



U.S. Department
of Transportation

Pipeline and Hazardous Materials
Safety Administration

1200 New Jersey Ave., SE
Washington, DC 20590

JAN 14 2009

Mr. Kevin Anderson
Lantheus Medical Imaging
Building 200-2
331 Treble Cove Road
Billerica, MA 01862

Ref. No. 08-0282

Dear Mr. Anderson:

This responds to your November 10, 2008 letter requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you ask for clarification of footnote (i) to the table of A_1 and A_2 values for radionuclides in § 173.435. Footnote (i) provides that $A_2 = 0.74$ TBq (20 Ci) for Molybdenum (Mo-99) for domestic use. You ask if this A_2 value may be used for the domestic portion of an international shipment from the United States to Canada.

The answer is yes. The A_2 value ($A_2 = 0.74$ TBq (20 Ci)) authorized by footnote (i) to the table of A_1 and A_2 values for radionuclides in § 173.435 permits the use of that value for any domestic transportation of Mo-99 including the domestic portion of an international shipment. Note that the shipment to Canada must also comply with the Transport of Dangerous Goods (TDG) regulations, which govern the transportation of hazardous materials in Canada.

I hope this information is helpful. Please contact us if you require additional assistance.

Sincerely,

Charles E. Betts,
Chief, Standards Development
Office of Hazardous Materials Standards



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October 29, 2008

U.S. Department of Transportation
Office of Hazardous Materials Technology
Attn: Richard Boyle, PHH-23
1200 New Jersey Avenue
SE East Bldg. 200, 2nd Floor
Washington, D.C. 20590

Eichenlaub
§173.435
RAM
08-0282

Dear Mr. Boyle,

This letter is a follow up to our telephone conversation on October 27, 2008.

I would like to make shipments, originating in the U.S., containing 20 curies of Molybdenum-99 (Mo-99) into Canada.

As per the U.S. D.O.T. regulations, §173.435, the maximum amount of Mo-99 allowed during ground transportation is 20 curies for a domestic shipment. Does the word "domestic" imply that shipments going into Canada must follow the maximum requirements of 16.2 curies for non-domestic shipments?

The Canadian Nuclear Safety and Control Act, Section 2 (d) allows for 21 curies of Mo-99 to be transported during a ground transportation shipment. Additionally, Transport Canada Regulations, Section 9.1 recognizes U.S. D.O.T. 49 CFR regulations for ground transportation.

With regards to U.S. D.O.T., is it acceptable to transport 20 curies of Mo-99 into Canada?

Thank you for your help in this matter.

Sincerely,

Kevin Anderson
Senior Transportation Compliance Officer