



U.S. Department  
of Transportation

**Research and  
Special Programs  
Administration**

The Administrator

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

AUG 20 1998

**The Honorable Jim Hall  
Chairman  
National Transportation Safety Board  
Washington, DC 20594**

Dear Mr. Chairman:

This letter addresses the efforts being made to implement the National Transportation Safety Board's safety recommendations I-92-01 and I-92-02 issued to the Research and Special Programs Administration (RSPA). The recommendations were issued following investigation of a multi-vehicle chain-reaction accident in Calhoun, Tennessee, on December 11, 1990. The recommendations state:

**I-92-01**

Require that attachments to all U.S. Department of Transportation authorized hazardous materials packagings be designed to minimize the risk of puncturing other hazardous materials packagings during an accident situation.

**I-92-02**

Revise requirements for pressure relief venting on U.S. Department of Transportation specification 57 portable tanks used to transport dicumyl peroxide and other products with similar rapid decomposition characteristic to ensure that the pressure-relief systems prevent over pressure rupture of tanks from a rapid product decomposition reaction.

**Action on I-92-01**

RSPA planned to address the issue by amending Parts 173 and 178 of the Hazardous Materials Regulations in the miscellaneous amendments, Docket HM-166Y. After reconsideration and review of the recommendations, RSPA concluded that it would be more appropriate to address the recommendations in the Notice of Proposed Rulemaking addressing requirements for cylinders, Docket HM-220. RSPA will propose that manufacturers of cylinders consider the effect that the design will have on other containers, including the potential to puncture other packagings during transportation. Docket HM-220 is currently under development and scheduled for publication in September 1998.




Action on I-92-02

RSPA, in cooperation with the Organic Peroxide Producers Association, is developing a method to determine the minimum vent size for organic peroxides. Three organic peroxides were tested at the Energetic Materials Research and Training Center at the New Mexico Technical Institute in February 1998, to ensure that the pressure-relief systems prevent over-pressure rupture of tanks from a rapid product decomposition reaction. Additional full-scale testing to validate the analytical model to size the valves is planned for September 1998.

Based upon RSPA's research and rulemaking progress, I request that these recommendations remain classified as "Open-Acceptable Action." RSPA will keep you informed of the progress on these two initiatives.

If you have any questions, please contact me or Mr. William E. Vincent, Director, Office of Policy and Program Support, at (202) 366-4831.

Sincerely,



Kelley S. Coyner