



Savannah River
Nuclear Solutions, LLC
A Fluor Daniel Partnership

Savannah River Nuclear Solutions, LLC

Contractors Transportation Management Association
Portland, Oregon
Chris Solum
June 24, 2010



Topics

- Best Practices
- Recommendations
- Findings
- What's Next



Best Practices

Motor Carrier

Driver Qualification - Each commercial motor vehicle operator candidate must satisfactorily demonstrate driving skills. Those candidates that require additional instruction, skills, or experience are afforded a mentoring opportunity with the Driving Skills Examiner.

Vehicle Maintenance - Inspection of a specification cargo tank (MC 306) semi-trailer (E 83193) revealed that the cargo tank motor vehicle had the specification plate permanently altered to formally render the cargo “non-spec”. This was accomplished by obliterating the specification marking and re-stamping the data plate to indicate “NON-SPEC”.

Railroad

The SRS railroad activity resulted in the design, fabrication, testing and filing of a US patent application for a safety stand attachment to a rail car. The stand is portable and can be attached to a railcar. This prevents an individual from hanging on the side of a railcar ladder while the car is moving and simultaneously talking with other crew members and engineer with a hand held radio. The stand provides for a square communications.



Recommendations

Transportation Management Operations (Traffic Services)

The Transportation Management functions are vital to all site transportation activities. Carriers must be selected, freight bill audit and payment performed, Loss & Damage claims processed, etc. This activity should serve many contractors on site and not dispersed between several traffic management organizations. The function should be staffed and budgeted to perform necessary duties.

Emergency Response

Savannah River Nuclear Solutions should continue to conduct periodic drills to challenge assumptions and validate performance and expectations.

General Management

SRNS include the review date on all their procedures, which would provide objective evidence indicating compliance to their own requirement.

Motor Carrier

Documents required by regulation should undergo a comprehensive review to determine that all required content is addressed.



Findings - Packaging

Closure instructions for previously procured hazardous material packagings are not properly maintained on the INSITE database. 49 CFR 173.24(b) requires the Shipper of each package used for the shipment of hazardous materials to fill and close the package such that it can withstand conditions normally incident to transportation without the release of its contents. The INSITE database will need to be updated to include closure instructions for previously procured drums.

Findings – Motor Carrier

Driver Qualification - A review of driver qualification files revealed that a commercial motor vehicle operator was qualified by participation in a vision/diabetes waiver study; however, the employee is not a participant in said study. (49 CFR 391.64)

Controlled Substances Use and Alcohol Misuse Testing.

- A review of the SRNS DOT Controlled Substances & Alcohol Policy indicates that the materials do not contain all required content. (49 CFR 382.601)
- The Policy indicates a “stand-down” provision may be implemented; “stand-downs” are prohibited unless a waiver has been obtained from the Federal Motor Carrier Safety Administration. (49 CFR 382.119)
- Each motor carrier must maintain the original signed statement from each affected commercial motor vehicle operator that has received a copy of the educational materials; the original signed record was not available for inspection. (49 CFR, 382.601)
- Motor Carriers must ask commercial motor vehicle operators candidates if they have tested positive (pre-employment) or refused to test while in the employ of another motor carrier. (49 CFR 40.25). No evidence of this activity was available for review.

Findings – Motor Carrier (continued)

Hours of Service - Violation of 49 CFR 395.8. A review of Time and Attendance Collection System documentation indicates employees identified as commercial motor vehicle operators are on-duty in excess of 12 consecutive hours, nullifying the records of hours of service exception in 49 CFR 395; driver's daily logs are required in those instances.

Hours of Service - Violation of 49 CFR 395. A review of Time and Attendance Collection System documentation indicates employees identified as commercial motor vehicle operators record being on-duty in excess of 70 hours; commercial motor vehicle operation must be prohibited after having accrued 70 hours on duty.

Records of Vehicle Inspection, Maintenance, and Repair - Violation of 49 CFR 180.417. A copy of the manufacturer's certificate for each specification cargo tank was not available for review.

Records of Vehicle Inspection, Maintenance, and Repair - A review of specification cargo tank inspection and re-test records indicates the report does not contain all the required content (49 CFR 180.417).



Findings – Motor Carrier (continued)

Safety Permit – Violation of 49 CFR 385.407. No evidence of a communications plan was available for review.

Safety Permit – Violation of 49 CFR 385.415. No evidence of communications plan records was available for review.



Findings – Training

Pursuant to 49 CFR 172.704 (d) each hazmat employer is required to have a record of each hazmat employees training to include a description, copy, or the location of the training materials used and certification that the hazmat employee has been trained and tested. Hazmat Materials Transportation Representative (HMTR) is required to receive training and testing on several special permits. The Team received copies of the HMTR's certification of training and testing on the special permits; however, the training and testing materials have not been formalized and were not available.



Findings – Emergency Response

Violation of 49 CFR 172.604. A review of previously conducted drill/exercise notes revealed that attempts to connect callers of the emergency contact telephone number with Site Hazardous Materials Coordinators (SHMC) were not consistently successful.

During a drill the caller asked the Duty Officer to contact the SHMC and connect the responding SHMC person with the caller. The initial attempt to connect the caller with the SHMC was unsuccessful.



Findings – Security Plan

Pursuant to 49 CFR 172.800 each person who offers for transportation in commerce or transports in commerce a quantity of hazardous material that requires placarding must develop and adhere to a security plan for hazardous materials. This requirement is mostly met. But it appears that elements of the plan dealing with security breaches, notification to law enforcement officials and threats and vulnerabilities of personnel security need further attention. SRNS needs to review and revise its security plan to ensure that it conforms to the DOT.

Pursuant to 49 CFR 172.704 each hazmat employee of a person required to have a security plan must be trained concerning the security plan and its implementation. Security training must include company security objectives, specific security procedures, employee responsibilities, actions to take in the event of a security breach, and the organizational security structure. Contrary to this requirement, the current training does not include instruction about the current security plan. Consequently, the current in-depth security training, as required by 49 CFR 172.704, must be reviewed to ensure that the training elements include the revised security plan.



What's Next

Factual Accuracy Review

Final Report

Corrective Action Plan

Programmatic Improvement



Questions

