

Section 1: High-Quality Drivers and Carrier Compliance

Lead States: Colorado, New Mexico

The Issue: Highly qualified, well-trained drivers; diligent vehicle maintenance; carrier compliance with regulations; and enhanced carrier and driver performance requirements can greatly reduce the risk and consequences of truck incidents.

The Objective: Establish, implement, and maintain an enhanced carrier contract and management plan for the dedicated WIPP carriers, focusing on high quality drivers and vehicles.

The Approach: Although the possibility of incidents cannot be eliminated, it can be significantly reduced by requiring stringent driver qualifications and training; through strict adherence to all applicable laws and regulations; and special provisions in the carriers' transportation contracts to enhance safety and performance.

In 2007, DOE-CBFO awarded an unrestricted contract and a small business set-aside contract to two different commercial carriers. The contracts provide truck transportation of transuranic waste to WIPP for a period of five years. Under these contracts, the two carriers are required to dedicate designated trucks and drivers for TRU waste shipments to WIPP.

DOE recognizes the experience and expertise of state regional group organizations including WGA in working with carriers to ensure the safe and uneventful transportation of TRU waste to WIPP. The Technical Advisory Group has been able to provide suggested requirements for the WIPP transportation contract and the carrier's management plan. The contract and management plan ~~includes~~include above minimum regulatory requirements for driver qualifications, driver performance, driver training, carrier performance, inspection requirements, and vehicle maintenance. These and other safety requirements are described in detail in *Model Safety Elements in the WIPP Transportation Contract and Corresponding Carrier Management Plan*.

The Technical Advisory Group will participate in the carrier acquisition process through (1) the development of technical contract requirements (these requirements will drive the development and implementation of the carriers' transportation management plans as directed by DOE and concurred with by the TAG) and (2) the technical evaluation of proposals. This participation will occur in accordance with applicable procurement regulations.

The Technical Advisory Group established ~~the Independent Contract Carrier Review~~a Compliance Audit Program to verify compliance by the contract carriers with all applicable laws, regulations, and other requirements. This program involves regularly scheduled site visits to the contract carrier's facilities by a designated state authority where record keeping audits and other inspection functions are performed. ~~Carrier Review~~Audit checklists that identify applicable statutory, regulatory, and contractual

requirements, were developed for use during the review~~audit~~ process. These checklists have been reviewed, modified and approved by the Technical Advisory Group, DOE-CBFO, and contract carriers.

The DOE-CBFO and Western States agree that Carrier Reviews~~audits~~ of companies awarded carrier contracts for shipments of transuranic waste in Western States will be performed. Where possible these Carrier Reviews will be performed by the host state which is the state designated as the carrier's headquarters by the United States Department of Transportation (USDOT). ~~In the unlikely event that one or more host states are unwilling to perform the Carrier Reviews, those carriers will be reviewed by the State of New Mexico. audits will be performed by the host state. In the event the host state is in not part of the WGA region, WGA requests that one of the lead states be allowed to observe audits of the carrier. These audits will be completed by the company's host state on a quarterly basis for new carriers (during the first year) and twice a year for established carriers. The frequency of these audits and the check lists used will be reassessed periodically by the Technical Advisory Group and DOE-CBFO. Consultation and coordination with the DOE, its contractors/subcontractors, DOT, and other interested and affected entities will remain an important, integral component of the Compliance Audit Program.~~

When a contract carrier resides in a host state outside of the WGA state regional group (SRG), WGA will seek to partner with the SRG to which that host state belongs and develop a joint independent contract carrier review program. Documentation of any such joint program will be included as a supplement to this guide.

These Carrier Reviews will be completed by the contract carrier's host state or the State of New Mexico on an annual basis. Consultation and coordination with the DOE, its contractors/subcontractors, USDOT, and other interested and affected entities will remain an important, integral component of the Independent Contract Carrier Review Program.

Evaluation: On an annual basis, the WGA Co-Lead~~lead~~ states and any other host state will review whether revisions are required to the checklists to incorporate changes in the applicable transportation requirements. Proposed revisions will be presented to the WGA Transportation Technical Advisory Group, corresponding SRG, DOE-CBFO and its contract carriers for their consideration and approval. Upon approval, the checklists will be revised accordingly and used during subsequent Carrier Reviews~~compliance audits~~.

DOE-CBFO will work with the host states and corresponding SRGs to ensure that Carrier Reviews~~audits~~ of all contract carriers are performed on an annual basis.

Each host~~utilizing either the host state, for the carrier, or another organization as selected by DOE-CBFO (since DOE-CBFO cannot mandate that host states be required to perform the audits).~~ The Host state will analyze the Carrier Review and prepare a final summary of findings that will be shared initially with the contract carrier. The states

conducting all WGA Motor Carrier Audit Reports. Copies of the Carrier Reviews will submit summary findings to USDOE as well as to their respective Regional Group Office. Information audits from Carrier Reviews will be shared between WGA and corresponding SRGs. The regions will prepare a biennial review carrier review for inclusion in the WGA all WIPP Biennial Review.

Copies of formal audits from all contract carriers transportation companies will be presented by DOE-CBFO to the regional coordinating organizations for dissemination to their member states. For the west, these reports will be analyzed by the lead states. Audit deficiencies, along with recommendations for correcting identified deficiencies, will be discussed at the next Technical Advisory Group meeting.

Table 1: High–Quality Drivers and Carrier Compliance

Lead States: Colorado, New Mexico

Documents	Responsible for Updates	Status
-----------	-------------------------	--------

<i>Documents included in Guide</i>		
<i>Model Safety Elements in the WIPP Transportation Contract and Corresponding Carrier Management Plan, New Mexico, Revised January 1996.</i>	NM	Final
<i>WIPP Project Compliance Review Driver Checklist, Colorado State Patrol (CSP), July 1995.</i>	CSP	Final
<i>WIPP Project Compliance Review Vehicle Checklist, Colorado State Patrol (CSP), July 1995.</i>	CSP	Final
<i>Letter from DOE-CBFO to WGA regarding the WIPP carrier selection process. June 2008</i>	DOE	Final