OCT 30 1998

U.S. Department of Transportation
Research and Special Programs Administration

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

DOT-E-12114

EXPIRATION DATE: October 31, 1999

(FOR RENEWAL, SEE 49 CFR SECTION 107.109)

1. GRANTEE: GPU Nuclear, Inc.
Middletown, PA

2. PURPOSE AND LIMITATION:

a. This exemption authorizes the one time transportation in commerce of a steam generator and a pressurizer from the GPU Nuclear's Saxton Nuclear Experimental Corporation facility to the Chem-Nuclear Systems, Inc. (CNSI) Waste Management Facility located in Barnwell, SC. This exemption authorizes the steam generator and pressurizer to be classified as surface contaminated objects, class II, and transported as non-specification packages under a transport plan which provides an equivalent level of safety to the packages and procedures specified in Title 49 of the Code of Federal Regulations. This exemption provides no relief from any regulation other than as specifically stated herein.

b. The safety analyses performed in development of this exemption only considered the hazards and risks associated with transportation in commerce.

3. REGULATORY SYSTEM AFFECTED: 49 CFR Parts 106, 107 and 171-180.

4. REGULATIONS FROM WHICH EXEMPTED:

a. The definition for fixed and non-fixed contamination levels for surface contaminated objects, class II, of 49 CFR Part 173.403, in that the surface contamination levels for all areas, in particular the inaccessible regions of the steam generator and pressurizer, cannot be specifically verified.

b. 49 CFR 173.427(a) in that the use of non-DOT specification packagings(steam generator and pressurizer)are authorized for the transportation of surface contaminated objects, class II.

5. BASIS: This exemption is based on the application of GPU Nuclear dated June 24, 1998 and the additional data submitted on October 12, 1998. All documents were submitted in accordance with 49 CFR 107.105 and the public proceeding thereon.

6. HAZARDOUS MATERIALS (49 CFR 172.101):

Hazardous materials description -- proper shipping name	Hazard Class/ Division	Identi- fication Number	Packing Group
Radioactive material, surface contaminated object	Class 7	UN 2913	N/A

7. SAFETY CONTROL MEASURES:

a. PACKAGING -

1. Under the provisions of this exemption, the steam generator and pressurizer are considered to be a non-specification packages providing an equivalent level of safety to the packaging authorized under Title 49 of the Code of Federal Regulation.

2. The contamination levels and radionuclides present on the steam generator and the pressurizer shall be consistent with the levels identified in GPU Nuclear's application.

3. To maximize radiation protection, the steam generator and pressurizer will be prepared for shipment by welding or bolting shut all nozzles, instrument penetrations and mechanical enclosures using closure plates. After these preparations have been completed, the outer shell of the steam generator and pressurizer shall be painted.

4. All lifting mechanisms will be removed or rendered inoperable.

b. OPERATIONAL CONTROLS -

1. The steam generator and pressurizer will shipped by dedicated, sole use train and will be consigned as exclusive use.

2. All controls, provisions and routes specified in

GPU Nuclear Transportation Plan and Emergency Response Plan which was submitted as part of the exemption application and amended on October 12, 1998 shall be followed.

c. MARKING - The package shall be plainly and durably marked "DOT-E-12114" in accordance with 49 CFR 172.301(c). In accordance with 49 CFR 173.427(a)(6), the package shall must be marked "Radioactive - SCO" and, if appropriate, package must also be stenciled with the letters "RQ".

8. SPECIAL PROVISIONS:

a. Shippers using the packaging covered by this exemption must comply with all provisions of this exemption, and all other applicable requirements contained in 49 CFR Parts 171-180.

b. The steam generator and pressurizer shall be marked, labeled, and placarded in accordance with the provisions identified in 49 CFR 173.427(a).

9. MODES OF TRANSPORTATION AUTHORIZED: Motor vehicle and rail freight.

10. MODAL REQUIREMENTS:

A copy of this exemption must be carried aboard each motor vehicle used to transport packages covered by this exemption.

11. COMPLIANCE: Failure by a person to comply with any of the following may result in suspension or revocation of this exemption and penalties prescribed by the Federal hazardous materials transportation law, 49 U.S.C. Section 5101 et seq:

- All terms and conditions prescribed in this exemption and the Hazardous Materials Regulations, 49 CFR Parts 171-180.

- Registration required by 49 CFR 107.601 et seq., when applicable.

No person may use or apply this exemption, including display of its number, when the exemption has expired or is otherwise no longer in effect.

Each "Hazmat employee", as defined in 49 CFR 171.8, who performs a function subject to this exemption must receive training on the requirements and conditions of this exemption in addition to the training required by 49 CFR 172.700 through 172.704.

12. REPORTING REQUIREMENTS: The carrier is required to report any incident involving loss of packaging contents or packaging failure to the Associate Administrator for Hazardous Materials Safety (AAHMS) as soon as practicable. (49 CFR 171.15 and 171.16 apply to any activity undertaken under the authority of this exemption.) In addition, the holder(s) of this exemption must inform the AAHMS, in writing, of any incidents involving the package and shipments made under the terms of this exemption.

Issued at Washington, D.C.:

OCT 30 1998

Alan I. Roberts
Associate Administrator
for Hazardous Materials Safety

(DATE)

Address all inquiries to: Associate Administrator for Hazardous Materials Safety, Research and Special Programs Administration, Department of Transportation, Washington, D.C. 20590. Attention: DHM-31.

The original of this exemption is on file at the above office. Photo reproductions and legible reductions of this exemption are permitted. Any alteration of this exemption is prohibited.

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