



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

1200 New Jersey Avenue, SE
Washington, DC 20590

Mr. Michel A. Wentz
Manager, Dangerous Goods Compliance
Safety, Security, & Environmental
American Airlines
4333 Amon Carter Blvd.
Fort Worth, TX 76155

MAR 24 2015

Reference No. 15-0016

Dear Mr. Wentz:

This responds to your December 22, 2014 letter requesting clarification on transporting Class 7 materials under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) aboard passenger aircraft. Section 175.700(a) prescribes that no person may carry any Class 7 materials aboard a passenger-carrying aircraft unless that material is intended for use in, or incident to research, medical diagnosis or treatment. Regardless of its intended use, no person may carry a Type B(M) package aboard a passenger-carrying aircraft, a vented Type B(M) package aboard any aircraft, or a liquid pyrophoric Class 7 material aboard any aircraft.

You ask if a passenger aircraft operator may transport Type B(U) packages containing vials of liquid radioactive Molybdenum 99 (Mo99) and the return of empty Type B(U) containers as Type A packages, provided the requirements applicable to radioactive materials incident to research, medical diagnosis or treatment are satisfied.

The answer to your question is yes. Radioactive materials in Type B(U) and Type A packages that do not exceed a transport index of 3.0 and intended for use in or incident to research, medical diagnosis, or treatment may be transported on board passenger-carrying aircraft in accordance with §§ 173.448(f) and 175.700(a).

I trust this information is helpful. If you have further questions, please do not hesitate to contact this office.

Sincerely,

A handwritten signature in black ink that reads "Duane A. Pfund". The signature is written in a cursive style with a large, stylized 'P'.

Duane A. Pfund
International Standards Coordinator
Standards and Rulemaking Division

Michel A. Wentz
Manager, Dangerous Goods Compliance
Safety, Security & Environmental

American Airlines 

Wiener
§ 175.700(a), 173.403
Special Limitations

15-0016

December 22, 2014

U.S. DOT
PHMSA Office of Hazardous Materials Standards
Attn: PHH-10
East Building
1200 New Jersey Avenue, S.E.
Washington, D.C. 20590-0001

RE: Type B(U) packages of radioactive materials transported by air

Dear Sir,

In 49 CFR 175.700 (a) it states:

(a) Except as provided in 173.4a, 173.422 and 173.423 of this subchapter, no person may carry any Class 7 materials aboard a passenger-carrying aircraft unless that material is intended for use in, or incident to research (See 171.8 of this subchapter), medical diagnosis or treatment. Regardless of its intended use, no person may carry a Type B(M) package aboard a passenger-carrying aircraft, a vented Type B(M) package aboard any aircraft, or a liquid pyrophoric Class 7 material aboard any aircraft.

In 49 CFR 173.403, Definitions under "Package" it states;

(4) "Type B package" means a packaging designed to transport greater than an A₁ or A₂ quantity of radioactive material that, together with its radioactive contents, is designed to retain the integrity of containment and shielding required by this part when subjected to the normal conditions of transport and hypothetical accident test conditions set forth in 10 CFR part 71.

(i) "Type B(U) package" means a Type B packaging that, together with its radioactive contents, for international shipments requires unilateral approval only of the package design and of any stowage provisions that may be necessary for heat dissipation.

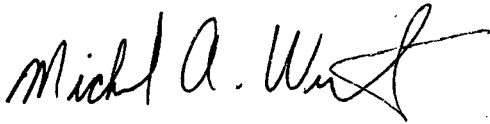
4333 Amon Carter Blvd.
Fort Worth, TX 76155
817 931 6892 Office
817 931 6392 Fax
Mike.wentz@aa.com



We are requesting clarity that authorized type B(U) packages with materials intended for use in, or incident to research, medical diagnosis or treatment are acceptable for air transport per 49 CFR 175.700.

Provided all other requirements of 49 CFR for transportation of radioactive materials incident to research, medical diagnosis or treatment are met, is a passenger carrier such as American Airlines permitted to carry authorized Type B(U) packages as defined in 49 CFR 173.416 containing vials of liquid radioactive Molybdenum 99 (Mo99) and the return of empty Type B(U) containers as Type A packages?

Sincerely,



Michel A. Wentz
Manager, Dangerous Goods Compliance
Safety, Security & Environmental

