



EFCOG Waste Management Working Group

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