May 29. 1990

Docket: 15000004

B&B X-Ray and Testing 2015 Westwind Drive, Suite 10 Bakersfield, CA 93301

ATTN: Jeff Aal, Assistant RSO

Mr. Aal:

Per our telephone discussion on May 24, 1990, I am forwarding to you the NRC's guidance on the transportation of radiography devices. This guidance is in the form of NRC Inspection and Enforcement Information Notice (IEIN) No. 87-47. Regarding your question as to if your vehicle had to be placarded when carrying a radiography device in a specially constructed and shielded locker that was permanently mounted within your vehicle mounted laboratory. I find, based on our recent telephone conversation and a tour of your facility on April 19, 1990, including observation of your truck mounted dark room and "convenience box" use for storage of radiography devices during transport, it appears you have satisfied the criteria of 10 CFR 71 and 49 CFR 172 and 173 relative to labeling of packages, and if the locker, when loaded with radiography device(s), satisfies the dose rate limits (49 CFR 172.403) for a Category II label the vehicle need not be placarded (49 CFR 172.504).

Individual state transportation requirements may differ, but should always be equivalent or greater than federal requirements. I am presenting the <u>federal</u> hazardous material transportation requirements interpreted and disseminated by the NRC as an IEIN.

If I can be of further assistance please feel free to call me at (415) 943-3700.

Dean Chaney, Acting Chief Nuclear Materials safety

Section

cc: R. Pate Inspection File (241) J. Horner

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