



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

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

AUG 11 1999

Mr. Thomas C. Savage
Manager, Transportation Operations
DynCorp
TriCities Services, Inc.
P.O. Box 1400
Richland, WA 99352

Ref. No. 98-0129

Dear Mr. Savage:

This responds to your letter regarding the transport of low specific activity (LSA) liquid in a specification DOT 412 cargo tank with a sump which has been securely closed by a threaded cap or bolted flange. Specifically, you asked if this type of arrangement is allowed when transporting LSA materials.

The answer is yes, provided the sump is not the cargo tank outlet used for normal loading or unloading of the tank. See §§ 178.345-1 and 178.345-11.

I hope this information satisfies your inquiry.

Sincerely,

Thomas G. Allan
Senior Transportation Regulations Specialist
Office of Hazardous Materials Standards



980129

178.345-1



Tri-Cities Services, Inc.
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(509) 376-6058
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June 3, 1998

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

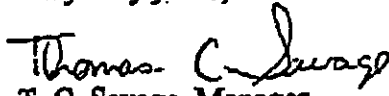
Dear Mr. Mazzullo:

SHIPPING LOW SPECIFIC ACTIVITY LIQUID

DynCorp TriCities Services, Inc. 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 bolted flange 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...."
DynCorp's interpretation of the regulations allows a securely closed, bolted blank flange on the bottom of the DOT 412 cargo tank when transporting LSA liquids, does DOT concur?

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

Very truly yours,


T. C. Savage, Manager
Transportation Operations

RL - D. W. Claussen S7-55

DYN - W. A. Ferree G4-02
J. F. Woods G4-02

WMNW - J. H. Portsmouth H1-14
TCS File/LB