

Honeywell

Honeywell International Inc.
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Dockets Management System
US Department of Transportation
400 Seventh Street. SW
Washington, DC 20590-0001
Submitted Electronically

**RE: DOCKET RSPA-99-6283
COMPATIBILITY WITH THE REGULATIONS OF THE IAEA**

Dear Sirs:

Honeywell International Inc. respectfully submits the following comments in response to RSPAs Advance Notice of Proposed Rulemaking, published in the Federal Register on Tuesday, December 28th. The docket number is referenced above.

Honeywell is strongly opposed to the proposed requirement in the International Atomic Energy Agency (IAEA) document ST-1 which would require placarding for all shipments of Radioactive Material (RAM), regardless of quantity or type. Currently placarding is only required for shipments of Yellow-III radioactive materials.

This will have a significant negative impact if adopted. The nature of the Honeywell businesses requires that a certain amount of low level radioactive materials (white-I and yellow-II) be carried in personal vehicles short distances to and from internal and external customer locations. This is done only when it is impossible to arrange for contract carriers and there is no other reasonable way to transport the radioactive sources. Approximately 100 shipments of this type are done each year.

The requirement for placarding will result in a regulatory snowball effect, bringing various aspects of the Federal Motor Carrier Safety Regulations into play. There are four aspects of the FMCSRs that are particularly important to note:

- (1) Requiring placarding of a vehicle of any size will cause that vehicle to be considered a commercial motor vehicle (CMV) under the FMCSRs. There are approximately 75 cars and/or vans that would fall into this classification.

- (2) Drivers of commercial motor vehicles must have commercial driver's licenses (CDLs). Drivers of placarded CMVs must have a hazmat endorsement on their CDL. Obtaining a CDL requires a written test a vehicle pre-trip inspection test and training (in order to pass these tests). Preparing for the hazmat endorsement testing will require additional time. It is estimated that each of our 100 drivers would lose between 2-3 days of work in order to prepare for and obtain a CDL with a hazmat endorsement.
- (3) Specifications and regulations governing commercial vehicles are strict (reflectors, signage, marking etc) and personal vehicles could never meet the standards for commercial motor vehicles. To this point, even if our drivers could take the time to obtain a CDL with hazmat endorsement, they could no longer use their personal vehicles to transport these small samples of RAM. Honeywell would have to purchase additional CMVs (small vans) at a cost of approximately \$35,000 each. In addition to this cost, there is the cost of lost work time. Currently, drivers are able to make these pick-ups and deliveries on their own schedule since they are using their own vehicles. If a facility were limited to a single CMV for this purpose, much time would be lost due to the fact that only one delivery could be made at a time. This would hinder our ability to meet customer requests and customer requirements, potentially hurting our ability to compete in this market.
- (4) For placarded vehicles, the FMCSRs require that an analysis is performed and a detailed pre-planned route from origin to destination is prepared for every shipment. Drivers must be provided with the route in advance of the trip and the route to be taken must be filed with the Federal Highway Administration within 90 days after the shipment.

All this will create an unnecessary burden on our businesses that offer and carry radioactive materials without providing an increased level of safety.

Within Honeywell, there have been approximately 20,000 radioactive source shipments made over the past 25 years. That number includes shipments made from our sites & shipments made by employees (at our direction) from customer sites. We are unaware of any incidents, leaks, exposures or accidents during that time and do not believe that placarding would provide any added measure of safety.

Even if an accident should occur on a highway or other roadway, the addition of placards would not provide an increased margin of safety to the public or to emergency responders. The hazards associated with the types of radioactive materials we transport are very low. We ship only relatively low activity sealed sources of radionuclides that emit relatively non-penetrating radiation. DOT required packaging is used for all shipments, even when not necessary, and these packagings have been stringently tested to withstand an interesting variety of accidents w/o destruction of the radiation shielding or damage to the sealed

source. In order to present a hazard to the public or to emergency response personnel in the event of an accident, several things would have to happen. The source (packaged in a DOT Type A package) would somehow have to become unshielded & the people would need to get very close to the unshielded source.

Thank you for your consideration of our comments. We look forward to additional information from RSPA concerning this issue.

Sincerely,

Barbara Konrad
Manager, Transportation Regulatory Affairs