

Pipeline and Hazardous Materials Safety Administration East Building, PHH-23 1200 New Jersey Avenue SE Washington, D.C. 20590

July 18, 2024

Director, Division of Fuel Management
Office of Nuclear Material Safety and Safeguards
ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
11545 Rockville Pike
Rockville, MD 20852-2738

Dear DFM Director,

In accordance with the Memorandum of Understanding between our agencies and decisions made after meeting with you and members of your staff, I request you review the enclosed amendment request for the Model 880 Series Type B(U) containers approved under Certificate of Compliance No. 9296, Revision 12 and make a recommendation for upgrading the regulatory citation for import and export shipments to the 2018 edition of International Atomic Energy Agency's Regulations for the Safe Transport of Radioactive Material, Safety Series 6 (Rev. 1).

While I concur with the applicant that the regulatory changes specific to their package design are minor, I am not convinced sufficient technical data has been submitted to validate that position. As similar applications are expected in the coming months, I look forward to working with you and your staff to define the technical data needed to support such an application.

If you have any questions or need any additional safety information, please feel free to contact me at (202) 697-1301 or via email at Rick.Boyle@dot.gov.

Sincerely,

Richard W. Boyle, Radioactive Materials Division of Sciences and Engineering Office of Hazardous Materials Safety

**Enclosure**