



U.S. DEPARTMENT *of* ENERGY

Office of Environmental Management

DOE Packaging Certification Program

SAFETY EVALUATION REPORT

Amendment of Certificate of Compliance No. 9978 for the Model 9978 Package

Docket No. 26-11-9978

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This Safety Evaluation Report (SER) documents the U.S. Department of Energy (DOE) Packaging Certification Program (PCP) independent review of a supplement to the Safety Analysis Report for Packaging (SARP) for the 9978 Package, prepared by the Savannah River National Laboratory (SRNL) on behalf of the Savannah River Operations Office (SR) for simple amendment of DOE Certificate of Compliance (CoC) Number 9978, Revision 6, for the Model 9978 package design.

EVALUATION

By email ^[1] dated November 6, 2025, SR submitted a request to amend DOE CoC 9978, Rev. 6, to correct a document formatting error with section numbering in Chapter 8 of the 9978 SARP.^[2] The application in support of this request is a supplement ^[3] to the SARP, with the correct section numbering and several other editorial changes. In addition, the technical contact for SR, requested several clarifications/improvements to CoC Table 1 and its footnotes.^[4]

- Chapter 8 Table of Contents, page numbers, and Section headers updated/corrected.
- Chapter 8 Clarifications:
 - Section 8.2.2.2, *Maintenance Leak-Rate Test*, revised "... The leak-rate test measures ..." to "... The annual leak-rate test measures ..."
 - Section 8.5.2.1.2, *O-Rings*, revised "... grease as described in Section 7.1.1.1." to "... grease as described in Step 24 of Section 7.1.1.1."
- Chapter 8 Punctuation: Removed comma, 3-places - Section 8.5.2.1.1. and References 3 and 7.
- CoC Table 1 and Table 1 Notes
 - Table 1 Note "d" – add "- applies to all content envelopes." (improvement)
 - Note "c" move from C.2 to "Material" column – this note applies to content envelopes C.1 through C.6 (revised for consistency with the SARP)
 - Table 1 Note "c" – add "... applies to content envelopes C.1 through C.6." (revised clarification and consistency with the SARP).
 - Note "d" add to C.2 (omitted in the CoC).

DOE PCP staff confirmed by document review, by comparing the supplement with Revision 3 of SARP Chapter 8, that these changes (listed below) do not affect safety basis of the package certification by the DOE Headquarters Certifying Official (HCO). In addition, staff concurs that the proposed changes to CoC Table 1 and its footnotes are improvements for clarity.

CONDITIONS OF APPROVAL

The following changes to the CoC are required to implement the changes evaluated in this SER.

- 5(b)(1), Table 1
 - Note "c" move from C.2 to "Material" column – this note applies to content envelopes C.1 through C.6.
 - Note "d" add to C.2 (omitted in the CoC)
- 5(b)(1), Table 1, Table 1 Notes
 - (b) – add "- applies to all content envelopes."
 - (c) – add "- applies to content envelopes C.1 through C.6" to Note "c".
- 5(d) Conditions
 - (5) – add ", as supplemented."

- (11) – revise to “Revision 6 of this certificate may be used until March 31, 2027.”
- 5(e) Supplements
 - (4) – add “Savannah River request to open DOE-EM Docket for 9978 Packaging, email, Sobus, L. to Cable, C. November 6, 2025.”
 - (5) – add “Revision 3 (Supplement November 2025 to correct section headings), SARP Chapter 8, S-SARP-G-00002.”

CONCLUSION

Based on the statements and representations in this supplement to the SARP, and the conditions of approval listed in this SER, DOE PCP staff independently confirmed by document review that the changes (corrections) provide reasonable assurance the Model 9978 package design continues to meet the requirements of 10 CFR Part 71, and recommends approval and issuance of an amendment to the CoC by the DOE HCO.

REFERENCES

- [1] *Savannah River request to open DOE-EM Docket for 9978 Packaging*, Email, L. Sobus to C. Cable, dated November 6, 2025.
- [2] *Safety Analysis Report for Packaging Model 9978*, S-SARP-G-00002, Revision 3, dated March 2023.
- [3] *Revision 3 (Supplement November 2025 to correct section headings)*, SARP Chapter 8, S-SARP-G-00002, Application, submitted November 6, 2025, with Reference 1.
- [4] RE: 9978 SARP and CoC Table Differences, Email, D. Leduc to L. Gelder, dated January 5, 2026.