



U.S. Department
of Transportation
**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Ave., S.E.
Washington, DC 20590

DEC 22 2008

Mr. Andrei Lazourenko
Traffic Manager
Atlantic RO-RO Carriers, Inc.
1051 Bloomfield Avenue
Clifton, NJ 07012

Ref. No: 08-0275

Dear Mr. Lazourenko:

This is in response to your August 1, 2008 letter requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to the transportation of Class 7 (radioactive) material by vessel. Your questions are summarized and answered as follows:

Q1. What is the maximum amount of fissile material contained solely within large freight containers that may be carried on board a single vessel?

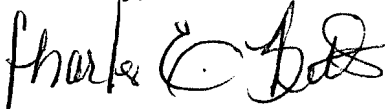
A1. In accordance with Table IIIB of § 176.704(d), there is no vessel criticality safety index (CSI) limit for large freight containers.

Q2. May a single vessel carry groups of packages and overpacks up to a total of 200 CSI and an unlimited amount of large freight containers provided the CSI limits for each large freight container are met?

A2. Yes. A single vessel may carry any combination of packages, overpacks and large freight containers containing fissile material, provided; (1) each large freight container, group of packages and/or overpacks satisfies the CSI limits and the separation distances specified in Table IIIB of § 176.704; (2) the CSI limits for each large freight container, hold, compartment and defined deck area are satisfied (see Table IIIB of § 176.704); and, (3) the total CSI of all packages and overpacks on the vessel does not exceed 200 (see Table IIIB of § 176.704). There is no vessel CSI limit for large freight containers (see A1).

I apologize for any delay in responding to your inquiry. I trust these answers satisfy your request. If you have any further questions, please contact Mr. Rick Boyle of our Radioactive Materials Transport division of our Office of Hazardous Materials Technology. Mr. Boyle can be reached by phone at 202-366-2993 or by email at rick.boyle@dot.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Charles Betts". The signature is written in a cursive style with a large initial "C" and "B".

Charles Betts
Chief, Standards Development
Office of Hazardous Materials Standards



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1-Aug-08

Eichenlaub
§ 176.704
RAM
08-0275

To: Pipeline and Hazardous Materials Safety Administration
Attn: Mr. Rob Benedict, Hazardous Materials Specialist

Re: Vessel (Sections 176.1 - 176.905)

We would like to get the **written** interpretation and explanation of the regulation containing in CFR 49 § 176.704 (Requirements relating to transport indices and criticality safety indices)

There are 2 questions for which we are looking for clarification:

- 1) May a vessel carry unlimited quantity of CSI indices if the cargo is in large freight containers as shown in the table in this paragraph subject to separation of groups of 50 CSI from each other with at least 6 m.
- 2) May a single vessel carry the cargo in overpacks upto 200 CSI and plus unlimited quantity of large freight containers with CSI indices subject to the same separation of groups with max 50 CSI. For instance, could a single vessel carry 40 cylinders with CSI = 5 per cylinder plus 10 large freight containers with CSI = 25 per container with appropriate stowage requirements.

Thanks in advance,
Regards,

Andrei Lazourenko
Traffic manager