

152

RECORD #152

TITLE: Request for Guidance Concerning Use of NRC Certified Casks

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

OCT 19 1982

MEMORANDUM FOR: L. R. Greger, Chief
Facilities Radiation Protection Section, R.III

FROM: Leo B. Higginbotham, Chief
Fuel Facilities and Materials Branch, IE

SUBJECT: REQUEST FOR GUIDANCE CONCERNING USE OF NRC CERTIFIED
CASKS

This replies to your October 6, 1982 memo, same subject.

We see no objection to the use of an NRC certified cask as an outer enclosure for inside packages, effectively simulating a "closed transport vehicle", as is illustrated in Appendix B, IE Information Notice 80-32, Rev. 1 (Left side scenario), copy attached. In such a case however, we firmly agree with NMSS that it would be appropriate to obliterate or cover over the NRC Certificate identification marking on the cask exterior, and refrain from any reference to the certificate on shipping papers.

Leo B. Higginbotham, Chief
Fuel Facilities and Materials Branch, IE

Enclosure: As Stated

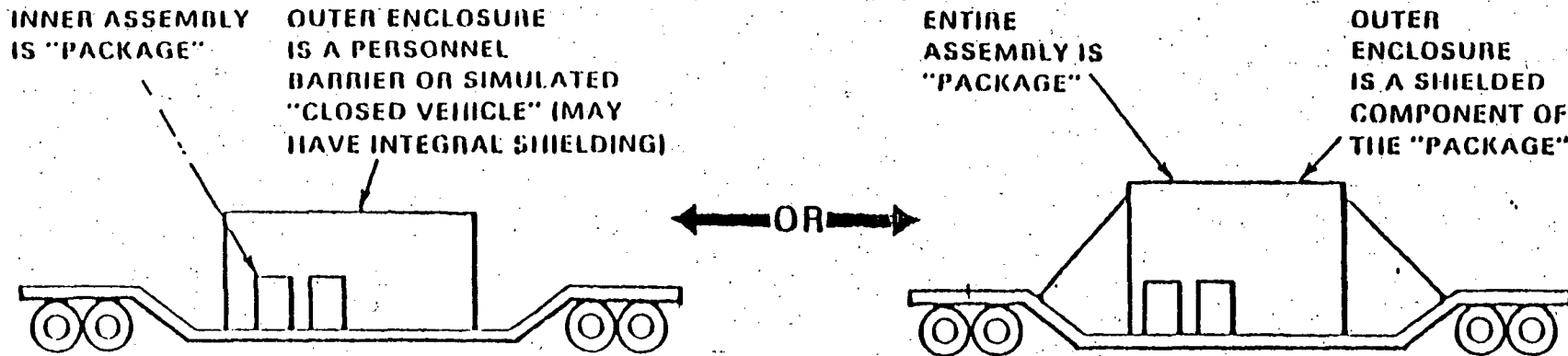
- cc w/incoming:
C.E. MacDonald, NMSS
J. Joyner, R. I
J. Gibson, R. II
J. Miller, R. III
R. Bangart, R. IV
H. Book, R. V
E. Flack, IE
L.J. Cunningham, IE
W.L. Fisher, IE

WHAT COMPRISES THE PACKAGE?

PERTINENT CONSIDERATIONS:

- The Definition of a "closed transport vehicle"-see 49 CFR 173.309(g)
- 49 CFR 171.0 Defines packaging such that you must consider the assembly of one or more containers and any other components necessary to achieve compliance with the minimum packaging requirements.
- The NRC general license requirements of 10 CFR 71.7(b), 71.11(b)(1), 71.12(b), and 71.35 require that any "package" used to ship LSA in quantity exceeding Type A must be designed to withstand standards for normal conditions of transport

THEREFORE:



IF

- radiation level at 3' from any secondary inner "package" does not exceed 1 rem/hr (See 173.393(j)(1)); and
- radiation level at exterior surface of outer enclosure does not exceed 200 mrem/hr (See 173.393(j)(2)); and
- Activity content within any single secondary inner "package" does not exceed a Type A quantity as LSA;

THEN

- Each secondary inner container is marked as a "package"
- The exterior of the outer enclosure is placarded as a vehicle

IF

- radiation level at 3' from any single inner container exceeds 1 rem/hr (See 173.393(j)(1)); or
- Activity content within any single inner container exceeds a Type A quantity as LSA;

THEN

- The exterior of the outer enclosure is marked as a "package"
- The entire assembly must be certified by NRC as Type A, if LSA material is involved.



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
799 ROOSEVELT ROAD
GLEN ELLYN, ILLINOIS 60137

OCT 06 1982

MEMORANDUM FOR: L. B. Higginbotham, Chief, Fuel Facilities
and Materials Branch, IE


THRU: J. R. Miller, Chief, Technical Inspection Branch.

FROM: L. R. Greger, Chief, Facilities Radiation
Protection Section

SUBJECT: REQUEST FOR GUIDANCE CONCERNING USE
OF NRC CERTIFIED CASKS

Frequently, licensees ship 55-gallon drums containing LSA material inside shielded casks. When this is done, the licensee may consider the drums to be the packages and the cask as a shield to meet the transport vehicle dose rate limits (10 mR/hr at 2 meters and 2 mR/hr in cab). IE Information Notice No. 80-32, Revision 1, acknowledges this practice and finds it acceptable under specified circumstances. However, a recent telephone conversation with NMSS prompted this request for clarification concerning the acceptability of such action when the cask is an NRC certified package.

Is it acceptable for a licensee to use a NRC certified cask in the same manner as an uncertified cask, as described above, without regard to the certificate of compliance requirements? If such use is acceptable, must anything be done to clarify the intended use of the cask, such as obliterating the cask identification? Obliteration of the cask identification was suggested by NMSS (Odegaarden).


L. R. Greger, Chief
Facilities Radiation
Protection Section

cc: L. J. Cunningham, IE
W. L. Fisher, IE