

**re:** PHMSA-2007-27329(HM0233A)

**Operating Organization:** Pipeline and Hazardous Materials Safety Administration

**Comment:**

The United States Enrichment Corporation (USEC) recommends DOT-SP 11868 for inclusion into the HMR. DOT-SP 11868 allows the shipment of uranium hexafluoride (UF<sub>6</sub>) cylinders with valves and plugs that are tinned with certain American Society of Testing Materials (ASTM) solder alloys other than those specified by the American National Standards Institute (ANSI) Standard N14.1 referenced in the HMR. The original issue of this special permit was on April 16, 1997 as DOT-E 11868. The current revision of the special permit was issued on October 6, 2005 as DOT-SP 11868 (Sixth Revision). In the 10 years since the original special permit was issued to USEC, party status has been granted to numerous corporations, most notably Global Nuclear Fuel – Americas, AREVA NP, Inc., Westinghouse Electric Company, LLC, Honeywell International Inc., Cameco Corporation and Bechtel Jacobs Company LLC. There have literally been thousands of cylinders shipped under this special permit without incident.

In the original application for the special permit, USEC stated that that the alternative solder alloys are equivalent to that specified in the ANSI N14.1 standard and that the alternative alloys do not compromise the ability of the cylinders to remain leak-tight. USEC certifies that the descriptions, technical information, and safety assessment submitted in the original application remain accurate and complete.

The benefits that would result from incorporating DOT-SP 11868 into the HMR lie in the elimination of many regulatory burdens for grantees. The benefits are exactly as stated in the second paragraph in the “Supplemental Information” section of Docket No. PHMSA-2007-27239(HM-233A)