



U.S. Department of Transportation

COMPETENT AUTHORITY CERTIFICATION FOR A TYPE FISSILE

RADIOACTIVE MATERIALS PACKAGE DESIGN CERTIFICATE USA/0595/AF-96, REVISION 7

Pipeline and Hazardous Materials Safety Administration

REVALIDATION OF JAPANESE COMPETENT AUTHORITY CERTIFICATE J/156/AF-96

The Competent Authority of the United States certifies that the radioactive material package design described in this certificate satisfies the regulatory requirements for a Type AF package as prescribed in the regulations of the International Atomic Energy Agency¹ and the United States of America².

- 1. Package Identification RAJ-III.
- 2. Package Description and Authorized Radioactive Contents as described in Japanese Certificate of Competent Authority J/156/AF-96, 3 (attached).
- 3. <u>Criticality</u> The minimum criticality safety index is 0.25. The maximum number of packages per conveyance is determined in accordance with Table X of the IAEA regulations cited in this certificate.

4. General Conditions -

a. Each user of this certificate must have in his possession a copy of this certificate and all documents necessary to properly prepare the package for transportation. The user shall prepare the package for shipment in accordance with the documentation and applicable regulations.

b. Each user of this certificate, other than the original petitioner, shall register his identity in writing to the Office of Engineering and Research, (PHH-23), Pipeline and Hazardous Materials Safety Administration, U.S. Department of Transportation, Washington D.C. 20590-0001.

¹ "Regulations for the Safe Transport of Radioactive Material, 2012 Edition, No. SSR-6" published by the International Atomic Energy Agency (IAEA), Vienna, Austria.

² Title 49, Code of Federal Regulations, Parts 100-199, United States of America.

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- c. This certificate does not relieve any consignor or carrier from compliance with any requirement of the Government of any country through or into which the package is to be transported.
- d. Records of Management System activities required by Paragraph 306 of the IAEA regulations¹ shall be maintained and made available to the authorized officials for at least three years after the last shipment authorized by this certificate. Consignors in the United States exporting shipments under this certificate shall satisfy the applicable requirements of Subpart H of 10 CFR 71.

5. Special Conditions -

- a. Transport by air is not authorized.
- b. Lid lifting features must be rendered incapable of being used for lifting or tie-down of the package.
- c. Package closure bolts must be adequately secured and torqued to prevent loosening during transport. Minimum and maximum torque values shall be included in the operating instructions for the package.
- d. For shipments which enter into or transit the United States, all international approvals and revalidations, including the Approval of Packaging and Confirmation of Package certificates issued by the government of Japan, shall be issued prior to the commencement of transport.
- 6. Marking and Labeling The package shall bear the marking USA/0595/AF-96 in addition to other required markings and labeling.
- 7. Expiration Date This certificate expires on September 3, 2022. Previous editions which have not reached their expiration date may continue to be used.

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This certificate is issued in accordance with paragraph(s) 816 of the IAEA Regulations and Section 173.472 and 173.473 of Title 49 of the Code of Federal Regulations, in response to the August 8, 2018 petition by Edlow International Company, Washington, DC, and in consideration of other information on file in this Office.

Certified By:

William Schoonover

William Schoonover Associate Administrator for Hazardous Materials Safety August 31, 2018 (DATE)

Revision 7 - Issued to endorse Japanese Certificate of Approval No. J/156/AF-96, Revision 3, dated October 10, 2017.



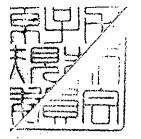
IDENTIFICATION MARK J/156/AF-96(Rev.3)

COMPETENT AUTHORITY OF JAPAN

CERTIFICATE FOR APPROVAL OF PACKAGE DESIGN FOR THE TRANSPORT OF RADIOACTIVE MATERIALS

ISSUED BY

NUCLEAR REGULATION AUTHORITY 1-9-9, ROPPONGI MINATO-KU TOKYO, JAPAN



CERTIFICATE FOR APPROVAL OF PACKAGE DESIGN FOR THE TRANSPORT OF RADIOACTIVE MATERIALS

This is to certify, in response to the application by Global Nuclear Fuel-Japan Co., Ltd., that the package design described herein complies with the design requirements for a package containing fissile uranium dioxide fuel rods, specified in the 2012 Edition of the Regulations for the Safe Transport of Radioactive Materials (International Atomic Energy Agency, Safety Standards Series No.SSR-6) and the Japanese rules based on the Act on the Regulation of Nuclear Source Material, Nuclear Fuel Material and Reactors.

This certificate does not relieve the consignor from compliance with any requirement of the government of any country through or into which the package will be transported.

COMPETENT AUTHORITY

IDENTIFICATION MARK: J/156/AF-96(Rev.3)

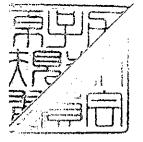
Oct. 10.2017

Date

Kazuya Aoki

Director, Division of Licensing for Nuclear Fuel Facilities

Secretariat of Nuclear Regulation Authority Competent Authority of JAPAN for Package Design Approval



Reference of J/156/AF-96 (Rev.3) Page 2 of 6 Pages

1. The Competent Authority Identification Mark: J/156/AF-96 (Rev.3)

2. Name of Package: Type RAJ-III

3. Type of Package: Type A Fissile Package

4. Specification of Package

(1) Main Material of Packaging : See the attached Table-1
 (2) Total Weight of Packaging : Approximately 920kg

(3) Outer Dimensions of Packaging

(i) Length : Approximately 507cm(ii) Width : Approximately 73cm(iii) Height : Approximately 74cm

(4) Total Weight of Package : 1490kg or less

(5) Illustration of Package : See the attached Figure (Bird's-eye view)

Refer to the following drawings for more details.

Title: Structure of Outer Container (RAJ-III) 1/6 - 6/6, Date: 2006.12.25

Number of Drawing: TTO-T06-047-01

Title: Structure of Inner Container (RAJ-III) 1/6 - 6/6, Date: 2006.12.25

Number of Drawing: TTO-T06-047-02

Title: Structure of Shock Absorber (RAJ-III) 1/1, Date: 2006.12.25

Number of Drawing: TTO-T06-047-03

5. Specifications of Radioactive Contents: See the attached Table-2

6. Description of Containment System

There are no component parts as the containment device in this packaging, and the containment boundary consists of cladding tube and end plugs of fuel rod.

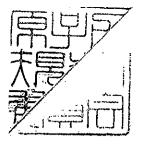
7. For Package containing Fissile Materials

(1) Restrictions on Package

(i) Restriction Number "N" : 200

(ii) Array of Package : No Restriction

(iii) Criticality Safety Index (CSI) : 0.25



(2) Description of Confinement System

No equipment corresponds to confinement system for criticality.

(3) Assumptions of Leakage of Water into Package

The criticality calculation takes the event of water leaking into packaging into account.

(4) Special Features in Criticality Assessment The criticality calculation is evaluated upon assumption that the whole portion of outer and inner container is in immersion condition by water except fuel rods as the containment boundary under the normal conditions and accident conditions in transport.

8. For Type B(M) Packages, a statement regarding prescriptions of Type B(U) Package that do not apply to this Package

Not applicable.

9. Assumed Ambient Conditions

- (i) Ambient Temperature Range: -40°C ~ 38°C
- (ii) Insolation Data: Table 12 of IAEA Regulation (No.SSR-6).

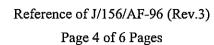
10. Handling, Inspection and Maintenance

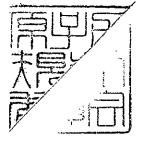
- (1) Handling Instructions
 - (i) Package should be handled carefully in accordance with the schedule and procedures established properly taking all possible safety measures.
 - (ii) Package should be handled using appropriate lifting devices such as forklift or crane.
 - (iii) When packaging is stored outdoors, it should be covered with an appropriate waterproof sheet, avoiding the situation where it is placed directly on the ground.

(2) Inspections and Maintenance of packaging

The following inspections should be performed not less than once a year (once for every ten times in a case where the packaging is used not less than ten times a year) and defect of packaging should be repaired, if any, in order to maintain the integrity of packaging.

- (i) Visual Inspection
- (ii) Subcriticality Inspection





(3) Actions prior to Shipment

The following inspections should be performed prior to shipment.

- (i) Visual Inspection
- (ii) Lifting Inspection
- (iii) Weight Inspection
- (iv) Surface Contamination Inspection
- (v) Dose Equivalent Rate Inspection
- (vi) Subcriticality Inspection
- (vii) Contents Inspection
- (4) Precautions for Loading of package for Shipment

Package should be securely loaded to the conveyance at the designated tie-down portion of the packaging so as not to move, roll down or fall down from the loading position during transport.

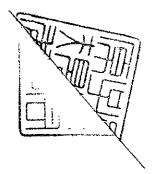
11. Issue Date and Expiry Date

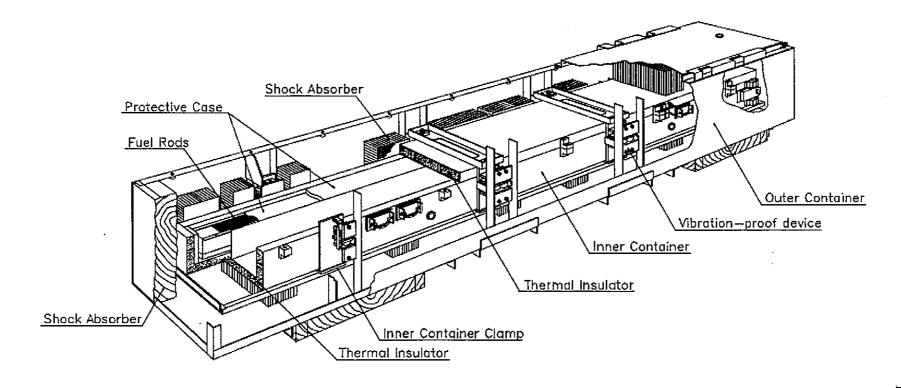
(1) Issue Date

September 4, 2017

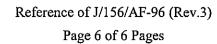
(2) Expiry Date

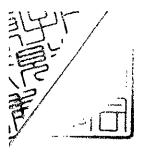
September 3, 2022





Attached Figure Overall View of Type RAJ-III Package





Attached Table-1 Description of Main Materials in Packaging Assembly

| | Portion of Packaging Assembly | Materials and so on | |
|--------------------|-------------------------------|---|--|
| Inner Container | Outer Shell | G-1-1 G1 (GY IG 204 - A GTC) (204/204X) | |
| | Inner wall | Stainless Steel (SUS 304; ASTM 304/304L) | |
| | Thermal Insulator | Alumina Silicate | |
| | Gaskets | Natural Rubber | |
| Outer Container | Outer Shell | Stainless Steel (SUS 304; ASTM 304/304L) | |
| | Angle | | |
| | Shock Absorber | Balsa and Paper Honeycomb | |
| | Gaskets | Natural Rubber | |

Attached Table-2 Description of Nuclear Fuel Materials and so on.

| Attached Table-2 Description of Nuclear Fuel Materials and so on. | | | | |
|---|---|--|--|--|
| Description | Non Irradiated Nuclear Fuel Rod (Uranium Dioxide) | | | |
| Property | Solid (Pellet) | | | |
| Weight | Contents | Pro F Pro [] F [] Ma | eximum 570 kg Intective Case(TYPE I) Maximum 46 pieces of non Irradiated 8x8 Type Nuclear Guel Rods are installed by one Protective Case] Intective Case(TYPE II) Maximum 46 pieces of non Irradiated 8x8 Type Nuclear Guel Rods are installed by one Protective Case] Maximum 52 pieces of non Irradiated 9x9 Type Nuclear Guel Rods are installed by one Protective Case] ximum 2 units of Protective Cases are installed by e packaging | |
| | UO ₂ | Ma | ximum 306 kg | |
| | U | Ma | ximum 269.7 kg | |
| | Total Activ | ity | Maximum 3.56×10 ¹⁰ Bg | |
| | ²³² U | | Maximum 2.23×10 ⁷ Bq | |
| | ²³⁴ U | | Maximum 3.11×10 ¹⁰ Bq | |
| Activity | ²³⁵ U | | Maximum 1.08×109 Bq | |
| | ²³⁶ U | | Maximum 1.62×108 Bq | |
| | ²³⁸ U | | Maximum 3.19×109 Bq | |
| | ⁹⁹ Tc | | Maximum 1.69×10 ⁶ Bq | |
| Enrichment | Maximum 5.0 wt% | | | |
| Burn up Rate | | | | |
| Total Heat Generation Rate | Not Applicable | | | |
| Cooling Time | | | | |
| | ²³² U | | ≦ 0.0001 μg/gU | |
| | ²³⁴ U | | $\leq 10,000 \mu \text{g}/\text{g}^{235} \text{U}$ | |
| Impurity Specification of | ²³⁶ U | | ≦ 250 · μg/gU | |
| Enriched Uranium | ⁹⁹ Tc | | ≦ 0.01 μg/gU | |
| | | | urement result is less than 125 μg/gU, then measurement | |
| of ²³² U and ⁹⁹ Tc are not required. | | | are not required. | |





Pipeline and Hazardous Materials Safety Administration

CERTIFICATE NUMBER: USA/0595/AF-96

ORIGINAL REGISTRANT(S):

Edlow International Company 1666 Connecticut Ave, N.W Suite 201 Washington, DC, 20009 USA