



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

0733/62

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FEB 11 1982

MEMORANDUM FOR: Anthony N. Fasano, Chief
Three Mile Island Section, Region I

FROM: Charles E. MacDonald, Chief
Transportation Certification Branch
Division of Fuel Cycle and Material Safety, NMSS

SUBJECT: GASKET DEFECTS

This is in response to your memorandum dated January 25, 1982 concerning a gasket with a circumferential crack and a piece of the gasket on outer circumference missing.

The memorandum states that the licensee held the opinion the gasket was not defective because the 3-4" long crack in the gasket and the missing 1/4" x 1/4" x 1" piece from the outer edge of the same gasket did not go through the full gasket radially. In addition, the licensee stated that criteria for defining a "defect" is not specified in 10 CFR Part 71 or the Certificate of Compliance. Also, the licensee referenced a definition of a defect found in 10 CFR Part 21.

Part 71 and the Certificate of Compliance do not provide an explicit definition of "defect." The definition of "defect" in 10 CFR §21.3 applies only to Part 21. The requirement in 10 CFR §71.54(c), Routine determinations (prior to each use of the package) states:

"The closure of the package and any sealing gaskets are present and are free from defects" (emphasis provided).

The word "defect" is defined as "imperfection" in the dictionary. It is our opinion that when imperfections are obvious to the naked eye, a gasket is not free from defects. We believe that a package sealed with a gasket as described in your memorandum does not meet the requirements of 10 CFR §71.54(c). This practice should be stopped and consideration given to citing the licensee for not meeting the requirements of 10 CFR Part 71.

Charles E. MacDonald
Charles E. MacDonald, Chief
Transportation Certification Branch
Division of Fuel Cycle and
Material Safety, NMSS

cc: R. Keimig, IE, Reg. I

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