



Hittman
Nuclear &
Development
Corporation
9190 Red Branch Road
Columbia, Maryland 21045
301/730-7800

Refer to:
HN-5810

NRC PUBLIC DOCUMENT 2001

October 16, 1979

DOCKET NUMBER
PROPOSED RULE

PR-71(18)(44FR48235)



Secretary of the Commission
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

ATTENTION: Docketing and Service Branch

Subject: Nuclear Regulatory Commission 10CFR Part 71
Packaging of Radioactive Material for
Transportation and Transportation of
Radioactive Material Under Certain
Conditions; Compatibility with IAEA
Regulations

Dear Sir:

In response to the notice which appeared in the Federal Register, Vol-
ume 44, No. 161 concerning a proposed rule change to 10 CFR Part 71, we
wish to make the following comments:

71.4(1)(3)

Are there limits on the quantity of material that can be shipped in a
single Type B package?

71.4(n)

Does definition of "Radioactive Material" apply to disposal as well as
transportation? If an object has a specific activity of less than .002
microcuries per gram, may it be disposed of as non-radioactive material?

71.8(b)

Does this mean that the NRC will no longer issue Certificates of Compliance
for shipping packages to handle "greater than Type A quantities" of radio-
active materials?

71.12

As written, this section does not grant a license for Type A, LSA or LLS
shipments in containers designed to meet NRC or DOT standards. The pro-
posed rules under 49 CFR Part 127 provide design requirements but do not
provide comparable licensing authority.

1329 094

Acknowledged by card... 10/25 dh

7911140 029

Secretary of the Commission

October 16, 1979

71.12(b)

In the event a licensee who is not the owner of a package procures a package for another licensee to make a shipment, which licensee(s) must register as users of the package and have copies of the Certificates of Compliance and all referenced documents?

71.31(a)(1) and 71(a)(2)

Will calculations be considered as an "acceptable other assessment" to demonstrate the capability to withstand normal transport conditions and hypothetical accident conditions?

71.32(h)

Have the "NRC approved test procedures" on the loss or dispersal of radioactive contents been published?

71.53 and 71.54 and 71.62

Under the condition where the shipper (licensee) of a package is not the owner of the package, and the owner of the package is a licensee, who is the licensee that must perform the Preliminary and/or Routine determinations (71.53 and 71.54) and keep the records (71.62)?

71.62

Record keeping requirements - Are records required for greater than Type A quantities of LLS or LSA?

71.63(e)

Is notification based solely on quantities of materials being shipped required if the decay heat load or operating pressure limits are not exceeded?

Thank you for your courtesy and attention to these matters.

Very truly yours,



Barry Koh, Ph.D.
Vice President and
General Manager