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RECORD #161

TITLE: Consideration of NRC Independent Measurement Samples as  
"Research" ...

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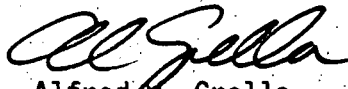
September 4, 1986

MEMORANDUM FOR: John Buchanan  
Operating Reactors Programs Branch, IE

FROM: Alfred W. Grella  
Safeguards and Materials Programs Branch, IE

SUBJECT: CONSIDERATION OF NRC INDEPENDENT MEASUREMENT SAMPLES  
AS "RESEARCH" PURSUANT TO 49 CFR 175.700(c) and 172.204(c)(4)

As agreed to in our conversation on August 27, 1986, on that date I contacted Mr. Walt Greiner, the Hazardous Materials Specialist of FAA Headquarters. My question to him was whether or not the independent measurement samples collected by NRC inspectors could legitimately be considered as "research" pursuant to the subject regulation, and therefore, allowable as freight to be offered for transport aboard passenger-carrying aircraft. After describing the sampling program and type of samples, materials involved, etc., as well as the purpose of the samples, he gave his opinion that the samples could be considered as "research." I therefore recommend that this be the case and that such a position continue to be taken with regard to Section 05.04(d) of MC 1232, currently under revision and the subject DOT regulation.



Alfred W. Grella  
Safeguards and Materials Programs Branch, IE