National Transportation Safety Board

Washington, D.C. 20594

Office of the Vice Chairman

MAR 07 2005

Mr. Samuel G. Bonasso
Deputy Administrator
Research and Special Programs Administration
Washington, D.C. 20590

Dear Mr. Bonasso:

Thank you for your September 28, 2004, letter updating the status of action taken to implement Safety Recommendation H-04-23, stated below. The National Transportation Safety Board issued this recommendation to the Research and Special Programs Administration (RSPA) on July 1, 2004, as a result of the Safety Board's investigation of a hazardous materials release near Calamus, Iowa, on April 15, 2003.

H-04-23

> Require periodic nondestructive testing to be conducted on nurse tanks to identify material flaws that could develop and grow during a tank's service and result in a tank failure.

The Safety Board notes RSPA's agreement with the Board that, because periodic inspection and testing of nurse tanks are not currently required, defects could result in tank leaks, and ruptures may not be detected. However, RSPA further indicates that before it initiates any action (including regulatory action), it will examine the Hazardous Materials Information System and other data to develop information on incidents involving nurse tanks. As we noted in our report of this accident, existing databases do not yield compelling or even accurate information about the extent of nurse tank failures. Nurse tanks are used in farm environments, and accidents may have taken place when the tanks were not in transportation (that is, being transported over public roads). Such accidents might not have been reported to RSPA. The Calamus accident, for example, which took place at a filling station, did not appear in RSPA's accident database. Consequently, while we encourage RSPA to review existing data and perhaps consider collecting more accurate data, implementation of this recommendation can not be contingent on the results of RSPA's review. We specifically stated that although failures of nurse tanks may be rare, when they do occur (as in the case of the Calamus accident), they can be catastrophic, given the extremely hazardous nature of the anhydrous ammonia they contain. For that reason, we believe that periodic nondestructive testing should be conducted regardless of the results of RSPA's review of data. RSPA further indicates that because the welding problem may be more likely to occur in nurse tanks manufactured prior to 1985, RSPA will also ascertain how many of these nurse tanks are still in service, assess the safety issues, and

then consider a range of alternatives, including periodic inspections or testing, to address the problem and the costs and benefits of those alternatives.

Because RSPA has initiated action on this issue, Safety Recommendation H-04-23 is classified "Open—Acceptable Response." The Safety Board would appreciate receiving a projected timeframe for fully implementing this recommendation.

Thank you for your commitment to transportation safety.

Sincerely,

Mark V. Rosenker
Vice Chairman

cc: Ms. Linda Lawson, Director
Office of Safety, Energy, and Environment
Office of Transportation Policy