

J. Higginbotham

WM DOCKET CONTROL
CENTER

Ref: SA/KNS

JUN 18 1985

'85 JUN 19 P3:01

Mrs. Nancy P. Kirner, Supervisor
Radioactive Materials Control Unit
Radiation Control Section
Department of Social and Health Services
Mail Stop LF-13
Olympia, Washington 98504

WM Record File

WM Project 50

Docket No. _____

PDR ☒

LPDR _____

Distribution:

LBH

(Return to WM, 623-SS)

*cc: Johnson
Dremer*

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Dear Mrs. Kirner:

Pursuant to your February 20, 1985 letter concerning the proposed installation of vents in the NuPac F1-50 high integrity container (HIC) and our discussions held in Milwaukee with T. Strong the week of May 19, 1985, we have the following comments.

You are, of course, quite correct in placing the origins of the concerns that resulted in our recommendation for vents on the fact that some polyethylene containers have become "stuck" in their transportation casks due to internal gas generation and pressurization. As a result of a request from the State of South Carolina Department of Health and Environmental Control, we presented our views on the subject in a letter (copy enclosed) dated December 10, 1984. As you can see, the staff, after due deliberation, has concluded that installation of vents in all HICs, not just polyethylene ones, would be a prudent way to address the potential symptoms of the problem with gas generation. It is intended to be an interim remedy, which would be applied while an investigation of the causes of past occurrences with gas generation problems would be conducted. We would expect that such an investigation would lead to a permanent solution to the problem through the implementation of administrative procedures that would permit appropriate handling (possibly involving identification and segregation) of potential gas-generating agents. At that time the requirement for venting would be removed (because we would have a means to address the cause of the problem, not just the symptoms).

We have given consideration to the proposal of allowing the HIC lid gasket to act as a pressure relief valve on the HIC. We currently believe that this alternative is inadvisable, principally because a leaky gasket cannot be depended upon as an engineered design feature. It should not, in our view, be promulgated as an acceptable regulatory approach to this problem.

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SURNAME	PDR	WASTE					
DATE	WF-50	PDR					

Mrs. Nancy P. Kirner

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It is possible to consider relief on a case-by-case basis if there is evidence to support an alternative approach?

Sincerely,

Original signed by:
D. Nussbaumer

Donald A. Nussbaumer
Assistant Director for
State Agreements Program
Office of State Programs

Enclosure:
As stated

cc: T. Strong, WA
H. Shealy, SC

Distribution:
SA R/F
Dir R/F
KNSchneider
LHigginbotham, WM
JGreeves, WM
TJohnson, WM

OFFICE	SA	SA	NUS				
JURNAME	KNSchneider	bh. DANussbaumer	RB Downing				
DATE	6/11/85	6/12/85	6/ /85				