June 17, 2014

Ms. Christine Gelles, Associate Deputy Assistant Secretary
Waste Management, EM-30
US Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585

SUBJECT: Freight Container Guidance Document dated April 17, 2014

Dear Ms. Gelles:

Attached is the Freight Container Guidance Document that was prepared by the
Department of Energy sponsored Packaging Management Council (PMC) and the
EFCOG Packaging and Transportation (P&T) Subgroup of the Waste Management
Working Group.

The Freight Container Guidance Document has been in development since 2006
following the Department of Transportation (DOT) allowing freight containers to be used
as Industrial Packaging Type 2 or 3 in 49 CFR 173.411(b)(6). Following that decision by
DOT, freight containers became the container of choice for DOE contractors in shipping
low specific activity (LSA) materials and surface contaminated objects (SCO). However,
because the practices of procuring, loading and securing, modifying, and maintaining a
freight container are different from other radioactive material containers and those
practices vary across the DOE complex, the PMC established a working group with
EFCOG participation to provide guidance in order to meet both the DOT regulations and
applicable DOE requirements.

The document is organized in a manner which allows the user to make determinations
beginning with the process of packaging selection, development of a technical
specification, procurement, receipt inspection, and end user requirements. In addition,
this document offers useful technical information common to freight containers that
includes, but is not limited to, common definitions, historical background of the freight
container certification process, samples of procurement specifications and inspection
plans, questions and answers on common issues, and applicable DOT letters of
interpretation.

With your agreement, we plan to post this document on the EFCOG website and would
suggest that DOE provide the appropriate mechanism to circulate this document for
general use throughout the DOE complex.
This evaluation was conducted in cooperation and communication with members of the PMC and EFCOG team along with key members of your staff. The team members are prepared to support future efforts, if requested, by conducting additional reviews, providing assistance in implementation of this guidance document, or other actions on a complex-wide basis. Please share this report with other individuals and organizations, as appropriate, and advise me if follow-up actions are desired. Questions regarding this report should be directed to me or Jim Portsmouth, Chair, P&T Subgroup, James_H_Portsmouth@rl.gov.

Sincerely,

W. T. Goldston, Chair
EFCOG Waste Management Working Group
EnergySolutions

cc:  Frank Marcinowski, DOE/EM-30
     Steve O’Connor, DOE/EM-33
     Doug Tonkay, DOE/EM-31
     William Levitan, DOE/EM-10
     Linda Suttora, EM-11
     Tom Longo, NNSA
     Mark Senderling, DOE/EM-32
     Ashok Kapoor, DOE/EM-33
     Jay Rhoderick, EM-20
     Kathleen Burianek, NNSA-174
     Ahmad M. Al-Daouk, NNSA-174
     Renee Echols, Vice Chair EFCOG Waste Management WG, Perma-Fix
     Mark Frei, EFCOG Working Group Coordinator, Longenecker & Associates
     Sydney Gordon, Vice Chair EFCOG P&T Subgroup, NSTec/NNSS
     Billy Morrison, EFCOG Director, Sponsor EnergySolutions
     Jim Portsmouth, Chair EFCOG P&T Subgroup, CHPRC/Hanford
     Susan Stiger, Chair, EFCOG Board of Directors, Bechtel
     Mike Waters, Vice Chair EFCOG P&T Subgroup, CHPRC Hanford
     Dan Shrum, EnergySolutions - Clive
     Mark Ledoux, EnergySolutions - Clive
     Gregg Geisinger, NSTec/NNSS
     Harry Boston, Boston Government Services
     Ted Giltz, MSA/Hanford
     Mark B. Hawk, PMC
     Ronald B. Natali, R. B. Natali Consulting, Inc.
     Erich K. Opperman, SRNS