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RECORD #80

TITLE: Packaging Greater Than Type A Quantities of LSA Radioactive
Material for Transport

FICHE: 01033-039

UNITED STATES
NUCLEAR REGULATORY COMMISSION
OFFICE OF INSPECTION AND ENFORCEMENT
WASHINGTON, D.C. 20555

May 12, 1978

IE Circular 78-03

PACKAGING GREATER THAN TYPE A QUANTITIES OF LOW SPECIFIC ACTIVITY
RADIOACTIVE MATERIAL FOR TRANSPORT

This circular describes a situation that has occurred at nuclear power facilities and that could occur wherever greater than Type A quantities of low specific activity (LSA) radioactive material are packaged for transport.

Some licensees subject to the requirements of 10 CFR Part 71 have shipped packages containing greater than Type A quantities of LSA material in packages which are not authorized by NRC. These unauthorized shipments have resulted from inadequate understanding of Part 71 regarding LSA material. Differences between Part 71 and the Department of Transportation requirements in 49 CFR Parts 170-189 have apparently contributed to these misunderstandings.

Specifically, 49 CFR 173.392 authorizes the shipment of LSA material in "strong, tight packages" when transported in vehicles assigned for the sole use of the consignor. DOT regulations make no mention of the total activity that may be shipped in this manner. On the other hand, NRC regulations (10 CFR 71.3) require that no licensee shall (a) deliver any licensed materials to a carrier for transport or (b) transport licensed material except as authorized in a general or specific license issued by the Commission, or as exempted in Part 71. The general license of 10 CFR 71.12 has requirements for the type of container when more than a Type A quantity of radioactive material is to be transported. LSA material in excess of a Type A quantity is not exempt from the general license requirements. Several licensees have failed to recognize the difference in the DOT and NRC requirements and have packaged greater than Type A quantities of LSA material for transport in containers other than those authorized by the general license of 10 CFR 71.12.

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Compliance with Part 71 is the responsibility of the NRC licensee who delivers licensed material to a carrier for transport or who transports such material outside the confines of his plant or other place of use.

No written response to this Circular is required. If you require additional information regarding this matter, contact the Director of the appropriate NRC Regional Office.

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