



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

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

JUN 17 2004

Mr. John Wells  
Environmental Specialist  
General Dynamics - OTS  
8820 Route 148 South  
Marion, IL 62959

Ref. No. 04-0121

Dear Mr. Wells:

This responds to your May 5, 2004 letter requesting clarification on §173.56 of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) regarding new explosive approvals. Specifically, you ask whether a new explosives approval is required for any of the following revisions/changes to a current explosives approval: (1) part number of an explosive device changes; (2) revisions levels to a drawing; and (3) suffix numbers are added to a part number.

Your questions are paraphrased and answered as follows:

Q1. Part number of an explosive device changes. If our engineering department changes the part number of our currently approved device, would this require a new DOT approval? There are no changes to the design, components, or energetic materials of this device.

A1. A new approval is not required. However, you must submit a request to the Office of Exemptions and Approvals in writing to include the new part number in your current approval.

Q2. Revision levels to a drawing. If a part number for a drawing was changed to JW9000 Revision A, would this require a new approval? The revision may be as simple as a change in ink color used to mark the item. In addition, there are no changes to the design, components, or energetic materials of this device.

A2. You must request in writing that the Office of Exemptions and Approvals review this change to make a determination as to whether the revision is significant enough to warrant a new testing and approval review process or is a minor editorial revision request.



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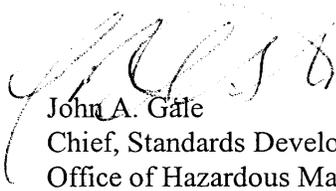
173.56

Q3. Suffix numbers added to a part number. (Due to design change, with no energetic material change). If a minor change to a device, such as number of threads or angle of chamber, and the new part number is now changed, would a new approval be required? There are no changes to the energetic materials or the functionality of this device.

A3. See answer A2 above.

I hope this answers your inquiry.

Sincerely,

A handwritten signature in black ink, appearing to read "John A. Gale", is written over the typed name and title.

John A. Gale  
Chief, Standards Development  
Office of Hazardous Materials Standards

**GENERAL DYNAMICS**  
Ordnance and Tactical Systems

May 5, 2004

Mr. Edward Mazzullo, Director  
U.S. Department of Transportation  
Office of Hazardous Materials Standards, DHM-10  
400 Seventh Street, S.W.  
Washington, DC 20590-0001  
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Booth  
§173.56  
Explosives  
04-0121

Subject: Request for Clarification  
Reference: 49 CFR 173.56

Dear Mr. Mazzullo:

General Dynamics, OTS, Marion, is requesting a letter of interpretation.

Would any of the following conditions would require a new DOT approval:

1. The part number of an explosive device changes. If we currently had a competent authority approval for theoretical part number JDW-500, and our engineering department changes the part number of this device to theoretical part number 6009854, would this require a new DOT approval? Note that there are no changes to the design, components, or energetic materials of this device.
2. Revision levels to a drawing. If we currently had a competent authority approval for theoretical part number JW9000, and the item is revised to JW9000 Revision A, would this require a new DOT approval? The revision may of been as simple as color change of the ink used to mark the item. Note that there are no changes to the design, components, or energetic materials of this device.
3. Suffix numbers added to a part number due to design change, but no energetic material change. If we currently had a competent authority approval for theoretical part number 6292300, and engineering made a minor change to the device, such as number of threads or angle of chamfer, and the new theoretical part number becomes 6292300-10, would this require a new DOT approval? Note that there are no changes to the energetic materials or the functionality of this device.

If the answer to any of the above three questions is no, is it necessary to note on the shipping documents either or both part numbers?

Regards,

  
John Wells  
Environmental Specialist

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