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UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION V
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SUITE 302 WALNUT CREEK PLAZA
WALNUT CREEK, CALIFORNIA 94598

January 23, 1981



X-Ray Engineering Company
1118 Chess Drive
Foster, CA 94404

NRC Lic. #04-00616-04

Gentlemen:

The enclosed information notice No. 81-02 is forwarded for your information and guidance in the requirements for safe transportation and carriage of radiographic devices. If there are any questions related to this notice, please contact this office.

Sincerely,

R. H. Engelken
Director

Enclosures:

- 1. IE Information Notice No. 81-02
- 2. Recently Issued IE Information Notices

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

January 23, 1981

IE Information Notice No. 81-02: TRANSPORTATION OF RADIOGRAPHY DEVICES

Background:

Recent inspections by NRC have identified frequent noncompliance with transportation regulations by radiography licensees. As of December 3, 1979, the NRC inspection program has included inspection/enforcement of DOT regulations in 49 CFR 170-178 as direct NRC requirements (see 10 CFR 71.5).

The nature of radiography operations is somewhat unique in that radiography devices most frequently serve a dual function; that is, they serve as operational radiography cameras/source changers and as transportation packages. Historically, this has caused some confusion on the part of radiography users, particularly with respect to sorting out the transport regulatory requirements of 49 CFR/10 CFR 71 from the operational requirements of 10 CFR 34 and the specific license which has been issued to the radiography user. Another source of confusion for the radiography operator is that he most frequently functions, with respect to the transportation regulations, in the dual role of both shipper and carrier.

This notice discusses some of the pertinent transportation requirements for radiography devices when used as transport "packages." The explanations should help to clarify the application of operational licensing requirements versus transport requirements applicable to shippers and carriers, thereby enhancing regulatory compliance with the requirements.

Discussions:

Source Design -- Radiography sources contained within a device are always encapsulated (Co-60 or Ir-192) and, therefore, meet the physical integrity requirements of "special form" as defined in 49 CFR 173.389(g) and 173.398(a). Radiography transporters are reminded that these requirements call for each shipper of a special form source to maintain a file of supporting safety analysis or documentation containing the results of the testing performed on the source to demonstrate that it meets the special form requirements. This does not mean that each shipper has to actually perform the tests, only that he maintains records of the tests. As a practical matter, it may be necessary, therefore, for the transporter to obtain information from his source supplier.

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