#### The Packaging and Transportation of FUTURIX-FTA Fuel Pins

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#### ABSTRACT

The FUTURIX-Actinide Transmutation Fuels (FTA) project is an international collaboration program between the United States Department of Energy (DOE) and the French Commissariat à l'Energie Atomique (CEA). The project deals with irradiation test of experimental fuels to be conducted in the Phenix Reactor located at the CEA-Marcoule site near Avignon, France. This paper describes the process for shipment of unirradiated plutonium based fuel pins from the Idaho National Laboratory (INL) to the Phenix Reactor utilizing a French licensed transport package; TN-BGC 1. This type of knowledge and experience is vital to the shipment of both fuel and radioactive waste material.

#### **INTRODUCTION**

The shipment of any radioactive type material includes the three basic elements of: the transport package, regulatory compliance, and transport logistics. The transport package must meet the physical requirements of the specified payload. Regulatory compliance ensures that all applicable governmental regulations are adhered to. Regulations concerning safety, material accountability, and liability are incumbent on the responsible party to understand and follow. The transport logistics dictates the actual mode of conveyance including air, land, and sea and the associated detailed planning of each transport route.

The shipment of the FUTURIX-FTA plutonium based fuel pins presented specific challenges in each of the three basic transport elements. The specified package, the TN-BGC 1, required an internal arrangement to contain the fuel pins to prevent damage during the transport and to record the temperature of the pins which could affect the sodium bonding of the metal fuel. Two TN-BGC 1 transports were utilized to streamline the regulatory process. The regulatory compliance issues emanated from the United States, France, and various international regulations

including the International Maritime Dangerous Goods Code (IMDG). In addition, international liability in the form of the Price Anderson Act (PAA) and the Paris Convention Accords were applied appropriately throughout the transport. The logistics of the FUTURIX-FTA transport included ground arrangements in the United States and France, the ocean transport, and transfers at the ports of Savannah, Georgia and Cherbourg, France.

# PAYLOAD

The FUTURIX-FTA payload consisted of four sodium bonded fast reactor fuel pins. INL fabricated the two metallic alloy fuel slugs and Los Alamos National Laboratory (LANL) fabricated two nitride fuel pellets. At INL, the four pins were clad in stainless steel tubes of 0.655 cm outer diameter and 30 cm in length. The pins make use of a metallic sodium bond in the fuel-clad gap. The metallic sodium will be solid during transportation. The projected elemental masses of the pins are delineated in table 1.

The two metallic alloy fuel slugs fabricated at INL have design dimensions of: solid cylinders having a nominal diameter of 0.489 cm and a nominal height of 10.0 cm. The two metallic alloys have a nominal composition of Pu-12-Am-40Zr and U-29Pu-4Am-2Np-30Zr, where alloy constituents are given in weight-percents.

The nitride fuel pellets of two compositions were fabricated at LANL and shipped to INL for use in fabricating of two more experimental fuel pins. The fuel pellets as designed have outer diameters of 0.489 cm and the pellets are stacked in each of the two fuel pins to a nominal total fuel column height of 10.0 cm. The two nitride fuels will have nominal compositions of  $(U_{0.50}, Pu_{0.25}, Am_{0.15}, Np_{0.10})N$  and  $(Pu_{0.50}, Am_{0.50})N$ -36wt%ZrN.

		Fuel Elemental Masses (g)						
		Total	Total	Total	Total	Total	Total	
Fuel Composition		Alloy	Np	U	Pu	Am	Zr	
Pu-12Am-40Zr	(1)	17.8	0.053	0.013	8.678	1.875	7.383	
U-29Pu-4Am-2Np-30Zr	(2)	20.1	0.418	6.954	5.678	0.755	6.340	
(U0.50,Pu0.25,Am0.15,Np0.10)N	(3)	18.7	1.435	8.823	4.565	2.354	0.000	
(Pu0.50,Am0.50)N-36wt%ZrN	(4)	12.2	0.000	0.145	4.614	0.851	6.094	
TOTAL		68.8	1.906	15.935	23.535	5.835	19.817	

Table I. Projected Elemental Masses of Metallic and Nitride Fuels in Shipment.

# TRANSPORT PACKAGE

The TN-BGC 1 transport package is utilized internationally for transport of low and high enriched materials up to 95% (powder, pellets, etc). Outer dimensions of the package are 1,800 mm  $\times$  600 mm (70.9 in  $\times$  23.6 in  $\times$  23.6 in). The maximum loaded weight is 400 kg (882 lbs). Figure 1 shows a cutaway view of this transport package.

The package is comprised of the following components:

- 1. An inner stainless steel shell defining a useful cavity of 178 mm (7.0 inches) in diameter, and 1,475 mm (58.1 inches) in length
- 2. A resin layer for neutron absorption for the criticality control and dose rate reduction.
- 3. An outer stainless steel shell protecting the resin.
- 4. A Closure Lid using a bayonet system device avoiding the use of bolts.
- 5. An impact limiter plug which protects the Closure Lid.
- 6. An aluminum frame surrounding the cask to facilitate the handling and tie down system. In addition this frame aides in the shipment criticality spacing configuration.



Figure 1. TN-BGC 1 Transport Package

### **Primary Arrangement**

As the TNBGC-1 design accommodates various radioactive contents, a set of internal arrangements called Secondary Internal Arrangement and spacers are available and licensed accordingly for each payload. For the FUTURIX-FTA transport, the TN-90 Secondary Arrangement was utilized and a primary internal arrangement was designed specifically for this transport. Temperature tape was required to document that the pins stayed below 80°C to preclude the need for additional sodium bond settling upon arrival at Marcoule, France.

## **REGULATORY COMPLIANCE**

International shipment involves the understanding of all the regulatory issues for each country that the package will travel through. In the case of the FUTURIX-FTA shipment, the French Safety Analysis Report (SAR) for the TN-BGC 1 was required to be amended by the CEA to add the FUTURIX-FTA payload to the French competent authority certification. Once this process was successfully completed, it was necessary to submit the revised French amendment, along with the payload configuration, for approval by the United States Department of Transportation (DOT) per 49CFR173 to allow for the import or export only of material meeting the FUTURIX-FTA payload profile.

Furthermore, a United States export license issued by the Nuclear Regulatory Commission (NRC) was required. International liability was also a key issue to properly implement based on contractual agreements and legal regulations.

#### French TN-BGC 1 SAR Amendment Process

The TN BGC1 package design already had a French approval certificate. For the FUTURIX-FTA payload, a French extension of the approval certificate was necessary. CEA was required to revise the Safety Analysis report of the TN BGC1 package design in order to submit the FUTURIX-FTA payload. The application for the extension of the approval certificate was performed by CEA to the French Competent Authority (DGSNR) in February 2005. A type B(U)F package design was applied as it was initially foreseen to transport all the pins in only one cask. The French extension F/313/B(U)F-96 (Haf) for the FUTURIX-FTA content was issued in October 2005.

#### **United States Revalidation Process**

The utilization of foreign certified packages within the United States require the approval of the DOT in concert with the NRC as deemed necessary. It is important to stress that this revalidation of a foreign certificate of compliance is only valid for direct import or export activities.

According to 10CFR71.15, a content is exempt from classification as fissile material if the package contains 15 grams or less of fissile material. The benefit of the fissile exemption is that a criticality analysis is not required which can streamline the revalidation process. However, the package is still a Type B package, requiring certification from DOT. By shipping two pins per

TN-BGC 1 it was possible to request the fissile exemption which reduced the supporting documentation to the DOT but necessitated the use of two packages.

### **Export License**

An Export License is required for the export of special nuclear material such as plutonium. Because it is mandatory that the export license be approved prior to the initiation of the shipment, the effects of sea vessel timing can be heavily affected by this process. Approval of the FUTURIX-FTA Export License required 3 months due to the various governmental agencies completing the review both in the United States and France. Final contract negotiations with the sea vessel were not completed until this document was received because of the possibility of costly port costs for maintaining a vessel on standby if the Export License was delayed.

## **International Liability**

The U.S. Price Anderson Act (PAA) and the Paris Convention on Third Party Liability of the Field of Nuclear Energy of July 29, 1960 and its protocols (Paris Convention) are the two instruments that afford protection regarding nuclear liability in the unlikely events of a nuclear incident during the shipment of the FUTURIX-FTA fuel pins. It is important to understand where each of these instruments is applicable with respect to the actual shipment route.

With respect to DOE contracts and subcontracts involving transport or processing of nuclear materials, DOE normally includes a Nuclear Hazards Indemnity Agreement that implements DOE's duties under the PAA. That Indemnity Agreement is normally applicable with respect to nuclear incidents within the United States and U.S. territorial water that take place during performance of the contract. The DOE indemnity agreement is applicable outside of the United States only where DOE has legal title to the nuclear material that is involved in a nuclear incident

One of the key features of the PAA is the availability of funds to compensate members of the public who suffer a loss as the result of a nuclear incident. In addition to the PAA's financial protection that results from DOE's Nuclear Hazards Indemnity Agreements, the Nuclear Regulatory Commission (NRC) rules implementing the PAA require mandatory financial protection, with respect to nuclear incidents at power reactors and research reactors and transportation of nuclear material within the United States to and from such facilities

The nuclear liability protection afforded by the PAA with respect to the FUTURIX-FTA fuel pins arises from the DOE's "Nuclear Hazards Indemnity Agreement". DOE includes this agreement in contracts whose performance is deemed to pose a risk of a nuclear incident. This Indemnity Agreement is set forth in DOE's procurement rules per 48 CFR section 952.250-70. For these types of shipments it is vital that this DOE Indemnity Agreement is properly "flowed down" from the primary contractor to all subcontractors to indemnify all parties involved through the various purchase orders issued for the project.

The nuclear liability protection afforded by the Paris Convention and French law during transport of the FUTURIX-FTA fuel pins on the high seas and in France is described as follows in the authoritative Expose des Motif, published by the OECD Nuclear Energy Agency: "Where such substances are being carried from a non-Contracting State [such as the U.S.] to a

Contracting Party [such as France] . . . it is vital for victims that there should always be somebody liable within the territory of the Contracting Parties: Liability in this case is imposed upon the operator for whom the substances are destined, and with whose written consent they have been sent, from the moment that they have been loaded on the means of transport by which they are to be carried from the territory of the non-Contracting State [Article 4(b)(iv)] subject always to the conditions described in paragraphs 27 and 28."

Article 4(c) of the Paris Convention requires the operator liable in accordance with the Convention to "provide the carrier with a certificate by or on behalf of the insurer or other financial guarantor furnishing the security required pursuant to Article 10 of the Paris Convention." The "Certificate of Financial Security" that is referenced in article 4(c) of the Paris Convention is the actual document required to be issued by the French operator (in this shipment; CEA) to the shipping contractor. The" Certificate of Financial Security" specifically indicates the extent to which financial protection under the Paris Convention and French law implementing that Convention will be applicable. The applicability of the Paris Convention with respect to the FUTURIX-FTA fuel pins was specified in agreements between DOE and CEA.

# TRANSPORT LOGISTICS

A time line for the major milestones of the FUTURIX-FTA shipment is presented in Table 2. This table gives a clear indication of the time and effort involved in planning and executing an international shipment of radioactive material. Though less expensive, air transport was not possible for this transport because of the presence of plutonium within the fuel pins.

One of the key requirements for a successful transport is the completion of at least one complete dry run of the entire process. Dry runs, utilizing qualified personnel, of the procedures with a simulated payload, the actual package, and supporting equipment such as the leak testing equipment and tie down systems are paramount to ensure the safety of the transport and compliance to regulatory requirements. In addition a thorough dry run of all transport paperwork minimizes issues from arising during the actual transport.

Milestone	Description	Activity Initiated	Activity Completed
Feasibility	A Packaging and Transport Scenario study	7/2005	10/2005
Study	written to describe all packaging services		
2	required to complete the FUTURIX-FTA		
	Transport		
French	Receipt of French Amendment for	2/2005	10/2005
Amendment	FUTURIX-FTA payload		
DOT	Receipt of DOT approval of the French	2/2006	4/2006
revalidation	amendment for FUTURIX-FTA payload		
Dry Run of	Verification of internal arrangements, leak	4/16/06	4/16/06
loading	testing, loading procedures		
Fuel	Fabrication of nitride pellets at LANL, metal	10/2005	5/2006
Fabrication	pins at INL, fuel jacket/sodium bonding at		
	INL		
Export	Receipt of NRC Export License	4/2006	7/2006
License			
US Ground	Load at INL for shipment via US public roads	8/14/06	8/16/06
Shipment	to Port of Savannah, GA		
Atlantic Transfer of cargo from truck to ship and		8/17/06	9/4/06
Crossing	Crossing shipment to Cherbourg, France		
French	French Unloading at Cherbourg, France and ground		9/7/06
Ground	shipment to the Phenix Reactor		
Transport			
Final	Radiograph of fuel pins to verify sodium	9/17/06	9/17/06
Acceptance bond and overall fuel pin integrity			

Table II. FUTURIX-FTA Transportation Milestones

#### **Transport Documentation**

A major aspect to any radiological shipment is the necessary paperwork to ensure safety and accountability of the material. The major documents required for the domestic transport segment of FUTURIX-FTA included:

- a. Inland Bill of Lading
- b. Exclusive Use Instructions
- c. Radioactive Material Emergency Response Information.

The major documents required for the international segment of this transport included:

- a. Competent authority certification in USA
- b. Competent authority certification in France
- c. Pro-Forma Invoice. This document reflects the value of the material and packages
- d. TNBGC1 Shipping Container Shipment Checklist This document states the Radiation and Contamination Surveys for each package.
- e. Dangerous Goods Declaration

- f. NRC Export License
- g. Shipper's Export Declaration
- h. Ocean Bill of Lading

### **Tie Down Design**

For US road transportation of generic materials, 49CFR393 specifies the loads to be considered for transporting material on public roads. However, these loads apply to any carried material and are not specific to dangerous goods and class 7 transportation. To utilize a more conservative standard, the draft American National Standards Institute(ANSI) N14.2 l, the International Code for the Safe Carriage of Packaged Irradiated Nuclear Fuel, Plutonium and High-Level Radioactive Wastes on Board Ships (INF) code, and the International Atomic Energy Agency (IAEA) were also reviewed. Table 3 shows the various load accelerations evaluated for the tie down design. The final values were a compilation of the reviewed data.

Transport mode	Longitudinal (+ forward / - rearward)	Transverse	Vertical (+ up / - down)	
US road transportation	+ 0.8 g - 0.5 g	$\pm 0.5$ g	-0.2 g	
	± 1.5 g	± 1.5 g	± 1.5 g	
Sea transport	± 1.5 g	± 1.5 g	+ 1.0 g - 2.0 g	
Road Transport	±2.0 g	± 2.0 g	+ 2.0 g - 3.0 g	
Bounding Load	± 2.0 g	± 2.0 g	+ 1.5 g - 4.0 g	

Table III. – Load Acceleration per Transport Mode

Based on the load analysis, the FUTURIX-FTA tie down system was designed of commercially available straps, lumber, and rigging bolts. The connection points within the ISO container were verified by the supplier to meet acceptable load limits for this transport. Figure 2 shows the final tie down configuration with the TN-BGC 1s.



Figure 2. FUTURIX-FTA tie down configuration

#### **United State Ground Transportation and Ocean Transport**

The two TN-BGC 1 packages were shipped in an ISO container with the stated tie down system in place from the Materials and Fuels Complex on the INL to the Port of Savannah, GA. A team of two drivers meeting the appropriate DOT regulations for transporting radioactive material completed this transport segment.

The ISO container was loaded onto the Atlantic Osprey as shown in Figure 3. The FUTURIX-FTA Shipment and one other transport were the only cargo aboard ship. The Atlantic Osprey is an INF-2 vessel approved under the IMO code for the transport of irradiated nuclear fuel, high level waste and Plutonium with radionuclide activities of 2 x 10^6 TBq for the former two and 2 x 10^5 for Plutonium. The vessel is British Flagged and entirely crewed by United Kingdom nationals. The Osprey is capable of both load/on/load off and roll/on/roll/off loading. It was purchased from a Germany shipping company and modified in the United Kingdom. These modifications included extra accommodation for armed guards and numerous shipboard security features. For this shipment none of these security features are required. The Atlantic Osprey calls into the US roughly twice a year with Foreign Research Reactor fuel being returned to the US DOE.

#### **French Ground Transportation and Final Receipt**

Upon arrival at the Cherbourg Port, the ISO container loaded with the TN BGC1 containing the FUTURIX-FTA pins was unloaded from the vessel onto a LEMARECHEL CELESTIN vehicle. These vehicles comply with the European Agreement concerning the International carriage of dangerous goods by road (ADR) and particularly for the transport of radioactive materials.



Figure 3. Cherbourg unloading preparations (Atlantic Osprey dock side)

After departing from the port, the FUTURIX-FTA transport traveled from Cherbourg to the CEA facility of Marcoule (2 days of transport). Due to the physical category of the transport, an over night stop in another nuclear facility of CEA (Saclay) was necessary. At the arrival at Marcoule, the TN BGC1 was transferred to CEA for unloading. Figure 4 shows the unloading of the TN-BGC 1 at the Marcoule site.



Figure 4. Unloading of the FUTURIX-FTA Pin Assembly at Marcoule, France

Once unloaded, CEA completed radiography on the four FUTURIX-FTA pins at Marcoule. The condition of the fuel and bond sodium was confirmed to be consistent with the original fabrication data.

#### CONCLUSION

The FUTURIX-FTA Transport successfully demonstrated the international shipment of research plutonium based fuel pins by appropriately addressing the three basic elements of any shipment of radioactive material: package requirements based on payload properties, regulatory compliance of all nations involved including international liability, and transport logistics covering all conveyance modes.

The integration of these shipment elements requires detailed scope planning prior to execution of any actual shipment tasks. The duration of the actual "in transit" shipment was one month while the planning aspects and approval process consumed 13 months. The ability to properly sequence issuance of regulatory approvals and notifications with the actual movements of the material is one of the major challenges of international shipment.