

GENERAL ELECTRIC

NUCLEAR ENERGY
ENGINEERING
DIVISION

GENERAL ELECTRIC COMPANY, P.O. BOX 460, PLEASANTON, CALIFORNIA 94566

August 18, 1982

Transportation Certification Branch
Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555



Attention: Charles E. Williams

- Ref: 1) Certificate of Compliance No. 5942, Docket 71-5942.
- 2) Letter, G. E. Cunningham to C. E. MacDonald; August 10, 1982.

Dear Mr. Williams:

This letter is in response to your question concerning our use of the phrase, "not safety related component", with respect to the jacket lifting/tie-down ears for the G.E. Model 700 shipping container (Part 10, Certification Drawing 129D4769). The term Safety Related Component (SRC) is defined in the Vallecitos Nuclear Center (VNC) engineering practices and procedures as "a component, part, or assembly which performs a function or functions necessary to prevent the release of radioactive contamination or prohibit the radiation exposure of the general public in excess of levels permitted by regulations under normal or accident conditions of transport".

The term SRC is used in the classification of components for the purposes of the VNC shipping container quality assurance program and is limited to features of radioactive packagings the failure of which under normal or accident conditions could result in unacceptable releases of radioactive materials or radiation levels. Components of a packaging not classified as SRC's must still be designed and constructed to meet all of the applicable requirements of 10CFR71.

For the case in point the tie-down ears were evaluated, designed, and constructed to meet the requirements of 10CFR71.31(d). As the ears meet the requirements of 10CFR71.31(d)(3) and their failure would not impair the ability of the package to meet the other requirements of 10CFR71 (i.e., the normal transport and hypothetical accident conditions), they were not classified as SRC's. (Note: Although the ears are not normally used to lift the package, they have been analyzed and meet the requirements of 10CFR71.31(c).) As noted before, the decision not to classify the ears as SRC's is in no way intended to gain relief from any applicable requirements of 10CFR71.

