



NUCLEAR CARGO + SERVICE GMBH

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Airmail

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U.S.A.

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Ihre Zeichen / Nachricht vom

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21PF-1 Overpacks

Dear Sir,

Nuclear Cargo + Service GmbH (NCS) is a subsidiary of the German Railway (Deutsche Bahn AG). The main function of NCS is to provide transport capacities for a variety of radioactive material, mainly front end material from powder to MOX fuel assemblies, but irradiated fuel and waste as well.

One major part of our business is the transport of enriched uranium hexafluoride in internationally approved 30 B type cylinders, which are shipped in the appropriate overpacks. For this purpose NCS owns some 100 overpacks which are used for international and national transports. Most of the overpacks are of type US DOT-21PF-1A, the rest of type US DOT-21PF-1B under their Certificate of Compliance USA/4909/AF, currently superseded by the Special Arrangement USA/0507/X.

NCS is a member of the USEC co-ordinated Overpack Owners' Consortium collaborating with the international intention to provide sufficient reliable data to permit an appropriate design of overpack and valve protector to be specified and used for low enriched uranium hexafluoride transportation purposes. We do expect that, assuming the project remains on programme, data will be available prior to the expiry of the present Certificate. Hopefully, the data will be such as to allow the Special Arrangement to be superseded by an appropriate revision of USA/4909/AF and USA/9234/B(U)F.

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Special Arrangements, as you will readily understand, require more data to be available to National Competent Authorities and more time to process the validation of such Arrangements. We would prefer to have at least six weeks grace before expiry of a current Certificate in order to place a request for Validation to our National Competent Authority. As in the U.S.A, we, here in Europe, enter into commitments to Customers on a regular ongoing basis, believing that, when product is contracted to be shipped, appropriate certification will be available to permit product to be delivered. Any delays in validation or gaps in Certification are, therefore, of great concern to us.

Should you need to re-issue the Special Arrangement, it would be particularly helpful if such information was available as soon as possible both to those in Europe who own and use overpacks and to our National Competent Authorities. This will allow the relevant information to be gathered and presented with a request to Validate the Certificate. We appreciate the steps which have already been taken to establish close communications internationally at Competent Authority level and do hope, ourselves, to keep in touch with the developing work through the Secretariat provided by USEC. We would also be interested in any feedback there might be from yourselves or indication of probabilities and timing of issue of the next Certificates, perhaps by the same mechanism.

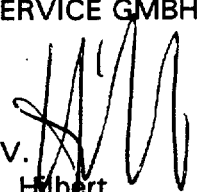
In thanking you for your consideration of the above, we take this opportunity to assure you of our desire to see these matters resolved in a manner that is satisfactory to all and consistent with IAEA Regulations.

Yours faithfully

NUCLEAR CARGO + SERVICE GMBH



P. Lodatta



i.V.
F. Hilbert