

# CCP-TP-065

Revision 1

## CCP Shipment of the MOVER

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APPROVED FOR USE

RECORD OF REVISION

Revision Number	Date Approved	Description of Revision
0	05/28/2002	Initial Revision.
1	09/17/2003	Revised to remove all WIPP site-specific requirements. Separated electronically fillable forms and updated references in procedure.

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## 1.0 PURPOSE

This procedure provides a guideline for the preparation and safe shipment of the CCP Mobile Visual Examination and Repackaging system (MOVER) by public highway.

### 1.1 Scope

This procedure provides a guide for the Transportation Certification Official (TCO) or Host Site Transportation Personnel, to classify, mark, label, placard, and provide shipping papers for the transport of the CCP MOVER.

## 2.0 REQUIREMENTS

### 2.1 References

Shipments of the MOVER shall be in compliance with applicable federal and state regulations and DOE Orders.

#### Baseline Documents

- 41 CFR 109-40.306-2, Property Management Regulations
- 49 CFR Parts 100-178, Hazardous Material Transportation
- 49 CFR Part 373.101, Motor Carrier Bill-of-Lading
- DOE Order 460.1A, Packaging and Transportation Safety
- MOVER Type A certificate

#### Referenced

- CCP-QP-002, *CCP Training and Qualification Plan*
- CCP-QP-008, *CCP Records Management*

### 2.2 Training Requirements

2.2.1 TCO shall be trained in accordance with CCP-QP-002, *CCP Training and Qualification Plan*.

2.2.2 Host Site Transportation personnel trained in accordance with site specific requirements.

2.2.3 Trainees operating under the direct supervision of a qualified TCO are authorized to perform the TCO function of this procedure, except trainees are not authorized to sign shipping papers.

## 2.3 Precautions and Limitations

2.3.1 To qualify as a Type A container the MOVER must be maintained and/or inspected as specified in Attachment 2.

## 2.4 Prerequisite Actions

2.4.1 The first stage HEPA filter has been removed from the MOVER glovebox.

2.4.2 The used/contaminated gloves have been removed from the glovebox.

2.4.3 The MOVER glovebox has been wiped down prior to initiation of radiological surveys for shipment.

## 2.5 Definitions

2.5.1 MOVER - a steel container for the containment and transport of the visual examination glovebox.

2.5.2 Visual examination glovebox - a enclosure providing radiological containment for the visual examination of the contents of a waste drum. The glovebox has viewing windows, glove ports, bag-in/bag-out ports, and a HEPA filter system.

## 3.0 RESPONSIBILITIES

### 3.1 Host Site Radiological Group

3.1.1 The host site radiological group will supply the radiological surveys referenced in this procedure in accordance with the CCP/site interface agreement and this procedure.

### 3.2 Transportation Certification Official/Host Site Transportation Personnel

3.2.1 Assemble radiological and other information necessary to classify the shipment.

3.2.2 Classify the shipment in accordance with 49 Code of Federal Regulations (CFR) Parts 171-173.

3.2.3 Prepare shipping papers in accordance with 49 CFR Part 172.200.

3.2.4 Mark the shipment in accordance with 49 CFR Part 172.300.

3.2.5 Label the shipment in accordance with 49 CFR Part 172.400.

3.2.6 Placard the shipment in accordance with 49 CFR Part 172.50.0

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4.0 PROCEDURE

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**NOTE**

Steps in 4.1 may be performed concurrently.

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4.1 Shipment Classification

4.1.1 Check the primary (1<sup>st</sup> stage) HEPA filter and the used gloves have been removed from the glovebox.

4.1.2 Check the glovebox has been wiped down.

4.1.3 Obtain the following:

- Documentation of the isotopic concentrations of the drums which have been characterized in the glovebox (including Pu-241).
- Direct alpha survey readings from inside the glovebox (15 points), as necessary.
- Direct beta-gamma surveys of the glovebox interior (if fission product activity was included in the isotopes characterized but cannot be adequately quantified), as necessary.
- Documentation of the calibration of the instruments used for the survey showing that the range(s) used for the measurements was tested with a source traceable to NIST.
- Radiation surveys of the MOVER complex interior and exterior.
- Other content defining documents for the proposed shipment, as applicable.

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4.1.4 Classify shipment per 49 CFR 173.400

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**NOTE**

The glovebox has 23,587 sq. in. / 152,175 sq. cm. of surface area and weighs ~13,000 pounds. The MOVER weighs 28,760 pounds / 13,405.32 kg gross.

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**NOTE**

The maximum activity contained by the MOVER is a Type A quantity as defined in 49 CFR 173.433.

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[A] The quantity limitations for Limited Quantity per 49 CFR 173.425, or

[B] The quantity limitations for Type A quantities per 49 CFR 173.433, or

[C] The quantity limitations for Surface Contaminated Objects (SCO) per 49 CFR 173.427.

[D] Contains  $\leq$  15 grams of fissile material (U-233, U-235, Pu-238, Pu-239, or Pu-241).

4.1.5 **IF** activity content of the MOVER glovebox meets one of the quantity limitations of 4.1.4[A], 4.1.4[B], or 4.1.4[C], **AND** contains less than 15 grams fissile, **THEN** go to step 4.1.7.

4.1.6 **IF** the MOVER glovebox does **NOT** meet one of the quantity limitations of 4.1.4[A], 4.1.4[B], 4.1.4[C] or contains more than 15 grams of fissile material, **THEN** the MOVER glovebox requires more decontamination, exit this procedure.

4.1.7 Verify radiation levels on the exterior of the MOVER are less than the following:

- 200 mrem/hr on contact with shipping package
- 10 mrem/hr at two meters

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**NOTE**

Sites may require a lower release level than stated in 4.1.8

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4.1.8 Verify contamination levels on the exterior of the MOVER are less than the following:

- 2,200 dpm/100 cm<sup>2</sup> beta-gamma
- 220 dpm/100 cm<sup>2</sup> alpha

4.1.9 Determine hazard label and transportation index from the radiological surveys and operational information, as required.

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**NOTE**

**IF** the quantity determination in Step 4.1.4 meets the criteria for a limited quantity or SCO,

**THEN** the MOVER is not required to meet 7A integrity criteria, however, it must qualify as a strong tight container.

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4.1.10 Verify 7A integrity by completing Attachment 2 .

4.1.11 Complete CCP-TP-065-A1, CCP MOVER Shipment Worksheet.

4.1.12 Prepare shipping paper in accordance with 49 CFR 172.200.

4.1.13 FAX draft shipping papers to WIPP Transportation at 505-234-6030.

4.1.14 Prepare or obtain the Emergency Response Guide(s) (e.g., 161, 162, 163) for radioactive materials and subsidiary hazard(s), as applicable.

4.1.15 Verify material is packaged, marked, and labeled in accordance with 49 CFR 172-178 and MOVER Type A packaging certificate.

4.1.16 Verify the following items for the transport vehicle:

- Proper placarding (if required)
- Valid vehicle annual inspection
- Proper loading/securing of packaging.

4.2 Shipment Completion

4.2.1 Host Site Transportation Personnel or TCO and vehicle driver, sign and date shipping paper(s).

4.2.2 Obtain driver's signature on Attachment 1, Drivers Instructions.

4.2.3 Provide the following to vehicle driver:

- Original Shipping Papers
- Driver Instructions
- Emergency Response Guides

4.2.4 Contact WIPP CMR (505-234-8863 or 505-234-8457) and request approval to release shipment.

4.2.5 Once approval is granted, release Shipment.

4.2.6 Deliver copies of the following to host site 24-hour emergency response center:

- Shipping papers
- Driver instructions
- Emergency Response Guides

4.2.7 Provide the consignee the following information:

- Date(s) of the shipment
- Expected date of arrival
- Any special loading or unloading instructions

4.2.8 Place signed copies of classification calculations, shipping papers, Driver Instructions, CCP-TP-065-A1 and Attachment 2 in shipment folder.

4.2.9 Forward shipment folder to CCP Records.

5.0 RECORDS

5.1 The records generated by this procedure are as follows and will be maintained in accordance with CCP-QP-008, *CCP Records Management*.

5.1.1 QA/Lifetime

[A] Shipping paper(s): Bill of Lading (BOL)

| [B] CCP-TP-065-A1, CCP MOVER Shipment Worksheet

| [C] Attachment 1, Carrier/Driver Instructions

| [D] Attachment 2, Maintenance of 7A Container

[E] Supporting documents (as applicable)

## Attachment 1 - Carrier/Driver's Instructions

### Emergency Response Plan During Transportation

This Emergency Response Plan is to be used as guidance in the event a package of hazardous material has been damaged during transport. The following actions are to be taken in addition to all normal actions (e.g., extinguishing fires, medical treatment of injured personnel, placing caution devices on the road) necessary to control an accident situation.

Isolate the immediate area around the vehicle or compartment where the package was stored or is located.

Prevent unauthorized personnel from entering the affected area.

Notify local authorities.

Notify WIPP Central Monitoring Room Operator immediately at **505-885-6883** (collect authorized) and report as much of the following information as is available at the time. Do not delay calling if all the information is not known.

- Date, time, and location of accident.
- Description of accident.
- WIPP shipment number and description of material from the shipping papers.
- Extent of property damage and/or personnel injuries.
- Who is in charge at the scene.
- What civil agencies have been notified.
- What assistance is required.

Notify your dispatch agent.

As required by 49 CFR Part 171.15, make the appropriate notifications. Department of Transportation (DOT) toll free number is **1-800-424-8802**. Per 49 CFR Part 171.16, a written report must be sent to DOT within 30 days.①

Do not immediately move vehicles, containers or wreckage unless directed by the on-scene commander or if it is in the interest of public safety to do so.

Identify people who might have been in the immediate area of the vehicle or compartment where the package is or was stored to the on-scene commander. If the on-scene commander is not present, request those persons who have been identified to remain at the scene.

Stand by until assistance arrives.

### DRIVER CERTIFICATION

The shipping documents attached to this form contain the information prescribed by DOT regulations for a shipment of Hazardous Materials, if present. Appropriate placards have been offered for this shipment. These documents must accompany all carriers of this shipment.

I am aware that the Federal Motor Carrier Regulations (DOT) require specific driver qualifications, if not exempted, for carriers of hazardous materials. I am fully qualified to transport hazardous materials.

Carrier's Name: \_\_\_\_\_

\_\_\_\_\_  
Driver Name (Printed)

\_\_\_\_\_  
Driver Signature

\_\_\_\_\_  
Date

## Attachment 2 - Maintenance of MOVER 7A Container

Requirement	Acceptance Criteria	Pass / Fail	Conducted by Date	Corrective Action
Spray the door exterior with low pressure water (20-30 psi) at 5 - ≤10 gpm from a distance of 5 feet	Door seals do not leak			Replace door seals
Visually verify that all floor penetrations are properly caulked and no cracking of caulk is present	Caulk is present and no cracks in the caulk			If cracking is absent/present, remove the bolt, shoot caulk in the tapped hole, apply caulk to the bolt threads and reinstall bolt.
Check all exterior penetrations that have been caulked for signs of cracking	No cracks in the caulk			If cracking is found remove damaged caulk and re-caulk
The 7A integrity is maintained by the interior floor and exterior walls and ceiling.	No cracks.			Repair/replace as necessary

