

The MODERATOR

Training Resources and Information for the Nuclear Industry

Vol. 10, No. 2

June 2012

IATA Issues Amendment to the 53rd DGR Edition



IATA Dangerous Goods Regulations

53rd Edition (English)
Effective 1 January 2012

ADDENDUM
Posted 26 April 2012

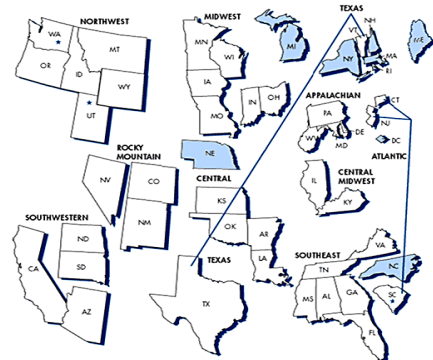
The International Air Transport Association (IATA) has issued an amendment to their 2012 or 53rd edition of the Dangerous Goods Regulations (DGR). In this amendment, the following countries have made changes to their variations: Brazil, Canada, Croatia, Netherlands, Oman, Romania, Singapore, & Sri Lanka. Many operators filed changes to their variations to include: Air India, China Airlines, DHL & United Airlines. There are changes to shipping wheelchairs with batteries in Section 2. A new ERG code "5C" was added for several "Calcium hypochlorite" proper shipping names listed in Section 4 Table 4.2. IATA added a requirement that overpacks containing limited quantities must have the limited quantity marking visible or applied on the overpack. Lastly, Canada, Croatia & Italy have changed their contact information in Appendix D & E. For more details, please download the IATA Amendment at: www.iata.org/whatwedo/cargo/dangerous_goods/Documents/53rev01en-apr26.pdf

Clive Waste Acceptance Criteria Update

Clive has a procedure to help you fulfill the export rules of your low-level radioactive waste (LLRW) compact. The following compacts may require approval to export (ATE) documentation: Central (AR, KS, LA, OK), Northwest (AL, HI, ID, MT, OR, UT, WA, WY), Rocky Mountain (CO, NM, NV), Southwestern (AZ, CA, ND, SD), and Texas (TX, VT). Please ensure you have the most up-to-date copy of this LLRW Export Approval procedure (CL-AD-PR-030 Revision 3) and you understand which waste types and compacts have additional approvals needed to dispose your LLRW at our Clive site.

Reminder: New Basic Description Sequence Deadline

The deadline of December 31, 2012 is fast approaching to change our software programs and/or shipping paper documentation to show the basic description with the identification number first. At the moment, we can have the identification number in the third position (for example: Radioactive material, Type A package, 7, UN2915). Starting January 1, 2013, the identification number must be placed first (from the earlier example: UN2915, Radioactive material, Type A package, 7).



★ Active Disposal Site (3)	Note: Data as of May 2010
□ Approved Compact (10)	Alaska and Hawaii belong to Northwest Compact.
□ Unaffiliated (10)	Puerto Rico is unaffiliated.

New Rulings in the Federal Register

On March 28, 2012 (77 FR 18871), the NRC published a notice that revision 1 to Regulatory Guide 7.7, "Administrative Guide for Verifying Compliance with Packaging Requirements for Shipment and Receipt of Radioactive Material" is now available. The draft was issued as DG-7007, dated January 2011. A copy of this new revision may be downloaded from: <http://pbadupws.nrc.gov/docs/ML1121/ML112160407.pdf>.

New Rulings in the Federal Register *Cont'd*

On March 9, 2012 (77 FR 14445), the NRC published a notice that revision 1 to Regulatory Guide 7.4, "Leakage Tests on Packages for Radioactive Material" is now available. The draft was issued as DG-7008, dated January 2011. Regulatory Guide 7.4 was originally published in June 1975 to endorse the guidance in the ANSI N14.5-1973 as an acceptable method for complying with the then current version of 10 CFR Part 71. Since that time the NRC has revised 10 CFR Part 71 a number of times and the ANSI N14.5 standard has been revised twice with no change to the regulatory guide. This revision of regulatory guide 7.4 endorses ANSI N14.5-1997 which was reaffirmed in 2008 and is the current active version of the ANSI standard. A copy of this new revision may be downloaded from: <http://pbadupws.nrc.gov/docs/ML1125/ML112520023.pdf>.

On April 26, 2012 (77 FR 24885), the Pipeline and Hazardous Materials Safety Administration (PHMSA) published a notice of proposed rulemaking to make miscellaneous amendments to the Hazardous Materials Regulations. Among other provisions, PHMSA is proposing to update various entries in the Hazardous Materials Table and corresponding special provisions, clarify the lab pack requirements for temperature-controlled materials, and revise the training requirements to require that a hazardous material employer must make hazardous materials employee training records available upon request. Comments must be received by June 25, 2012.

On May 1, 2012 (77 FR 25760), the NRC issued a new Policy Statement on Low-Level Radioactive Waste (LLRW) Volume Reduction. This statement encourages licensees to take steps to reduce the amount of waste generated and to reduce the volume of waste once generated. The purpose of this revised statement is to recognize progress in reducing waste volume has been achieved since the 1981 Policy Statement was published, and to acknowledge that factors other than volume reduction may be considered by licensees to determine how best to manage their LLRW. The new Policy Statement was effective on May 1, 2012.

On both February 22, 2012 (77 FR 10401) and May 8, 2012 (77 FR 26991), the NRC published a notice seeking more comments on proposed revisions to its low-level radioactive waste (LLW) disposal requirements in 10 CFR 61. The NRC states that over the last several years there have been a number of developments that have called into question some of the key assumptions made in connection with the earlier 10 CFR Part 61 Environmental Impact Statement, including:

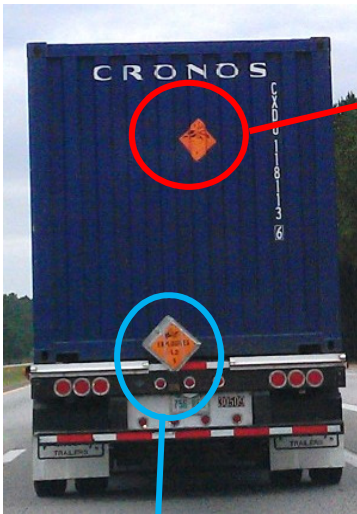
- The emergence of potential LLW streams that were not considered in the original 10 CFR Part 61 rulemaking, including large quantities of depleted uranium (DU), and possibly incidental wastes associated with the commercial reprocessing of spent nuclear fuel;
- The DOE's increasing use of commercial facilities for the disposal of defense-related LLW streams; and
- Extensive international operational experience in the management of LLW and intermediate-level radioactive wastes that did not exist at the time 10 CFR Part 61 was promulgated.

Recent Industry Issues

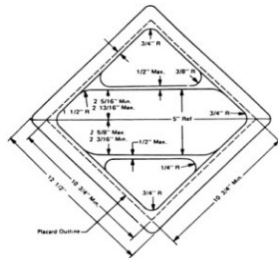


Can rust be part of or obscure the DOT specification and/or manufacturer markings? What are the package and manufacturer marking visibility requirements in both 49 CFR 172.304 and 178.3? The rust seems to be only in the area where the magnetic cover was placed over these manufacturer markings. Who is responsible to ensure the manufacturer markings meet the visibility requirements, the shipper and/or the manufacturer?

Who is responsible for maintaining a specification label during transportation? Will the driver and/or shipper be in trouble for the peeling label? The driver is only responsible for the maintenance of the placards if applied [49 CFR 172.516(c)(6)] and accepting a compliant load from the initial shipper (49 CFR 177.801). What can shippers do to prevent labels from peeling off during normal conditions of transport?



(b) In addition to complying with §172.519 of this subpart, the background color on the EXPLOSIVES 1.1, EXPLOSIVES 1.2, and EXPLOSIVES 1.3 placards must be orange. The "*" shall be replaced with the appropriate division number and, when required, appropriate compatibility group letter. The symbol, text, numerals and inner border must be black.



Do placards on freight containers and trailers have to meet all the placard specifications in 49 CFR 172 Subpart F? Can a placard be placed on a corrugated surface, where the placard no longer meets the size and design requirements (see DOT letter of interpretation #05-0276)? Placards may be placed in a holder if the placard holder meets the requirements in Part 172 Appendix C as shown, but can we turn the holder? If this was a domestic shipment only, should the placards on the freight container and vehicle match? If this was an international shipment, can we leave the international placards on freight container as outlined in 172.519(f) and must domestic placards be displayed on the trailer as outlined in Part 171 Subpart C?

2012 ERG Changes Update

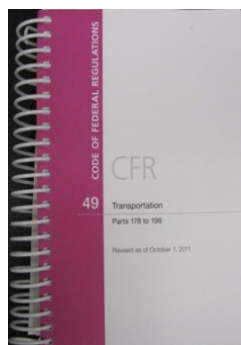
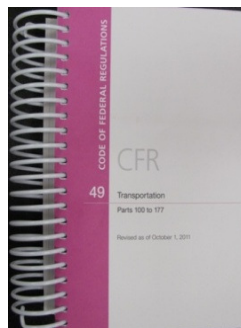
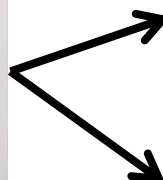
DOT has added a PDF download on their website (www.hazmat.dot.gov) with a summary of changes and updates to the new 2012 ERG. This includes generic descriptions of the changes made in each section.

DOT 49 CFR 2011 Edition Change

Pipeline and Hazardous Materials Safety Administration's (PHMSA's) regulations are now in two (2) books. Before 2011, we would purchase one book from the Government Printing Office (GPO) containing 49 CFR Chapter 1 Parts 100 to 185. This one book contained the main regulations needed for the administrative functions and the transportation of hazardous materials by ground in the United States called the Hazardous Material Regulations (HMRs). For the 2011 edition, we will need to purchase two (2) books to have the entire HMRs. These 2 books include 49 CFR Parts 100 - 177 and 49 CFR Parts 178 - 199. Be sure to buy both books to be in compliance with DOT 49 CFR & NRC IE 79-19.

New Course Available

Many of you have requested a function-specific course geared towards Radiological Protection Technicians or RCTs. We now offer a 1-day training class that focuses on only radiation and contamination controls and limits concerning the packaging and transportation of Class 7 radioactive material. General awareness of 49 CFR is also included to meet 49 CFR Part 172 Subpart H training requirements. This class can be on-site or with enough interest we can offer the class as an open-enrollment in a location that best suits your travel needs. We appreciate your feedback and comments, so please contact us on how we can meet your training requirements.



2012 Training Schedule

Advanced Radioactive Material Shipper Certification Training	June 5-7, 2012
Load Securement for Drivers and Traffic Personnel	June 5, 2012
Hazardous Materials Drivers Training	June 5, 2012
Federal Motor Carrier Safety Regulations for Drivers	June 7, 2012
Hazardous Material General Awareness Transportation Training	June 7, 2012
Basic Level Transportation Training – Module 1 – Basic Hazardous Material	June 11-13, 2012
Basic Level Transportation Training – Module 2 – Basic Hazardous Waste	June 13, 2012
Basic Level Transportation Training – Module 3 – Basic Radioactive Material	June 14-15, 2012
Load Securement for Drivers and Traffic Personnel	June 12, 2012
Highway Route Control Quantity (HRCQ)	June 13, 2012
DOT/NRC Radioactive Waste Packaging, Transportation and Disposal Training	June 18-21, 2012
General Packaging Requirements for the Transport of Hazmat	June 19, 2012
Radioactive Material Packaging Training	June 20, 2012
Air Transport of Radioactive Materials	June 22, 2012
Load Securing of Radioactive Materials	June 22, 2012
Advanced Mixed Waste Shipper Certification Training	June 25-28, 2012
Federal Motor Carrier Safety Regulations for Managers & Supervisors	June 26-27, 2012
Advanced Hazardous Material Shipper Certification Training	June 26-27, 2012
Hazardous Materials Drivers Training	June 26, 2012
Reasonable Suspicion Training for Supervisors	June 28, 2012
Load Securing of Radioactive Materials	July 9, 2012
NRC/DOT Experienced Radioactive Waste Shipper Refresher Training	July 10-12, 2012
Hazardous Material General Awareness Transportation Training	July 12, 2012
Air Transport of Radioactive Materials Training	July 13, 2012
Advanced Hazardous Waste Shipper Certification Training	July 17-19, 2012
Federal Motor Carrier Safety Regulations for Drivers	July 19, 2012
Load Securement for Drivers and Traffic Personnel	July 19, 2012
IATA: Transportation of Dangerous Goods by Air Shipper Certification Training	July 23-25, 2012
Advanced Mixed Waste Shipper Certification Training	July 23-26, 2012
Transport of Lithium Batteries by Air/Highway	July 26, 2012
Hazardous Material General Awareness Transportation Training	July 31, 2012
DOT/NRC Radioactive Waste Packaging, Transportation and Disposal Training	August 6-9, 2012
Federal Motor Carrier Safety Regulations for Drivers	August 7, 2012
Load Securement for Drivers and Traffic Personnel	August 8, 2012
Highway Route Control Quantity (HRCQ)	August 9, 2012
Hazardous Materials Drivers Training	August 9, 2012
Air Transport of Radioactive Materials	August 10, 2012
Load Securing of Radioactive Materials	August 10, 2012
Basic Level Transportation Training – Module 1 – Basic Hazardous Material	August 20-22, 2012
Basic Level Transportation Training – Module 2 – Basic Hazardous Waste	August 22, 2012
Basic Level Transportation Training – Module 3 – Basic Radioactive Material	August 23-24, 2012
Federal Motor Carrier Safety Regulations for Drivers	August 21, 2012
Advanced Hazardous Waste Shipper Certification Training	August 21-23, 2012
Hazardous Material General Awareness Transportation Training	August 23, 2012
Highway Route Control Quantity (HRCQ)	August 29, 2012

The MODERATOR is the official Training Services Newsletter for EnergySolutions
This newsletter can also be viewed on our web site at www.energysolutionstraining.com





Online Training

EnergySolutions offers many courses online. Online training is a cost effective alternative to classroom training. It is self-paced and flexible, allowing the user to complete the course at his or her convenience. Training materials and references are accessed from the website.

Upon successful completion of your online training and receipt of payment, EnergySolutions will provide a certificate indicating that you have completed the training.

How to Get Started:

- Call or e-mail a contact listed below.
- Provide payment (check or credit card).
- Receive an access code.

What you Will Need:

- Access to a computer.
- Ability to print PDF files.

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Please visit our web site at
www.energysolutionstraining.com
 for course descriptions, pricing, and registration forms.

Available Courses

- Air Transport of Radioactive Materials – \$395
- FMCSR for Drivers – \$350
- FMCSR for Managers and Supervisors – \$545
- Hazardous Material General Awareness Transportation Training – \$350
- General Packaging – \$350
- Hazardous Material Drivers Training – \$250
- HRCQ for Drivers – \$250
- Load Securement for Drivers and Traffic Personnel – \$250 **New**
- Multi-Modal Transport of Automotive Parts – \$395 **New**
- Transport of Lithium Batteries by Air and Highway – \$350 **New**
- Transportation of Radioactive Materials for Drivers and Carriers – \$395 **New**
- NRC/DOT Radioactive Waste Packaging, Transportation and Disposal Training – \$1,095 **Coming Soon**
- Transportation of Radioactive Materials by Medical, University and Single Source Licensees – \$695 **Coming Soon**