



DOE Transportation Directives Requirements Implementation Matrix

Advanced Mixed Waste Treatment Project

Approved:

Signature on file, See DCR-5332

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AMWTP IMPLEMENTATION MATRIX		
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1.0 PURPOSE/SCOPE

The purpose of this document is to list the DOE transportation directives requirements and the location within the AMWTP documentation system where each requirement is implemented.

2.0 DEFINITIONS

None

3.0 REFERENCES

- (1) DOE O 460.1B, Attachment 2, Contractor Requirements Document
- (2) DOE O 460.2A, Attachment 2, Contractor Requirements Document
- (3) DOE M 460.2-1, Attachment 2, Contractor Requirements Document
- (4) DOE M 461.1-1, Attachment 2, Contractor Requirements Document
- (5) DOE O 461.1B, Attachment 2, Contractor Requirements Document

4.0 APPENDICES

Appendix A – Contractor Requirements

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Appendix A

Contractor Requirements

Requirement ID	Requirement Description	Implementation Source
DOE O 460.1B, Attachment 2, Contractor Requirements Document		
1	Offsite shipment of hazardous materials shall follow the Hazardous Material Regulations of DOT and the applicable tribal, State, and local regulations not otherwise preempted by DOT.	MP-TRNS-20.2 Section 3.1.1.1
2	Hazardous Material Regulations with a non-compliant package or shipment shall apply for a DOT exemption through the Field Element to the Office of Environmental Management or the NNSA for processing to DOT.	MP-TRNS-20.1 Section 3.5.2
3	Specific radioactive material packagings the following shall apply...	MP-TRNS-20.2 Section 3.1.1.1. Following DOT regulations implements these requirements.
4	Contractors who participate in the design, fabrication, procurement, use, or maintenance of a hazardous materials packaging, shall have an approved quality assurance program that, for Type B and fissile radioactive materials packaging, satisfies the applicable requirements of 10 CFR Part 71, Subpart H.	This requirement is met per BNFL-5232-QAPP-01, AMWTP Quality Assurance Program Plan.
5	Contractors that use Type B, fissile or plutonium packaging specified in 3 above, shall implement operating controls and procedures that satisfy the requirements of 10 CFR Part 71, Subpart G.	AMWTP procedures that deal with the AMWTP use of Type B packages (TRUPACTs) are approved by CBFO which ensures compliance with 10CFR71, Subpart G.
6	Contractors may follow international packaging and transportation regulations for domestic segments of transportation by air, vessel, rail, or highway of shipments in international traffic as authorized by the DOT regulations, as appropriate.	MP-TRNS-20.2 Section 3.1.1.1. Following DOT regulations and IATA regulations fulfills this requirement.
7	Comply with 49 CFR 171-180 for onsite hazardous materials transfers or comply with an approved site- or facility-specific Transportation Safety Document.	MP-TRNS-20.2 Section 3.1.1.1 and 3.1.1.2.

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8	Implement and/or expand lessons learned programs to include sharing transportation and packaging safety successes and problems throughout the site and with other DOE contractors.	MP-ISIH-2.43
9	Develop and implement a training program and procedures for the safe packaging, transfer and transportation of hazardous materials; assure that all personnel who support and/or perform packaging, transfer and transportation operations are appropriately trained and qualified; and maintain auditable training records in accordance with site record retention requirements.	AWT3200, DOT Training MP-RTQP-14.1, Preparation and Administration of Individual Training Plans MP-RTQP-14.4, Personnel Qualification and Certification MP-RTQP-14.6, Job Analysis MP-RTQP-14.19, Training Records Administration
DOE O 460.2A, Attachment 2, Contractor Requirements Document		
1	Conduct operations in compliance with all applicable international, Federal, State, local, and Tribal requirements governing materials transportation, unless exemptions or alternatives are approved.	MP-TRNS-20.2 Section 3.1.1.1, 3.1.1.2., and 3.1.6. MP-TRNS-20.1 Section 3.5.2
2a	Must use an automated transportation management system.	MP-TRNS-20.1 Section 3.9.1.7
2b	Contractor must not expend Government funds to insure property against loss, damage, or destruction while in transit, unless the shipment qualifies as a special circumstance as defined in 48 CFR 47.102.	See Jim Simonds for implementation.
2c	Consign the shipment as: To: U.S. Department of Energy in care of (name of DOE contractor) or From: (name of DOE contractor) on behalf of the U.S. Department of Energy.	MP-TRNS-20.2 section 3.1.1.15.
2d	For military air transportation, the contractor must send requests to the Air Force [Department of Defense regulation 4500.9-R, Defense Transportation Regulation].	AMWTP does not use military air transportation. If military air transport is required, this requirement will be implemented.
2e	Special train services must be approved by the DOE field office or program traffic manager.	AMWTP does not use special train services. If special train services are required this requirement will be implemented.

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3	<p>For each shipment of fissile material or more than a Type A quantity of radioactive material the contractor must:</p> <ul style="list-style-type: none"> a. notify the consignee of the date of shipment, expected date of arrival, and special loading or unloading instructions. b. Require the consignee to notify the shipper by the end of the first working day after the estimated arrival date if the shipments have not been received. 	MP-TRNS-20.2 Section 3.1.1.19
4a	<p>Upon request from the field organization or other DOE organization, the contractor must evaluate carriers that transport of highway route controlled quantities of radioactive material in less-than-truckload (TL) quantities, any TL quantities of radioactive material, and hazardous waste in any quantity. A copy of the evaluation must be provided by the contractor to the field element within 30 days after completion of the carrier evaluation.</p>	MP-TRNS-20.2 Section 3.1.1.8 The AMWTP will only use carriers evaluated by DOE.
4b	<p>The contractor must ensure that rail tenders and tariffs reflect the lowest available commercial rates for the commodity.</p>	AMWTP does not ship by rail. If rail services are used, this requirement will be implemented.
4c	<p>Only carrier rates on file with field organizations, other Federal agencies, or a State commission will be used for shipments by common carrier on behalf of DOE or NNSA.</p>	MP-TRNS-20.1 Section 3.9.1.9.3
4d	<p>When the contractor uses other than a low-cost carrier or mode of transportation, for any shipment other than overnight express, a written justification or management approval statement must be retained.</p>	MP-TRNS-20.2 Section 3.1.1.7.2

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5	The contractor must include in shipping papers a 24-hour emergency response phone number as required by 49 CFR 172.604. The contractor must perform periodic tests/drills to ensure that the 24-hour emergency response system is operable.	Complying with DOT regulations invokes the first part of this requirement. AMWTP uses the WCC for the 24 hour emergency response phone number, except for WIPP shipments where the WIPP 24 hour number is used.
6a	The contractor must ensure that shipments are inspected upon receipt for damage or loss and evidence of leakage: <ul style="list-style-type: none"> a. Radioactive material shipments must be inspected for external contamination and radiation levels (10 CFR 835.405, Occupational Radiation Protection). b. Claims will be filed according to the provisions of the DOE Accounting Handbook and facility procedures. 	Requirement is met per MP-CMNT-10.3, Supply Chain Management.
6b	If a delivery conveyance is contaminated by the radioactive cargo or when surveys indicate potential exposure above acceptable limits, the transport vehicle must be detained and the carrier notified immediately to ensure that other potentially contaminated vehicles can be surveyed. (Release limits are specified in 49 CFR 177.843, Contamination of Vehicles.) Specific response will follow facility procedures.	MP-TRNS-20.2, Section 3.2.3.2
6c	Perform additional transfer checks and receipt measurements for nuclear materials (which have not been discarded as waste)	AMWTP does not handle these materials. If explosives are transported this requirement will be implemented.
7	Transport of explosive substances and articles	AMWTP does not transport these materials. If explosives are transported this requirement will be implemented.
8	The contractor must perform a self-assessment of transportation and packaging operations at least every 3 years to ensure compliance with applicable regulations.	MP-TRNS-20.2, Section 3.1.20

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DOE M 460.2-1, Attachment 2, Contractor Requirements Document		
1	All shipments will comply with the requirements of 49 CFR 100-185, except those that infringe upon maintenance of classified information.	MP-TRNS-20.2, Section 3.1.1.1
2a	Transportation Planning. The contractor must prepare a transportation plan with information on shipments of spent nuclear fuel, high-level waste, tritium-bearing reactor components, and transuranic waste shipments to the Waste Isolation Pilot Plan (WIPP) and submit it to the appropriate field element.	DOE/CAO 98-3103 for WIPP shipments. The AMWTP does not ship spent nuclear fuel, high-level waste, tritium-bearing reactor components. If these materials are shipped, a transportation plan will be prepared.
2b	For nonclassified shipments (by highway and rail) of spent nuclear fuel, high-level waste, and tritium-bearing reactor components, the contractor will perform an analysis of proposed routes using transportation models such as Transportation Routing Analysis Geographic Information System.	AMWTP does not ship spent nuclear fuel, high-level waste, or tritium-bearing reactor components. If these materials are shipped, this requirement will be implemented.
2c	Carrier/Driver Requirements. Upon request from the field element or DOE, the contractor must evaluate carriers. For carriers that transport highway route controlled quantities of radioactive material in less-than-truckload (TL) quantities, any TL quantities of radioactive material or hazardous waste will be evaluated by the contractor. A copy of the evaluation document must be provided by the contractor to the field element within 30 days after completion of the carrier evaluation.	MP-TRNS-20.2 Section 3.1.1.8 The AMWTP will only use carriers evaluated by DOE.

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2d	Shipment Prenotification. Before shipping spent fuel or high-level waste within or through a State or tribal jurisdiction, the contractor must prepare a letter, to be sent by registered mail with return receipt, to the State Governor (or the Governor’s designee) and tribal President or Governor (or tribal designee) postmarked at least 7 days before the shipment. Alternatively, a notification may be delivered by messenger to these same representatives at least 4 days before a shipment is transported within or through the State or tribal jurisdiction. A record must be retained in the shipping records file that includes the names of the persons contacted and the dates and times of the contacts.	AMWTP does not ship spent nuclear fuel or high-level waste. If these materials are shipped, this requirement will be implemented.
2e	Transportation Operational Contingencies. For spent fuel, high-level waste, tritium-bearing reactor components, and transuranic waste shipments to WIPP, the contractor must concur with the carrier that travel conditions are considered acceptable before dispatch. In the even of any substantial unanticipated delay in transit, the contractor will notify the affected states and tribes of the event through the DOE Transportation Tracking and Communication System (TRANSCOM).	This requirement is met through the shipper/driver/WIPP conference call required by MP-TRUW-8.12 for WIPP shipments. AMWTP does not ship spent fuel, high-level waste, and tritium-bearing reactor components. If these materials are shipped, this requirement will be implemented.

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2f	<p>Tracking. The contractor must use TRANSCOM for tracking and monitoring the following categories of shipments:</p> <ol style="list-style-type: none"> 1. Spent nuclear fuel (see DOE M 5632.1 C-1, Chapter 4; 2. Tritium-bearing reactor components; 3. high-level waste; and 4. transuranic waste destined for WIPP 	<p>This requirement is met per MP-TRUW-8.12 for WIPP shipments. AMWTP does not ship spent fuel, high-level waste, and tritium-bearing reactor components. If these materials are shipped, this requirement will be implemented.</p>
2g	<p>Inspections. The contractor must ensure preshipment inspections are done by the shipper and/or carrier to ensure compliance with regulatory standards. For highway shipments of spent nuclear fuel, high-level waste, tritium-bearing reactor components, and transuranic waste shipments to WIPP, the contractor must ensure shipments are made available, before departure, for inspection by certified State inspectors (Commercial Vehicle Safety Alliance Enhanced North American Standard Procedures (Level VI)] unless other arrangements have been made with the State.</p>	<p>This requirement is met per MP-TRUW-8.12 for WIPP shipments.</p> <p>For other shipment types MP-TRNS-20.2, Step 3.1.1.17.</p>
2h	<p>Recovery and Cleanup. The contractor must review truckload carrier's plans for recovery and cleanup or verify they have a contract with a remediation company. For shipments of spent nuclear fuel, high-level waste, tritium-bearing reactor components, and transuranic waste shipments to WIPP, the contractor must ensure carriers have specific written plans and procedures for providing recovery and cleanup in the event of an accident or incident.</p>	<p>This requirement is met per DOE/CBFO 94-1007, Rev. 3, Recovery Guide For TRU Waste Packages, for WIPP shipments. AMWTP does not ship spent fuel, high-level waste, and tritium-bearing reactor components. If these materials are shipped, this requirement will be implemented.</p>

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DOE M 461.1-1, Attachment 2, Contractor Requirements Document		
All		Section 2 of this Manual states that the requirements apply only to onsite packaging and transfer activities at DOE facilities that retain and transport nuclear explosives, per DOE O 452.2B, Safety of Nuclear Explosive Operations, and special nuclear material, nuclear components, or special assemblies, pursuant to DOE O 461.1B. The AMWTP does not conduct any onsite or offsite packaging and transfer activities of any of these materials. In addition, DOE O 461.1B does not apply to the AMWTP.
DOE O 461.1B, Attachment 2, Contractor Requirements Document		
All		Per section 3.c.3, this Order is not applicable to packaging and transportation of hazardous materials subject to DOE O 460.1B and DOE O 460.2, Chg 1, both of which are applied to the AMWTP.