



U.S. Department
of Transportation

**Research and
Special Programs
Administration**

The Administrator

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

SEP 21 1993

The Honorable Carl W. Vogt
Chairman
National Transportation Safety Board
Washington, DC 20594



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Dear Mr. Chairman:

This letter is in response to your request for Research and Special Programs Administration (RSPA) to inform you of the efforts being made to implement National Transportation Safety Board (NTSB) safety recommendations I-92-2. The recommendation was issued following investigation of a multi-vehicle chain-reaction accident in Calhoun, Tennessee on December 11, 1990. A related recommendation, I-92-1, was also issued following that accident, and is also discussed. The recommendations state as follows:

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. (Class II, Priority Action) (I-92-1).

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 characteristics to ensure that the pressure-relief systems prevent overpressure rupture of tanks from a rapid product decomposition reaction. (Class II, Priority Action) (I-92-2).

Action on I-92-1

RSPA plans to address the issue by amending Parts 173 and 178 of the Hazardous Materials Regulations. We will require that all manufacturers of containers and other hazardous materials packagings consider the effect that the design will have on other containers and packages during transportation and eliminate sharp edges and other appurtenances. These recommendations will be included in the Notice of Proposed Rulemaking issued under the next docket of miscellaneous amendments, HM-166Y, which is planned for publication early next year. We request that I-92-1 be classified as "Open-Acceptable Action".

Action on I-92-2

RSPA agrees that hazardous materials products with rapid decomposition characteristics need to be reviewed with respect to requirements for pressure relief venting on DOT specification 57 portable tanks. Action on this recommendation will require an in-house analysis of technical information

related to the decomposition characteristics of peroxides and other similar hazardous materials. Analysis of information from outside technical sources, including industry trade associations and other federal agencies, may also be necessary. If the results of the analyses indicate that a revision to the regulations is necessary, we will initiate the proper rulemaking action. We request that the recommendation be classified as "Open-Acceptable Action".

Sincerely,

A handwritten signature in cursive script, appearing to read "Rose A. McMurray".

Rose A. McMurray
Acting Administrator