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MEMORANDUM FOR: Marie Janinek, OSP  
FROM: Steven Bernstein, TPSB:OSD  
SUBJECT: FINAL REPORT FROM SOUTH CAROLINA ON TRANSPORTATION  
SURVEILLANCE PROGRAM

This is in response to your memorandum of March 12, 1980 to Ralph Jones, Chief TPSB, OSD. I have the following comments to offer on the subject report.

1. On page 3 reference is made to NRC Certified Type A shielded shipping casks. The NRC only certifies type B shipping containers. Often these certified containers are used to transport material that does not require the use of a type B shipping container. The reason for this practice is the shielding afforded by the cask which is necessary in order to comply with DOT regulatory limits on external radiation levels. The report should be clarified so as not to leave the impression that the NRC certifies type A containers. This comment also applies to the description, on page 30, of the cask involved in the June 18, 1979 transportation accident.
2. On page 3 it is stated that a detailed inspection program was initiated on shielded shipping casks used to transport low level waste. Little information is given in the remainder of the report concerning the discrepancies found and the overall results of the program.
3. There is no discussion in the report of Table 6, Personnel Exposure. It appears that the data in this table was not obtained under the state surveillance program, but was gathered by Chem-Nuclear Systems, Inc. However, since the state surveillance program contract, Appendix D, includes an item on worker exposure, some discussion should be given on the meaning of the data in Table 6.
4. Some reference should be made in the report to the various appendices at the end of the report.
5. In Table 3, page 10, the entry for the total number of packages or casks inspected does not agree with the sum of the individual entries.

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- 6. On pages 2 and 3, a brief description is given concerning the procedure used by a state inspector examining a waste shipment. Step 7 of the procedure should be performed after unloading is complete and the transport vehicle moved from the trench area. This will ensure compliance with the provisions of 49CFR173.397(c) which specifies contamination limits applicable before a vehicle is returned to service.

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Steven Bernstein  
 Transportation & Product Standards Branch  
 Office of Standards Development

SD TASK NO.: N/A

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