

PREDECISIONAL DRAFT

Protocol Topic: Inspections

I. Introduction

This protocol addresses inspections of shipments of DOE radioactive materials including both safety verifications of vehicles and radiological verifications of loaded vehicles. This protocol is to be used in conjunction with related protocol areas. This protocol does not specifically address water or air modes.

II. Inspections - Highway

A Non-Classified Shipments

1. Spent Fuel, High-Level Waste, Tritium-Bearing Reactor Components, and Transuranic Waste Shipments

Shipments will be inspected prior to departure in accordance with the Commercial Vehicle Safety Alliance (CVSA) Enhanced North American Uniform Inspection Procedures. Inspections will be performed by certified state inspectors unless other arrangements have been made with the state. CVSA is an organization of federal, state, and provincial government agencies and representatives from private industry in the United States, Canada and Mexico dedicated to improving commercial vehicle safety. Their enhanced inspection procedure includes more stringent criteria for placing a vehicle out-of-service, and additional inspection and out-of-service criteria items, compared to the standard inspection and adds a radiological survey. Shipments can not proceed until any out-of-service criteria violations have been corrected. Shipments en-route may be inspected to the enhanced CVSA standard, at the discretion of the states.

Post-shipment inspections will be conducted by the receiver of the shipment in accordance with applicable regulations. Any post-shipment inspection which reveals contamination levels above DOT limits will be handled in accordance with the emergency notification protocol. Routinely, the package, its tie-downs, and associated transportation system hardware are visually inspected at the point of destination to assure that no physical damage occurred during transit.

2. Low-Level and Mixed Low-Level Waste

Inspections may be done at the discretion of the states, in accordance with CVSA North American Standard Inspection (Level I) criteria or to individual state requirements. The CVSA Level I inspection includes examination of driver's license, medical examiner's certificate, hours of service, vehicle inspection report, brake system, coupling devices, exhaust system, frame, fuel

system, turn signals, brake lamps, tail lamps, head lamps, safe loading, steering mechanism, suspension, tires, wheels and rims, windshield wipers, shipping papers, placarding, blocking and bracing, and radiation levels at the surface of the vehicle.

B Classified National Security Shipments

For classified shipments, DOE has its own fleet of vehicles, operated by the Transportation Safeguards Division (TSD). All TSD vehicles are required to undergo a complete maintenance pre-inspection prior to departing to transport national security shipments. The vehicle safety inspection standards used by TSD meet or exceed those contained in the Commercial Vehicle Safety Alliance Enhanced North American Standards. According to 49 CFR 173.7(b), these shipments are not subject to Department of Transportation regulations 49 CFR 170 through 189. Security and technical considerations for these shipments do not permit adherence to all of the regulations. However, as a good practice, TSD voluntarily follows those regulations which are compatible with security and technical requirements. Cargo leaving a DOE facility is radiologically surveyed and complies with 49 CFR 173.441 and 443. Cargo leaving a Department of Defense (DOD) facility is handled in accordance with DOD procedures that have the practical effect of assuring compliance with 49 CFR 173.443. Compliance with 49 CFR 173.441 is an intrinsic property of the cargo and the capacities of the trailer in which it is transported.

III. Inspections - Rail

A Spent Fuel, High-Level Waste

Inspections will be performed prior to every shipment. Specifically, equipment inspectors will conduct an inspection of the cask and idler (buffer) cars and the escort vehicle (if used) at the point of origin to assure compliance with the Safety Appliance, Power Brake, and Freight Car FRA Standards, and industry rules and recommended practices. Hazardous materials inspectors will conduct an inspection of the cask and cask car to ensure compliance with applicable Hazardous Materials Regulations concerning placarding, shipping papers, crew notification, train placement and securement requirements. These inspections will be performed by rail carrier and shipping facility personnel and may be duplicated or verified by FRA Federal or state representatives, at their discretion. Shipments can not proceed if they are not in compliance with Federal Railroad Administration requirements. Inspections may be performed en-route by the Federal Railroad Administration (FRA) and state agencies through the FRA state participation program.

Post-shipment inspections will be conducted by the receiver of the shipment in accordance with applicable regulations. Any post-shipment inspection which reveals contamination levels above DOT limits will be handled in accordance with the

emergency notification protocol. Routinely, the package, its tie-downs, and associated transportation system hardware are visually inspected at the point of destination to assure that no physical damage occurred during transit.

B Low-Level and Mixed Low-Level Waste

Inspections may be performed by the FRA and state agencies through the FRA state participation program.