



Syncor International Corporation

The Service Difference

June 22, 2000

Dockets Management System  
U.S. Department of Transportation  
400 Seventh Street, SW  
Washington, DC 20590-0001

RE: Docket Number RSPA-99-6283 - 14

To Whom It May Concern:

Syncor International Corporation is submitting the following comments in regard to the above referenced Notice of Proposed Rulemaking.

In reviewing the proposed amendment of the Hazardous Materials Regulations (HMR) to adopt the standards contained in "IAEA Safety Standards Series: Regulations for the Safe Transport of Radioactive Material, 1996 Edition, Requirements, No. ST-1" (ST-1), we request that you consider the following issues:

1. The most drastic change that adoption of ST-1 would cause is the required placarding of all vehicles carrying labeled packages. A vast majority of the shipments that Syncor makes are of WI and YII shipments, which do not currently require placards. Requiring placards on these shipments would necessitate that the approximately 1500 drivers currently employed by Syncor obtain a commercial driver's license. This requirement would place a huge financial and administrative burden on Syncor while providing little benefit.

Also to be considered is the effect this increased visibility would have on the general public. Unplacarded materials are currently delivered by Syncor in unmarked passenger vehicles. The addition of placards to all of Syncor's, as well as other companies', vehicles may increase public apprehension toward transportation of radioactive materials, which could lead to restrictions on usage times, roads, etc.

Syncor strongly urges that the requirement to placard all vehicles carrying labeled packages not be adopted.

2. The requirements in ST-1 for a radiation protection program should not be adopted for several reasons. Similar requirements were removed from the most recent revision to the HMR, and there is no valid basis for reintroducing them. The requirements place an unreasonable burden on the shipper regarding dose limits to the public. These doses would be very difficult to

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assess and it would be difficult to ensure compliance with the limits. We believe that compliance with the requirements of the current HMR (without the ST-1 radiation protection program) is sufficient to ensure that public doses remain below acceptable limits.

3. The  $A_2$  value for Mo-99 given in ST-1 is 0.6 TBq (16.2 Ci). Current regulations allow a 20 Ci limit for domestic use shipments. We request that the current limit for domestic use shipments remain in effect to allow for the shipment of Mo-99/Tc-99m generators up to this limit.
4. The proposed changes to the UN Numbers and Proper Shipping Names would be costly to implement due to the required reprinting of boxes and labels preprinted with the current numbers, while it would provide little, if any benefit. We recommend that the current UN Numbers be retained in the regulations.

Also, ST-1 requires a UN Number on the outside of all packages, including excepted packages. Will inclusion of the UN Number require shipment as Dangerous Goods by couriers such as Federal Express? Because of this possibility, we recommend not adopting this requirement for excepted packages.

5. ST-1 appears to make several changes to the testing requirements for packages. One example is for Type A packages. ST-1 requires that the package be designed such that during the prescribed testing procedures it will prevent loss of shielding integrity that would result in more than a 20% increase in the radiation level at any external surface. The same requirements in the current regulations specify a "significant increase in radiation levels calculated or measured at the surface" rather than the 20% limit. Would changes such as these require the retesting of packages?

Due to the cost and time required for package testing, we request that currently certified packages be exempted from any new testing requirements.

6. ST-1 lists nuclide specific values for defining material as radioactive. This introduces substantial complexity over the current definition of 2 nCi/g for all radionuclides, while not appearing to provide any substantial safety benefit. We therefore recommend that this change not be adopted.
7. It is unclear in ST-1 what the differences are between a Type B and Type C package. The definitions should be clarified and indicate what materials will require a Type C container.

Several of the changes noted above could result in a significant financial cost to Syncor and other companies in the nuclear medicine industry. This could result in an increase in the cost of nuclear medicine procedures in the United States

due to the large amount of radioactive material that is transported for these purposes and the potential impact of the proposed regulations. We therefore request that the above changes be avoided due to their lack of added benefit to radiation safety and their potential financial implications.

Thank you for your consideration of these issues.

Sincerely,

A handwritten signature in black ink, appearing to read "David W. Pellicciarini". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

David W. Pellicciarini, CHP  
Manager, Health Physics