Transportation/Hazardous Materials: Pipeline and Hazardous Materials Safety Administration Interpretive Letter Addressing Radioactive Materials

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07/23/2025

The Pipeline and Hazardous Materials Safety Administration ("PHMSA") addressed in a July 10th Interpretive Letter the application of the Hazardous Materials Regulations ("HMR") to fissile exceptions for radioactive materials.

PHMSA was responding to a December 2nd query from the Packaging Management Council Coordinator ("PMCC").

PMCC asked whether the exceptions for fissile materials specified in § 173.453(b) allow for the packaging mass to be included as part of the non-fissile material mass, when calculating the 200:1 solid non-fissile to fissile mass ratio for compliance with this section.

PHMSA responds in the affirmative, stating:

…The packaging mass can be counted towards the solid non-fissile mass in the 200:1 ratio for fissile exceptions as found in § 173.453(b), provided that the mass of any lead, beryllium, graphite, and hydrogenous material enriched in deuterium are not included in the calculation of the 200:1 ratio.

A copy of the Interpretive Letter can be downloaded here.