
Cc: Bennett, Marvin; Rahimi, Meraj; O'Connor, Stephen; Lorson, Raymond;

Weaver, Doug;
Benner, Eric; Saverot, Pierre
Subject: S300 Packagings Control

Justin,

Per the e-mail from NRC below:
Stop all use of the S300 packaging until NRC gives DOE the OK to resume shipping in them.

Do you have all of the S300 packagings under your control? That is are there any non DOE users of the S300 that we need to contact? If we are talking about a small number of containers and all shipments are made by DOE and you or your DOE lead are in direct control of these containers, we are probably okay with just this email. If that is not the case, we may need to send out a formal notification as the CoC holder.

Jim

Dr. James M. Shuler
Manager, DOE Packaging Certification Program

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-----Original Message-----

From: Rahimi, Meraj [mailto:Meraj.Rahimi@nrc.gov]
Sent: Tuesday, December 29, 2009 4:02 PM
To: Shuler, James
Cc: Lorson, Raymond; Weaver, Doug; Benner, Eric; Saverot, Pierre
Subject:

Dear Mr. Shuler,

This is a follow up to the voice-mail I left you last week regarding the criticality safety issue raised by the German Competent Authority on the S300 package which is a NRC-certified transportation package. Our preliminary calculations indicate similar results as the German Competent Authority's. Therefore, the issue needs to be addressed before any more shipments, using the S300 transportation packages, can be made.

thanks,

Meraj Rahimi
Acting Branch Chief
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Subject: FW: Update - S300 Packagings Control
Sent Date: 1/13/2010 5:20:02 PM
Received Date: 1/13/2010 5:20:02 PM
From: Shuler, James

Created By: James.Shuler@em.doe.gov

Recipients:

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Tracking Status: None
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Options

Expiration Date:
Priority: 01ImportanceNormal
ReplyRequested: False
Return Notification: False

Sensitivity: 01Normal
Recipients received: