



Department of Energy
Washington, D.C. 20545

PDR

71-361

Mac Donald

*No program
response*

Due date

6/25

In #81

JUN 12 1979

Mr. Donald A. Nussbaumer
Division of Fuel Cycle and
Material Safety
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555



Dear Mr. Nussbaumer:

The present Certificate of Compliance #0361 for the PAT-1 plutonium oxide packaging has a serious administrative flaw. In section 12 describing the operational controls there is a requirement for stowing the cargo in an aft-most location. There is a practical problem if this location is not accessible to a crew member during flight as required by DOT regulation 49 CFR 175.85b.

We recommend that NRC revise the present certificate #0361 as follows:

- 12a) The package(s) must be stowed aboard aircraft on the main deck in the aft-most location that is possible for cargo of its size and weight and accessibility. No other type cargo may be stowed aft of the package(s).

If you have any questions about this suggestion, please call me.

Sincerely,

Donald M. Ross

Donald M. Ross, Chief
Occupational Safety Branch
Operational and Environmental
Safety Division



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