



EM Environmental Management

safety ❖ performance ❖ cleanup ❖ closure

DOE Packaging Certification Program

Safety Evaluation Report for Certificate of Compliance No. 9978 Renewal for the Model 9978 Package

Docket No. 24-14-9978

Prepared by:

**CHRISTOPHE
R CABLE**

Digitally signed by
CHRISTOPHER CABLE
Date: 2024.04.24 17:16:24
-04'00'

Christopher Cable
Office of Packaging and Transportation

Approved by:

Julia C. Shenk

Digitally signed by Julia C. Shenk
Date: 2024.04.25 09:26:44 -04'00'

Julia C. Shenk
DOE Headquarters Certifying Official
Director
Office of Packaging and Transportation

Evaluation

By email ^[1] dated January 29, 2024, the Savannah River Operations Office (SR) submitted a request to renew US Department of Energy (DOE) Certificate of Compliance (CoC) Number 9978, for Package Identification No. USA/9978//B(M)F-96 (DOE).

SR did not request any changes to either the package design or the authorized contents since the CoC Revision 5, was issued on June 21, 2023. CoC Rev 5 is based on *Safety Analysis Report for Packaging Model 9978* (SARP), S-SARP-G-00002, Revision 3, March 2023, which was listed as Supplement 5(e)(5). Additional CoC supplements include the non-safety basis documents for optional use of radio frequency identification devices:

- (1) Justification for Use of the Radio Frequency Identification (RFID) System, Safety Analysis Report for Packaging Model 9978, Addendum, S-SAR-G-00011, Revision 0, February 2010.
- (2) Guide to the RFID Monitoring System (Models 9975, 9977, and 9978 Packages), Argonne National Laboratory, ANL/DIS-09-5, December 3, 2009.

DOE Packaging Certification Program (PCP) staff confirmed that the SARP Rev 3 and supplements listed above were available and complete.

Based on the statements and representations in the renewal request and SARP Rev 3, and the conditions specified below in this SER for inclusion in the CoC, DOE PCP staff concludes that the package continues to meet the requirements of 10 CFR Part 71.

Conditions of Approval

The following changes to CoC Revision 5 are required for renewal.

- Section 3, certificate holder and safety basis information
 - (2) Title: ... Update to “Safety Analysis Report for Packaging Model 9978, S SARP G 00002, Revision 3...” [approved in CoC Rev 5 as Supplement 5(e)(5)]
 - (3) Date: ... Update to “March 2023” (date SARP Rev 3 approved)
- Section 5(a)(2)
 - *Option to use the radiofrequency identification (RFID) system* - Update for clarification/correction to reference the CoC supplements “The option to use the RFID system is justified by Supplement 5(e)(1) ... The RFID guide Supplement 5(e)(2), provides ... Appendix B of the RFID guide provides ...”
- Section 5(d) *Conditions*
 - (5) – Revise to remove reference for previous SARP supplements “... Chapter 9 of the SARP.”
 - (6) – Update for clarification/correction to reference the CoC supplements “If the option is chosen to attach a DOE MK-II RFID tag to the 9978 packaging, the

- operating procedures must follow the additional steps per Chapter 7 in Supplement 5(e)(1), and the guide to RFID monitoring system in Supplement 5(e)(2) ...”
- (8) – Update the standard statement for DOE CoCs “Only DOE or persons working under contract to DOE shall consign the package for domestic transport.”
 - (9) – Update the standard statement for DOE CoCs “NRC or Agreement State licensees shall not consign a DOE certified package for domestic transport but can transfer the material on-site to DOE or persons working under contract to DOE, for consignment of the package.”
 - (11) – Revise to “Revision 4 of the certificate may be used until April 30, 2024. Revision 5 of this certificate may be used until April 30, 2025.” (grace period to allow users to implement/reference the latest certificate).
- Section 5(e) *Supplements*:
 - Remove Supplements (3) through (5) (incorporated in SARP Rev 3 or no longer applicable)
 - (3) – Add “9978 & 9981 5-year CoC Renewal Request, email, Sobus, L. to Shenk, J., January 29, 2024.”

Conclusion

Based on the statements and representations in the renewal request and SARP Rev 3, and the conditions of approval specified in this SER for inclusion in the CoC, DOE PCP staff concludes that the package continues to meet the requirements of 10 CFR Part 71.

References

- [1] Email, *9978 & 9981 5-year CoC Renewal Request*, Sobus, L. to Shenk, J., January 29, 2024.