



U.S. Department  
of Transportation

**Pipeline and Hazardous  
Materials Safety  
Administration**

1200 New Jersey Avenue, SE  
Washington, D.C. 20590

**MAR 25 2013**

Mr. Kenta Kuronuma  
General Affairs Department  
JAL Cargo Service Co., Ltd.

Reference No.: 13-0028

Dear Mr. Kuronuma:

This is in response to your January 29, 2013 email to the Hazardous Materials Information Center requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to packages containing Class 7 radioactive material transported as cargo aboard passenger aircraft.

You ask, when carrying packages containing Class 7 material as cargo on passenger aircraft in accordance with § 175.700, does the 25 kg quantity limitation provided in § 175.75(c) apply to those packages.

The limitations provided in § 175.700 apply to packages containing Class 7 material transported as cargo aboard passenger aircraft. The limitations provided in § 175.700 are based on the transport index of the radioactive material and not the net weight of the material.

Inadvertently, Class 7 materials were not excluded from the quantity limitations for passenger aircraft in § 175.75(c). The revision of § 175.75(c), to exclude Class 7 materials, may be considered for a future rulemaking.

I trust this satisfies your inquiry. Please contact us if we can be of further assistance.

Sincerely,

Delmer Billings  
Senior Regulatory Advisor  
Standards and Rulemaking Division

**Drakeford, Carolyn (PHMSA)**

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**From:** INFOCNTR (PHMSA)  
**Sent:** Tuesday, January 29, 2013 5:14 PM  
**To:** Drakeford, Carolyn (PHMSA)  
**Subject:** FW: Query about carriage of Radioactive Materials by a passenger aircraft

Hi Carolyn,

We received the following request for a formal letter of interpretation.

Thanks,  
Victoria

**From:** kenta.kuronuma@jal.com [mailto:kenta.kuronuma@jal.com]  
**Sent:** Tuesday, January 29, 2013 2:02 AM  
**To:** INFOCNTR (PHMSA)  
**Subject:** Query about carriage of Radioactive Materials by a passenger aircraft

Completed by AE via email on 1/29/13 at 2:29

Dear Sir or Madam,

I am Sorry to bother you, but could you please clarify the following questions regarding the quantity limitation of the Radioactive Materials on passenger aircraft?

When carrying the packages containing radioactive material on **a passengers aircraft** in accordance with the requirements of 49 CFR 175.700, does the 25 kg quantity limitation shown in the 175.75 also apply to those packages containing radioactive materials? And, if the 25 kg limitation applies to the radioactive materials, how do you expect the operators to comply with the limitation since the requirements of 172.202 (a) (6) requires the shipping paper to show the net quantity of radioactive materials by activity, not the actual net mass of the radioactive materials.

I have read the requirements of 175.75 and 175.700 but couldn't find out the application of the requirements of 175.75 for radioactive materials on passenger aircraft.

I would appreciate your help.

Sincerely  
Kenta Kuronuma

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Kenta Kuronuma  
General Affairs Dept.  
JAL Cargo Service Co.,Ltd  
Tel 81-476-32-3355  
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