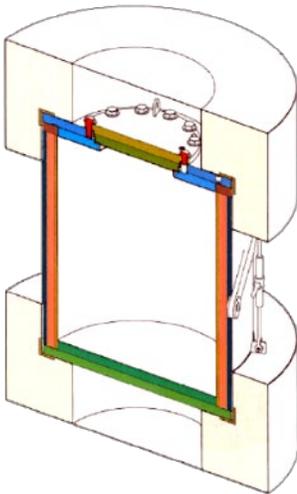


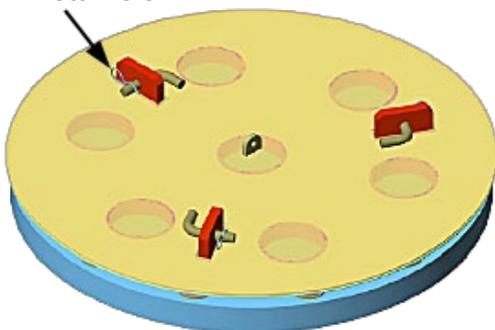
## 8-120B and 8-160B Type B Cask Packaging Update

Most of you may already know our two Type B certified casks have had a new challenge to ensure they meet the NRC 10 CFR 71 and the 1996 edition of IAEA TS-R-1 puncture and thermal hypothetical accident condition tests. We discovered a design discrepancy with both our 8-120B and 10-160B casks during an engineering review early this year. Both casks are designed with a donut-shaped upper impact limiter. The hole in the middle allows access to the secondary lid without removing the whole upper impact limiter by removing only a steel plate. A thermal shield placed on top of the secondary lid is now required per the new certificate of compliance. Please download the new cask manuals at: <http://www.energysolutions.com/customer-portal/cask-manuals.php>

Submitted by James Leonard



Pin Retainers



Secondary Lid Thermal-Shield

## Reminder: New Cargo Aircraft Only Label Deadline



The cargo aircraft only label with "DANGER" text will no longer be allowed to be used after December 31, 2012. Starting January 1, 2013, the new cargo aircraft only will be required on any radioactive material transported by air not allowed on passenger carrying aircraft. As a reminder, this label is required [49 CFR 172.402(c)] for all radioactive material shipments required to be in a specification package (LSA, SCO, Type A, Type B quantities), unless the material is intended for use in, or incident to, research, medical diagnosis or treatment and the transport index does not exceed 3.0 per 49 CFR 173.448(e), (f) & (g)(3).

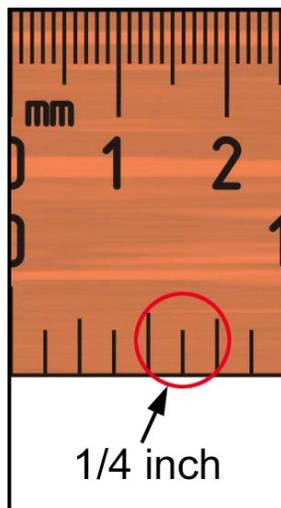
## Lesson Learned – Sharp Edges

Always be mindful and careful of your surrounds and equipment! It has been noted the cotter pins on our casks have sharp edges. When working around these cotter pins, especially when installing the rain cover, please take extra care to avoid or prevent contact with these pointed ends. Stay safe.



## A Quarter of an Inch Conversion

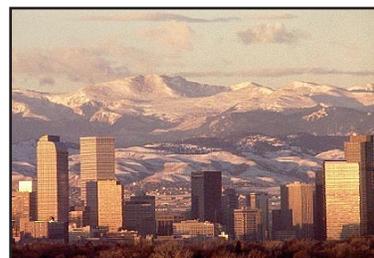
There are at least five places in 49 CFR Parts 100-180 where the measurement of a quarter of an inch is discussed. It is always preceded by the international units in millimeters, but not always the same value and they also change up the format of designating a quarter of an inch. So which one is correct? Four out of the five times, DOT is correct in the conversion. It is mentioned twice in the Special Provisions 172.102, specifically in B32 and TP45 using 6.35 mm (0.250 inch). That same conversion is also used in 173.315 NOTE 24. In 180.213 they change it up a little using 6.35 mm (1/4in.). But then in 173.137 an inaccuracy in conversion is made when they use 6.25 mm (0.25 inch). Its close: 6.25 mm converts to 0.246063 inch. In this case, the difference in conversion is actually more conservative for the application since it involves the corrosion rate on steel or aluminum as a minimum.



*Submitted by Brad Scott*

## New Course Lineup for 2013

There will be two (2) major changes to our NRC/DOT course schedule for 2013. First, we have moved all of our NRC/DOT/EPA Mixed Waste courses to cities near our disposal and processing facilities. We are still receiving feedback to have classes that will provide you an opportunity to tour either our Barnwell or Clive Disposal Sites, or our Bear Creek Processing Facility. If you will be shipping any hazardous material, hazardous waste and/or mixed waste to NRC/Agreement State licensed facility, or would like to know how to rule out these hazards from your radioactive material, than plan to attend one of our Mixed Waste Classes. Secondly, we have added Denver and Reno during summer time in 2013 for our main NRC/DOT radioactive shipping class. Please visit our website for the latest updates and information on our courses, newsletter and schedules at [www.energysolutionstraining.com](http://www.energysolutionstraining.com) Also, Monterey will be back with the addition of Key West in 2014. Look forward to seeing you in class!



## Frequently Asked Questions

Our FAQ topic below is about registering with DOT to offer or transport hazardous materials.

- **When do I have to register per 49 CFR 107.601 if I only ship class 7 radioactive material?**

### Reference # 00-0021

Registration is only required for radioactive material shipments that require placarding and shipments containing highway route controlled quantities(HRCQ).

- **If registration is required, must each wholly owned subsidiary of a company register?**

### Reference # 00-0231

Yes. Each subsidiary must register and pay the registration fee separately.

- **Do I have to register if I choose to placard when not required?**

### Reference # 01-0158

No. Registration is only necessary when required to placard.

- **If I broker a placarded shipment, will I need to register?**

### Reference # 02-0112

Yes. Registration is required for anyone who performs a regulated function (see 49 CFR 171.1) for a shipment that requires registration (see 49 CFR 107.601).

- **Must packaging manufacturers register?**

### Reference # 00-0200

No. Packaging manufacturers do not offer or transport hazardous materials.

- **Is there any documentation requirements associated with registration?**

### Reference: 49 CFR 107.620

Yes, a copy of the filed registration statement and the issued Certificate of Registration must be kept for 3 years at the principal place of business and just a copy of the Certificate of Registration on board each truck for carriers.

To access any DOT letters of interpretation, go to: <http://www.phmsa.dot.gov/hazmat> Then, click on: "Interpretations" Next, you can search by entering the reference number in the search box or search by the applicable regulatory section number, or search by the published date. Do not forget that you have these internet addresses (and many more) in a Word document on our training class CD handout.

## Recent Industry Issues



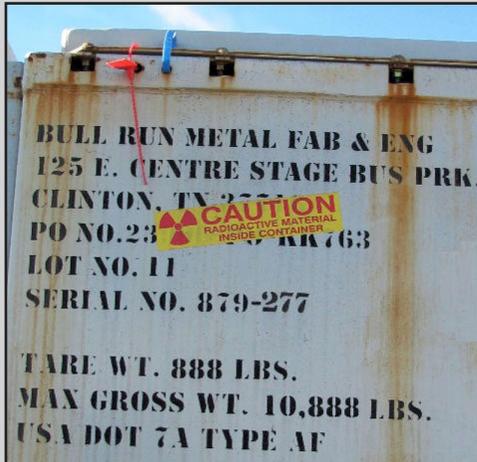
Should labels have any entries in the contents block? [49 CFR 172.403(g)(1)] If they were entered before transportation began, what can you do to prevent your entries from fading during transportation? [49 CFR 172.407(a)] Could the driver have prevented this if the shipper had provided extra filled-in labels? [49 CFR 177.800(b) & 177.801] Also, what are the required units in the activity block? [49 CFR 172.403(g)(2)]



What is the maximum spacing allowed around the pedestal when securing an ISO container (Sea Land, intermodal, freight, conex container) to a trailer? [49 CFR 393.126(b)(2)] Would this be the responsibility of the shipper per 49 CFR 173.30, 173.410(a), 173.427(a) (6), 177.804(a) and 177.842(d); or the driver's responsibility per 49 CFR 177.801, 177.804(a), 392.9(a)(1); or yes to both?

*(continued on page 4)*

## Recent Industry Issues (cont.)



Does the rust and yellow sticker look appropriate for a hazardous material shipping container? [49 CFR 173.1(b)] If this is a reusable radioactive material packaging, what will the rust say about the maintenance performed to ensure this package will still meet all the required packaging requirements prior to shipment? [49 CFR 173.22(a)(2) & (4) and 178.3] Will covering the manufacturer's name and address with a yellow sticker still meet the packaging marking visibility requirements in 49 CFR 178.3(a)(3)?

## New Rulings in the Federal Register

**On May 24, 2012 (77 FR 30976)**, the Pipeline and Hazardous Materials Safety Administration (PHMSA) published a notice of proposed rulemaking (NPRM) to amend the recordkeeping and package marking requirements for third-party labs and manufacturers to assure the traceability of packaging; clarify an acceptable range in specifications for resins used in the manufacture of plastic drums and Intermediate Bulk Containers (IBCs); remove the listing for "Gasohol, gasoline mixed with ethyl alcohol, with not more than 10% alcohol, NA1203"; harmonize internationally and provide a limited quantity exception for Division 4.1, Self-reactive solids and Self-reactive liquids Types B through F; allow smokeless powder classified as a Division 1.4C material to be reclassified as a Division 4.1 material to relax the regulatory requirements for these materials without compromising safety; and provide greater flexibility by allowing the Dangerous Cargo Manifest to be in locations

designated by the master of the vessel besides on or near the vessel's bridge while the vessel is in a United States port. Comments must be received by July 23, 2012.

**On May 25, 2012 (77 FR 31275)**, the PHMSA published a NPRM to amend the Hazardous Material Regulations (HMR) with recent revisions to international standards for the transport of hazardous materials by all modes. One change to the HMR will be the phase out of the "ORM-D system" by air transport beginning January 1, 2013 and allowing continued use of "Consumer commodity, ORM-D" and the limited quantity square-on-point mark containing the ID number for domestic highway, rail and vessel transportation until December 31, 2015. Comments must be received by July 24, 2012.

**On June 11, 2012 (77 FR 34194)**, the Nuclear Regulatory Commission (NRC) published a final rule to require licensees to provide advance notification to participating Federally recognized Tribal governments regarding shipments of irradiated reactor fuel and certain nuclear wastes for any shipment that passes within or across their reservations. The rule extends to Tribal officials, his or her designee, and Tribal law enforcement personnel relief from fingerprinting requirements required for access to Safeguards Information (SGI). The participating Tribal government is required to protect the shipment information as SGI. This final rule is effective on August 10, 2012.

**On June 11, 2012 (77 FR 34411)**, the NRC published a notice to solicit public comments on a revised draft Revision 1 of its Branch Technical Position on Concentration Averaging and Encapsulation (CA BTP). An earlier draft was completed in August 2011 and made available to the public in September 2011. After receiving and addressing public comments on this revised draft, the NRC will finalize the CA BTP to replace the 1995 version now in effect. Submit comments by October 8, 2012.

**On June 12, 2012 (77 FR 34846)**, the Federal Motor Carrier Safety Administration (FMCSA) published a final rule to eliminate the requirement for drivers operating intermodal equipment (IME) to submit and intermodal equipment providers (IEPs) to retain driver-vehicle inspection reports (DVIRs) when the driver has neither found nor been made aware of any defects in the IME. This final rule is effective June 12, 2012.

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**New Rulings in the Federal Register (cont.)**

**On June 29, 2012 (77 FR 38859)**, the NRC published an updated listing of Governors’ Designees Receiving Advance Notification of Transportation of Certain Shipments of Nuclear Waste and Spent Fuel to comply with 10 CFR 71.97. Current State contact information can also be accessed throughout the year at <http://nrc-stp.ornl.gov/special/designee.pdf>.

**On July 6, 2012 (77 FR 39899)**, the NRC published a final rule to make technical corrections to 10 CFR Chapter I, including updating the street address for its Region I office, correcting authority citations and typographical and spelling errors, and making other edits and conforming changes. This rule is effective August 6, 2012.

**On July 9, 2012 (77 FR 40385)**, the NRC published a notice to withdraw regulatory guide (RG) 7.3, “Procedures for Picking Up and Receiving Packages of Radioactive Material.” The RG is being withdrawn because it is outdated and the relevant information contained in it has been updated and incorporated into Revision 1 of RG 7.7, “Administrative Guide for Verifying Compliance with Packaging Requirements for Shipment and Receipt of Radioactive Material,” which was issued on March 28, 2012 (77 FR 18871) in the Federal Register.

**On August 15, 2012 (77 FR 49168)**, the PHMSA published a NPRM to amend the Hazardous Materials Regulations to maintain alignment with international standards by incorporating various amendments. Shipping class 7 radioactive material is not addressed in this ruling. One change for all hazard classes will be the size of non-bulk markings to at least 12 mm for > 30 kg or > 30 L packaging capacity; at least 6 mm for < 30 kg or < 30 L packaging capacity; or appropriate size if < 5 kg or < 5 L packaging capacity. Comments must be received by October 15, 2012.

**On August 27, 2012 (77 FR 51706)**, the FMCSA published a final rule to amend the definition of gross combination weight rating (GCWR). FMCSA is removing the option of using the actual measured gross combination weight as the GCWR, if the vehicle manufacturer does not include the GCWR information on the vehicle certification label required by the National Highway Traffic Safety Administration (NHTSA). FMCSA has determined the definition should not include what is essentially guidance that is difficult for the motor carrier and enforcement communities to use. Therefore, FMCSA amends this definition to state that the GCWR is the value specified by the commercial motor vehicle manufacturer. This final rule is effective October 26, 2012

*Submitted by James Leonard*

**2012 Training Schedule**

Course	Date	Location
Load Securement for Drivers and Traffic Personnel	September 5, 2012	Richland, WA
Federal Motor Carrier Safety Regulations for Drivers	September 6, 2012	Richland, WA
Load Securing of Radioactive Materials	September 10, 2012	Salt Lake City, UT
NRC/DOT Experienced Radioactive Waste Shipper Refresher Training	September 11-13, 2012	Salt Lake City, UT
Clive Disposal Site Facilities Tour	TBA	Salt Lake City, UT
Advanced Radioactive Material Shipper Certification Training	September 11-13, 2012	Richland, WA
Hazardous Material General Awareness Transportation Training	September 12, 2012	Richland, WA
Air Transport of Radioactive Materials Training	September 14, 2012	Salt Lake City, UT
Advanced Radioactive Material Shipper Certification Training	September 18-20, 2012	Las Vegas, NV
Federal Motor Carrier Safety Regulations for Managers / Supervisors	September 18 – 19, 2012	Richland, WA
Federal Motor Carrier Safety Regulations for Drivers	September 20, 2012	Richland, WA
Reasonable Suspicion Training for Supervisors	September 20, 2012	Richland, WA
DOT/NRC Hazardous Waste/Mixed Waste Packaging, Transportation and Disposal	September 24-27, 2012	Oak Ridge, TN
Air Transport of Radioactive Materials	September 28, 2012	Oak Ridge, TN
Load Securing of Radioactive Materials	September 28, 2012	Oak Ridge, TN

*(continued on page 6)*

**2012 Training Schedule (cont.)**

<b>Course</b>	<b>Date</b>	<b>Location</b>
Advanced Hazardous Waste Shipper Certification Training	October 9-11, 2012	Richland, WA
Hazardous Material General Awareness Transportation Training	October 9, 2012	Richland, WA
Hazardous Materials Drivers Training	October 10, 2012	Richland, WA
Highway Route Control Quantity (HRCQ)	October 16, 2012	Richland, WA
Hazardous Material General Awareness Transportation Training	October 16, 2012	Richland, WA
Federal Motor Carrier Safety Regulations for Drivers	October 17, 2012	Richland, WA
Load Securement for Drivers and Traffic Personnel	October 11, 2012	Richland, WA
Advanced Mixed Waste Shipper Certification Training	October 22-25, 2012	Richland, WA
Hazardous Material General Awareness Transportation Training	October 23, 2012	Richland, WA
DOT/NRC Radioactive Waste Packaging, Transportation and Disposal Training	October 29 – November 1, 2012	Hilton Head Island, SC
Hazardous Material General Awareness Transportation Training	November 1, 2012	Richland, WA
Air Transport of Radioactive Materials	November 2, 2012	Hilton Head Island, SC
Load Securing of Radioactive Materials	November 2, 2012	Hilton Head Island, SC
IATA: Transportation of Dangerous Goods by Air Shipper Certification Training	November 6-8, 2012	Richland, WA
Hazardous Material General Awareness Transportation Training	November 6, 2012	Richland, WA
Load Securement for Drivers and Traffic Personnel	November 8, 2012	Richland, WA
Basic Level Transportation Training – Module 1 – Basic Hazardous Material	November 12-14, 2012	Richland, WA
Basic Level Transportation Training – Module 2 – Basic Hazardous Waste	November 14, 2012	Richland, WA
Basic Level Transportation Training – Module 3 – Basic Radioactive Material	November 15-16, 2012	Richland, WA
Hazardous Material General Awareness Transportation Training	November 13, 2012	Richland, WA
Federal Motor Carrier Safety Regulations for Drivers	November 14, 2012	Richland, WA
Advanced Radioactive Material Shipper Certification Training	November 27-29, 2012	Las Vegas, NV
Advanced Hazardous Waste Shipper Certification Training	November 27-29, 2012	Richland, WA
Hazardous Material General Awareness Transportation Training	November 29, 2012	Richland, WA
DOT/NRC Radioactive Waste Packaging, Transportation and Disposal Training	December 3-6, 2012	Las Vegas, NV
Highway Route Control Quantity (HRCQ)	December 4, 2012	Richland, WA
Federal Motor Carrier Safety Regulations for Drivers	December 6, 2012	Richland, WA
Air Transport of Radioactive Materials	December 7, 2012	Las Vegas, NV
Load Securing of Radioactive Materials	December 7, 2012	Las Vegas, NV
IATA: Transportation of Dangerous Goods by Air Shipper Certification Training	December 10-12, 2012	Las Vegas, NV
Advanced Radioactive Material Shipper Certification Training	December 11-13, 2012	Richland, WA
Transport of Lithium Batteries by Air/Highway	December 13, 2012	Las Vegas, NV
Hazardous Material General Awareness Transportation Training	December 13, 2012	Richland, WA
Hazardous Materials Drivers Training	December 18, 2012	Richland, WA
Advanced Hazardous Material Shipper Certification Training	December 18-19, 2012	Richland, WA
Load Securement for Drivers and Traffic Personnel	December 20, 2012	Richland, WA

For more information check our website at: <http://www.energysolutionstraining.com>