



U.S. Department  
of Transportation  
**Research and  
Special Programs  
Administration**

400 Seventh St., S.W.  
Washington, D.C. 20590

OCT 11 2002

Ms. Candice M. Graf  
Hazardous Materials Coordinator  
Cerac Incorporated  
407 N. 13<sup>th</sup> Street  
Milwaukee, WI 53233

Ref. No. 02-0082

Dear Ms. Graf:

This responds to your letter concerning the recurrent testing of packagings intended to contain radioactive materials under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically, you inquire whether a DOT Specification 7A Type A packaging must be periodically retested.

The answer is no. There is no requirement to retest a Type A packaging that is designed and constructed under the conditions specified in § 178.350.

I trust this satisfies your inquiry. Please contact us if we can be of further assistance.

Sincerely,

Hattie L. Mitchell  
Chief, Regulatory Review and Reinvention  
Office of Hazardous Materials Standards



020082

173.465

407 N. 13<sup>th</sup> Street  
Milwaukee, WI 53233  
Phone: 414-289-9800  
Fax: 414-289-9805



February 27, 2002

Mr. Edward T. Mazzullo  
Director, Office of Hazardous Materials Standards  
U.S. DOT/RSPA (DHM-10)  
400 7th Street S.W.  
Washington, D.C. 20590-0001

Stevens  
3173-465  
Testing  
02-0082

Dear Sir or Madam:

I am requesting clarification on the recurrent testing requirements of a DOT 7A Type A Package for radioactive materials. While I am fully aware of the frequency of single and combination non-bulk performance-oriented packaging testing requirements for UN Specification packaging in spelled out in 49 CFR 178, I do not see any recurrent testing standards for the DOT 7A Type A Package in 49 CFR Part 173.400. The closest the CFR touches on this subject is in 49 CFR 173.461 "Demonstration of Compliance with Tests". Should I assume from this section that my if my DOT 7A package does not change I do not have to retest? Also, when I review my current test report for the DOT 7A from TEN-E Packaging Services it does not state anywhere in the test report a periodic retest date. I always see this type of information on my standard UN Test Reports for our 1A2's or 4G's. Please advise.

Sincerely,

A handwritten signature in cursive script that reads "Candice M. Graf".

Candice M. Graf  
Hazardous Materials Coordinator

