



**Department of Energy**  
Washington, DC 20585

August 5, 2020

MEMORANDUM FOR VIRGINIA G. KAY  
DIRECTOR, MATERIAL DISPOSITION PROGRAM  
OFFICE OF FISSILE MATERIALS DISPOSITION  
NATIONAL NUCLEAR SECURITY ADMINISTRATION

FROM:

JULIA C. SHENK

Julia C. Shenk

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Shenk  
Date: 2020.08.05 08:23:37  
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HEADQUARTERS CERTIFYING OFFICIAL  
DIRECTOR  
OFFICE OF PACKAGING AND TRANSPORTATION

SUBJECT:

Revision 17 of Department of Energy Certificate of Compliance  
Number 9315

In response to the request from William Kilmartin (NA-233) to Dr. James Shuler of my staff dated February 28, 2020, Department of Energy Certificate of Compliance (CoC) Number 9315, Revision 17, for the Model ES-3100 package is issued for renewal with its attached Safety Evaluation Report. Changes to the CoC are indicated by vertical bars in the right page margin.

This CoC is issued by DOE under the authority of 49 CFR 173.7(d) and is conditional upon fulfilling the applicable Operational and Quality requirements of 49 CFR Parts 100 199 and 10 CFR Part 71, and the conditions specified in Item 5 of the CoC.

The expiration date of the certificate is July 31, 2025.

If you have any questions, please contact me or Dr. Shuler at (301) 903-5513.

Attachment

cc: Stan Thomas, CNS Y-12  
Yung Liu, ANL  
James Shuler, EM-4.24  
Docket 20-49-9315



CERTIFICATE OF COMPLIANCE For Radioactive Materials Package

DOE Packaging Certification Program

5-85 (Formerly EV-618)

Table with 5 columns: 1a. Certificate Number (9315), 1b. Revision No. (17), 1c. Package Identification No. (USA/9315/B(U)F-96 (DOE)), 1d. Page No. (1), 1e. Total No. Pages (15)

2. PREAMBLE

- 2a. This certificate is issued under the authority of 49 CFR Part 173.7(d).
2b. The packaging and contents described in Item 5 below meet the safety standards set forth in subpart E, "Package Approval Standards" and subpart F, "Package Special Form, and LSA-III Tests" Title 10, Code of Federal Regulations, Part 71.
2c. This certificate does not relieve the consignor from compliance with any requirement of the regulations of the U.S. Department of Transportation or other applicable regulatory agencies...

3. This certificate is issued on the basis of a safety analysis report of the package design or application — (1) Prepared by (Name and Address): U.S. Department of Energy, NNSA, Y-12 National Security Complex... (2) Title and identification of report or application: Safety Analysis Report for Packaging (SARP) Y-12 National Security Complex... (3) Date: September 2016

4. CONDITIONS

This certificate is conditional upon fulfilling of the applicable Operational and Quality Assurance requirements of 49CFR parts 100 – 199 and 10CFR Part 71, and the conditions specified in Item 5 below.

5. Description of Packaging and Authorized Contents, Model Number, Transport Index, other Conditions, and References:

(a) Packaging

(1) Model Number: ES-3100

(2) Description:

The ES-3100 packaging, which is depicted in Figure 1.1 below, is a cylindrical container that is approximately 43.5 inches (110 cm) in overall height, including the cover and lid and approximately 19 inches (49 cm) in overall diameter.

The packaging is composed of an outer drum assembly and an inner containment vessel (CV). The main functions of the packaging are to provide containment, shielding, and nuclear criticality safety. Table 2.7 of the SARP provides detailed material specifications for the packaging components.

The outer drum assembly consists of (a) a reinforced stainless steel, standard military specification 30 gallon drum with an increased length; (b) a cylindrical layer of castable refractory material (Kaolite 1600™), which is comprised of concrete and vermiculite, and which acts as both an impact-absorbing and thermal-insulating material; (c) a cylindrical layer of castable refractory (277-4 special dry mix) for neutron attenuation; (d) an inner steel liner; and (e) a removable top plug that also has a layer of the castable refractory material (Kaolite 1600™) for impact absorption and thermal insulation. The 30-gallon drum is manufactured from 16-gauge Type 304

6a. Date of Issuance: August 5, 2020

6b. Expiration Date: July 31, 2025

FOR THE U.S. DEPARTMENT OF ENERGY

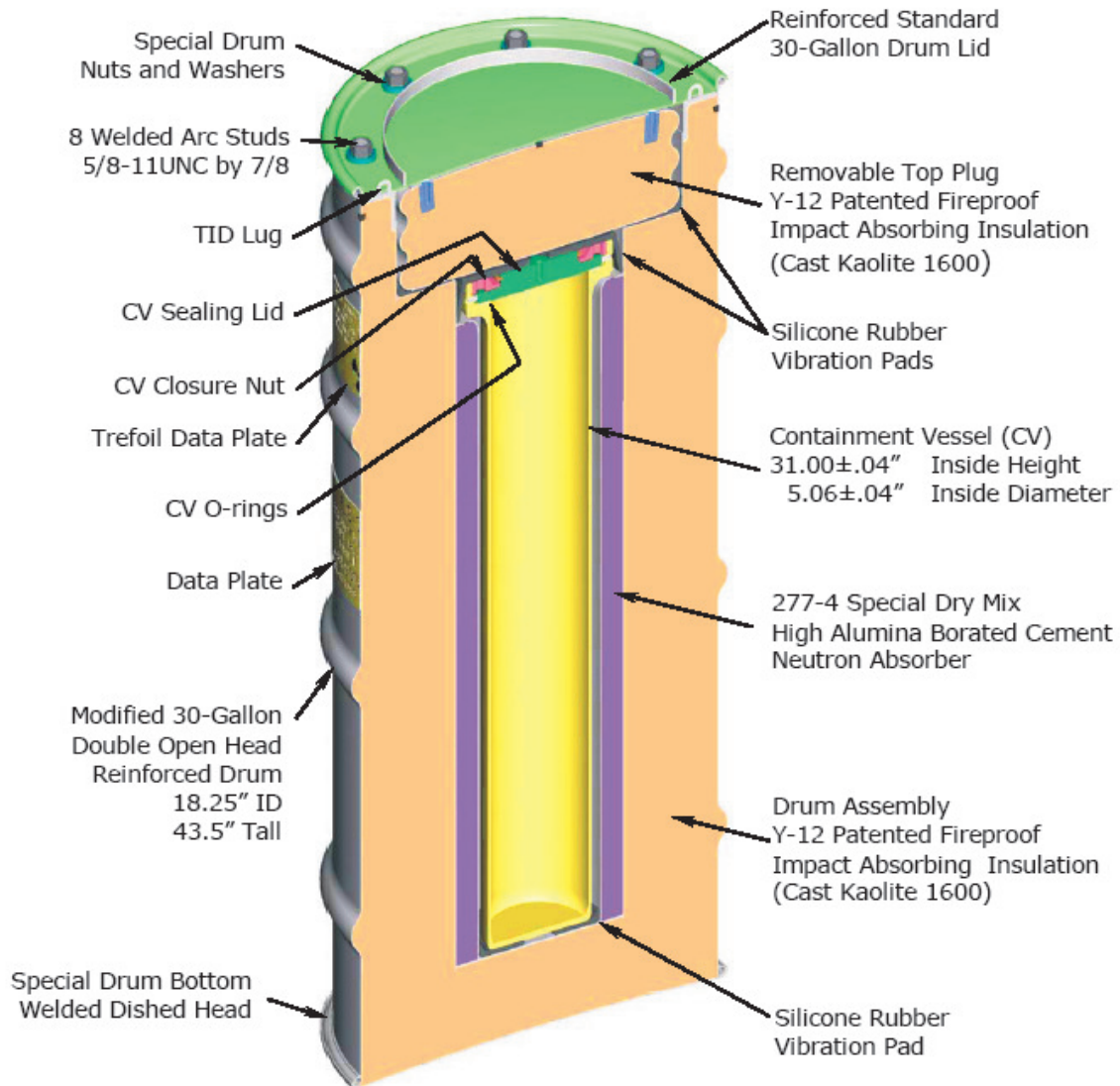
7a. Address (of DOE Issuing Office) U.S. Department of Energy Office of Packaging and Transportation, EM-4.24 1000 Independence Avenue, SW Washington, DC 20585

7b. Signature, Name, and Title (of DOE Approving Official) Julia C. Shenk Julia C. Shenk Director Headquarters Certifying Official Office of Packaging and Transportation

Digitally signed by Julia C. Shenk Date: 2020.08.05 08:20:25 -04'00'

or 304L stainless steel. The fabrication is accomplished according to requirements specified in NUREG/CR-3854, and is in accordance with the dimensional requirements of MIL-D-6054F as modified according to Drawing M2E801580A004. The inner liner is also manufactured from Type 304 or 304L stainless steel.

An ARG-US radiofrequency identification (RFID) tag may be attached to the ES-3100 package if desired. If an ARG-US RFID tag is attached to the package using the drum stud and nut assembly, the normal thread engagement of the external nut shall not be affected when compared to adjacent stud and nut attachments.



**Figure 1.1. Schematic of the ES-3100 shipping package.**

The CV is placed inside the outer drum assembly, surrounded by the neutron-attenuating and the impact-absorbing and thermal-insulating materials. It is approximately 32 in. (82 cm) in overall height and 5 in. (13 cm) in overall diameter, and is constructed of Type 304L stainless steel. The lid assembly consists of a sealing lid; a closure nut; an external retaining ring that holds both the assembly and closure nut together; and double O-rings. The O-rings are ethylene propylene diene monomer (EPDM) fabricated to ASTM D 2000, M3BA712A14B13F17. The double O-rings in the top flange of the CV permit leak testing of the CV.

The containment boundary consists of the 0.1 in. (0.254 cm) thick CV body, the CV sealing lid assembly, and the inner O-ring.

Option to use the ARG-US radiofrequency identification (RFID) system: The option to use the ARG-US RFID system is authorized. The RFID guide, ANL/DIS-09-5 is incorporated by reference is SARP Chapter 7 and provides procedures for using the ARG-US RFID system. The ARG-US RFID tag is not considered a part of the package. The ARG-US RFID tag is equipped with a suite of sensors to monitor seal integrity, temperature, humidity, shock, radiation, and battery status. The seal sensor is a thin, flexible membrane that is pressed by washers when installed on one of the bolts used to close the lid of the 30-gallon drum. The seal sensor may be credited as a Tamper-Indicating Device (TID) for enhanced security and safeguards, and the seal has been evaluated, and judged to be adequate, following the NRC Regulatory Guide 5.80 "Pressure Sensitive (PS) and Tamper Indicating Device Seals for Material Control and Accounting (MC&A) of Special Nuclear Material," dated December 2010. Therefore, the ARG-US RFID tag may be used as TID seal, based on "DOE Packaging Certification Program Qualification/Accreditation of ARG-US Tag as TID Seal," dated July 30, 2012. The ARG-US RFID tag has a robust plastic front cover and the stainless-steel back plate which provide adequate protection of the tag against damage under normal handling and transport. The tag weighs approximately 2.4 lb (with four batteries) and is approximately 8 inches wide x 7 inches high x 1.5 inches tall. Appendix B of the RFID guide provides documentation that the batteries used in the ARG-US RFID tag are not subject to the hazardous material regulations and also contains the Material/Product Safety Data Sheet for the batteries.

(3) Drawings:

The drawings that pertain to the ES-3100 package design are listed in Table 1.0.

**Table 1.0. List of Drawings Pertaining to the ES-3100 Package**

Drawing No.	Revision	Title
M2E801580A037	G	Consolidated Assembly Drawing (3 sheets)
M2E801580A001	C	Drum Assembly
M2E801580A002	B	Body Weldment
M2E801580A003	B	Inner Liner Weldment (2 sheets)
M2E801580A004	B	Double Open Head Reinforced Drum
M2E801580A005	E	Misc. Details
M2E801580A006	B	Drum Lid Weldment
M2E801580A007	B	18.25" Diameter Drum Lid
M2E801580A008	B	Top Plug Weldment
M2E801580A009	D	Pad Details
M2E801580A010	E	Data Plate Details
M2E801580A011	G	Containment Vessel Assembly
M2E801580A012	C	Containment Vessel Body Assembly (2 sheets)
M2E801580A013	D	Containment Vessel O-ring Details
M2E801580A014	B	Containment Vessel Lid Assembly
M2E801580A015	C	Containment Vessel Sealing Lid
M2E801580A016	B	Containment Vessel Closure Nut
M2E801580A023	E	Containment Vessel Leak Test Assemblies
M2E801580A024	C	Containment Vessel Vibration Absorbing Silicone 4.25" Can Pad
M2E801580A031	G	Main Assembly
M2E801580A043	B	Heavy Can Spacer Assembly (SST)
T2E801827A008	A	Leak Check Flange Assembly

(b) Contents

The authorized contents for shipment in the ES-3100 package consist of bulk highly enriched uranium (HEU) in the form of oxide ( $UO_2$ ,  $UO_3$ ,  $U_3O_8$ ,  $U_3O_8-Al$ ,  $UO_2-Mg$ , and  $UO_2-ZrO_2$ ); uranium metal and alloy in the form of solid geometric shapes or broken pieces; uranium compounds; uranyl nitrate crystals (UNX); research reactor fuel elements and components; and HEU metal or alloy turnings, fines or powders with an enrichment of  $\leq 100\%$ .

HEU metal or alloy may be shipped in tin-plated carbon steel, stainless steel, aluminum, or nickel-alloy convenience cans; Teflon convenience bottles; or Teflon bottles inside metal convenience cans. Solid form HEU contents (i.e., cylinders, bars, slugs) that will not fit in a convenience can may be bagged with no convenience can required around the contents. HEU oxide and compounds may be shipped in tin-plated carbon steel, stainless steel, or nickel-alloy convenience cans; polyethylene or Teflon convenience bottles; or glass ( $UO_2-Mg$  oxide only), polyethylene, or Teflon bottles inside metal convenience cans.

The maximum content decay heat load shall not exceed 5.0 watts.

The radioactive materials are placed in convenience cans, polyethylene bottles, or Teflon bottles. Long fuel elements may be bagged or wrapped in polyethylene or nylon. Protective end caps may be placed over bagged contents. Typical loading of the bulk HEU into the packaging, using convenience cans is depicted in Figure 1.2 of the SARP. Typical shipping configurations inside the CV are depicted in Figure 1.4 of the SARP.

The maximum concentrations of uranium isotopes that are permitted in the ES-3100 package contents are listed in Table 1.1.

**Table 1.1. Uranium Concentration Limits**

Uranium Isotope	Limit
$^{232}U$	0.040 $\mu g/gU$
$^{233}U$	0.006 g/gU
$^{234}U$	0.02 g/gU
$^{235}U$	1.00 g/gU
$^{236}U$	0.40 g/gU
$^{238}U$	1.00 g/gU

The bounding uranium isotopic concentration in oxide is listed in Table 1.2.

**Table 1.2. Bounding Uranium Isotopic Concentration in Oxide**

Isotope	Bounding Limit
$^{232}U$	40 ppb
$^{233}U$	0.6 wt %
$^{234}U$	2.0 wt %
$^{235}U$	100.0 wt %
$^{236}U$	40.0 wt %

The maximum impurities in uranium silicide are shown in Table 1.2a.

**Table 1.2a. Maximum impurities in uranium silicide<sup>a, b</sup>**

Element	Parts per million (ppm)
Aluminum	600
Boron	30
Carbon	1000
Cadmium	20
Cobalt	10
Copper	100
Iron and nickel	1000
Hydrogen	200
Lithium	10
Nitrogen	500
Oxygen	7000
Zinc	1000

- a Other individual elements not listed in table are limited to a maximum of 500 ppm. The total of all other elements is a maximum of 2500 ppm.
- b The total impurity content in uranium silicide shall not exceed the equivalent boron content of 30 ppm on a weight basis relative to uranium silicide. The equivalent boron content is calculated as shown in Reference TRTR-14 in the SARP.

In addition to the uranium isotopes shown in Tables 1.1 and 1.2, transuranic isotopes may be present in the HEU contents, and are allowed to be transported according to the limits shown Table 1.2b.

**Table 1.2b. Concentration Limits for Transuranics**

		Concentration Limits		
Mode of Transport	Type and Form of Contents	<sup>237</sup> Np (in All Forms)	Transuranics Other Than <sup>237</sup> Np (As Metal or Alloy)	Transuranics Other Than <sup>237</sup> Np (as Other Than Metal or Alloy)
		Ground	0.0250 g/gU	800.0 µg/gU
Air	0.0250 g/gU	40.0 µg/gU	40.0 µg/gU	

Note the SARP does not contain Table 1.2b.

Certificate Number	Revision No.	Package Identification No.	Page No.	Total No. Pages
9315	17	USA/9315/B(U)F-96 (DOE)	6	15

### Weights and Contents Descriptions

The maximum gross shipping weight of the ES-3100 package, with any contents, is 420 lb (190.5 kg).

The weight of the radioactive contents in the ES-3100 package is limited to 77.6 lb (35.2 kg). The maximum weight of all contents, including the radioactive contents, the convenience cans or bottles, can spacers, polyethylene bagging and other packing materials, is limited to 90 lb (40.82 kg). There is no minimum content weight requirement.

For contents that must be shipped with spacers (see Table 1.3), the spacers must be in accordance with B&W Y-12, L.L.C., Drawing No. M2E801580A043.

### Radioactive/Fissile Constituents

The maximum number of  $A_{25}$  is 4752.8 (at 70 yrs) and the maximum activity is 0.72554 TBq (at 10 yrs).

The following loading limits are imposed based on the mode of transport:

- a) For ground transport, fissile material loading limits for all materials except Uranyl Nitrate are presented in Table 1.3 and Uranyl Nitrate is presented in Table 1.3a. CAUTION NOTE: PLEASE READ ALL FOOTNOTES ON THESE TABLES BEFORE LOADING MATERIAL.
- b) For air transport, HEU in the form of metal/alloy, HEU metal or alloy turnings, fines, or powder, research reactor fuel elements and components, and HEU oxide ( $UO_2$ ,  $UO_3$ ,  $U_3O_8$ ,  $U_3O_8-Al$ ,  $UO_2-Mg$ , and  $UO_2-ZrO_2$ ) the fissile material mass loading limits are presented in Table 1.3b. CAUTION NOTE: PLEASE READ ALL FOOTNOTES ON THIS TABLE BEFORE LOADING MATERIAL.
- c) The loading limit for mixed-mode transport is taken as the most restrictive limit for either ground or air mode of transportation (Table 1.3 or 1.3b).

**Table 1.3 –Authorized Content and Fissile Mass Loading Limits for Ground Transportation<sup>a, b, c</sup>**

Content Description		Enrichment	CSI	No Spacers, <sup>235</sup> U (kg)	277-4 can Spacers, <sup>d</sup> <sup>235</sup> U (kg)
Solid HEU metal or alloy (specified geometric shape) <sup>e</sup>	Cylinder A	≤ 100%	0.0	15.000	25.000
	Cylinder B	≤ 100%	0.0	18.000	30.000
	Square bars	≤ 100%	0.0	30.000	35.200 <sup>f</sup>
	Slugs	≤ 95%	0.0	17.374	-
	Slugs	≤ 80%	0.0	-	29.318
	Slugs	> 80%, ≤ 95%	0.0	-	24.324
	Slugs	>80%, ≤ 95%	0.4	-	34.749
Broken HEU metal or alloy	>95%, ≤ 100%	0.0	Spacers req'd <sup>d</sup>	2.774	
		0.4	Spacers req'd	5.549	
		0.8	Spacers req'd	9.248	
		2.0	Spacers req'd	13.872	
		3.2	Spacers req'd	24.969	
	>90%, ≤ 95%	0.0	Spacers req'd	3.516	
		0.4	Spacers req'd	6.154	
		0.8	Spacers req'd	10.549	
		2.0	Spacers req'd	18.461	
		3.2	Spacers req'd	26.373	
	>80%, ≤ 90%	0.0	Spacers req'd	3.333	
		0.4	Spacers req'd	7.500	
		0.8	Spacers req'd	12.500	
		2.0	Spacers req'd	20.000	
		3.2	Spacers req'd	28.334	
	>70%, ≤ 80%	0.0	2.967	4.450	
		0.4	5.192	8.900	
		0.8	8.900	16.317	
		2.0	17.059	25.218	
		3.2	27.443	28.184	
	>60%, ≤ 70%	0.0	3.249	5.198	
		0.4	5.848	12.996	
		0.8	13.646	20.793	
		2.0	21.444	24.692	
		3.2	24.692	24.692	
	≤ 60%	0.0	5.576 kg U	11.154 kg U	
		0.4	14.872 kg U	28.813 kg U	
		0.8	28.814 kg U	35.20 kg U <sup>f</sup>	
		2.0	35.20 kg U <sup>f</sup>	35.20 kg U <sup>f</sup>	
		3.2	35.20 kg U <sup>f</sup>	35.20 kg U <sup>f</sup>	



**Table 1.3 –Authorized Content and Fissile Mass Loading Limits for Ground Transportation (cont) <sup>a, b, c</sup>**

Content Description	Enrichment	CSI	No Spacers, <sup>235</sup> U (kg)	277-4 can Spacers, <sup>d</sup> <sup>235</sup> U (kg)
HEU metal or alloy turnings, fines, or powders <sup>g</sup>	>95%, ≤ 100%	0.0	1.849	Spacers not required
		0.4	3.699	
		0.8	6.473	
		2.0	11.097	
		3.2	11.097	
	>90%, ≤ 95%	0.0	2.637	
		0.4	4.395	
		0.8	7.032	
		2.0	14.944	
		3.2	17.581	
	>80%, ≤ 90%	0.0	2.637	
		0.4	5.000	
		0.8	9.166	
		2.0	16.667	
		3.2	21.667	
	>70%, ≤ 80%	0.0	2.967	
		0.4	5.192	
		0.8	8.900	
		2.0	17.059	
		3.2	19.284	
	>60%, ≤ 70%	0.0	3.249	
		0.4	5.848	
		0.8	13.646	
		2.0	21.444	
		3.2	24.692	
≤ 60%	0.0	5.576 kg U		
	0.4	14.872 kg U		
	0.8	28.814 kg U		
	2.0	35.20 kg U <sup>f</sup>		
	3.2	35.20 kg U <sup>f</sup>		

**Table 1.3 –Authorized Content and Fissile Mass Loading Limits for Ground Transportation (cont) a, b, c**

Content Description	Enrichment	CSI	No Spacers, <sup>235</sup> U (kg)	277-4 can Spacers, <sup>d</sup> <sup>235</sup> U (kg)
HEU oxide <sup>h, i</sup> (UO <sub>2</sub> , UO <sub>3</sub> , U <sub>3</sub> O <sub>8</sub> , U <sub>3</sub> O <sub>8</sub> -Al, UO <sub>2</sub> -Mg, <sup>j</sup> UO <sub>2</sub> -ZrO <sub>2</sub> )	≤ 100%	See below	15.13 kg oxide	Spacers not required
bulk density 2.0 – 6.54 g/cm <sup>3</sup>		0.0	9.682 kg <sup>235</sup> U	
bulk density 2.0 – 6.54 g/cm <sup>3</sup>		0.4	12.323 kg <sup>235</sup> U	
bulk density ≥1.75, <2.0 g/cm <sup>3</sup>		0.0	9.46 kg <sup>235</sup> U	
bulk density ≥1.5, <1.75 g/cm <sup>3</sup>		0.0	8.36 kg <sup>235</sup> U	
bulk density ≥1.25, <1.5 g/cm <sup>3</sup>		0.0	7.04 kg <sup>235</sup> U	
bulk density ≥1.0, <1.25 g/cm <sup>3</sup>		0.0	5.94 kg <sup>235</sup> U	
bulk density ≥0.75, <1.0 g/cm <sup>3</sup>		0.0	4.84 kg <sup>235</sup> U	
bulk density ≥0.5, <0.75 g/cm <sup>3</sup>		0.0	3.52 kg <sup>235</sup> U	

**Table 1.3 –Authorized Content and Fissile Mass Loading Limits for Ground Transportation (cont) a, b, c**

Content Description		Enrichment	CSI	No Spacers, <sup>235</sup> U (kg)	277-4 can Spacers, <sup>d</sup> <sup>235</sup> U (kg)
Research reactor fuel elements and components	UZrH <sub>x</sub> (TRIGA) <sup>k</sup>	≤ 20%	0.0	0.921 <sup>l</sup>	Spacers not required
		> 20%, ≤ 70%	0.0	0.408 <sup>l</sup>	
	UZrH <sub>x</sub> (SNAP) <sup>k</sup>	≥ 93%	0.0	0.857 <sup>l</sup>	
	U-Zr	≤ 100%	varies	See limit for broken metal or alloy	Spacers <u>as</u> required
	U-Al	≤ 100%	0.0	7.333 kg U-Al 1.117 kg U 1.050 kg <sup>235</sup> U	Spacers not required
	U <sub>3</sub> O <sub>8</sub> -Al	≤ 100%	0.0	15.13 kg oxide 9.682 kg <sup>235</sup> U	
			0.4	15.13 kg oxide 12.323 kg <sup>235</sup> U	
	UO <sub>2</sub>	≤ 100%	0.0	21.937 kg UO <sub>2</sub> 19.308 kg <sup>235</sup> U	
	Oxides of U-Zr <sup>m</sup>	≤ 100%	0.0	15.13 kg oxide 9.682 kg <sup>235</sup> U	
			0.4	15.13 kg oxide 12.323 kg <sup>235</sup> U	
UO <sub>2</sub> -Mg	≤ 100%	0.0	15.13 kg oxide 9.682 kg <sup>235</sup> U		
		0.4	15.13 kg oxide 12.323 kg <sup>235</sup> U		
U <sub>3</sub> Si <sub>2</sub> -Al <sup>n</sup>	≤ 100%	0.0	5.825 kg U <sub>3</sub> Si <sub>2</sub> -Al 2.277 kg U 450 g <sup>235</sup> U		

**Table 1.3 –Authorized Content and Fissile Mass Loading Limits for Ground Transportation (cont) a, b, c**

Content Description		Enrichment	CSI	No Spacers, <sup>235</sup> U (kg)	277-4 can Spacers, <sup>d</sup> <sup>235</sup> U (kg)
Uranium compounds	UF <sub>4</sub>	≤ 100%	0.0	3 kg UF <sub>4</sub> 2.267 kg <sup>235</sup> U	Spacers not required
			2.0	24.0 kg UF <sub>4</sub> 18.136 kg <sup>235</sup> U	
	UO <sub>2</sub> F <sub>2</sub>	≤ 100%	0.0	3 kg UO <sub>2</sub> F <sub>2</sub> 2.067 kg <sup>235</sup> U	
	UC	≤ 100%	0.0	2 kg UC 1.815 kg <sup>235</sup> U	
	UN	≤ 100%	0.0	2 kg UN 1.888 kg <sup>235</sup> U	
	TRISO	≤ 100%	0.0	2 kg TRISO 1.815 kg <sup>235</sup> U	
	U <sub>3</sub> Si <sub>2</sub> <sup>n</sup>	≥19.7%, <40%	0.0	13 kg U <sub>3</sub> Si <sub>2</sub>	
			0.0	7 kg U <sub>3</sub> Si <sub>2</sub>	

- a With the exception of the UNX crystals (Section 1.2.2.2 of the SARP), which are loaded for shipment in crystalline solid form, HEU in solution form is not authorized for shipment in the ES-3100.
- b All limits are expressed in kg <sup>235</sup>U unless otherwise indicated.
- c Mass loadings cannot be rounded up.
- d 277-4 can spacers as described on Drawing No. M2E801580A043 (Appendix 1.3.7 of the SARP).
- e HEU bulk metal and alloy not covered by these specific geometric shapes must be put into the broken metal category. Geometries of solid shapes are as follows:
- Cylinder A is larger than 3.24 in. diameter but no larger than 4.25 in. diameter: maximum of 1 cylinder per can.
  - Cylinder B is no larger than 3.24 in. diameter: maximum of 1 cylinder per can.
  - Square bars are no larger than 2.29 in. × 2.29 in. (cross section): maximum of 1 bar per can.
  - Slugs are a maximum of 1.5 in. diameter × 2.0 in. tall: a maximum of 10 per convenience can where the actual number permitted is restricted by the stated loading limit.
- f Maximum planned content weight is 35.20 kg. Maximum analyzed content weight for criticality safety is 35.32 kg.
- g If the mass of metal or alloy turnings, fines, or powders is ≤ 50 g, then it may be shipped as the parent form (e.g., broken metal, reactor fuel, etc.).
- h Seal time must be 12 months or less. Seal time is the length of time after the ES-3100 containment vessel is sealed that the shipment must be complete.
- i Allowable HEU bulk oxide densities are 0.5-6.54 g/cm<sup>3</sup> and the total mass of oxide in all cases is limited to 15.13 kg. Moisture content in oxide is limited to 3 weight percent water.
- j UO<sub>2</sub>-Mg will be shipped in a glass bottle inside a metal convenience can under an inert cover gas.
- k For SNAP UZrH<sub>x</sub>, x ≤ 2. For TRIGA UZrH<sub>x</sub>, x ≤ 1.6.
- l Evaluation limit is based on specific fuel type as opposed to a maximum calculated limit for UZrH<sub>x</sub>.
- m Oxides of U-Zr are UO<sub>2</sub>-Zr and UO<sub>2</sub>-ZrO<sub>2</sub>.
- n The maximum impurities in uranium silicide are shown on Table 1.2a of the SARP and this certificate.

**Table 1.3a – Loading Limits for Uranyl Nitrate Crystals for Ground Transport**

Product <sup>a, b</sup>	Seal time <sup>c</sup> (months)	CSI	Loading limit <sup>d, e</sup> (kg UNX)	U content <sup>f</sup> (wt%)
UNX 0 < X ≤ 3	2	0.4	11.90	52 < U ≤ 61
	4	0.4	6.70	52 < U ≤ 61
UNX X > 3	2	0.4	9.17	46 < U ≤ 52
	4	0.0	4.75	46 < U ≤ 52

- a UNX is uranyl nitrate hydrate [UO<sub>2</sub>(NO<sub>3</sub>)<sub>2</sub> \* XH<sub>2</sub>O] where 0 < X ≤ 6.  
b Must be shipped in Teflon bottles.  
c Seal Time – length of time after the ES-3100 containment vessel is sealed that the shipment must be complete.  
d Total mass of UNX crystals. Spacers are not required for this content type.  
e Loading limits for uranyl nitrate crystals are based on hydrogen generation calculations presented in Appendix 3.5.4 of the SARP.  
f Enrichment up to 100%.

**Table 1.3b - Loading Limits for Air Transport <sup>a, b, c</sup>**

Content description	Enrichment	CSI	<sup>235</sup> U (kg)
HEU metal or alloy	≤ 100%	— <sup>d</sup>	7.00
HEU metal or alloy turnings, fines, or powder <sup>e</sup>	≤ 100%	— <sup>d</sup>	7.00
Research reactor fuel elements and components (UZrH <sub>x</sub> , <sup>f</sup> U-Zr, U-Al, U <sub>3</sub> O <sub>8</sub> -Al, UO <sub>2</sub> , oxides of U-Zr, <sup>g</sup> UO <sub>2</sub> -Mg, U <sub>3</sub> Si <sub>2</sub> -Al)	≤ 20%	— <sup>d</sup>	0.921
	> 20%	— <sup>d</sup>	0.408
HEU oxide <sup>h, i</sup> (UO <sub>2</sub> , UO <sub>3</sub> , U <sub>3</sub> O <sub>8</sub> , U <sub>3</sub> O <sub>8</sub> -Al, UO <sub>2</sub> -Mg, <sup>j</sup> UO <sub>2</sub> -ZrO <sub>2</sub> ):	≤ 100%	0.0 (Spacers not required)	see below
bulk density ≥ 1.0, < 1.5 g/cm <sup>3</sup>			2.15
bulk density ≥ 1.5, < 2.0 g/cm <sup>3</sup>			2.77
bulk density ≥ 2.0, < 3.0 g/cm <sup>3</sup>			3.38
bulk density ≥ 3.0, < 4.0 g/cm <sup>3</sup>			4.75
bulk density ≥ 4.0, < 5.0 g/cm <sup>3</sup>			6.02
bulk density ≥ 5.0, ≤ 6.54 g/cm <sup>3</sup>	7.57		

- a All limits are expressed in kg <sup>235</sup>U unless otherwise indicated.  
b Mass loadings cannot be rounded up.  
c The loading limit for mixed-mode transport is taken as the most restrictive limit for either ground or air mode of transportation (Table 1.3 or 1.3b of SARP and this certificate).  
d. CSI and spacer use are governed by ground transport mode.  
e. If the mass of metal or alloy turnings, fines, or powders is ≤ 50 grams, then it may be shipped as the parent form (e.g., broken metal, reactor fuel, etc.).  
f. For SNAP UZrH<sub>x</sub>, x ≤ 2. For TRIGA UZrH<sub>x</sub>, x ≤ 1.6.  
g. Oxides of U-Zr are UO<sub>2</sub>-Zr and UO<sub>2</sub>-ZrO<sub>2</sub>.  
h Seal time must be 12 months or less. Seal time is the length of time after the ES-3100 containment vessel is sealed that the shipment is complete.  
i Allowable HEU bulk oxide densities are 1.0-6.54 g/cm<sup>3</sup>. Moisture content in oxide is limited to 3 weight percent water.  
j UO<sub>2</sub>-Mg will be shipped in a glass bottle inside a metal convenience can under an inert cover gas.

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(c) Criticality Safety Index

The Criticality Safety Index (CSI) assigned for each content is shown above in section 5(b) of this certificate.

(d) Conditions

- (1) The vent holes on the outer steel drum shall be capped closed during transport and storage to preclude entry of rain water into the insulation cavity of the drum.
- (2) Content forms may not be mixed in a single ES-3100 containment vessel.
- (3) Where can spacers are required for a "per package" mass loading, the quantity of fissile materials located in any vacancy between or adjacent to can spacers shall not exceed one-third of the mass loading limit in Table 1.3. Spacers must be positioned between every two convenience cans, or in the case of shipping one convenience can only, the spacer must be positioned on top of the single can.
- (4) Uranium metal and alloy pieces must have a surface-area-to-mass ratio of not greater than 1.00 cm<sup>2</sup>/g or must not pass freely through a 3/8-inch (0.0095 m) mesh sieve, or equivalent size-grading system. The uranium metal must also have had no more than a limited contact with water and been subsequently dried. Particles and small shapes that do not pass this size restriction, as well as powders, foils, turnings, and wires, are not permitted, unless they are in a sealed container under an inert cover gas. Uranium material or alloy which has been stored in water or is visibly wet at the time of packaging is not authorized to be shipped in this package.
- (5) Intact TRIGA fuel elements and fuel section elements (pellets) are allowed. Fuel from TRIGA reactor elements shall be unirradiated. The fuel sections may be from any of three types of fuel elements: TRIGA standard fuel elements, instrumented TRIGA standard fuel elements, and TRIGA fuel follower control rods. The <sup>235</sup>U mass for TRIGA standard fuel elements and instrumented TRIGA standard fuel elements is a nominal 136 grams per element, and the <sup>235</sup>U mass for TRIGA fuel follower control rods is a nominal 113 grams per element. Each fuel element contains three fuel sections, either stainless steel or aluminum clad or unclad. The fuel elements are approximately 15 inches in length, with sections approximately 5 inches in length; the approximate diameter of the fuel is 1.44 inches for the standard and instrumented fuel elements, and 1.31 inches for the fuel follower control rods. The fuel elements and sections are packaged within stainless steel or tin-plated carbon steel convenience cans. Disassembled fuel elements are to be packaged with a maximum of three fuel sections, or three fuel elements, per convenience can. Fuel sections from different fuel elements may not be mixed within a single convenience can. A maximum of three convenience cans with disassembled fuel elements may be loaded into a single package. Three stainless steel or aluminum clad elements with crimped ends are to be packaged in a single convenience can with a maximum of one can per package. For TRIGA standard fuel elements and instrumented TRIGA standard fuel elements, the maximum allowable loading per package is 408 grams <sup>235</sup>U per package, and for TRIGA fuel follower control rods, the maximum allowable loading is 339 grams <sup>235</sup>U per package.

The SNAP fuel pins are approximately 1.25 inches in diameter and approximately 12.45 inches long. The SNAP fuel pins may be packed in appropriate length convenience cans or bundled together and protected on each end with an open-ended can. A maximum of three SNAP fuel elements may be packed into any one convenience can or any one bundle. Up to two loaded convenience cans or two bundles may be shipped in the ES-3100.

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- (6) Any combination of convenience can sizes is allowed in a single package, as long as the total height of the can stack (including silicone rubber pads and spacers, if required) does not exceed the inside working height of the containment vessel (31 inches). Any closure on the convenience can is allowed.
- (7) The maximum mass of off-gassing packing materials in the containment vessel (e.g., polyethylene containers or bagging, silicone rubber pads, nylon bags, etc.) shall not exceed 500 grams. Off-gassing packing materials may be any type of hydrogenous material, except in the case of shipping uranium in the form of broken metal, in which case the hydrogenous material must have a hydrogen atom density less than or equal to that of water. With the use of Teflon bottles as convenience containers, the maximum mass of off-gassing packaging material may be increased by approximately 330 grams for Teflon only, for each Teflon bottle; up to three Teflon bottles (990 grams of Teflon) and off-gassing packaging material (500 grams max.) are permitted in the containment vessel (1,490 grams/package). If closed convenience cans with an outer diameter greater than 4.25 inches are used, the user shall verify at least 55 cubic inches of free or void volume must exist inside the containment vessel to allow for gas expansion and offgassing of packing materials at temperatures associated with NCT or HAC.
- (8) Empty convenience cans, spacers, silicone rubber pads, and/or stainless-steel scrubbers (i.e., stainless steel trimmings that act as dunnage) may be used to fill the void space in the containment vessel. In situations where empty convenience cans are shipped in the package, they may be placed either above or below the loaded cans. Empty convenience cans must have a minimum 0.125 inches diameter hole through the lid.
- (9) The contents and the convenience cans may be bagged or wrapped in polyethylene, nylon, or aluminum foil for contamination control provided the limits of Section 5(d)(7) of this certificate are met.
- (10) The mass of unidentified constituents in the content to be shipped shall be counted against the fissile mass loading limit. Content shall not contain unevaluated moderating materials.
- (11) Transport by air is not authorized, except as specified in Table 1.3b. For air transport, the total amount of free water in Kaolite is limited to 12 lb (5,443 g). Other than that, the ES-3100 package will not contain any free water at the time it is loaded for transport.
- (12) In addition to the requirements of Subparts G and H of 10 CFR Part 71, and except as specified in section 5(d) of this certificate, each package must be fabricated, acceptance tested, operated, and maintained in accordance with the Operating Procedures requirements of Chapter 7, Acceptance Tests and Maintenance requirements of Chapter 8, and packaging-specific Quality Assurance requirements of Chapter 9 of the SARP, Revision 2, as supplemented.
- (13) Revision 16 of the certificate may be used until July 31, 2021. For export or import use of this package under a Department of Transportation Competent Authority Certification (CAC), previous revisions of this certificate may continue to be used until their expiration date, unless otherwise specified in the CAC.
- (14) The periodic leakage rate test interval of the containment boundary is 24 months.
- (15) Only use the drawings listed in 5(a)(3) of this certificate.
- (16) Transport by air or ground is authorized for HEU metal or alloy turnings, fines, or powders in the ES-3100 package. These contents shall be in a sealed inerted container: the Teflon bottles, the metal convenience cans, and the containment vessel shall be inerted with argon of high purity (>99%) and with low moisture (<5 ppm moisture).

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- (17) Only Departmental elements or persons working under contract to Departmental elements shall consign the package for shipment.
- (18) Nuclear Regulatory Commission (NRC) or Agreement State licensees shall not consign a DOE certified package for shipment, but can transfer the material on-site to DOE elements or persons working under contract to DOE elements for consignment of the package.
- (19) HEU oxide with residual particles of metallic uranium (a.k.a., clinkers and screenings) and meeting the requirements of footnote "i" of Table 1.3 (for ground transport) or Table 1.3b (for air transport) of this certificate must be prepared for shipment in accordance with the authorized content and loading limits for "Broken HEU metal or alloy" in Table 1.3 (for ground transport) or Table 1.3b (for air transport) and Condition (4) of this certificate, and must be shipped within the seal time per footnote "h" of the aforementioned tables.

(e) Supplements

- (1) Safety Analysis Report for Packaging, Y-12 National Security Complex, Model ES-3100 Package with Bulk HEU Contents, SP-PKG-801940-A001, Revision 2, Page Change 1, dated June 26, 2017.
- (2) Request for Shipment of a variation of HEU oxide in the ES-3100 Package, CoC USA/9315/B(U)F-96 (DOE), Revision 10, Letter Kilmartin to Shuler, May 24, 2017.
- (3) Revised Request for Amendment to ES-3100, Certificate of Compliance (CoC) USA/9315/B(U)F-96 (DOE), Revision 10, Docket 16-45-9315, Letter Kilmartin to Shuler, May 25, 2017.
- (4) Request for Certificate Revision or Letter Amendment to Ship Low Density Oxide by Air Transport in the ES-3100 Package, CoC USA/9315/B(U)F-96 (DOE), Letter Kilmartin to Shuler, June 28, 2018.
- (5) Criticality Evaluation of Low Density Product Oxides for Air Transport for the ES-3100 Package, RP 801940-0020 000 00, June 2018.
- (6) Safety Analysis Report for Packaging, Y-12 National Security Complex, Model ES-3100 Package with Bulk HEU Contents, SP-PKG-801940-A001, Revision 2, Page Change 2, July 11, 2019.
- (7) ES-3100 Containment Vessel (CV) O-rings Life Extension Testing, RP-801580-0022 000 01, July 11, 2019.
- (8) Amendment Items for the ES-3100 Package with Bulk HEU Content, US DOE Certificate of Compliance USA/9315/B(U)F-96 (DOE), Letter Kilmartin to Shuler, February 28, 2020