



U.S. Department
of Transportation

Pipeline and Hazardous Materials
Safety Administration

1200 New Jersey Ave., SE
Washington, DC 20590

NOV 26 2008

Mr. James M. Shuler
Manager, Packaging Certification Program
Safety Management and Operations
Office of Environmental Management
Department of Energy
Washington, DC 20585

Ref. No. 08-0245

Dear Mr. Shuler:

This responds to your September 29, 2008 letter requesting clarification of Competent Authority approvals USA/0696/S-96 and USA/0695/S-96 issued by the U.S. Department of Transportation in accordance with the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask if the competent authority approvals referenced above, are required to specifically list daughter products, which would be present during transportation. If so, you ask if it would be necessary to apply for a modification to the above mentioned approvals to specifically list the additional radionuclides in order for those Competent Authority approvals to be valid.

The answer is no. Competent Authority approvals issued in accordance with § 173.476 of the HMR require a detailed description of the contents of a special form capsule. However, the approvals do not have to identify daughter products that are part of the natural decay chain of the parent radionuclide. Therefore, it is not necessary to apply for a modification of the above referenced competent authority approvals to identify daughter products.

I hope this information is helpful. Please contact us if you require additional assistance.

Sincerely,

Charles Betts
Chief, Standards Development
Office of Hazardous Materials Standards