

Allen, William

From: Michael.Conroy@dot.gov
Sent: Friday, December 13, 2013 11:06 AM
To: Allen, William
Subject: RE: Plutonium Affect?

I got a response from them - they said:

In the current description of the content 11, there is no other specific limitation about the plutonium than the mass limitation.

We don't know yet if we will have to transport any content including plutonium traces under these agreement, but we would rather keep this possibility.

That's why we propose you to add the requirements of the paragraph 71.88 (a) (2) in the US agreement.

So, we can assume trace amounts, but require they meet that paragraph.

From: Conroy, Michael (PHMSA)
Sent: Tuesday, December 10, 2013 8:55 AM
To: 'Allen, William'
Subject: RE: Plutonium Affect?

I think they'd have to meet the NRC restrictions on air transport of Pu (10 CFR 71.88 in particular).

We have a standard clause we put in some of our revalidations:

"This certificate provides no relief from the limitations for transportation of plutonium by air in the United States as cited in the regulations of the U.S. Nuclear Regulatory Commission 10 CFR 71.88."

In this instance, I think they'd have to meet 10 CFR 71.88 (a) (2):

"The plutonium is contained in a material in which the specific activity is less than or equal to the activity concentration values for plutonium specified in Appendix A, Table A-2, of this part, and in which the radioactivity is essentially uniformly distributed;"

I haven't figured out yet if they'd meet that.

From: Allen, William [<mailto:William.Allen@nrc.gov>]
Sent: Monday, December 09, 2013 5:24 PM
To: Conroy, Michael (PHMSA)
Subject: Plutonium Affect?

Does the possible presence of plutonium in the TN-BGC1 impact authorization to ship by air?