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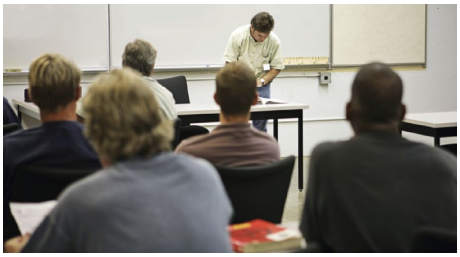
Vol. 18, No. 1, March 2019 Training Resources and Information for the Nuclear Industry

## What to Expect When Attending an Atkins/SNC-Lavalin Course

Some of you are "old hands" when it comes to attending Atkins/SNC Lavalin courses. For those who are newer, we thought it would be important for you to know what to do and what to expect when you attend our courses.



**First, read your confirmation.** Many of the questions you have will be answered in the information you receive when you register. If you still have questions, you can contact any of the staff members on our website by email or phone. Our website address is **www.atkinsglobal.com/energytraining**.

**Second, know where you are going.** We teach many classes at the Volpentest HAMMER Federal Training Center in Richland, Washington. Here are some things to know if you attend a class at HAMMER:

- The address is 2890 Horn Rapids Road, Richland, WA 99354
- Classes begin at 6:30 am.
- There is a cafeteria that serves breakfast and lunch between 5:45 am and 1:00 pm Monday through Thursday.
- Refrigerators and microwaves are available for student use.
- During inclement weather you can call the Hanford Hotline (509) 376-9999 to check on delays, closures, and early release. Hanford's website, Hanford.gov, may also be helpful.
- Badges are not required.

We teach many classes at the DOE Facility in North Las Vegas, Nevada currently operated by MSTS. Here are some things to know:

- The address is 2621 Losee Road, North Las Vegas, NV 89030.
- Classes begin at 8:00 am, however if you are attending the Basic Transportation Modules, class begins at 7:00 am.
- Badges are required and must be worn visibly. If you have a universal DOE badge, you don't need a visitor badge. If you do not have a universal DOE badge, you will need a visitor badge (no picture).
- We provide the class roster to MSTS Security for badging of students. The Badging Office opens at 6:30 am. Proper identification is required.
- If you do not drive through the gate, (i.e., if you are dropped off outside the gate) you will need a pin number to enter through the walk-through gate. Please let the badging personnel know that you will need access through the walk-through gate.
- There is a cafeteria on the premises.
- There are refrigerators available for student use.

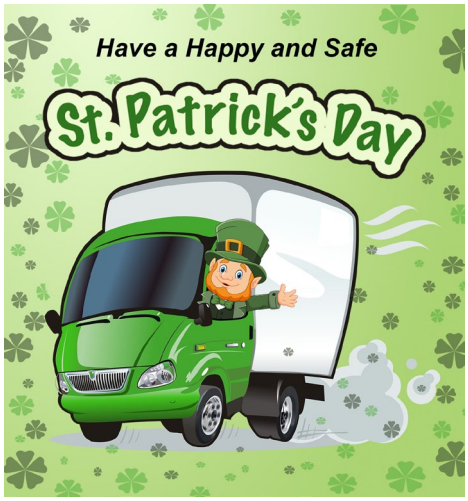
Classes are sometimes held at the National Museum of Nuclear Science and History in Albuquerque.

- The address is 601 Eubank Blvd SE, Albuquerque, NM 87123.
- Classes begin at 8:00 am, however if you are attending the Basic Transportation Modules, class begins at 7:00 am.
- No badges required.
- There is no cafeteria but there are restaurants within driving distance
- No student refrigerators available.

Generally, if we have classes in other locations, specific information will be provided to you in the registration confirmation. All classes include the materials students need to complete the course. For some classes, you will be asked to bring a calculator that has scientific notation capability.

**Third,** we recommend that if you are traveling out of town for training, book your return trip for the day after the class. This allows plenty of time for testing on the last day without the stress of having to catch a flight.

As mentioned above, if you have questions, feel free to contact any of the staff listed on our website.



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Vol. 18, No. 1, March 2019 Training Resources and Information for the Nuclear Industry

## Do Your Hazmat Employee Training Records Meet the Requirements?

Most employees who are involved in transportation of hazardous materials know that they need transportation training every 3 years. But do all employers know that there are specific record keeping requirements for training their employees?

The requirements can be found in 49 CFR 172.704(d) which states:

(d) *Recordkeeping.* Each hazmat employer must create and retain a record of current training of each hazmat employee, inclusive of the preceding three years, in accordance with this section for as long as that employee is employed by that employer as a hazmat employee and for 90 days thereafter. A hazmat employer must make a hazmat employee's record of current training available upon request, at a reasonable time and location, to an authorized official of the Department of Transportation or of an entity explicitly granted authority to enforce the HMR. The record must include:

(1) The hazmat employee's name;

(2) The most recent training completion date of the hazmat employee's training;

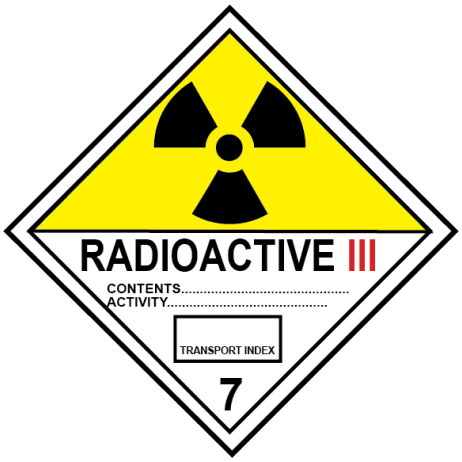
(3) A description, copy, or the location of the training materials used to meet the requirements in paragraph (a) of this section;

(4) The name and address of the person providing the training; and

(5) Certification that the hazmat employee has been trained and tested, as required by this subpart.

When you attend an Atkins/SNC Lavalin course, you will receive a certificate that contains all the above information. Making a copy of the certificate and filing the copy will fulfill those requirements. If an auditor requests to see the training materials (item 3), we have them here in our Richland office. Contact us and we will gladly work with you to provide the materials requested.

## How Do I Get All These Radionuclides on That Little Line?




People who ship radioactive material recognize that it can be difficult, at best, to try to fit all those radionuclides on a radioactive label. How many are required?? How many need to be squeezed in there?? There is an answer for that in 173.433(g) and 172.403(g)(1).

First is the "95% Rule" in 173.433(g) which applies to both labels and shipping papers. Readers discover that they only need to list the radionuclides that are contributing to 95% of the A value (note that this is not the activity).

Here are the steps:

- Divide the activity of each radionuclide by its individual A value. This is called the "fraction" for each
- Add up all the fractions
- Multiply the sum by 0.95
- This is the number you will use as your goal value of 95%
- Going back to the individual fractions, start with the highest fraction and add the next highest, and then the next highest, etc., until the number reaches or exceeds the goal value
- The radionuclides that need to be shown on the label and shipping paper will be those included in the goal value

Hopefully and typically, you will end up with 3-4 major players.

Now to the label: In 172.403(g)(1) there is a sentence that states: "For mixtures of radionuclides, with **consideration of space available on the label**, the radionuclides that must be shown must be determined in accordance with 173.433(g).

This implies that there is some "wiggle room" to only list the very top contributors that actually fit in the space on the label. This is ultimately the shipper's call and should be documented if it is ever questioned.

This is one of the many things you will learn when you attend an Atkins/SNC Lavalin Advanced Radioactive Material or Advanced Mixed Waste Shipper Certification training. See our line-up at www.atkinsglobal.com/energytraining

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Vol. 18, No. 1, March 2019 Training Resources and Information for the Nuclear Industry

# Latest Happenings in the Federal Register

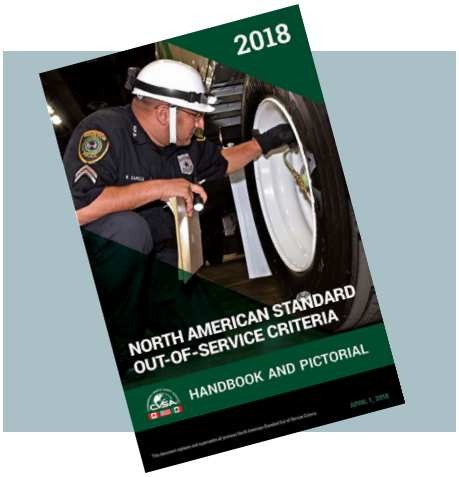
## Motor Carrier Identification Report Input Requested

The Federal Motor Carrier Safety Administration (FMCSA) announced its plan on February 6, 2019 (84 FR 2317) to submit the Information Collection Request (ICR) to the Office of Management and Budget (OMB) for its review and approval and invites public comment.

FMCSA requests approval to revise an ICR titled, "Motor Carrier Identification Report," which is used to identify FMCSA regulated entities, help prioritize the agency's activities, aid in assessing the safety outcomes of those activities, and for statistical purposes. This ICR is being revised due to a final rule dated January 17, 2017, titled, "Unified Registration System; Suspension of Effectiveness," effective January 14, 2017, which suspended its regulations requiring existing interstate motor carriers, freight forwarders, brokers, intermodal equipment providers (IEPs), hazardous materials safety permit (HMSP) applicants, and cargo tank facilities under FMCSA jurisdiction to submit required registration and biennial update information to the Agency via a new electronic on-line Unified Registration System (URS).

During this suspension, entities needing to file will follow the same procedures and forms used to submit information to FMCSA as they did prior to January 14, 2017, including use of Form MCS-150 or MCS-150B. The Form MCS-150 or MCS-150B will also be used by the small number of Mexico-domiciled motor carriers that seek authority to operate beyond the United States municipalities on the United States-Mexico border and their commercial zones. This ICR is necessary to ensure regulated entities are registered with the DOT. Comments must be received on or before April 8, 2019.

## Safety Permit Regs Update Reference to CVSA Handbook




On December 31, 2018 (83 FR 67705) the Federal Motor Carrier Safety Administration (FMCSA) proposed to amend its Hazardous Materials Safety Permits regulations to incorporate by reference the updated Commercial Vehicle Safety Alliance (CVSA) handbook. The Out-of-Service Criteria provide uniform enforcement tolerances for roadside inspections to enforcement personnel nationwide, including FMCSA's State partners. Currently, the regulations reference the April 1, 2016, edition of the handbook. Through this notice, FMCSA proposes to incorporate by reference the April 1, 2018, edition. Comments on this document must be received on or before January 30, 2019.

## Transportation Pop Quiz

1. Placarding is only required for the primary hazard class. **T or F**

2. A 55 gallon drum containing radioactive material requires how many radioactive labels?

3. Vehicle load securement is only required for drivers who hold a CDL and operate a CMV. **T or F**

4. If a death occurs due to the hazmat being transported, the National Response Center must be notified within 2 hours of the incident. **T or F**

5. A commercial motor vehicle (CMV) operating in interstate commerce that is required to have a DOT number must always be operated by a CDL driver. **T or F**

## Answers

1. False – Subsidiary placarding is required for certain materials in 49 CFR 172.505

2. Two – 49 CFR 172.403

3. False – Load securement is required by all states for any kind of material and for any driver

4. False – 49 CFR 171.15 states notification must be made as soon as practical but no later than 12 hours

5. False – 49 CFR 383.5. A CMV with a DOT number would not require a CDL driver if: the vehicle did not require placarding; is under 26,001 lbs.; or is carrying 15 passengers or less including the driver

the Moderator

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Vol. 18, No. 1, March 2019 Training Resources and Information for the Nuclear Industry

# Class Schedule March 2019 – May 2019

| Course | Date | Location |
|---|---|---|
| Federal Motor Carrier Safety Regulations for Drivers | March 6, 2019 | Richland, WA |
| Hazardous Material General Awareness Transportation Training | March 7, 2019 | Richland, WA |
| Basic Level Transportation Training – Mod 1 – Basic Hazardous Material | March 11-12, 2019 | Richland, WA |
| Basic Level Transportation Training – Mod 2 – Basic Hazardous Waste | March 13, 2019 | Richland, WA |
| Basic Level Transportation Training – Mod 3 – Basic Radioactive Material | March 13-14, 2019 | Richland, WA |
| Load Securement for Drivers and Traffic Personnel | March 12, 2019 | Richland, WA |
| Advanced Hazardous Waste Shipper Certification Training | March 12-14, 2019 | Richland, WA |
| Hazardous Materials Drivers Training | March 13, 2019 | Richland, WA |
| Federal Motor Carrier Safety Regulations for Drivers | March 19, 2019 | Los Alamos, NM |
| Load Securement for Drivers and Traffic Personnel | March 20, 2019 | Los Alamos, NM |
| Advanced Hazardous Waste Shipper Certification Training | March 19-21, 2019 | Albuquerque, NM |
| Advanced Radioactive Material Shipper Certification Training | March 26-28, 2019 | Los Alamos, NM |
| Advanced Radioactive Material Shipper Certification Training | April 2-4, 2019 | Las Vegas, NV |
| Federal Motor Carrier Safety Regulations for Drivers | April 3, 2019 | Richland, WA |
| Hazardous Material General Awareness Transportation Training | April 4, 2019 | Richland, WA |
| Load Securement for Drivers and Traffic Personnel | April 10, 2019 | Richland, WA |
| Advanced Radioactive Material Shipper Certification Training | April 16-18, 2019 | Richland, WA |
| IATA: Transportation of Dangerous Goods by Air Shipper Cert. Training | April 23-25, 2019 | Las Vegas, NV |
| Hazardous Material General Awareness Transportation Training | April 24, 2019 | Richland, WA |
| Federal Motor Carrier Safety Regulations for Drivers | May 1, 2019 | Richland, WA |
| Load Securement for Drivers and Traffic Personnel | May 2, 2019 | Richland, WA |
| Advanced Mixed Waste Shipper Certification Training | May 6-9, 2019 | Albuquerque, NM |
| Hazardous Material General Awareness Transportation Training | May 7, 2019 | Richland, WA |
| General Packaging Requirements for the Transport of Hazmat | May 21, 2019 | Richland, WA |
| Advanced Mixed Waste Shipper Certification Training | May 20-23, 2019 | Las Vegas, NV |
| Radioactive Material Packaging Training | May 22, 2019 | Richland, WA |
| Hazardous Material General Awareness Transportation Training | May 23, 2019 | Richland, WA |
| Federal Motor Carrier Safety Regulations for Drivers | May 29, 2019 | Richland, WA |
| Advanced Mixed Waste Shipper Certification Training | May 13-16, 2019 | Richland, WA |

**Class dates and locations are subject to change**

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www.atkinsglobal.com/energytraining

for course descriptions, pricing, and registration forms.