PDR 71-6400

Babcock & Wilcox

Nuclear Materials Division

609 North Warren Avenue, Apollo, Pa. 15613 Telephone: (412) 842-0111

February 22, 1980

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Mr. C. E. MacDonald, Chief Transportation Branch U. S. Nuclear Regulatory Commission Washington, D. C. 20555

Dear Mr. MacDonald:

Babcock and Wilcox Nuclear Materials and Manufacturing Division Pennsylvania Operations (PA. Ops.) hereby requests: amendment of Certificate of Compliance No. 6400 for the SuperTiger overback shipping container; and, that our previous application of September 14, 1979 be withdrawn. The requested changes relate to treatment and packaging of hard waste, large equipment waste, and solidified liquid waste.

Relative to hard waste, PA. Ops. requests:

- a) that HEPA filters be included in this category (along with equipment, metal cans, tools, etc.);
 and
- b) that the following practice be included as acceptable under this category:

Hard waste items or packages of compacted hard waste items shall be individually double bagged within standard PVC bagging material, with each bag heat sealed, and these items shall be foamed rigidly in place within a DOT Specification 17H 55-gal. steel drum, such that a minimum annular thickness of 2 inches is maintained between the waste packages and inner drum wall. The annular section shall be guaranteed by a cylindrical column consisting of formed wire, wire mesh, cardboard, plastic, etc. A minimum thickness of 3 inches of foam will be maintained between the bottom of the drum and the lowermost waste package, and between the lid of the drum and the uppermost waste package. The foam shall have a nominal density of .0288 g/cc.

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Relative to large equipment waste, PA. Ops. requests:

- a) that HEPA filters be included (along with gloveboxes, furnaces, blowers, ductwork, etc.) in this category, because some HEPA filters exceed a size which could be packaged in a drum; and
- b) that the following be included as an authorized practice in this category:

The equipment contaminated surfaces shall be strip coated (by painting, dipping, spraying, etc.) or foamed to fix contamination or otherwise sealed by pipe caps or gasketed blind flanges prior to packaging.

Relative to solidified liquid waste, PA. Ops. requests that the following be included as an acceptable practice in this category:

- a) Liquid waste shall be solidified in concrete in 30-gal drum which is sealed in a plastic bag and centered and supported in a DOT specification 17H 55-gal steel drum by vermiculite, absorbent, plastic, or foam material. The 55-gal drum shall be lined with a sealed plastic bag liner and equipped with a standard drum closure. Soft, hard, or solidified liquid waste shall not be commingled within the same DOT Specification 17H 55-gal steel drum.
- b) Liquid waste shall be solidified in concrete in a cardboard container of approximate dimensions 10-1/4" length and 6-1/4" diameter, which is lined with a polyethylene bag. The cardboard container shall be double bagged in standard PVC bagging material, and each bag shall be dielectrically sealed. These double bagged containers shall be packaged as hard waste, according to the procedure proposed earlier in this application for the hard waste category. Soft waste shall not be commingled with either hard or solidified liquid waste.

Because this application is submitted in place of that previously submitted on September 14, 1979, we request that the administrative amendment fee of \$150.00 forwarded with the previous amendment request be applied to this current application.

If you have any questions regarding this request, call me or Dr. Tom Congedo.

Sincerely,

Michael A. Austin Manager, Technical Control

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