

From: [INFOCNTR \(PHMSA\)](#)
To: [Baker, Yul \(PHMSA\)](#)
Cc: [Hazmat Interps](#)
Subject: FW: Written Interpretation Request
Date: Wednesday, July 2, 2025 13:36:25
Attachments: [image001.png](#)
[image002.png](#)

Good afternoon,

Please see the following request for a letter of interpretation. Please let us know if you need anything else.

Best,

Aminah

From: tad.rumas@puco.ohio.gov <tad.rumas@puco.ohio.gov>
Sent: Wednesday, July 2, 2025 9:24 AM
To: PHMSA HM InfoCenter <PHMSAHMInfoCenter@dot.gov>
Subject: Written Interpretation Request

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To whom it may concern,

I am seeking clarification on the proper and/or specific location for the additional description entries as required by 49CFR Part 172.203(d)(1) – (d)(10).

Specifically, 172.203(d) Radioactive material, provides the following: “the description for a shipment of a Class 7 (radioactive) material must include the following additional entries as appropriate” which appears to indicate that all additional entries must immediately follow the basic description required by Part 172.202. However, 172.203(d)(9)(ii) provides “the statement ‘Exclusive Use Shipment’ may be entered only once on the shipping paper in a clearly visible location” and 172.203(d)(10) provides “the words ‘Highway route-controlled quantity’ or ‘HRCQ’ must be entered in association with the basic description”, while 172.203(d)(1) – (d)(8) provides no such specificity.

My questions are as follows:

Q1 – Does the term “the description for a shipment of a Class 7 (radioactive) material must

include” indicate that the additional information must immediately follow the basic description (to include horizontal or vertical format) only?

Q2 – Does the term “in association with” also indicate that the additional information must immediately follow the basic description (to include horizontal or vertical format) only?

Q3 – Based on the answer to Q1 & Q2, would it be permissible for information required by 172.203(d)(1) – (d)(8) to be in another location on the shipping paper?

Q4 – Based on the answer to Q1 & Q2, when are entries no longer considered “in association” with the basic description?

Q5 – Based on the answer to Q1 & Q2, when are entries no longer considered as “not included” with the basic description?

For reference, please see the example below.

No. of Units & Container Type	HM	Proper Shipping Name, Hazard Class, UN or NA Number, Packing Group	Line Item Weight(Kg)
1 Cask	RQ	UN3328, Radioactive material, Type B(U) package, fissile, Class 7 RQ UO2 Clad in Zirconium Alloy Solid Metal Radionuclides: Pu 238, Cm 244, Pu 241, Am 241, Ru 106, Cs 137, Pu 240, Cm 242, Pu 239 Package: USA/9225/B(U)F-96, Revision TI: 0.1 Label: Yellow-III Fissile CSI: 0.0	

Thank you in advance,



Tad Rumas

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