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United States Government

Department of Energy

# Memorandum

DATE: JUN 21 2005

REPLY TO  
ATTN OF: EM-3 (Dr. Inés R. Triay, 202-586-0738)

SUBJECT: Maintaining Efficiency of Contact Handled Transuranic Waste Shipments to the Waste Isolation Pilot Plant

TO: Distribution

This memorandum establishes the policy for efficient use of the Department of Energy (DOE) Transuranic (TRU) waste transportation resources. Shipping sites are responsible for the efficiency of their shipments. I have tasked the Carlsbad Field Office (CBFO) to monitor shipment data to ensure shipping sites are making efficient use of the TRU waste transportation resources provided [e.g., tractors, trailers, and Contact Handled (CH) Transuranic Package Transporters (TRUPACT-II) and Half Package Transporters (HalfPACTs)].

This policy requires shipping sites to ship the maximum number of loaded packages (i.e., three TRUPACT-II or two TRUPACT-II and one HalfPACT) per shipment with no dunnage containers and the maximum amount of waste [e.g., 14 55-gallon drums, 14 pipe overpacks, 8 85-gallon drums, 6 100-gallon drums, 2 standard waste boxes (SWBs), or 1 ten-drum overpack (TDOP) per TRUPACT-II]. It costs DOE the same amount to ship three packages as it does two, and the cost is the same to ship dunnage as shipping containers full of waste. In addition, it is an inefficient use of the Waste Isolation Pilot Plant (WIPP) waste disposal capacity to dispose of dunnage containers in the WIPP underground.

Exceptions to this policy are:

- **Weight restrictions:** When shipping heavy payload containers, it may be necessary to use two TRUPACT-II instead of three (or two TRUPACT-II and 1 HalfPACT) in order to prevent exceeding the 80,000-pound cumulative limit for truck, trailer, and payload. It may also be necessary to ship one or more dunnage payload containers if the cumulative weight for payload containers exceeds the payload capacity of the TRUPACT-II or HalfPACT. It is preferable to minimize the number of dunnage drums in a seven-pack by replacing a heavy payload container with a lighter one.
- **Fissile Gram Equivalent (FGE):** As defined in Section 3.3.2 of the Contact Handled Transuranic Waste Acceptance Criteria for the Waste Isolation Pilot Plant, DOE/WIPP-02-3122, payload containers shall meet requirements of this section and the Packaging Certificates of Compliance (CofCs). Where generator's waste approaches the TRUPACT-II and HalfPACT packaging FGE limits, it is permissible to ship dunnage containers in a shipment. If dunnage payload containers must be

utilized to meet the applicable FGE limits, it is preferable to minimize the number of dunnage containers by using a combination of high and low FGE payload containers such that no more than half of the containers are dunnage.

- Approval from the CBFO Director of the Office of Characterization and Transportation (OCT) or EM Chief Operating Officer (EM-3): For exceptions other than the two stated above, permission may be obtained from CBFO Director of OCT or EM-3.

If you have questions regarding this policy, please contact me at (202) 586-0738 or Mr. Kerry Watson, CBFO Director of the Office Characterization and Transportation, at (505) 706-0066.



Dr. Inés R. Triay  
Chief Operating Officer

Distribution

Elizabeth Sellers, NE-ID  
Jeffery Allison, DOE-SR  
Keith Klein, DOE-RL  
Edwin Wilmot, DOE-LASO

cc:

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