To: Jim Portsmouth, EFCOG P & T Subgroup Chair

Subject: Submission of EFCOG/PMC Freight Container Guidance Document to DOE

On behalf of the Energy Facility Contractors Group (EFCOG) Packaging and Transportation (P&T) Subgroup and the DOE EM-33 sponsored Packaging Management Council (PMC), we are requesting that the attached Freight Container Guidance Document (FCGD) be forwarded to EFCOG Waste Management Group Chair Sonny Goldston for submission to the DOE as a technical document. The FCGD has been in development since 2006 following the Department of Transportation (DOT) allowing freight containers to be used as Industrial Packagings Type 2 or 3 in 49 CFR 173.411(b)(6). After that, it was not long, before 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 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.

The three primary authors below have coordinated the development of this document with a freight container certification organization, DOE users, and suppliers of freight containers. The document has gone through several reviews by PMC and EFCOG members with all comments being resolved.

As stated above, and certified by the author’s signatures below, please review and forward this document to the EFCOG Waste Management Group Chair Sonny Goldston to obtain the necessary authorizations.

Respectfully,

Mark B. Hawk                                     Ronald B. Natali                                     Erich K. Opperman