

## Section 2: Independent Inspections

Lead States: Idaho, Washington

**The Issue:** A quality, independent inspection program assures that drivers and vehicles perform at optimum levels and that radiation levels are within allowable limits.

**The Objective:** Reduce the chance of incidents from mechanical failure or human error by identifying and correcting defects before they pose a threat to shipment safety.

**The Approach:** Inspection and enforcement activities for radioactive material transportation are shared by federal and state agencies. Implementation of the inspection program by state personnel will provide independent verification of regulatory compliance, enhancing public confidence in the safety of the WIPP shipping campaign. The DOE selected the Commercial Vehicle Safety Alliance (CVSA), an organization of state motor carrier officials responsible for the administration and enforcement of motor carrier safety laws, to develop an inspection and enforcement program. CVSA has since developed the uniform inspection procedures and a model agreement for inspection reciprocity for radioactive material shipments entitled the *CVSA Enhanced North American Safety Inspection Standards - Level VI* (CVSA Level VI).

These inspection procedures were developed with the assistance of the Conference of Radiation Control Program Directors. The procedures provide uniform standards for radiation surveys, inspection of drivers, shipping papers, vehicles, and packages. The standards also provide for vehicle inspections at points-of-origin and-destination, and for en route inspections. The enhanced inspection procedures also require a higher level of out-of-service criteria than the North American Inspection Standards.

A comprehensive interstate inspection program should be based on a process that is consistent from state-to-state in terms of training, procedures, and application. The CVSA Enhanced Inspection Program meets these consistency requirements. The Western Corridor States inspect the WIPP shipments using the CVSA Enhanced Inspection Criteria. The DOE has agreed that vehicles carrying waste to the WIPP will comply with the out-of-service standards of the enhanced criteria.

CVSA Level VI inspections will be performed at the point of origin. Shipments shall be defect free before dispatch. Before dispatch a CVSA Level VI decal will be affixed to the tractor certifying the shipment has met inspection criteria and is defect free. During transit, to the WIPP, each state may inspect the shipment to verify that the CVSA Level VI inspection was performed and that the sticker verifying such is attached. Individual states may choose to perform en route inspections on shipments according to law or policy. Any reinspection en route should be performed in accordance with CVSA guidelines.

A CVSA Level VI inspection should be conducted if the tractor and trailer have been

separated or an accident or other off-normal event has occurred.

**Evaluation:** The Technical Advisory Group, DOE-CBFO, and CVSA all agree that the personnel completing the WIPP shipment inspections need to be competent and that all inspections are of the highest quality. The validity of the CVSA Enhanced North American Inspection Standards has been tested using other DOE radioactive material shipping campaigns. In October 1999, the CVSA prepared a final report with the findings from the different shipping campaigns. Additionally, the Technical Advisory Group and DOE-CBFO have used these standards and procedures to inspect over 6,000 WIPP shipments. CVSA maintains a statistical data base on these shipments and reports to the Technical Advisory Group periodically.

The Technical Advisory Group will continue to review CVSA's periodic report and monitor the WIPP shipping campaign, comparing the data for variances or oddities. Findings from these comparisons will be used to improve the inspections of the WIPP shipments and recommend changes as appropriate.

Table 2: Independent Inspections

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Documents	Responsible for Updates	Status
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<b><i>Documents Included in Guide</i></b>		
<i>CVSA Final Report - Executive Summary, CVSA, October 1999.</i>	CVSA	Final
<i>CVSA/DOE Spent Fuel/Transuranic/High Level Radioactive Waste Pilot Study Inspection Form, CVSA.</i>	CVSA	Final
<i>WIPP Shipment Inspection Locations, February 2008</i>	WA	Final
<i>WIPP Shipment Level VI Inspection Policies by State, February 2008.</i>	WGA	Final
<i>Marking, Labeling and Placarding of WIPP Shipments containing Contact-Handled Transuranic (CH-TRU) Waste, New Mexico, April 1998.</i>	NM	Final

<b><i>Reference Material</i></b>		
<i>Recommended National Procedures for the Enhanced Safety Inspection of Commercial Highway Vehicles Transporting Transuranics, Spent Fuel, and High-Level Radioactive Wastes, CVSA, May 1993.</i>	CVSA	Final
<i>CVSA Training Course Information.</i>	CVSA	Final
<i>Cesium Transportation Campaign: Report on CVSA/DOE Pilot Study Inspection Activities, CVSA</i>	CVSA	Final