

UNC NAVAL PRODUCTS

71-5086

PDR



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In reply, please refer
to: NIS-80-9-54

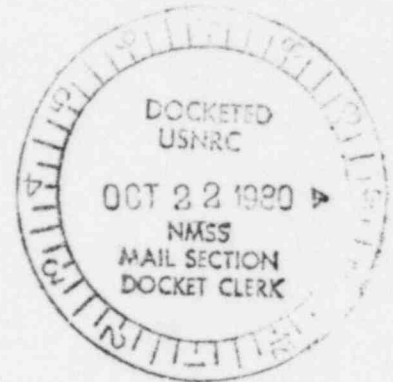
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September 25, 1980

Mr. Charles E. MacDonald, Chief
Transportation Certification Branch
Division of Fuel Cycle & Material Safety
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Subject: Use Of The Term "Drop Forged Lugs" In
Reference To Container Closure Rings

Reference: 49 CFR 178.103-5 (6L)
49 CFR 178.104-4 (6M)
49 CFR 178.118-8 (17H)



Dear Sir:

During the recent renewal of Certificate of Compliance No. USA/5086/AF, the addition of the condition "drop forged lugs" was made.

I believe this term goes back to the period in which the closure ring was a circular rod, in which one or both ends were forged into lug(s). If only one end was forged, the other end was threaded and slipped into a drilled hole in the forged lug, which then had a nut put on. If both ends were forged, then a separate bolt was used.

However, with the availability of generally reliable welding and a desire to lighten the shipping container, a combination ring of roll-formed sheet with welded lugs was developed.

The specification of "drop forged lugs" is unnecessary when the bolt and ring are low carbon steel, and the attachment weld of the lug to ring is only "good workmanship". The lug could be fabricated by any commercial means (e.g., cut from rolled plate, cast or forged) as long as it was low carbon steel.

It has been our experience that the general mode of failure is the weld.

It is requested that the unnecessary term "drop forged lug" be discontinued in all NRC-DOT shipping container terminology.

Very truly yours,

W. F. Kirk

W. F. Kirk, Manager
Nuclear & Industrial Safety

jr

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*reanalysis of
materials dispensing action
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