



U.S. Department
of Transportation

**Research and
Special Programs
Administration**

400 Seventh Street, S.W.
Washington, D.C. 20590

AUG 18 1998

Mr. J.G. Field
Manager Engineering
Waste Management Federal Services, Inc.
345 Hills Street
Richland, WA 99352

Ref. No. 98-0125

Dear Mr. Field:

This is in response to your letter of June 1, 1998, regarding the transport of low specific activity radioactive liquid (LSA) in a specification DOT 412 cargo tank that has a sump which has been secured by a threaded cap or bolted flange.

Specifically, you asked if a threaded capped pipe or bolted flange may be used to close an outlet on the sump of the tank when transporting a LSA liquid? Yes, provided the sump is not the cargo tank outlet used for normal loading or unloading of the tank. See §§ 178.345-1 "loading/unloading outlet" and 178.345-11.

I hope this satisfies your request.

Sincerely,

Delmer F. Billings
Chief, Standards Development
Office of Hazardous Materials Standards



Waste Management Federal Services, Inc.

Northwest Operations
345 Hills Street
Richland, WA 99352

Phone 509.376.7055
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June 1, 1998

WMNW-EPC-98-099

Mr. Edward Mazzullo
Director of Office of Hazardous
Materials Standards
U.S. Department of Transportation
400 7th Street SW
Washington, DC 20590

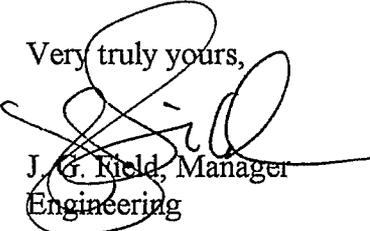
Dear Mr. Mazzullo:

SHIPPING LOW SPECIFIC ACTIVITY LIQUID

Waste Management Federal Services, Inc., Northwest Operations question: "Is it permissible to transport radioactive low specific activity (LSA) liquid in a U.S. Department of Transportation (DOT) 412 cargo tank that has a sump consisting of a threaded cap or bolted flange, with either device securely closed?" Reference 173.427 (c) allows transport of LSA-I liquid in a DOT 412 cargo tank, but states that bottom outlets are not allowed. Reference 178-345-1, under the definition of "outlet," states that the following are not outlets: "A threaded opening securely closed during transportation with a threaded plug or a threaded cap a flanged opening securely closed during transportation with a bolted or welded blank flange...." Was it the intention of the regulations to allow a removable (non-welded) capped pipe or removable flange on the bottom of the tank when transporting LSA liquids?

We are requesting a written interpretation for the U.S. Department of Energy, Richland Operations Office.

Very truly yours,


J. G. Field, Manager
Engineering

acp

RL - D. W. Claussen S7-55

WMH - D. L. McCall H1-11 *DM 6/1/98*

WMNW - E. P. Clements H1-15
JGF File/LB