



U.S. Department  
of Transportation

**Research and  
Special Programs  
Administration**

400 Seventh Street, S.W.  
Washington, D.C. 20590

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*send* — **OCT 31 1996**  
**50-272/311**

Dr. William Travers, Director  
Spent Fuel Project Office  
Office of Nuclear Material Safety and Safeguards (NMSS)  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Dear Dr. Travers:

On September 28, 1995, our agencies published final rules which brought our respective transportation regulations in harmony with the 1985 IAEA Regulations for the Safe Transport of Radioactive Material, Safety Series No. 6. One of the major provisions of these rules dealt with the redefinition of low specific activity material and the creation of a new class of material, surface contaminated objects. Under the terms of our Memorandum of Understanding, the Department of Transportation is responsible for approving the transport of both these materials.

Since July 1996, we, and members of your staff, have been working with the Public Service Electric and Gas Company (PSE&G) regarding their intended transportation of four steam generators from their Salem Generating Station to the Chem Nuclear Systems, Inc. Waste Management facility located in Barnwell, SC. As a result of this work, we have prepared the enclosed exemption certificate which allows PSE&G to transport the steam generators, in accordance with their transportation plan, as surface contaminated objects (SCO-II) in non-specification packages. This transport system provides an equivalent level of safety to that specified in our regulations. Because of your staff's involvement in this issue, we request your comments concerning this exemption certificate.

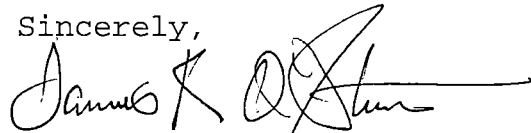
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I appreciate your assistance in evaluating the data submitted by PSE&G and your recommendation concerning this certificate. In order to support PSE&G shipping schedule, we request you provide your recommendation by November 8, 1996. If you have any questions concerning this matter, please feel free to call me, or Mr. Richard Boyle of my Radioactive Materials Branch. Both Mr. Boyle and I can be reached at 202-366-4545.

Sincerely,

A handwritten signature in black ink, appearing to read "James K. O'Steen", with a long horizontal flourish extending to the right.

James K. O'Steen, Director  
Office of Hazardous Materials  
Technology

Enclosure



U.S. Department  
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**Research and  
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400 Seventh Street, S.W.  
Washington, D.C. 20590

DOT-E-11745

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EXPIRATION DATE: one year from  
issuance

(FOR RENEWAL, SEE 49 CFR SECTION 107.109)

1. GRANTEE: Public Service Electric & Gas Company (PSE&G)  
P.O. Box 236  
Hancocks Bridge, NJ 08038
2. PURPOSE AND LIMITATION: This exemption authorizes the transportation in commerce of four steam generators from the PSE&G Salem Generating Station to the Chem-Nuclear Systems, Inc. (CNSI) Waste Management Facility located in Barnwell, SC. This exemption authorizes the steam generators to be classified as surface contaminated objects and transported as non-specification packages under a transportation plan which provides an equivalent level of safety to the packages and procedures specified in Title 49 of the Code of Federal Regulations. This exemption provides no relief from any regulation other than as specifically stated herein.
3. REGULATORY SYSTEM AFFECTED: 49 CFR Parts 106, 107 and 171-180.
4. REGULATIONS FROM WHICH EXEMPTED:
  - a. 49 CFR Part 173.403 in so far as the fixed and non-fixed contamination levels for class II, surface contaminated objects (SCO-II) are waived for the steam generators specified in the exemption application.
  - b. 49 CFR 173.427(a) in so far as surface contaminated objects can be transported in non-specification packages under specified transport plans which provide equivalent safety to the packages and procedures specified.
5. BASIS: This exemption is based on the PSE&G's August 5

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1996 application and the additional technical data submitted by PSE&G on September 26, 1996 and October 10, 1996. All documents were submitted in accordance with 49 CFR 107.105 and the public proceeding thereon.

6. HAZARDOUS MATERIALS (49 CFR 172.101):

Hazardous materials description -- proper shipping name	Hazard Class/ Division	Identi- fication Number	Packing Group
Radioactive Material, surface contaminated object	Class 7	UN 2913	N/A

7. PACKAGING AND SAFETY CONTROL MEASURES:

a. PACKAGING -

1. Under the provisions of this exemption, the steam generator and its personnel barrier are considered to be a non-specification package providing an equivalent level of safety to the packaging authorized under Title 49 of the Code of Federal Regulation.

2. The contamination levels and radionuclides present on each steam generator shall not exceed those identified in PSE&G's application and supplemental technical documentation.

3. To minimize possible radiation exposures, each steam generator will be prepared for shipment by welding or bolting shut all nozzles, instrument penetrations and mechanical enclosures using closure plates. After these preparations have been completed, the outer shell of the steam generator shall be painted.

4. All lifting mechanisms will be removed or rendered inoperable

b. OPERATIONAL CONTROLS -

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1. The steam generators will be shipped individually and will be consigned as exclusive use.

2. All controls, provisions and routes specified in Chem-Nuclear Systems, Inc. document entitled "Salem Steam Generator Transportation and Emergency Response Plan", Document No. PL-CNSI-96-003, dated September 24, 1996 shall be followed.

c. MARKING -

1. Package shall be plainly and durably marked "DOT-E-11745" in accordance with 49 CFR 172.301(c). In accordance with 49 CFR 173.427(a)(6), the package shall must be marked "Radioactive - SCO" and, if appropriate, package must also be stenciled with the letters "RQ".

8. SPECIAL PROVISIONS:

a. Shippers using the packaging covered by this exemption must comply with all provisions of this exemption, and all other applicable requirements contained in 49 CFR Parts 171-180.

b. The steam generator shall be marked, labeled, and placarded in accordance with the provisions identified in 49 CFR 173.427(a).

9. MODES OF TRANSPORTATION AUTHORIZED: Motor vehicle and cargo vessel.

10. MODAL REQUIREMENTS:

A copy of this exemption must be carried aboard each cargo vessel or motor vehicle used to transport packages covered by this exemption.

11. COMPLIANCE: Failure by a person to comply with any of the following may result in suspension or revocation of this exemption and penalties prescribed by the Federal hazardous materials transportation law, 49 U.S.C. Section 5101 et seq:

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- o All terms and conditions prescribed in this exemption and the Hazardous Materials Regulations, 49 CFR Parts 171-180.
- o Registration required by 49 CFR 107.601 et seq., when applicable.

No person may use or apply this exemption, including display of its number, when the exemption has expired or is otherwise no longer in effect.

12. REPORTING REQUIREMENTS: The carrier is required to report any incident involving loss of packaging contents or packaging failure to the Associate Administrator for Hazardous Materials Safety (AAHMS) as soon as practicable. (49 CFR 171.15 and 171.16 apply to any activity undertaken under the authority of this exemption.) In addition, the holder(s) of this exemption must inform the AAHMS, in writing, of any incidents involving the package and shipments made under the terms of this exemption.

Issued at Washington, D.C.:

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Alan I. Roberts  
 Associate Administrator  
 for Hazardous Materials Safety

(DATE)

Address all inquiries to: Associate Administrator for Hazardous Materials Safety, Research and Special Programs Administration, Department of Transportation, Washington, D.C. 20590.  
 Attention: DHM-31.

The original of this exemption is on file at the above office. Photo reproductions and legible reductions of this exemption are permitted. Any alteration of this exemption is prohibited.

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APPENDIX A

The following are hereby granted party status to this exemption based on their application(s) submitted in accordance with 49 CFR 107.111 and the public proceeding thereon or 107.105, as appropriate:

Company Name City/State	Applica- tion Date	PTE	Expiration Date	Issue Date

\_\_\_\_\_  
Alan I. Roberts  
Associate Administrator for  
Hazardous Materials Safety

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