



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

April 8, 2025

Roger Page
Transportation Specialist, Waste Management
Fluor-BWXT Portsmouth LLC
P.O. Box 548
3930 US Route 23 South
Piketon, OH 45661

Reference No. 24-0125

Dear Mr. Page:

This letter is in response to your December 12, 2024, email requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to shipping paper requirements for radioactive materials. Specifically, you ask about the requirements in § 172.203(d)(3) that require the shipping description to include the maximum activity of the radioactive contents contained in each package during transport in terms of the appropriate International System of Units (SI) units. You have provided a copy of a shipping paper which has four United Nations (UN) proper shipping name entries. Each entry includes total activity, weight, criticality safety index (CSI), transport index (TI), and labeling requirements on the first two pages. Then, on the third page it lists—by package—the individual container identification number, weight, maximum activity, CSI, and TI.

Is this an acceptable way to meet the requirements in § 172.203(d)(3)?

Yes, based on the information included in your email and the format presented on the copy of the shipping paper example, it is the opinion of this Office that your shipping document complies with the requirements in § 172.203(d)(3).

I hope this information is helpful. Please contact us if we can be of further assistance.

Sincerely,

T. Glenn Foster
Chief, Regulatory Review and Reinvention Branch
Standards and Rulemaking Division

From: [INFOCNTR \(PHMSA\)](#)
To: [Dodd, Alice \(PHMSA\)](#)
Cc: [Hazmat Interps](#)
Subject: FW: Letter of interpretation request
Date: Thursday, December 12, 2024 3:49:48 PM
Attachments: [23-0134 Shipping Papers.pdf](#)

Hi Alice,

Please see the below interpretation request, and the attachment.

Let us know if you need anything,

-Breanna

From: Page, Roger <roger.page@ports.pppo.gov>
Sent: Thursday, December 12, 2024 2:29 PM
To: INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>
Cc: Barr, Randy <randy.barr@ports.pppo.gov>; Ashley, Chris <chris.ashley@ports.pppo.gov>
Subject: Letter of interpretation request

CAUTION: This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

To whom it may concern,

I am writing to request interpretation of 49 CFR 172.203 (d)(3) for the required entries for radioactive material on shipping papers. Through requalification of the training required by 49 CFR Part 172 Subpart H, it has come to our attention that we may be inputting the information on our shipping papers the incorrect way albeit the method is standard industry practice. Please see the following questions.

Question 1:

When preparing shipping papers at our site, multiple identical containers, with the same UN number and proper shipping name, are summarized into a single line item with the total activity, weight, criticality safety index (CSI), transport index (TI), and labeling requirements. Individual container identification numbers, weights, activities, CSI's, and TI's are depicted on additional pages of the shipping paper. Please see attached document for example. Are we correct in the way we are inputting the required information onto our shipping papers?

Question 2:

If we are incorrect in the way we are inputting the information, would we have to include this information per line item instead of summarizing and then showing the TI, CSI, and activity?

Please send your response to the following address:

Roger Page
P.O. Box 548
3930 US Route 23 South
Piketon, Ohio 45661

Please contact me if you have any questions, or require more information.

Thank you,

Roger Page
Transportation Specialist | Waste Management



Fluor-BWXT Portsmouth LLC
Contractor to the U. S. DOE under Contract No. DE-AC30-10CC40017
Office: 740-897-3634
Cell: 740-970-2756
Roger.page@ports.pppo.gov

Straight Bill of Lading – Short Form – Original – Not Negotiable

Shipper's Number: 23-0134

Date: 1/21/2023

Shipper (from)			Consignee (to)				
Fluor-B&W Portsmouth, LLC , on behalf of the U.S. Department of Energy 3930 US Route 23 South Piketon, OH 45661 Technical Contact: Randy Barr; (740) 835-6952 Job/Work Order: _____			U.S. Department of Energy, NNSA c/o Mission Support and Test Services, LLC Waste Management, Nevada National Security Site Kingston, TN 37763 Contact Name: Area 5 RWMC Reference #: POL23037			*HITT*	
No. Shipping Units	Type of Package	HM	Description of Articles, Special Marks, and Exceptions (Subject to Correction)	NMFC Item No.	Class	Rate	Weight (Subject to Correction)
7	DRUM, 30-GAL	X	UN3327, Radioactive material, Type A package, fissile, 7, Tc-99, U-234, Solid, Oxide, 3448.46 MBq, Yellow-II, TI=1.4, CSI=30.10 See Page 3 of 3 for Individual Container ID's, Weights, and Activities				227 kg
7	DRUM, 55-GAL	X	UN3327, Radioactive material, Type A package, fissile, 7, Tc-99, U-234, Solid, Oxide, 3501.47 MBq, Yellow-II, TI=1.4, CSI=25.90 See Page 3 of 3 for Individual Container ID's, Weights, and Activities				471 kg
1	DRUM, 55-GAL	X	UN3321, Radioactive material, low specific activity, (LSA-II), 7, U-234, Solid, Oxide, 32.09 MBq, Fissile Excepted See Page 3 of 3 for Individual Container ID				64 kg
25	<< Total Pieces		IN THE EVENT OF AN EMERGENCY, TELEPHONE (740) 897-3025 Contact or Registrant Name, or Contract Number Plant Shift Superintendent	- 24 HRS			5102 lbs 2314 kgs
FREIGHT CHARGES ARE:		If this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement: The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.		This shipment is on behalf of the U.S. Department of Energy and the actual total transportation charges paid to the carrier(s) by the consignor or consignee are assignable to, and shall be reimbursed by, the U.S. Government and is subject to the terms and conditions set forth in the standard form of the U.S. Government Bill of Lading and to any special rates or charges (41 CFR 109-40.50 and 41 CFR 109-40.3).		Remarks:	
<input checked="" type="checkbox"/> Prepaid <input type="checkbox"/> Collect <input type="checkbox"/> 3rd Party (see Remarks)		U. S. DOE		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No SECTION 13712/10721 RATES APPLY – TENDER NO.		ERG#: 162 and 165 ETA: Wednesday, January 25th, 2023 NNSA = National Nuclear Security Administration RWMC = Radioactive Waste Management Complex	
Received, subject to individually determined rates or contracts that have been agreed upon in writing between the carrier and shipper, if applicable, otherwise to the rates, classifications and rules that have been established by the carrier and are available to the shipper, on request. The property described above, in apparent good order, except as noted (contents and conditions of contents of packages unknown) marked, consigned and destined as shown herein, which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, unless otherwise specifically stated in individually determined rates and contracts that have been agreed upon in writing between the carrier and shipper, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at anytime interested in all or any of said property, that every service to be performed hereunder shall be subject to all the terms and conditions of the Uniform Domestic Straight Bill of Lading set forth (1) in Uniform Freight Classification in effect on the date hereof, if this is a rail or rail-water shipment, or (2) in the applicable motor carrier classification or tariff if this is a motor carrier shipment. Shipper hereby certifies they are familiar with all terms and conditions of the said bill of lading, set forth in the classification or tariff which governs the transportation of this shipment, and the said terms and conditions are hereby agreed to by the shipper and accepted for him/herself and their assigns. Commercial bills of lading (CBL) exceeding \$10,000: "Equal Employment Opportunity: All provisions of Executive Order 11246, as amended by Executive Order 11375 and Executive Order 13672, and of the rules, regulations, and relevant orders of the Secretary of Labor are incorporated herein."							
This is to certify that the above named materials are properly classified, described, packaged, marked, labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation (Applicable for Hazardous Materials Only)				Trailer Loaded by: <input checked="" type="checkbox"/> Shipper <input type="checkbox"/> Driver		Placards Required: RADIOACTIVE	
Shipper, acting under contract DE-AC30-10CC40017 with the U.S. Department of Energy: Fluor-BNXT Portsmouth, LLC On Behalf of the U.S. Department of Energy Kenneth Aday				Freight Counted by: <input checked="" type="checkbox"/> Shipper <input type="checkbox"/> Driver, Loose pieces <input type="checkbox"/> Driver, pallet said to contain <input type="checkbox"/> Driver, pallets containing		DAVID WAGNER Carrier: HITT / Hittman Transport Services, Inc.	
Per <i>Kenneth Aday</i> Date 1/20/2023				Vehicle/Car No: 509D / W34139 Seal: 1413595		Per <i>David Wagner</i> Date: 1/20/23	

TRANSPORTATION DEPARTMENT – PERMANENT POST OFFICE ADDRESS OF SHIPPER

PAGE 1 OF 3

Straight Bill of Lading – Continuation Page – Original – Not Negotiable Shipper's Number: 23-0134

Date: 1/21/2023

No. Shipping Units	Type of Package	HM	Description of Articles, Special Marks, and Exceptions (Subject to Correction)	NMFC Item No.	Class	Rate	Weight (Subject to Correction)
10	DRUM, 55-GAL	X	UN2913, Radioactive material, surface contaminated objects, (SCO-II), 7, U-234, Tc-99, Solid, Oxide, 8834.23 MBq, Fissile Excepted See Page 3 of 3 for Individual Container ID's, Weights, and Activities *****Exclusive Use Shipment*****				1,552 kg
25	<< Total Pieces						5102 lbs 2314 kgs

COPY

Bill of Lading #: 23-0134

Line Item 1

Cont ID	Gross Lbs	Waste Lbs	Gross Kgs	TI	CSI	Activity (MBq)
23-000684	58.00	5.43	26.31	0.2	5.8	308.520
23-000685	60.00	6.18	27.22	0.2	5.2	316.680
23-000686	62.00	5.79	28.12	0.2	3.9	274.600
23-000687	72.00	10.67	32.66	0.2	4.5	446.210
23-000747	76.00	15.67	34.47	0.2	1.3	518.000
23-000748	76.00	18.93	34.47	0.2	4.1	713.64
23-000752	96.00	23.12	43.54	0.2	5.3	870.81
7	500.00	85.79	226.79	1.40	30.10	3448.46

Line Item 2

Cont ID	Gross Lbs	Waste Lbs	Gross Kgs	TI	CSI	Activity (MBq)
23-000741	160.00	33.70	72.57	0.2	2.00	1105.000
23-000743	152.00	30.69	68.95	0.2	3.5	920.080
23-000744	120.00	18.48	54.43	0.2	4.2	677.820
23-000749	124.00	8.08	56.25	0.2	6.7	459.93
23-000786	158.00	42.21	71.67	0.2	2.5	207.11
23-000745	172.00	37.97	78.02	0.2	5.6	95.49
23-000855	152.00	26.22	68.95	0.2	1.4	36.04
7	1038.00	197.35	470.84	1.40	25.90	3501.47

Line Item 3

Cont ID	Gross Lbs	Waste Lbs	Gross Kgs	TI	CSI	Activity (MBq)
23-000746	142.00	23.66	64.41	N/A	N/A	32.09
1	142.00	23.66	64.41	0.00	0.00	32.09

Line Item 4

Cont ID	Gross Lbs	Waste Lbs	Gross Kgs	TI	CSI	Activity (MBq)
22-000313	383.00	321.00	173.72	N/A	N/A	1076.300
22-000423	353.00	291.00	160.12	N/A	N/A	1076.300
22-001210	294.00	234.00	133.36	N/A	N/A	1076.300
22-001211	204.00	144.00	92.53	N/A	N/A	1076.300
22-001475	428.00	366.00	194.14	N/A	N/A	1076.300
22-001497	483.00	423.00	219.08	N/A	N/A	1076.300
22-001537	438.00	376.00	198.67	N/A	N/A	1076.300
22-001842	370.00	308.00	167.83	N/A	N/A	1076.300
22-000944	164.00	72.00	74.39	N/A	N/A	219.10
22-001236	304.00	242.00	137.89	N/A	N/A	4.73
10	3421.00	2777.00	1551.73	0.00	0.00	8834.23
25	5101.00	3083.80	2313.77	2.80	56.00	15816.25

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