



Pipeline and Hazardous Materials Safety Administration

Office of Hazardous Materials
Enforcement
Karen Plessas

July 21, 2010

DOT Presentation

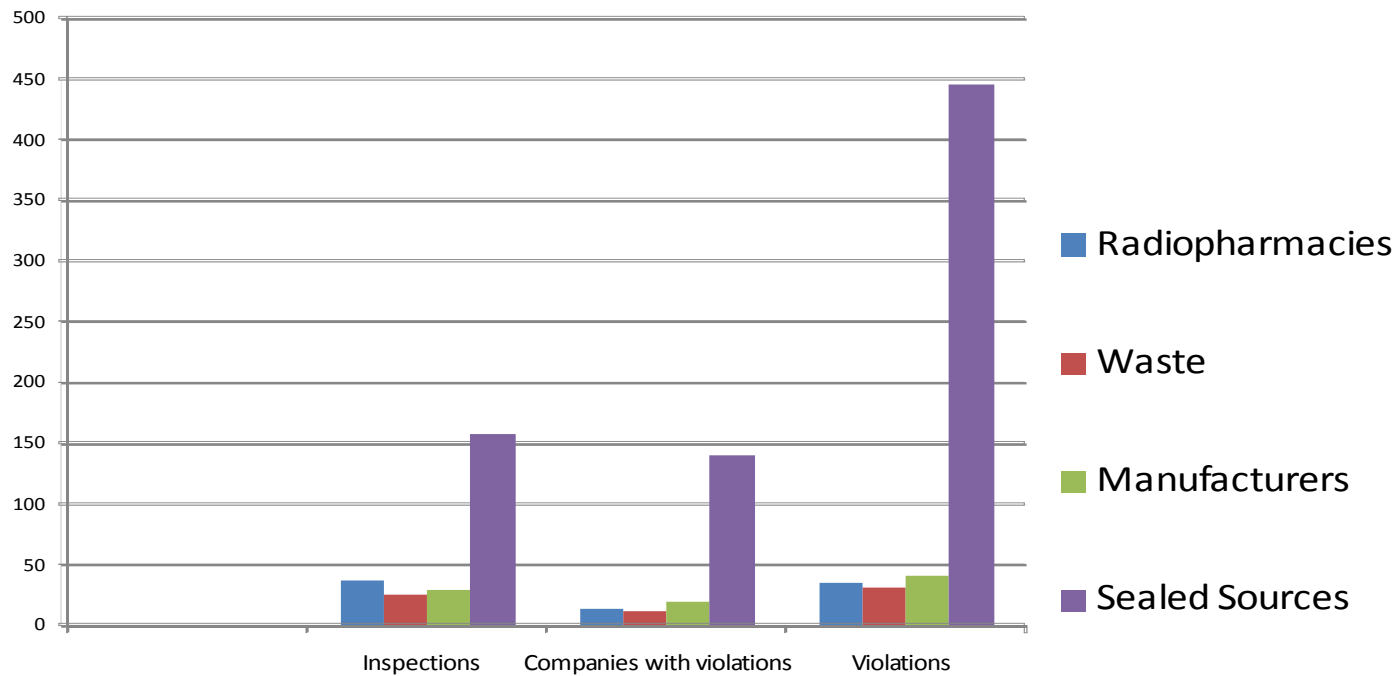
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Lessons Learned by a Radioactive Materials Investigator

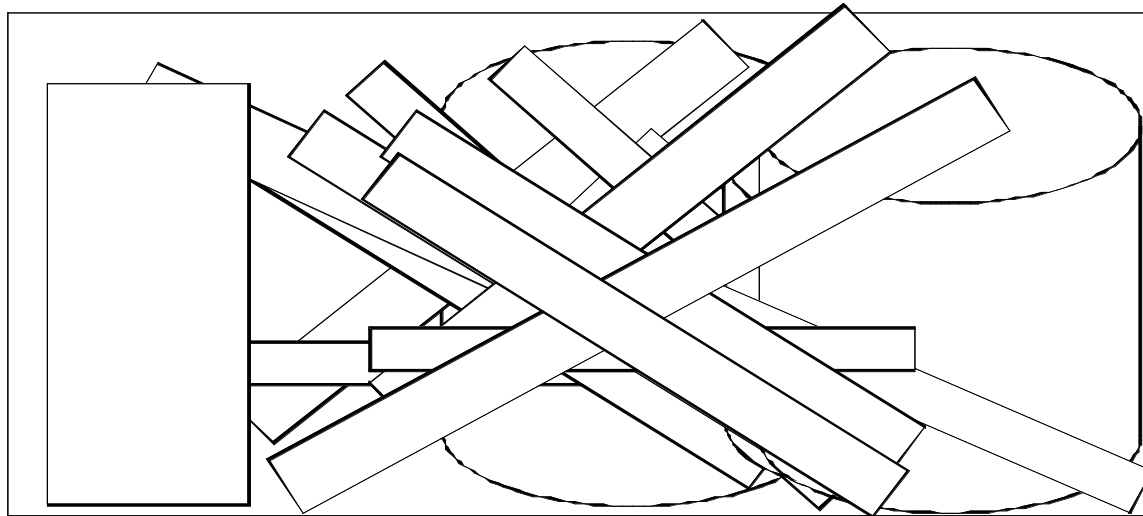


271 Inspections completed by OHME from 11/2005 to 11/2009



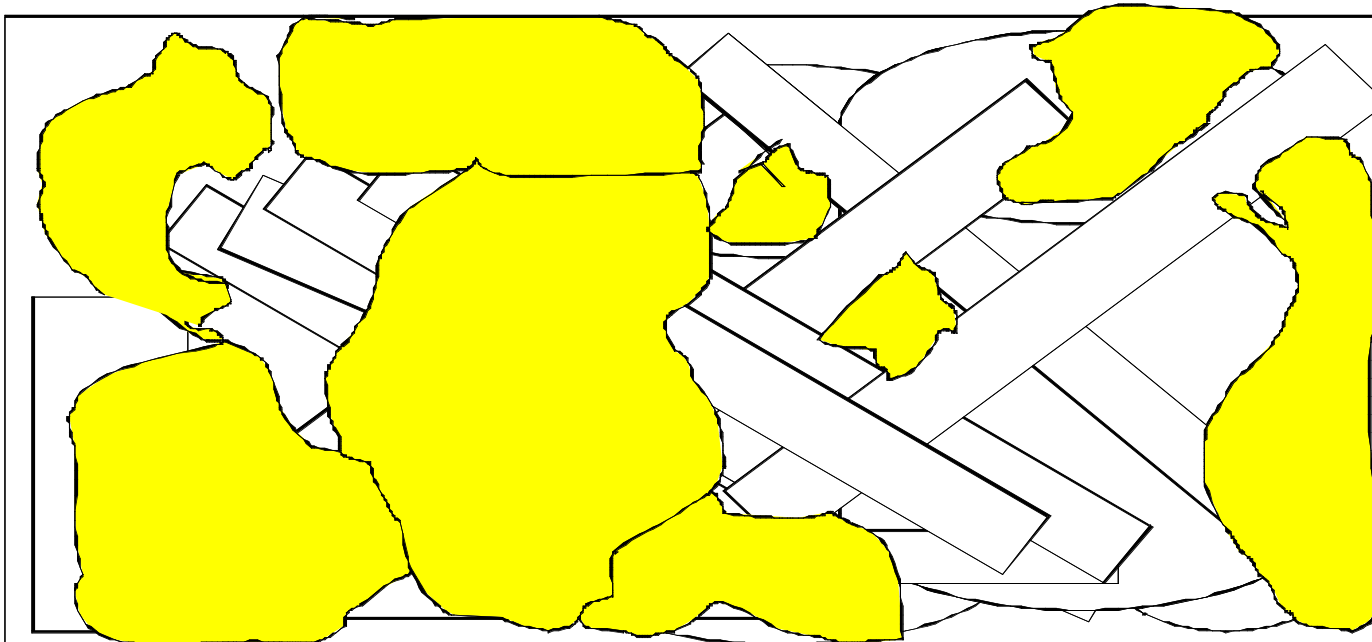


LSA?





LSA?






- NUREG 1608 – not incorporated into the Hazardous Materials Regulations, but:
 - You CAN mix LSA and SCO IF:
 - The part you are calling SCO meets the definition of SCO
 - The LSA portion meets the definition of LSA
 - You have documentation
 - You CANNOT use the weight of both the SCO and LSA to calculate the concentration per gram and then call the whole thing LSA.



Type A Documentation????



- Type A Documentation:
- Box 12"X12"X12"
- Spray Test PASS
- Drop Test PASS
- Penetration Test PASS
- Compression Test PASS
- Signed 
- Dated 1/1/1991

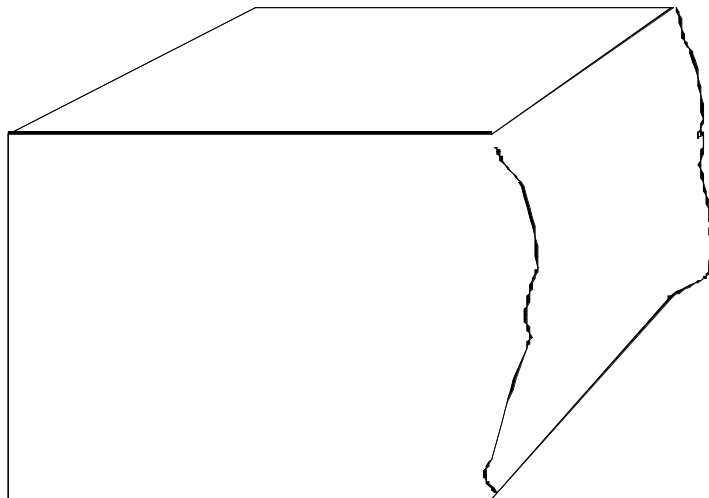


- PHMSA gets **VERY FEW** incident reports for Radioactive Material
 - Who is supposed to report? The person in physical possession at the time of the incident
 - What else is supposed to be reported for RAM?
 - Fire
 - Breakage
 - Spillage
 - Suspected contamination

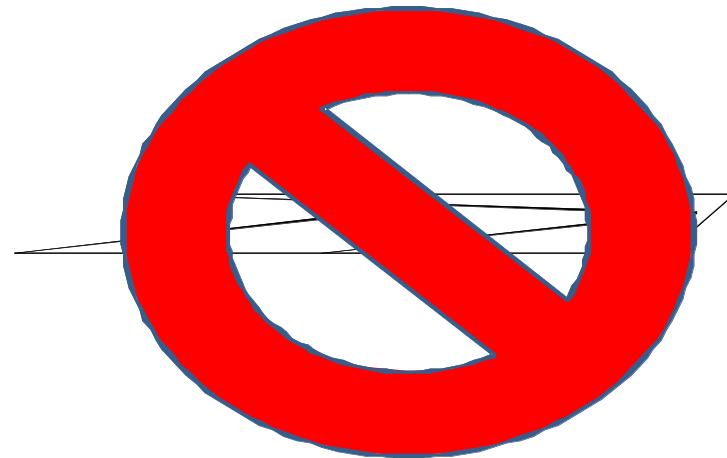


Reportable incident?

Dents are OK



Crushed packages are not





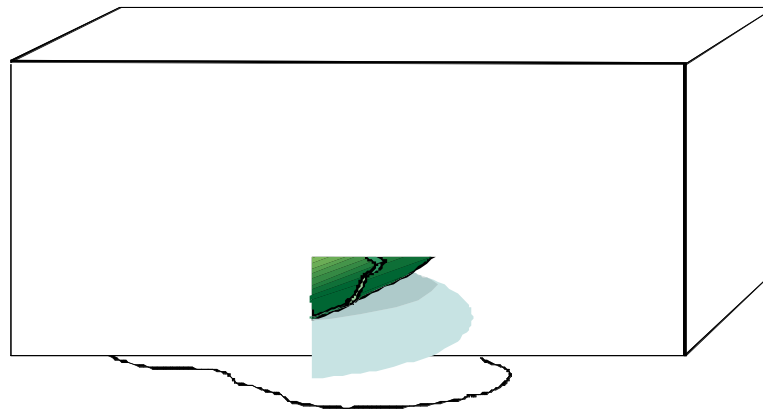
The regulations are just
as hard for the
investigators to work
with as it is for the
shippers!!!





Contamination?

Example: Less than $2.7E^{-5}$ Ci I-131 in bottle



2000 dpm/cm²

If the material spilled is not considered “regulated radioactive material” then there can be no “contamination”.



I see very few shippers purposely ignoring the regulations.

I see **MANY** shippers who don't understand the regulations.