U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

September 17, 2026

Lee Heft
Corporate Radiation Safety Officer, HSE
Halliburton
3000 N. Sam Houston Pkwy. E.
Houston, TX 77032

Reference No. 26-0056

Dear Mr. Heft:

This letter is in response to your May 6, 2026 email and subsequent correspondence with a member of my staff requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to Type A package surveying. Specifically, you provide pictures and describe Type A packagings bolted into a transport vehicle and not fully accessible. You ask whether surveying all accessible parts of the packagings and of the vehicle would satisfy the requirements of the HMR, including ensuring that the package does not exceed the radiation limits of 2 mSv/h (200 mrem/h) at any point on the external surface of the package in accordance with § 173.441(a).

Yes. Provided you survey the packagings and truck to the best of your ability and the readings are within the required limits, your described procedure for surveying your two Type A packagings bolted into a transport vehicle would be in compliance with the HMR.

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

Sincerely,

Alexander Wolcott
Acting Chief, Regulatory Review & Reinvention
Standards and Rulemaking Division

Jacobson, N.
26-0056

Letter of Interpretation Request

1 message

INFOCNTR (PHMSA) <infocntr.infocntr@dot.gov> Wed, May 6, 2026 at 3:19 PM
To: "Baker, Yul (PHMSA)" <yul.baker@dot.gov>, Hazmat Interps <hazmatinterps@dot.gov>

Good afternoon,

Please see the below interpretation request.

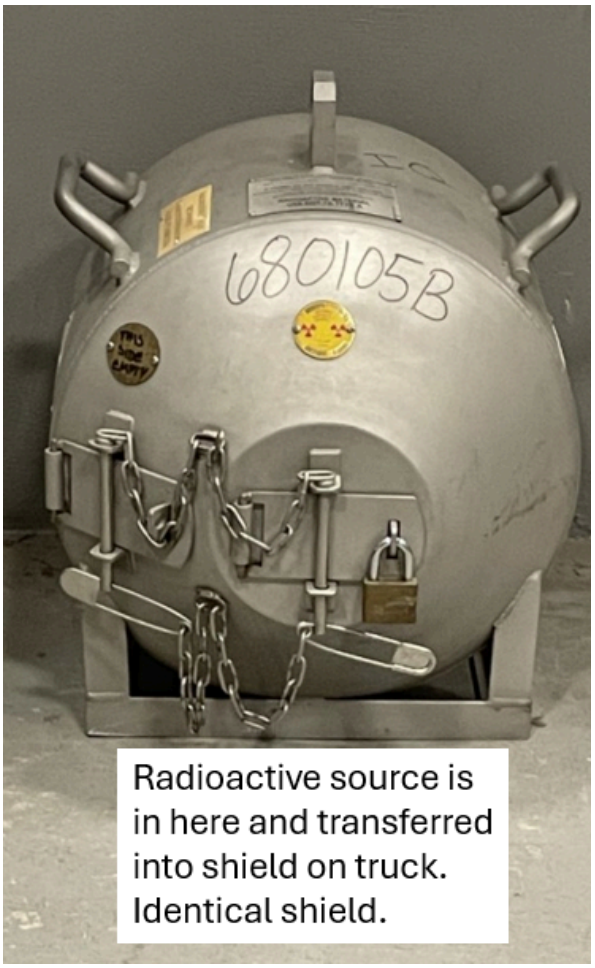
Let us know if you need anything,

Janaye

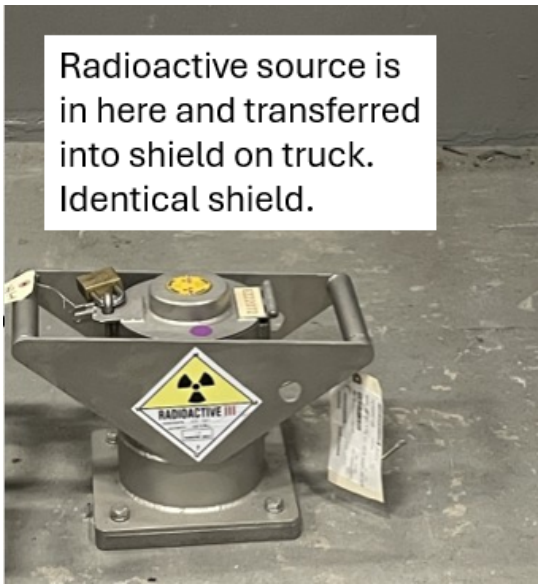
On Wed, May 6, 2026 at 12:42 PM Lee Heft <Lee.Heft@halliburton.com> wrote:

> Hello,
>
> I was speaking with a representative and they gave me a response that what we do is acceptable, but they suggested that I submit an e-mail for a written reply.
>
> The scenario we have is that we have Type A packages that are Yellow III and are under the limits for surface and TI. These Type A packages contain radioactive sources that get transferred into identical Type A packages that are bolted into a transport vehicle. We survey the Type A packages while they are in the shields that are not inside of the truck and they are less than 200 mREM/hr surface and less than 10 mREM/hr at 1 meter(TI).
>
> The question comes to when we transfer the sources into the shields bolted on the trucks. We are able to survey all of the accessible surfaces of the Type A packages and all other areas that a person would be in contact with, and they are still in compliance with the regulation, but we can't survey the inaccessible areas on the Type A package because a person's arms or survey meter can't fit to survey.
>
> Is it acceptable to survey all accessible areas of the Type A package and all accessible areas of the truck, and still be in compliance, if all of the dose rates are still less than 200 mREM/hr surface and less than 10 mREM/hr at 1 meter (TI) on the shield compartment and areas that a person could occupy?
>
> Below are pictures of what the shields look like by themselves. This is how they are stored before they go into the shields in the truck.
>
> - The area by the tire is not accessible by a person, so we don't survey as we know it is within limits because it was in the shields it was transferred from.
> - The front of the compartment where the door is accessible, so we can access to survey.

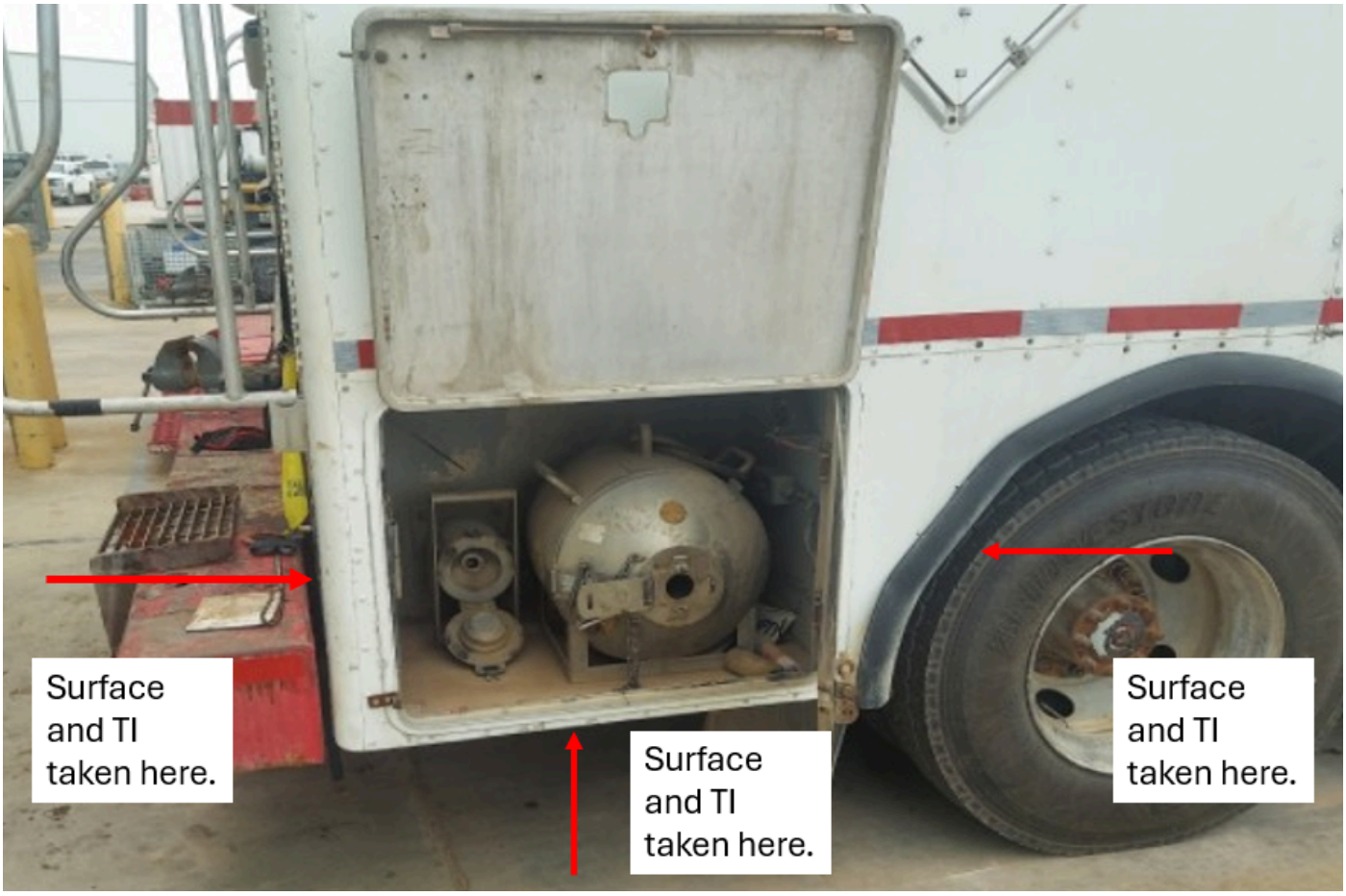
- The side of the compartment we can't get an accurate dose rate on the Neutron shield because the survey meter will not fit so we dose rate by the bumper.
- The opposite side of the compartment door is where the wireline spool is located. A person can't access that area, so we dose rate on the opposite side of the truck because that where a person would stand.

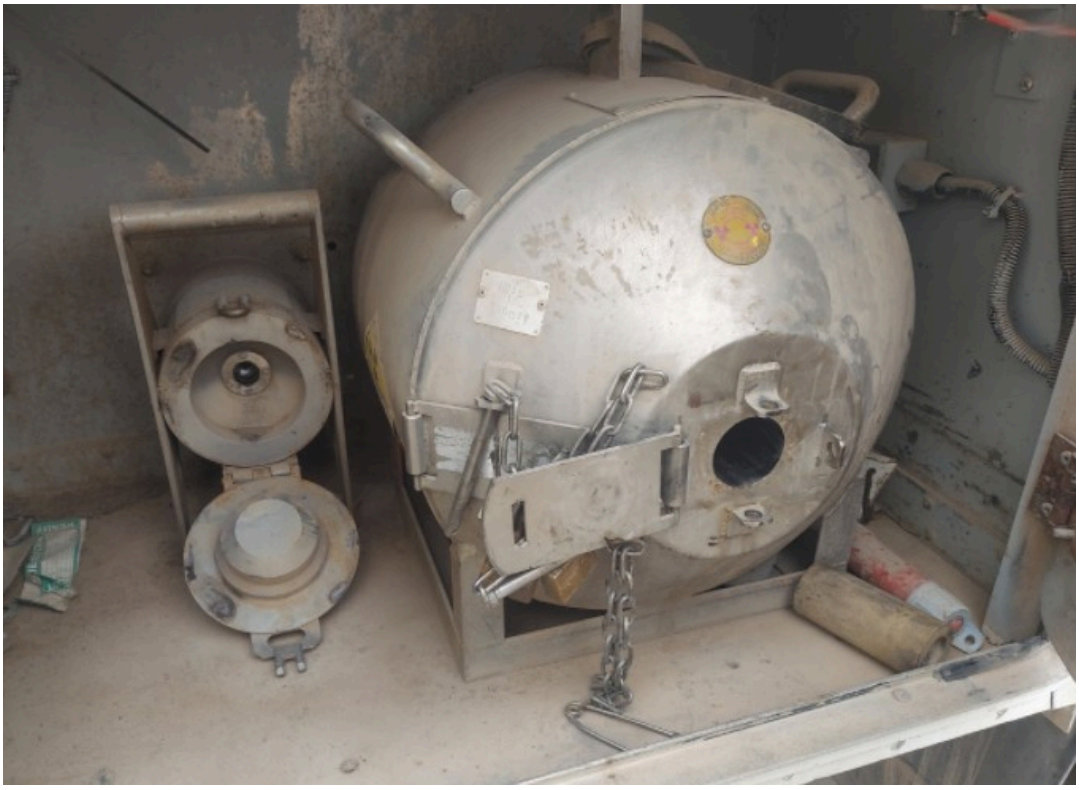


Gamma Shield



Neutron Shield


Surface and TI taken here.
Surface and TI taken here.
Surface and TI taken here.



If you need more clarification, please don’t hesitate to contact me.

Thank you,

Lee Heft
Corporate Radiation Safety Officer, HSE

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