

Q2 2018 NEWS

Test Drive e-Manifest

• [e-Manifest Release 2 is now live - Test drive the system today!](#)



New EPA HazWaste e-Manifest System— Starting on June 30th, 2018, the Environmental Protection Agency (EPA) will begin phasing in the new electronic hazardous waste manifest (e-Manifest) system. EPA hopes to completely replace the paper copy version of the Uniform Hazardous Waste Manifest (UHWM) within 3 years. Only the designated or receiving facility (typically a Treatment, Storage, Disposal Facility “TSDF”) of a hazardous waste shipment will be required to pay the fee to use the e-Manifest system. These fees will be determined by the “type” of manifest submission. For example, the cheapest fee would be a fully electronic manifest from start (generator, consignor) to finish (consignee) and the most expensive fee would be a paper copy used for the entire transport uploaded into the e-Manifest system by the receiving facility. If for some reason the generator does not use the e-Manifest system, then a new 5-copy paper version of the UHWM should be used after the effective date (June 30, 2018) of the EPA’s January 3, 2018 final rule (83 FR 420). The EPA has setup a [website](#) to give an overview of the whole system and the ability to test drive the system before it becomes live.

NRC Issues Shipping Violation—The Nuclear Regulatory Commission (NRC) has issued an [Order](#) on Wednesday, [May 2, 2018](#) imposing a civil monetary penalty of \$22,400 to a licensee in Idaho Falls, Idaho. The violations were identified in an NRC inspection report prepared following an incident that occurred April of 2017. The event involved a package containing several

radioactive sources shipped from a temporary jobsite in New York City back to the company’s headquarters. Upon receipt in Idaho Falls, workers scanned the package and determined that radiation levels exceeded regulatory limits resulting from radioactive sources that had not been properly packaged. The NRC concluded that the licensee’s radiation safety officers lacked appropriate training



RADIOGRAPHY CAMERA

on the source packaging’s containment system positive fastening device, failed to use a questioning attitude when work was beyond their training, worked under schedule pressure, and failed to raise the concern to their management.

DOT Hazmat Accident Investigation— The U.S. Department of Transportation’s Pipeline and Hazardous Materials Safety Administration (PHMSA) in their continuing efforts to improve safety has produced a [brochure](#) to promote its hazardous materials Accident Investigation Team (AIT) pilot program to hazmat and emergency first responder stakeholders. Fundamentally

NEW Training Contact Numbers

The EnergySolutions Commercial Training Department has changed some of its direct phone numbers to our new location within the Barnwell Processing Facility complex. Please update your records. New numbers:

James Leonard (HAZMAT Instructor) (803) 541-5019	Angie Lott (Training Coordinator) (803) 541-5014
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Our previous phone numbers will continue to be forwarded to these new numbers. Visit our [website](#) for a complete list of all our contact information.

different from traditional PHMSA Hazardous Materials Regulations (49 CFR Parts 107-180) enforcement efforts, the one-year AIT pilot program was launched in October 2017 to develop a comprehensive investigative process for significant hazmat accidents and incidents. This process includes identifying contributing and root causes with the purpose of learning from past mistakes to enable forecasting and mitigation of future hazmat accidents.



NRC Updated Advanced Notification Designee List—The Nuclear Regulatory Commission (NRC) has updated the list of individuals to receive advance notification of radioactive material and nuclear material shipments required by either 10 CFR Part 37 (Category 1 and 2), Part 71 (HRCQ) or Part 73 (Spent Nuclear Fuel) on **May 16, 2018**.

This list of States, Territories and Participating Tribes can be downloaded from the NRC website at <https://scp.nrc.gov/special/designee.pdf>

10-160B Cask Book Updated—EnergySolutions’ Cask Division has issued Revision 36 to the 10-160B Cask Book on

May 2, 2018. These changes include: 1. Administrative updates and minor changes based on 10-160B cask users’ feedback to “Handling Procedure for Transport Cask Model 10-160B, Certificate of Compliance Number 9204” (TR-OP-046 Rev. 15); 2. Align the pre-shipment leak test procedure for the 10-160B cask with current cask pre-shipment leak testing practices “10-160B Cask Pre-Shipment Leak Test” (TR-TP-004 Rev.9); and 3. Updated both “Conformance of 10-160B Cask with Specifications for Industrial Packaging Type 1 and Type 2” (ER-01-001 Rev. 2) & “Conformance of 10-160B Cask with Specifications for DOT 7A, Type A Packagings” (ER-01-003, Rev. 2) to incorporate the latest revision of applicable U.S. DOT Transportation Regulations. Revision 36 of the 10-160B cask book is now available and can be accessed via the EnergySolutions [customer portal](#). If you have any questions regarding these revisions, please contact either: Mike Frassica, (803)758-1809, mjfrassica@energysolutions.com; or Aleksandr Gelfond, (803) 591-9074, axgelfond@energysolutions.com.

Utah State Regulator Changes—If you ship radioactive waste to our Clive disposal site, please make note of some changes to the Utah regulator’s title and website. The former Utah Division of Radiation Control (DRC) has merged with the former Division of Solid and Hazardous Waste (DSHW) to form the new Utah Division of Waste Management and Radiation Control or DWMRC. Please bookmark their new [web address](#) and the Generator Site Access Permit (GSAP) System [webpage](#).

Three Key Factors Required for a Respirator to be Effective

Correct* **Incorrect**

- 1 The respirator must be put on correctly and worn during the exposure.
- 2 The respirator must fit snugly against the user’s face to ensure that there are no gaps between the user’s skin and respirator seal.
- 3 The respirator filter must capture more than 95% of the particles from the air that passes through it.

*If your respirator has a metal bar or a molded nose cushion, it should rest over the nose and not the chin area.

NIOSH Updates Respirator Guides—Nationwide, approximately 1.3 million workplaces provide at least a portion of their employees with respiratory protection. One of the most common types of respiratory protection is the filtering facepiece respirator (FFR), which is designed to be discarded when it becomes unsuitable for further use due to considerations of hygiene, excessive resistance, or physical damage. However, due to the considerations of cost, convenience, and supply, respiratory protection program managers and FFR users have great interest in the practices of the use of National Institute for Occupational Safety and Health (NIOSH)-approved FFRs. NIOSH National Personal Protective Technology Laboratory (NPPTL) has updated their Respiratory Protection Infographics [webpage](#) by pulling some of the important information from their various in-depth resources, packaging them into quick-study infographics to be used as educational tools. We hope that you will download, print, and use these to promote proper respiratory protection program practices.



Important Dates to Remember

January 1, 2018 - Uranium hexafluoride (UF6): add Division 6.1 poisonous material (HM-215N, 82 FR 15796, March 30, 2017)
- IATA DGR 59th Edition compliance
- IMDG Code Amendment 38-16 compliance

June 30, 2018 - EPA plans to launch and begin the operation of the e-Manifest system
- EPA 5-copy UHWM paper version (non e-Manifest users)

January 1, 2019 - Labels must have a 2mm inner border (HM-215M, 80 FR 1076, January 8, 2015 & HM-215N, 82 FR 15796, March 30, 2017)

FAQs

Topic: New EPA e-Manifest System for Hazardous Waste Shipments

*** Can I use paper manifests after June 30, 2018?** Yes, manifest users may continue to use paper manifests after the system launches on June 30, 2018. However, the EPA strongly encourages generators to use electronic manifests as these manifests will be the least expensive and easiest way to comply with the regulations.'

*** Can I use the old 6-copy manifest form after the launch of the e-Manifest system?** Yes, the EPA will accept Page 1 copies of the obsolete 6-copy forms for processing after June 30, 2018, but strongly recommends that users transition to the 5-copy forms as quickly as

possible. If a user wishes to continue to use the obsolete 6-copy forms, they should undertake measures to minimize confusion in their use, such as applying a pre-printed adhesive label to the top copy with the accurate copy distribution language ("designated facility to EPA's e-Manifest system"). Facilities should train their manifest personnel to inspect manifests carefully to ensure they are routed properly during the time any of the obsolete manifests remain in use.

*** Will the e-Manifest system collect manifests for wastes not regulated as hazardous by EPA, but are regulated as hazardous by a state?** Yes, the e-Manifest system will collect manifests for wastes shipped on a manifest, where the manifest is required either by federal law, or the law of the generator state or destination state. Users who use the manifest voluntarily for their waste shipments (i.e., the manifest is not required by federal or state law) should not submit their manifests to the e-Manifest system.

*** Do generators have to register and immediately start using the e-Manifest system?** No, it is not required that generators register for e-Manifest by June 30, 2018. Generators who are not registered in e-Manifest can continue to use paper manifests, as they do under the existing paper-based manifest system, or under the hybrid manifest scenario (hybrid or "mixed paper/electronic" manifest allows transporters to initiate an electronic manifest in e-Manifest and use this manifest with their non-participating generator customers. The initial transporter may print a copy of the electronic manifest for the generator). Eventually, and over time, generators will need to register for e-Manifest if they wish to sign manifests electronically in the system, view manifest records in the system, or if they want the ability to submit post-receipt data corrections to the manifest.

To access these FAQs and many others, please visit the EPA's FAQ [website](#).

popquiz



Did these markings survive normal conditions of transport? So, what are you doing to ensure your package communications make it to the consignee? Some suggest using high quality spray adhesive (like: 3M® Hi-Strength 90 or 3M® Industrial Grade Super 77); adding clear packing tape over these type of markings (like: Crystal Clear Gorilla Tape); and/or giving your dedicated driver a few extras to replace as needed during transport.



Is this Class 7 Empty label correct for a packaging which previously contained radioactive material? No, this Empty label is less than 6 inches square as stated in 49 CFR 172.450.

Should we include the required identification number on the label? No again, since the example in 49 CFR 172.450 does not include "UN2908" and the printing size of at least 1 inch is for each "letter" not numbers.

Lastly, should the label survive normal conditions of transport? Yes, the label should be durable per 49 CFR 172.407.



This picture is a little fuzzy, but can you find anything wrong with the placard design and how it is held to the trailer? Where is the outer border for this placard? The outer border is covered up by the gray duct (or duck) tape. The outer border is required to be clear per 49 CFR 172.516(c)(7) and 172.519(b)(2); and used to measure where the inner border is drawn per 49 CFR 172.519(c)(1).

Speaking of the inner border, where is the inner border on the top half portion? I only see yellow in the triangle. The inner border should be on all sides per 49 CFR 172.519(c)(1).



THE LATEST HAPPENINGS

EPA SEEKS COMMENT ON INL TRU SHIPPING APPROVAL—On March 05, 2018 (83 FR 9310), the Environmental Protection Agency (EPA) published a notice announcing the availability of, and soliciting public comment on the proposed approval of the Transuranic Waste Characterization Program at Idaho National Laboratory's Advanced Mixed Waste Treatment Project. On August 8-10, 2017, the EPA conducted a baseline inspection of the Advanced Mixed Waste Treatment Project (AMWTP)'s transuranic (TRU) waste characterization program at Idaho National Laboratory (INL), in accordance with the Waste Isolation Pilot Plant (WIPP) Compliance Criteria and Condition 3 of the EPA's initial May 13, 1998 WIPP certification, as amended. The inspection evaluated the technical adequacy of this program's characterization of contact-handled TRU debris and solid waste. The EPA is proposing to approve a new AMWTP baseline that includes the significant changes that have been implemented at INL since mid-2016. Until the EPA finalizes its baseline approval decision, the DOE Carlsbad Field Office (CBFO) may not recertify the AMWTP's TRU waste characterization program and the AMWTP may not ship any TRU waste unless it meets the requirements of the June 2017 revisions to the DOE's WIPP Waste Acceptance Criteria to the WIPP for disposal. Please submit comments on or before April 19, 2018.

NRC SEEKS COMMENT ON INDEFINITE SPENT FUEL STORAGE—On March 22, 2018 (83 FR 12504), the Nuclear Regulatory Commission (NRC) published a notice requesting public comment on a petition for rulemaking from Raymond Lutz and Citizens Oversight, Inc., dated January 2, 2018, requesting that the NRC amend 10 CFR Part 72 regarding spent nuclear fuel storage systems. The petition was docketed by the NRC on January 22, 2018, and has been assigned Docket No. PRM-72-8. The NRC is examining the issues raised to revise 10 CFR Part 72 to require: a 1,000 year design life goal for spent nuclear storage systems; estimates for the operating costs over the design life; determination of the safety margins over the design life; and time limited aging analyses demonstrating that structures, systems, and components important to safety will continue to perform for the design life. Please submit comments by June 5, 2018.

DOT SEEKS COMMENT ON AUTOMATED HAZMAT TRANSPORT—On March 22, 2018 (83 FR 12529), the Pipeline and Hazardous Materials Safety Administration (PHMSA) published a

notice requesting information on matters related to the development and potential use of automated technologies for surface modes (i.e., highway and rail) in hazardous materials transportation. In anticipation of the development, testing, and integration of Automated Driving Systems in surface transportation, PHMSA is issuing this request for information on the factors the Agency should consider to ensure continued safe transportation of hazardous materials without impeding emerging surface transportation technologies. Interested persons are invited to submit comments on or before May 7, 2018.

FMCSA SEEKS COMMENT ON AUTOMATED CMVS—On March 26, 2018 (83 FR 12933), the Federal Motor Carrier Safety Administration (FMCSA) published a notice requesting public comments on existing Federal Motor Carrier Safety Regulations (FMCSRs) that may need to be updated, modified, or eliminated to facilitate the safe introduction of automated driving systems (ADS) equipped commercial motor vehicles (CMVs) onto our Nation's roadways. To assist in this undertaking, FMCSA commissioned the U.S. Department of Transportation's John A. Volpe National Transportation Systems Center (Volpe) to conduct a preliminary review of the FMCSRs in 49 CFR Chapter III Subchapter B to identify regulations that may relate to the development and safe introduction of ADS. The Agency requests comments on this report, including whether any of FMCSA's current safety regulations that may hinder the testing and safe integration of ADS-equipped CMVs. Further, FMCSA requests comment on certain specific regulatory requirements that are likely to be affected by an increased integration of ADS-equipped CMVs. In addition, to support FMCSA's effort to understand future impacts on the FMCSRs (49 CFR Parts 350 – 399), FMCSA requests information, including from companies engaged in the design, development, testing, and integration of ADS-equipped CMVs into the fleet. Specifically, the Agency requests information about: The scenarios and environments where entities expect that ADS will soon be tested and integrated into CMVs operating on public roads or in interstate commerce; the operational design domains in which these systems are being operated or would be tested and eventually deployed; and, measures they believe are required to ensure the protection of any proprietary or confidential business information they intend to share with the FMCSA. Public comments on this notice must be received on or before May 10, 2018.

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DOT ISSUES CORRECTION ON AUTOMATED HAZMAT TRANSPORT—On March 29, 2018 (83 FR 13464), PHMSA published a notice to make technical corrections to the comment request published in the Federal Register on March 22, 2018 (83 FR 12529). PHMSA is still requesting information on matters related to the development and potential use of automated technologies for surface modes (i.e., highway and rail) in hazardous materials transportation. In anticipation of the development, testing, and integration of Automated Driving Systems in surface transportation, PHMSA is issuing this request for information on the factors the Agency should consider to ensure continued safe transportation of hazardous materials without impeding emerging surface transportation technologies. Interested persons are invited to submit comments on or before May 7, 2018.

DOT NEW FEEDBACK COLLECTION COMMENT REQUEST—On April 03, 2018 (83 FR 14311), PHMSA published a notice requesting comments on a new information collection pertaining to hazardous materials transportation for which PHMSA intends to request from the Office of Management and Budget. The information collection activity will garner qualitative customer and stakeholder feedback in an efficient, timely manner, in accordance with DOT's commitment to improving service delivery. This feedback will provide insight into customer or stakeholder perceptions, opinions, experiences and expectations, as well as an early warning of issues with service or focus attention on areas where communication, training or changes in operations might improve delivery of products or services. Interested persons are invited to submit comments on or before June 4, 2018.

FMCSA: ELECTRONIC DOCUMENTS & SIGNATURES—On April 16, 2018 (83 FR 16210), FMCSA published a final rule amending its regulations in 49 CFR Parts 370 thru 398 to allow the use of electronic records and signatures to satisfy FMCSA's regulatory requirements. These amendments permit the use of electronic methods to generate, certify, sign, maintain, or exchange records so long as the documents accurately reflect the required information and can be used for their intended purpose. This rule applies only to those documents that FMCSA's regulations obligate entities or individuals to retain; it does not apply to forms or other



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documents that must be submitted directly to FMCSA unless there are already procedures in place in the regulations for electronic submission to FMCSA. This rule partially implements the Government Paperwork Elimination Act (GPEA) and the Electronic Signatures in Global and National Commerce Act (E-SIGN). This final rule is effective June 15, 2018.

NRC SEEKS REVIEW COMMENTS OF ADMINISTRATIVE RULES—On May 03, 2018 (83 FR 19464), NRC published a notice initiating a retrospective review of administrative requirements to identify outdated or duplicative administrative requirements that may be eliminated without an adverse effect on public health or safety, common defense and security, protection of the environment, or regulatory efficiency and effectiveness. The NRC is providing an outline of its strategy and is seeking public comment on the criteria that the NRC proposes to use to identify administrative regulations for possible elimination. This retrospective review of administrative regulations will complement the NRC's existing strategy for retrospective analysis of existing regulations in 10 CFR Chapter I. Please submit comments by July 2, 2018. The NRC will not prepare written responses to each individual comment, due to the NRC's schedule for completing the retrospective review of administrative regulations.

NRC REVISES RIS FEDERAL REGISTER PUBLICATION—On May 08, 2018 (83 FR 20858), NRC published a notice notifying the public that documents regarding draft and final Regulatory Issue Summaries (RIS) that historically have been published in the "Notices" section of the Federal Register will now be published in the "Proposed Rules" and "Rules and Regulations" sections of the Federal Register. The Office of the Federal Register (OFR) recently informed the NRC that under OFR guidelines, these documents fall into the "Proposed Rules" and "Rules and Regulations" categories and requested that NRC reclassify these notices.

DOT PROPOSES 14 CFR AVIATION ECONOMIC AMENDMENTS—On May 09, 2018 (83 FR 21684), the U.S. Department of Transportation (DOT) Office of the Secretary (OST) published a notice of proposed rulemaking (NPRM) to amend various provisions in 14 CFR Chapter II Parts 200 through 399 regarding its aviation

economic regulations to eliminate any further remaining obsolete provisions and correct outdated statutory references. This rulemaking aligns with the Department's retrospective regulatory review initiatives to modify, streamline, or repeal regulations that are obsolete or out-of-date. Comments must be received on or before July 9, 2018.

NRC DISCONTINUES PART 37 CYBER SECURITY—On May 15, 2018 (83 FR 22413), NRC published a notice discontinuing the rulemaking activity that would have developed cyber security requirements for byproduct materials licensees possessing risk-significant quantities of radioactive materials as stated in 10 CFR Part 37. The purpose of this action is to inform members of the public of the discontinuation of the rulemaking activity and to provide a brief discussion of the NRC's decision. The rulemaking activity will no longer be reported in the NRC's portion of the Unified Agenda of Regulatory and Deregulatory Actions (the Unified Agenda) as of May 15th, 2018. However, the NRC staff determined that it would be prudent to issue an Information Notice (IN) to communicate effective practices for cyber security to byproduct materials licensees possessing risk-significant quantities of radioactive material. The IN will provide licensees with a better understanding of contemporary cyber security issues and strategies to protect digital assets (e.g., computers, digital alarm systems), including those used to facilitate compliance with physical security requirements, such as those in 10 CFR part 37. The IN, which will reference existing cyber security guidance developed by the NRC's Office of Nuclear Reactor Regulation and other Federal agencies, will be issued later in 2018.

NRC REVISES ENFORCEMENT POLICY—On May 15, 2018 (83 FR 22535), NRC published a notice revising its Enforcement Policy to address the requirements of the Federal Civil Penalties Inflation Adjustment Act Improvements Act of 2015. This amended the Federal Civil Penalties Inflation Adjustment Act (FCPIAA) of 1990, and now requires Federal agencies to adjust their maximum civil monetary penalty annually for inflation. Specifically, updating Table A monetary amounts found in Section 8.0, "Table of Base Civil Penalties" items a-e and g of the Policy. This monetary adjustment does not include item "f" since its monetary value is based on the

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estimated or actual cost of authorized disposal and not on the monetary value codified in 10 CFR 2.205(j). This action was effective on January 12, 2018.

MISCELLANEOUS FMCSR CORRECTIONS—On May 17, 2018 (83 FR 22865), FMCSA published a final rule making technical corrections throughout the Federal Motor Carrier Safety Regulations or 49 CFR Parts 350 – 398. FMCSA is making minor changes to correct inadvertent errors and omissions, remove or update obsolete references, ensure conformity with Office of the Federal Register style guidelines, and improve the clarity and consistency of certain regulatory provisions. This final rule is effective June 18, 2018.

DOT REQUESTS COMMENT ON ERG 2020—On May 17, 2018 (83 FR 23996), PHMSA published a notice requesting input on ways to improve the Emergency Response Guidebook (ERG) as it develops the 2020 edition (ERG 2020). PHMSA is interested in any comments and input from emergency services personnel who have experience using the ERG to respond to hazardous materials transportation incidents, and particularly looking for answers to several questions listed at the end of this federal register. In addition to the specific questions listed, PHMSA is also interested in any supporting data and analyses that will enhance the value of the comments submitted. Please submit your comments to the following email address: ERGComments@dot.gov

MISCELLANEOUS FMCSR CORRECTIONS—On May 25, 2018 (83 FR 24228), FMCSA published a final rule correcting the electronic documents and signatures final rule (83 FR 16210) published on April 16, 2018 that amended FMCSA regulations to allow the use of electronic records and signatures to satisfy FMCSA's regulatory requirements. This document corrects an amendatory instruction, removes two extra commas at the end of two phrases, and adds "of this section" to a cross reference in a paragraph. Finally, FMCSA rescinds its January 4, 2011, interpretations and regulatory guidance. This correction is effective June 15, 2018. As of June 15, 2018, the document published at 76 FR 411 on January 4, 2011 is withdrawn.

2018–19 COMMERCIAL TRAINING SCHEDULE

Radioactive Class 7 Material Packaging, Transportation & Disposal Regulatory Compliance Courses

All DOT/NRC training courses meet the requirements of 49 CFR Part 172 Subpart H and NRC IE Notice 79-19

COURSE	DATE	CEU**	TUITION	LOCATION
2018				
DOT/NRC/EPA Hazardous Waste/Mixed Waste Packaging, Transportation & Disposal	July 16 - 20	40	\$1,995	Oak Ridge, TN
Bear Creek Operations (BCO) Facility Tour	July 19	—	\$0	Oak Ridge, TN
DOT/NRC Radioactive Waste Packaging, Transportation & Disposal	July 30 - Aug. 2	40	\$1,895	Orlando, FL
Air Transport of Radioactive Materials (IATA/DOT)	Aug 3	8	\$945*	Orlando, FL
DOT/NRC/EPA Hazardous Waste/Mixed Waste Packaging, Transportation & Disposal	Sept. 10 - 14	40	\$1,995	Columbia, SC
Barnwell Disposal Site & Processing Facilities Tour	Sept. 13	—	\$0	Barnwell, SC
DOT/NRC Radioactive Waste Packaging, Transportation & Disposal	October 22 - 25	40	\$1,895	Hilton Head, SC
Air Transport of Radioactive Materials (IATA/DOT)	October 26	8	\$945*	Hilton Head, SC
DOT/NRC Radioactive Waste Packaging, Transportation & Disposal	Dec. 3 - 6	40	\$1,895	Henderson, NV
Air Transport of Radioactive Materials (IATA/DOT)	Dec. 7	8	\$945*	Henderson, NV
2019				
DOT/NRC Radioactive Waste Packaging, Transportation & Disposal	Feb. 25 - 28	40	\$1,895	Mount Pleasant, SC
Air Transport of Radioactive Materials (IATA/DOT)	March 1	8	\$945*	Mount Pleasant, SC
DOT/NRC/EPA Hazardous Waste/Mixed Waste Packaging, Transportation & Disposal	March 18 - 22	40	\$1,995	Salt Lake City, UT
Clive Disposal Site Facility Tour	March 21	—	\$0	Clive, UT
DOT/NRC Radioactive Waste Packaging, Transportation & Disposal	April 8 - 11	40	\$1,895	Surfside Beach, SC
Air Transport of Radioactive Materials (IATA/DOT)	April 12	8	\$945*	Surfside Beach, SC
DOT/NRC Radioactive Waste Packaging, Transportation & Disposal	June 3 - 6	40	\$1,895	San Diego, CA
Air Transport of Radioactive Materials (IATA/DOT)	June 7	8	\$945*	San Diego, CA

** If an IATA class is taken in conjunction with the DOT/NRC class during the same week, there is a \$200 multi-class discount*

*** The American Academy of Health Physics (AAHP) has pre-approved continuation education credit hours for these courses*

