Idaho National Laboratory

ASSESSMENT ACTIVITY FORM

Assessment Plan

1. Type of Assessment:

☒ **Surveillance** ☐ **Management Assessment** ☐ **Independent Assessment** ☐ **QA Audit** ☐ **Other**

2. Title: Ship Task NEL19021 Waste Transportation Surveillance

3. Assessment Number: ASMT 2019-0250

4. Assessment Requirements (AR #): N/A

5. Purpose and Scope: Observe NEL19021 waste transportation and associated preparation activities to verify compliance with requirements identified in Nevada National Security Site (NNSS) Waste Acceptance Criteria (WAC) Revision 325-16-00.

6. Objectives:

Observe NEL19021 shipping activities on-site 3/18/2019 to ensure compliance with NNSSWAC Revision 325-16-00.

Activities will be evaluated using the 1-24-2019 Edition of the NNSSWAC Rev. 325-16-00 Waste Transportation Assessment Checklist.

	(a) Objectives / Elements	(b) Applicable Documents	(c) LOIs (See Sect. 13)
1.	Review requirements.	NNSSWAC Rev. 325-16-00 Section 6 and Appendix C	1-24-2019 Edition of the NNSSWAC Rev. 325-16-00 Waste Transportation Assessment Checklist
2.	Observe and document NEL19021 waste transportation and associated preparation activities.	MCP-9810, "Shipment and Receipt of Hazardous Materials"	1-24-2019 Edition of the NNSSWAC Rev. 325-16-00 Waste Transportation Assessment Checklist
3.	Review submittal of NEL19021 records for compliance.	PLN-522, "Quality Assurance Program Plan for the Waste Management/ Waste Certification Program" MCP-17500, "Waste Generator Services Certification of Waste Shipments to the Nevada National Security Site"	1-24-2019 Edition of the NNSSWAC Rev. 325-16-00 Waste Transportation Assessment Checklist

7. Team Members ☒ Qualifications Verified

Name	Role	Objectives / Elements
A Vincent Chermak	Surveillance Lead (Lead Auditor)	All

8. Schedule of Activities:

Start Date 3/18/2019 Factual Accuracy Review 3/25/2019 – 4/1/2019 Completion Date 4/7/2019

Other Scheduled Activities Review documents and interview personnel as required.

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9. Assessment Plan Approval:

Submitted by:

A Vincent Chermak		March 12, 2019
Lead Assessor/Auditor Printed name	Signature	Date

Approved by:

Kent L Miller		3/13/19
Sponsoring Director or Manager / MSL Printed Name	Signature	Date

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Assessment Results

10. Executive Summary:	The scope of this surveillance was to observe waste transportation and associated preparation activities to verify compliance with requirements identified in Nevada National Security Site (NNSS) Waste Acceptance Criteria (WAC) Revision 325-16-00. Programmatic controls were reviewed as a whole, and shipment NEL19021, from the Materials and Fuels Complex (MFC) to NNSS, was witnessed. Two conditions were self-identified by WGS personnel and entered into the condition reporting system. No other conditions or examples of noncompliance were identified during the course of surveillance activities.
11. Conclusions:	Based on the activities observed and objective evidence reviewed, the waste transportation elements and controls of the waste management program are determined to be effective. Two conditions were identified by WGS personnel during the course of this surveillance: 1) After Revision 15 of Form 435.93 was issued, Revision 14 was used for NEL19016 and NEL19022. Form 435.93 was revised to remove an item from the checklist; therefore, use of the previous revision did not omit a critical item or negatively impact the quality of either shipment. All elements of Revision 15 were checked when Revision 14 was used. This condition was recorded in Labway by WGS personnel as CO 2019-0551. 2) Regarding waste packages requiring cranes for off-loading, MCP-17500 4.3.16 states to "Ensure waste packages requiring cranes for offloading have approved lift plans, generated by NNSS Radioactive Waste Management Complex, prior to shipment." Contrary to the above, objective evidence that this requirement is met could not be located. This condition is recorded in Labway by WGS personnel as CO 2019-0560. Since both of the above conditions were identified and documented by WGS personnel, they will be tracked through the established corrective action program and are not considered findings. No other conditions or examples of noncompliance were identified during the course of this surveillance.

Assessment Checklist: See Checklist Below

12. Obj.	13. Lines of Inquiry (LOI)		14. Results (Objective Evidence)	15. Sat / Unsat	16. Findings / Observations
N/A	1.	See Checklist below	See Checklist below	See Checklist below	See Assessment Results above

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NNSSWAC Rev. 325-16-00 Waste Transportation Assessment Checklist *Status: BMP= Best Management Practice, S= Satisfactory, U = Unsatisfactory, OBS = Observation/Weakness, N/A = Not Applicable					
Assessment No:	ASMT 2019-0250	Date:	March 18, 2019	Organization:	Quality Assurance for Waste Management
Assessor[s]:	A Vincent Chermak				**Reviewed and determined to be UNCLASSIFIED.** **Derivative Classifier: Major, John T II** **Signature: See INL/EXT-19-53440** **Date: 04/08/2019**
Personnel Contacted:	See Attachment 1: Assessment/Meeting Contact Record				
Reference Documents:	See Below				

Item No.	Requirement [Citation]	Objective Evidence	Status*
	OBJECTIVE: Determine whether additional requirements impact shipments		
1	**GENERAL** Are there any additional transportation-related requirements to consider due to Waste Profile conditions of Certificates of Compliance, approvals/deviations or DOT Special Permits being utilized for specific shipments being surveilled or in general?	At the time of this Assessment, deviation requests for 7 profiles were in effect: NEID-05SMC3056, R01: DU Contaminated Material NEID-0900RALLW, R03: INL Regulated Asbestos LLW NEID-09INLCLLW, R08: INL Routinely Generated Contact Handled Low-Level Waste NEID-09MFCRLLW, R06: INL Routinely Generated Remote Handled Low-Level Waste NEID-11SOURCES, R02: INL CH Sealed Sources NEID-17MFCCLLW, R00: MFC Contact Handled Fissile Low-Level Waste NEID-IRCCERCLA, R00: IRC Cercla Waste The U.S. Department of Energy Environmental Management Nevada Program approved the deviation on August 30, 2018. Each waste profile deviation was collectively assigned tracking number NEID-DR-18-06. The approval requests notification of Mission Support and Test Services, LLC Disposal Operations personnel with the applicable shipment number prior to use of the deviation on a shipment.	S

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Item No.	Requirement [Citation]	Objective Evidence	Status*
2	**OBJECTIVE: Verify generator has selected an MCEP-evaluated carrier and due diligence reviews are performed and documented**		
	CARRIER SELECTION/MOTOR CARRIER EVALUATION PROGRAM Are processes/controls in place to ensure that:		
	a. The carrier selected by the WG is identified on the most current MCEP List or has been evaluated by the WG. [6.4]	MCP-9810 Rev 5, section 4.1.1.10 states "If the carrier is to transport highway route-controlled quantities of radioactive material or truckload quantities of radioactive material or hazardous waste, verify the carrier has been assessed in accordance with the DOE Motor Carrier Evaluation Program" (MCEP). The Automated Transportation Logistics Assessment System (ATLAS) is used to generate the Bill of Lading (BOL). ATLAS pulls carriers from the most current MCEP list. BEA verifies the carrier they select has been assessed in accordance with MCEP for all shipments to NNSS. Objective evidence included review of the 1) NNSS Truckload Motor Carrier Due Dilligence Worksheet template for Wilcox Secured, Inc:, dated 2/4/19; 2) Due Dilligence Follow-up Review Log for NEL19019, dated 2/26/19; and 3) Due Dilligence Follow-up Review Log for NEL19021, dated 3/18/19.	S
	b. WG performs due diligence of the selected MCEP carrier's current status. [MCEP Program Plan]	Section 4.4.4.27 of MCP-17500 Revision 19, and Item 17 of Form 435.93 Rev 15 require the WCO to confirm the due diligence review of the selected motor carrier has been completed. Records were reviewed for NEL19016, NEL19019, NEL19020, NEL19022, and NEL19021. Each Form 435.93 indicated that check had been completed. For NEL19021, the auditor observed the WCO confirming the due diligence review while filling out Form 435.93. WGS self-identified that after Revision 15 of Form 435.93 was issued, Revision 14 was used for NEL19016 and 19022. Form 435.93 was revised to remove an item from the checklist; therefore, use of the previous revision did not omit a critical item or negatively impact the quality of either shipment. All elements of Revision 15 were checked when Revision 14 was used. This condition is recorded in Labway as CO 2019-0551.	S
	c. For new carriers, the WG evaluates the carrier in a manner similar to the MCEP process, or in lieu of conducting carrier assessments, the WG evaluates the carrier's performance by conducting a documented verification assessment using the "DOE MCEP - Evaluated Carrier Performance List." [6.4]	BEA only uses carriers identified on the most current MCEP List for shipments to NNSS.	N/A

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Item No.	Requirement [Citation]	Objective Evidence	Status*
	d. The WCO notifies the NNSA/NFO EMO Manager when a carrier is being evaluated. [6.4]	BEA only uses carriers identified on the most current MCEP List for shipments to NNSS.	N/A
	e. The NNSA/NFO EMO Manager is notified when a carrier discrepancy, noncompliance, or inadequate performance is identified. [6.4]	MCP-17500 section 4.4.4.28 bullet 4 requires notification of the NNSA/NFO EMO manager when "A motor carrier discrepancy, noncompliance, or inadequate performance has been identified". No instances of carrier discrepancy, noncompliance, or inadequate performance since ASMT 2017-0604, the last audit, were identified during the course of this assessment for NNSS shipments. ASMT 2017-0604 was a full-scope NNSS independent assessment performed to verify activities over the course of Fiscal year 2018.	S
3	**OBJECTIVE: Verify personnel performing transportation activities are knowledgeable of requirements**		
	TRAINING REQUIREMENTS Are processes/controls in place to ensure that:		
	WG personnel are trained and qualified to perform their assigned functions and tasks including the applicable parts of Title 49 CFR, Part 172, Subpart H "Training." [5.2 & 49 CFR 172.700]	49 CFR 172.704 (Subpart H, Training) requires: 1) Hazmat employee training: general awareness/familiarization, function-specific, safety, security awareness, and in-depth security. 2) OSHA, EPA and other training. Initial and recurrent training is required. Records were reviewed for individuals who were interviewed during the course of this assessment against the requirements specified above. All training appeared to be in compliance and was up to date.	S
4	**OBJECTIVE: Verify routing preferences are communicated to carrier/driver prior to departure**		
	SHIPMENT ROUTING Are processes/controls in place to ensure that:		
	a. The WG notifies the NNSA/NFO EMO Manager when the motor carrier route selection is being modified. [6.4] **(Continued on next page.)**	BEA Shipments typically contain less than highway route-control quantities of radioactive material. No instances containing highway route control quantities of radioactive material during the past 12 months were identified during the course of this assessment for NNSS shipments.	S

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Item No.	Requirement [Citation]	Objective Evidence	Status*
	a. **(Continued)** The WG notifies the NNSA/NFO EMO Manager when the motor carrier route selection is being modified. [6.4]	In accordance with DOE/NV--325-16-00 Section 6.4, INL Form 435.B04 Rev 02 prohibits transport of the load through Las Vegas or across the Hoover Dam by-pass bridge. NNSS Driver Briefing records were reviewed for NEL19016, NEL19019, NEL19020, NEL19022, and NEL19021. Checklist item 1 explicitly prohibits transport of the load through Las Vegas or across the Hoover Dam by-pass bridge; each briefing record was signed by the driver. During the course of this assessment, no shipments to NNSS were identified that required modification to the documented route restrictions.	S
	b. Routes selected minimize radiological risk, considering information on accident rates, time in transit, population density, construction activities, and time of day. [6.4]	Shipments from BEA typically contain less than highway route-control quantities of radioactive material. In accordance with DOE/NV--325-16-00 Section 6.4, MCP-17500 Section 4.4.4.23 requires routes to be chosen to minimize radiological risk and consider information on accident rates, time in transit, population density, construction activities, and time of day. INL Form 435.B04 notifies the driver not to transport the load through Las Vegas or across the Hoover Dam by-pass bridge. During the course of this assessment, no shipments to NNSS were identified that contained quantities requiring additional route control.	S
5	**OBJECTIVE: Verify wastes are packaged in accordance with applicable transportation regulations and NNSSWAC requirements**		
	GENERAL PACKAGING REQUIREMENTS Are processes/controls in place to ensure that waste packages:		
	a. At a minimum, meet IP-1 requirements and applicable DOE orders, 10 CFR, 40 CFR, and 49 CFR requirements. [3.2.14 & 173.410, 173.411(b), 173.24, 173.24a, and 173.24b]	MCP-17500 Section 4.2.4 requires "Waste containers used for shipping, at a minimum, will be Industrial Package-1 (IP-1), meeting the requirements of 49 CFR 173.410 and 173.411". PO numbers 00213438, 00216261, and 00215914 Rev 1 were reviewed and found to require compliance to 10 CFR 820, 830 Subpart A, and 835 and to be inspected by the contractor for indications of suspect or counterfeit conditions per DOE O 414.1D, and DOE G 414.1 2B. Also invoked were the requirements of NQA-1 2008, 1A 2009 Addenda. Procurement documents invoked 49 CFR Subchapter C Sections 173.411, 415, 476, or 178.601 as appropriate. Receipt inspection reports for PO number 00213438, and blanket PO number 00129719 were reviewed and found to include certification IP-1 or testing in accordance with 173.465 to demonstrate conformance to 173.410 requirements.	S

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Item No.	Requirement [Citation]	Objective Evidence	Status*
	b. Are capable of withstanding the stresses associated with loading, handling, stacking, and shipping. [3.2]	MCP-17500 Section 4.2.11 requires that "Packages are capable of withstanding the stresses associated with loading, handling, stacking, and shipping". Packages procured were tested in accordance with 173.465, or certified to demonstrate the capability to withstand the stresses associated with loading, handling, stacking, and shipping.	S
	c. Provide cleats, offsets, rings, handles, permanently attached or removable skids, or other auxiliary lifting devices that allow handling by means of forklifts, cranes, or similar handling equipment. [3.2.6]	PO 00215914 Rev 1 was for 7A Type A 48 IN X 46.5 IN X48 IN containers, which include permanently attached lid fork pockets and risers to allow handling by means of forklifts, cranes, or similar handling equipment. Cargo containers 180284 and 180349 were observed during shipment NEL19021. Both had fork pockets at the bottom of the container to allow handling by means of forklifts.	S
	d. Requiring cranes for off-loading have an approved lift plan generated by the NNSS M&O contractor prior to shipment. [3.2.6]	MCP-17500 Section 4.3.16 states this requirement. Form 435.89 section IV item 5.e and section VIII item 7.e require verification with WCO that the following advanced shipment notification(s) have been sent as required: Rigging certifications and lift plan. NEL19020 includes rigging certification; however, objective evidence that packages requiring cranes for offloading have approved lift plans prior to shipment could not be located. This condition was self-identified by WGS and is recorded in Labway as CO 2019-0560.	S
	e. With auxiliary lifting devices extending from the top of the package that are no higher than 4 inches in normal position. [3.2.6]	With respect to waste packages, MCP-17500 Section 4.2.11 requires that "Lifting devices are no higher than 4 in. in normal position". No auxiliary lifting devices extending from the top of the package higher than 4 inches in normal position were observed during the course of this assessment.	S
	f. With lifting devices that are designed in accordance with the current DOE Hoisting & Rigging Manual, DOE-STD-1090. [3.2.6]	MCP-17500 Section 4.2.11 requires that 'Lifting devices are designed in accordance with the DOE-STD-1090, "Hoisting and Rigging"'. Objective evidence reviewed as part of package NEL19020 included rigging certification and assembly proof testing.	S
	DRUMS g. Unless in a group of 3 or less, waste packaged in drums are palletized and banded in a manner to securely hold the drums to the pallet, and pallets are designed to support the total drum weights without failure during handling and transport. [3.2.14]	MCP-17500 Section 4.2.4, requires that "Waste packaged in drums will be palletized and banded. This requirement does not apply to drums in groups of three drums or fewer".	S

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Item No.	Requirement [Citation]	Objective Evidence	Status*
	BULK & UNPACKAGED ITEMS h. Unpackaged bulk material has external contamination fixed, covered, or contained sufficiently for safe transport. [3.2.7]	BEA does not typically send unpackaged bulk material to NNSS. No examples of shipments falling under this criterion were identified for the last 12 months during the course of this assessment. MCP-17500 Section 4.2.10, however, requires that "Any contamination is fixed, covered, or contained sufficiently for safe transfer".	S
	INTERMODAL [ROLL OFF BOXES] EMPTIED AND RETURNED i. The weight of intermodal is =< 42,000 lb. gross weight, and weight is evenly distributed. [Appendix F] j. No top-hinged tailgate intermodals are used. [Appendix F] k. There is no need for the NNSS M&O Contractor to open the top lid of the container for any reason. [Appendix F] l. There are attachments to secure the door in the open position during off-loading. [Appendix F] m. Containers are at least standard 6 × 8 × 20 ft. IP-1 intermodals. [Appendix F]	BEA does not send waste to NNSS in intermodal packages (roll-off boxes).	N/A
	LOW LEVEL WASTE CONTAINING REGULATED ASBESTOS n. RALLW material is packaged separately from other waste streams and is not packaged in soft-sided containers as the only containment. [3.1.15]	LI-435, Appendix B, section 1 specifically states "RALLW shall be profiled and segregated into a separate waste stream", and "RALLW shall not be packaged into soft-sided containers as the only containment". Shipment NEL19016 was an exclusive use shipment that contained asbestos material. The asbestos containers were metal boxes 170224 and 180016; they were packaged separately from other waste streams.	S
	o. PCB material is packaged separately from other waste streams. [3.1.11] **(Continued on next page.)**	MCP-17000 Section 4.14 Note 6 states "PCB bulk product waste (including PCB/radioactive bulk product waste) destined for disposal on the basis of its radioactive properties in a facility permitted, licensed, or registered by a state as a municipal or non-municipal, non-hazardous waste landfill is exempt from the manifesting and COD requirements". The above requirement is based on the NNSS WAC and the CFR it references. NNSS WAC section 3.1.10 states "Waste containing polychlorinated biphenyls (PCBs) that meet the requirements for disposal in a solid waste or permitted hazardous waste landfill as specified in 40 CFR 761 and NAC 444.9452 may be accepted".	S

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Item No.	Requirement [Citation]	Objective Evidence	Status*
	LOW LEVEL WASTE CONTAINING POLYCHLORONATED BIPHENYLS (PCB'S) o. **(Continued)** PCB material is packaged separately from other waste streams. [3.1.11]	40 CFR 761.62(b)(1)(i) states "(b) Disposal in solid waste landfills. (1) Any person may dispose of the following PCB bulk product waste in a facility permitted, licensed, or registered by a State as a municipal or non-municipal non-hazardous waste landfill: (i) Plastics (such as plastic insulation from wire or cable; radio, television and computer casings; vehicle parts; or furniture laminates); preformed or molded rubber parts and components; applied dried paints, varnishes, waxes or other similar coatings or sealants; caulking…". BEA sends only PCB bulk product waste as defined in 40 CFR 761.62(b)(1)(i) and approved in NEID09INLCLLW, Rev 8; NEID0900RALLW, Rev 3; NEID11SOURCES, Rev 2; and NEID09MFCRLLW, Rev 6. MFC180148 was shipped to NNSS containing PCB bulk product waste. The container was accepted under waste profile NEID09INLCLLW as part of NEL18050 in accordance with the above requirements. The contents of MFC180148 were packaged separately from other waste streams.	S
6	**OBJECTIVE: Verify shipments are properly protected and that the environment is not adversely impacted by lead devices**		
	TAMPER INDICATING DEVICES If applicable, are processes/controls in place to ensure that tamper-indicating devices [TIDs] clips, or banding do not contain lead. [3.2.10]	MCP-17500 Section 4.4.4.11 states "Prior to shipment departure, ensure lead free security seals are attached to the shipping trailer's door latches or to each package if the shipment is not enclosed in a trailer". BEA uses only plastic or non-lead metal seals. Examples verified during shipment NEL19021 included JJ Keller seal numbers 1389055 and 1389058.	S
7	**OBJECTIVE: Verify wastes are labeled in accordance with transportation regulations and NNSSWAC requirements**		
	GENERAL LABELING Are processes/controls in place to ensure that the following marks and labels are applied appropriately and as required to arrive at the NNSS intact and readable:		
	a. Weatherproof [must not deform when wet or fade in the sun] [C.1 & 49 CFR 172.407]	Packaging and Transportation (P&T) purchases their labels from JJ Keller. Literature obtained from Keller stated that the labels meet 49 CFR Part 172(E). 49 CFR 172.407(a) under subpart E requires the following regarding durability: "Each label, whether printed on or affixed to a package, must be durable and weather resistant".	S
	b. Resistant to tearing, peeling, and cracking [C.1]	The overview for Class 7 Radioactive III labels listed on the JJ Keller website states that they meet DOT requirements of 49 CFR Part 172(E), are comprised of PVC-free, exterior grade white poly, and a permanent adhesive meeting British Standard (BS5609) for 90-day sea water immersion.	S

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Item No.	Requirement [Citation]	Objective Evidence	Status*
	c. Print must be with permanent indelible ink and legible. [C.1]	Literature obtained from Keller stated that the labels meet 49 CFR Part 172(E). 49 CFR 172.407(a) under subpart E requires the following regarding durability: "A label on a package must be able to withstand, without deterioration or a substantial change in color, a 30-day exposure to conditions incident to transportation that reasonably could be expected to be encountered by the labeled package".	S
	d. Bar Code Label x 2 [3.2.12 & C.1]	MCP-17500 Section 4.3.11 requires a barcode label for each package in accordance with the instructions found in NNSSWAC § Appendix C or use LWIS-G. NNSSWAC § Appendix C requires "A total of two bar code labels shall be placed on each package near the top and on opposite sides". INL form 435.89 Section VI item 1.e requires "Two barcode labels have been securely placed on each package near the top and sides". Each package reviewed indicated that the requirement was met. Containers MFC180284 and MFC180349 were verified during the course of this surveillance; each were labeled with two barcodes.	S
	e. Completed and WCO/AWCO signed Package Certification Label [C.2]	INL form 435.89 Section VI item 1.c requires "Package certification label, signed by WCO/AWCO". Each package reviewed indicated that the requirement was met. Containers MFC180284 and MFC180349 verified during the course of this surveillance; each were labeled with WCO/AWCO signed Package Certification Label.	S
	f. Applicable DOT Labeling [3.0 & C.2]	MCP- 17000 Section 4.7.2 and LI-435 Section 5.2.2.6 refer to GDE-17233 for waste shipment and disposal label requirements. GDE-17233 section 5.2 states "For waste containers being shipped to the Nevada National Security Site, ensure the requirements of the Nevada National Security Site Waste Acceptance Criteria §3.3.6.1 and Appendix C are met". NNSS WAC Appendix C requires the following markings and labels: Marking and labeling as required in 49 CFR; Asbestos, Beryllium, or MLLW labeling as required; Package Certification Label signed by the WCO or package certifier; shipment number; package number; package weight in units of kilograms and pounds. Labeling and loading of packages MFC180284 and MFC180349 was witnessed for Shipment NEL19021. Both containers displayed the Package Certification Label signed by the WCO; shipment number; package number; and the package weight in units of kilograms and pounds. DOT labeling was present on the containers as applicable as well as the transport.	S
	g. Shipment Number Mark [C.2]		S
	h. Package Number Mark [C.2]		S
	i. Package Weight Mark or Label-[Kg & Lb.] [C.2]		S

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Item No.	Requirement [Citation]	Objective Evidence	Status*
	BERYLLIUM WASTE j. If applicable, verify that processes/controls are in place to ensure that Beryllium-containing waste and beryllium contaminated equipment are packaged in sealed, impermeable bags [minimum 6 mil], containers, or enclosures, labeled with the appropriate BERYLLIUM label. [3.1.17 & C.2]	LI-435 Appendix B item 2 states "Beryllium-containing waste and beryllium-containing equipment must be packaged in sealed, impermeable bags (minimum 6 mils), in a container, or in enclosures to prevent the release of beryllium dust during handling and transportation." Beryllium-containing waste is labeled in accordance with GDE-17233 section 12.4. Shipment NEL19022 contained beryllium. Form 435.79 identified that the shipment was packaged in a sealed cargo container. Form 435.89 section VI item 1.a and Form 435.93 indicate the package was marked with a beryllium label.	S
	LOW LEVEL WASTE CONTAINING REGULATED ASBESTOS k. If applicable, verify that processes/controls are in place to ensure that each container of RALLW bears an appropriate ASBESTOS label [3.1.15 & C.2]	INL Form 435.89 Section VI item 1.a requires the WCO verify "Marking and labeling as required (PCB, asbestos, beryllium, etc.)". Shipment paperwork associated with NEL19016 and NEL19022 indicated the appropriate labelling was verified.	S
8	**OBJECTIVE: Verify wastes are marked in accordance with transportation regulations and NNSSWAC requirements**		
	GENERAL MARKING Are processes/controls in place to ensure that package markings meet the following criteria:		
	a. Applicable DOT Marking [3.0 & C.2]	MCP- 17000 and LI-435 refer to GDE-17233 for waste shipment and disposal label requirements. GDE-17233 section 5.2 states "For waste containers being shipped to the Nevada National Security Site, ensure the requirements of the Nevada National Security Site Waste Acceptance Criteria §3.3.6.1 and Appendix C are met". Shipment NEL19021 was witnessed. P&T personnel placarded the outside of the transport and the containers with the appropriate DOT labeling prior to the containers being loaded.	S
	b. Center of gravity, as required due to abnormal center of gravity. [3.2.6]	MCP-17500 section 4.2.12 states "Ensure that low level waste (see def.) packages that have abnormal centers of gravity are marked clearly with the center of gravity". No shipments to NNSS with abnormal centers of gravity since the last assessment were identified during the course of this assessment.	S
	CLASSIFIED NON-RADIOACTIVE HAZARDOUS WASTE/MATTER c. Packages of =< 119 gallons are marked with the words "HAZARDOUS WASTE – Federal law prohibits improper disposal. If found, contact the nearest police or public safety authority of the U.S. Environmental Protection Agency", the Generators name and address, and Manifest Document Number [3.3.6.1] [40 CFR 262.32(b)]	BEA does not currently have any approved hazardous waste profiles with NNSS.	N/A

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Item No.	Requirement [Citation]	Objective Evidence	Status*
	MIXED LOW LEVEL WASTE d. If applicable, verify that processes/controls are in place to ensure that, for shipments of MLLW; packages of =< 119 gallons are marked with the words "HAZARDOUS WASTE – Federal law prohibits improper disposal. If found, contact the nearest police or public safety authority of the U.S. Environmental Protection Agency", the Generators name and address, and Manifest Document Number. [3.3.6.1 & C.2] [40 CFR 262.32(b)]	BEA does not send Mixed Low Level Waste to NNSS.	N/A
	PETROLEUM HYDROCARBON BURDENED LOW LEVEL WASTE [NV ONLY] e. Containers are identified as "HYDROCARBON WASTE" near the 2 bar code labels. [3.1.19]	BEA does not send Petroleum Hydrocarbon Burdened Low Level Waste to NNSS.	N/A
9	**OBJECTIVE: Verify waste packages are loaded and secured in accordance with transportation regulations and NNSSWAC requirements**		
	VEHICLE LOADING Are processes/controls in place to ensure that:		
	a. Except for cargo containers =< 30,000 pounds, bulk waste shipments with complex geometries are loaded in the most stable configuration. [3.2.6]	BEA does not typically send unpackaged bulk material to NNSS. No examples of shipments falling under this criterion since the last assessment were identified during the course of this assessment. MCP-17500 Section 4.2.13, however, requires that "bulk waste shipments with complex geometries are loaded in the most stable configuration".	S
	b. External contamination levels for waste packages and transport vehicles meet the release limits specified in Title 10 CFR Part 835, Appendix D or 49 CFR 173.443 Table 9, whichever is more restrictive. [3.2.13]	Surface contamination levels for transport vehicles are verified prior to loading as required by LI-435 section 5.7 and MCP-17500 section 4.3.14. MCP-17500 section 4.3.15 states "Ensure surveys for waste packages and loaded transport vehicles meet the limits specified in 10 CFR 835, Appendix D". Compliance regarding contamination levels for waste packages is verified by P&T for each shipment using the radiological survey map. Each package reviewed during the course of this assessment contained a radiological survey map. Radiological survey activities were observed for cargo containers 180284 and 180349 during shipment NEL19021. Calibration was verified for radiological measuring and test equipment (M&TE) used to perform the surveys:	S

Containers	Tool	ID	Cal Due	Date Used
MFC180284, MFC180349	MicroRem	854674	3/13/20	3/18/19
	Telepole II	854425	1/5/20	3/18/19

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Item No.	Requirement [Citation]	Objective Evidence	Status*
	c. Boxes > 11,000 lb are shipped on a flatbed trailer and cribbed to a 4-inch minimum height to allow offloading with a forklift. [3.2.8]	MCP-17500 Section 4.2.14 states "Ensure weight limits for final waste packages do not exceed the approved packaging design of NNSS limits of 4.082 kg (9,000 lb) per box". The note preceding that step states "The exception to the specified box weight limit is allowed if…Boxes exceeding 11,000 lb are shipped on a flatbed trailer and cribbed to a 4 in. minimum height to allow offloading with a forklift ". No boxes that required being cribbed to a 4 inch minimum height were identified since the last audit. Cargo containers 180284 and 180349 were observed during shipment NEL19021. Both had fork pockets at the bottom of the container to allow handling by means of forklifts.	S
	d. Drums are shipped in a closed transport vehicle or similar equipment as a Conestoga and other curtain-side trailer. [3.2.14] Note: N/A for Intra-NNSS shipments.	MCP-17500 Section 4.2.4 requires "Ensure the following requirements are satisfied to improve transportation safety and off loading at NNSS… Waste packaged in drums from offsite facilities is shipped in a closed transport vehicle". INL form 435.89 Section VI item 7 requires "Verify drums are shipped in closed conveyance". The U.S. Department of Energy, Environmental Management, Nevada Program approved a deviation allowing the loading of a small number of tarped drums on a flatbed trailer for seven waste streams on August 30, 2018. Each waste profile deviation was collectively assigned tracking number NEID-DR-18-06. The approval requests notification of Mission Support and Test Services, LLC Disposal Operations personnel with the applicable shipment number prior to use of the deviation on a shipment.	S
	e. Packages of MLLW or Non-Radioactive Hazardous Classified Waste/Matter with TIDs are loaded to protect TID from damage. [3.3.6.3]	MCP-17500 Section 4.2.6 requires "ensure the tamper indicating device is not removed or altered and is protected from damage during storage, loading, and transportation". Once loaded, INL form 435.89 Section VI item 8 requires "Check that all container(s) have TID(s) or there is a TID on the enclosed conveyance door(s)". Controls are in place, however, BEA does not send MLLW or hazardous waste to NNSS	N/A
	f. Security seals are attached to the trailer's door latches or to each package if not enclosed in a trailer. [6.2.1]	MCP-17500 Section 4.4.4.11 and INL Form 435.93 require security seals to be attached to the shipping trailer's door latches or to each package if the shipment is not enclosed in a trailer. Each package reviewed indicated that the requirement was met. During shipment NEL19021 seal numbers 1389055 and 1389058 were observed on the doors of the containers.	S

ASSESSMENT ACTIVITY FORM

Item No.	Requirement [Citation]	Objective Evidence	Status*
10	**OBJECTIVE: Verify drivers are provided information needed to facilitate a safe and compliant movement to the NNSS**		
	GENERATOR/CARRIER/DRIVER INTERFACE Are processes/controls in place to ensure that:		
	a. The route agreed to avoids the Hoover Dam Bypass Bridge and Las Vegas. [6.4 & 49 CFR 397.101] Note: Other than Nevada State Route 160.	In accordance with DOE/NV--325-16-00 Section 6.4, INL Form 435.B04 prohibits transport of the load through Las Vegas or across the Hoover Dam by-pass bridge. NNSS Driver Briefing records were reviewed for NEL19016, NEL19019, NEL19020, and NEL19022. Each briefing record was signed by the driver and explicitly prohibited transport of the load through Las Vegas or across the Hoover Dam by-pass bridge. For NEL19021, the driver briefing was observed. Each of the elements of this section of the checklist were discussed during that briefing.	S
	b. Driver is made aware of the importance of fully completing the "Drivers Questionnaire" at the NNSS before leaving the RWMC. [6.2.1]	The fourth item on Form 435.B04 is acknowledgement that the driver understands that he or she will fully complete the NNSS Drivers Route/Shipment form before leaving area 5 RWMC. The briefing record was signed by the driver in each package reviewed. For NEL19021, the driver briefing was observed. During that briefing the driver was made aware of the importance of fully completing the "Drivers Questionnaire" at the NNSS before leaving the RWMC.	S
	c. The Generator validates carrier driver(s) are US Citizens. [6.2.1]	MCP-17500 Section 4.4.4.9 and INL Form 435.93 require the driver to be a US Citizen. Each package reviewed indicated that the requirement was met. During the Driver briefing for NEL19021 proof of citizenship was verified by the WCO.	S
11	**OBJECTIVE: Verify waste shipments are documented in accordance with transportation regulations and NNSSWAC requirements**		
	SHIPPING PAPERS & ADDITIONAL DOCUMENTS Are processes/controls in place to ensure that:		
	a. Shipments are consigned to: U.S. Department of Energy, National Nuclear Security Administration in care of Mission Support & Test Services, LLC (MSTS) Waste Management Nevada National Security Site – Area 5, Radioactive Waste Management Complex Mercury, NV 89023 [6.2.2 & DOE O 460.2A CRD 2.c.] NOTE: Abbreviations are acceptable.	NEL19016, NEL19019, NEL19020, NEL19022, and NEL19021 were reviewed during the course of this surveillance. Each was documented as being sent to the address on the left.	S

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Item No.	Requirement [Citation]	Objective Evidence	Status*
	b. Shipments are made by "exclusive-use vehicles" or "dedicated service" only. [modified] [6.4 & 172.203(d)(9)(i) or (ii)]	MCP-17500 Section 4.4.4.17 states 'Ensure shipment is identified as either "Exclusive Use" or "Dedicated Service" as appropriate and ensure the appropriate shipment maintenance instructions are included with the shipping documentation'. INL Form 435.93 item 21 requires verification of "Exclusive use/dedicated use maintenance instructions, including routing information". Each package reviewed indicated that the requirement was met.	S
	c. **All shipments** are accompanied by: ○ An original PSDR or the original of an equivalent [6.3.3] ○ A signed Waste Shipment Certification Statement [6.3.4] ○ For DOT regulated material, a 49 CFR compliant shipping paper. [6.3.2]	MCP-17500 Section 4.4.4.12 and INL Form 435.93 item 22 require the original completed and signed PSDR or the original of an equivalent to the PSDR. MCP-17500 Sections 4.3.13 and 4.4.4.5, and INL Form 435.93 item 23 require Waste Certification Statements. MCP-17500 Section 4.4.4.16 requires "For materials regulated by DOT, ensure that complete shipping papers, with shipper's certification as required by Title 49 CFR, accompany each shipment". The 49 CFR compliant shipping paper used by BEA is the BOL that is pulled from ATLAS for each shipment. Each package reviewed included a Package Shipping Disposal Request (PSDR), a Waste Shipment Certification Statement, and an ATLAS generated BOL.	S
	d. Shipments of **unpackaged bulk waste** are shipped with a signed PCL accompanying the shipping papers. [C.2]	BEA does not typically send unpackaged bulk material to NNSS. No examples of shipments falling under this criterion were identified since the last audit during the course of this assessment. The note following 4.4.4.5 in MCP-17500, however, requires that "When waste is unpackaged bulk, a signed Package Certification Label must accompany the shipping papers"	S
	e. Shipments of **petroleum hydrocarbon-burdened LLW** are shipped separately and are accompanied by the following documents, as appropriate: ○ Bill of Lading ○ Shipping Manifest ○ PSDR ○ Certification Statement [3.1.19]	BEA does not send Petroleum Hydrocarbon Burdened Low Level Waste to NNSS.	N/A
	f. Shipments of **MLLW** are accompanied by the following documents, as appropriate: ○ Uniform Hazardous Waste Manifest [6.3.2] ○ An appropriate signed LDR Certification Statement is included with the shipment documents - only required for initial shipment of waste stream or when the WP changes. [6.3.4]	BEA does not send Mixed Low Level Waste to NNSS.	N/A

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Item No.	Requirement [Citation]	Objective Evidence	Status*
	g. Shipments of **Classified Matter** are accompanied by the following documents, as appropriate: ○ **Non-radioactive/Non-hazardous:** A Bill of Lading[3.1.18] ○ **Hazardous/Non-radioactive:** A Classified Matter Hazardous Material Shipping Document, NSO-291 [3.1.18] and an appropriate signed LDR Certification Statement - only required for initial shipment of waste stream or when the WP changes. [6.3.4] ○ **Treated and shipped from a commercial treatment facility:** A Uniform Hazardous Waste Manifest [3.1.18]	Of the classified waste types described to the left, BEA ships only non-hazardous waste. All shipments including classified non-hazardous waste require a Bill of Lading. All shipments reviewed during the course of this assessment included a Bill of Lading, the Waste Certification Statement, unclassified PSDR, the Shipping Request, and appropriate closure forms and NNSS checklists.	S
	h. Shipments of **intermodal [roll off boxes] containers** containing bulk LLW being returned to the Generator, processes/controls are in place to ensure that return shipping documents are provided to RWMC Operations personnel. [Appendix F]	BEA does not send waste to NNSS in intermodal packages (roll-off boxes).	N/A
	i. Shipments of PCB's are shipped under different shipment numbers than other waste streams. [3.1.11]	MCP-17500 Section 4.1.2 requires separate NNSS profiles for waste containing Polychlorinated biphenyl (PCB) remediation waste, or any waste containing PCBs that require disposal in a permitted hazardous waste landfill. MCP-17500 Section 4.3.1 requires separate IWTS shipping tasks for classified waste/matter, mixed low level waste, PCB remediation waste, any waste containing PCBs that meet the requirements for disposal in a permitted hazardous waste landfill, and asbestos low-level waste. As mentioned in item 5.o of this checklist, BEA sends only PCB bulk product waste as defined in 40 CFR 761.62(b)(1)(i) and approved by NNSS in NEID09INLCLLW, Rev 8; NEID0900RALLW, Rev 3; NEID11SOURCES, Rev 2; and NEID09MFCRLLW, Rev 6. During the course of this assessment, no PCBs other than PCB bulk product waste were identified as being shipped to NNSS since the last audit.	S
12	**OBJECTIVE: Verify required pre-notifications are made prior to shipment**		
	PRE-SHIPMENT NOTIFICATIONS & DOCUMENT SUBMITTALS Are processes/controls in place to ensure that:		
	a. An electronic version of the PSDR is transmitted to the NNSS M&O Contractor prior to shipment arrival. [6.3.3]	MCP-17500 Section 4.3.10 states "Transmit an electronic copy of the PSDRs prior to shipment arrival". INL Form 435.89 Section VI, item 13 requires PSDR(s) be submitted electronically on the day of shipment. Each package reviewed indicated that the requirement was met.	S

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Item No.	Requirement [Citation]	Objective Evidence	Status*
	b. PSDRs for RALLW asbestos shipments are uploaded 24 hours in advance of shipment arrival at the NNSS and the comment section for RALLW material denotes "Asbestos". [3.1.15]	Note 2 above MCP-17500 Section 4.3.10 states "PSDRs for shipments containing asbestos must be transmitted 24 hours prior to shipment arrival". INL Form 435.93 checklist item 2 verifies "Regulated asbestos – the PSDR text files were submitted to wmdata@nv.doe.gov at least 24 hours prior to shipment arrival at Area 5". NEL19016 and NEL19022 were reviewed and found to verify that this requirement was documented as being met.	S
	c. Shipments of Classified Waste or Classified Matter that require protection from visual observation, have a "NNSS Advance Shipment Notification" form submitted via fax or e-mail to the NNSS M&O Contractor at least 7 days prior to shipment arrival. [3.1.18]	INL Form 435.89 sections IV item 5.b, and VIII item 7.b require advance notification if the waste requires protection from visual observation. During the course of this assessment, no shipments requiring protection from visual observation were identified since the last audit.	S
	d. For packagings that require the radioactive content to be removed and the packaging returned, the expected internal fixed/removable contamination levels on the packaging and the expected fixed/removable contamination levels on the radioactive content inside the packaging are recorded on the Radiological Data For ALARA Planning Purposes and submitted to the NNSS M&O Contractor prior to delivery. [3.2.13]	MCP-17500 Section 4.3.18 requires an as low as reasonably achievable (ALARA) planning spreadsheet to be forwarded to the NNSS Radioactive Waste Management Complex operations by the WCO. NEL19020 contained a cask that required the radioactive content to be removed and the cask returned. Advance notifications included in that package indicated that expected internal fixed/removable contamination levels on the packaging and the expected fixed/removable contamination levels on the radioactive content inside the packaging were recorded on the Radiological Data For ALARA Planning Purposes and submitted to the NNSS M&O Contractor prior to delivery.	S
	e. For shipments that contain accountable or special nuclear material, a "Nevada National Security Site – Waste RIS VAB Accountable Nuclear Materials Authorization to Ship Waste" form, that includes the applicable shipment number(s), is faxed/e-mailed to the NNSS MC&A at least seven (7) days prior to shipment departure. [6.3.1]	MCP-17500 Section 4.4.4.15 states "For all accountable or SNM shipments, ensure…a completed "Nevada National Security Site— Waste RIS VAB Accountable Nuclear Materials Authorization to Ship Waste" form is faxed to (702) 295-4215 or emailed as listed on the form 7 days prior to shipment". INL Form 435.93 checklist item 1 verifies "Accountable or special nuclear material – the "NNSS – Waste RIS VAB Accountable Nuclear Materials Authorization to Ship Waste" form was faxed to (702) 295-4215 or emailed as listed on the form at least 7 days prior to shipment (NNSSWAC § 6.3.1) and approval to ship was received". Documentation for container MFC180284 of shipment NEL19021 was reviewed and found to verify that this requirement was met.	S

ASSESSMENT ACTIVITY FORM

Item No.	Requirement [Citation]	Objective Evidence	Status*
	ACCOUNTABLE OR SPECIAL NUCLEAR MATERIAL / 741 FORM f. WG obtains authorization to ship from NNSS MC&A prior to making shipment. [6.3.1] g. A "Nuclear Material Transaction Report" [NRC Form 741] is submitted to DOE NMMSS and the NNSS M&O, prior to shipment arrival that includes the applicable shipment number(s). [6.3.1]	MCP-17500 Section 4.4.4.15 states "For all accountable or SNM shipments, ensure… Authorization to ship has been obtained from NNSS materials control and accounting" and "Original DOE/NRC Form 741 accompanies shipment paperwork or is emailed to wminfo@nv.doe.gov prior to shipment arrival". INL Form 435.93 checklist item 30 verifies "For accountable or special nuclear material – NNSS MC&A authorization and original DOE/NRC Form 741 (unless original is submitted via email to wminfo@nv.doe.gov prior to shipment arrival)". Documentation for container MFC180284 of shipment NEL19021 was reviewed and found to verify that this requirement was met: DOE/NRC Form 741# JZD-VAB 45 is cited in NNSS Authorization # W190187.	S
13	**OBJECTIVE: Verify HAZTRAK entry is complete and includes information needed in the event of an incident and to facilitate availability of adequate Area 5 staffing/resources**		
	HAZTRAK/SHIPMENT NOTIFICATION Are processes/controls in place to ensure that:		
	a. The required pre-notification information is entered into the HAZTRAK database or, in the absence of access to HAZTRAK, a completed and accurate NNSS Advance Shipment Notification form is submitted to the NNSS M&O Contractor prior to 1500 Pacific Time -- at least one RWMC working day prior to shipments arrival. [6.2.1]	MCP-17500 Section 4.4.4.10 requires pre notification information to be entered into the HAZTRAK database prior to 1500 local time, at least 1 working day prior to shipment arrival. Each package reviewed included objective evidence of an on-time HAZTRAK database submittal.	S
	b. If the estimated date of arrival changes while in transit, the date is changed by either entering the new date in the HAZTRAK database or providing such information to the appropriate NNSS M&O Contractor contact at the earliest opportunity. [6.2.1]	MCP-17500 Section 4.4.4.14.1 requires the NNSS M&O Contractor be notified of the change using the HAZTRAK database at the earliest opportunity and providing the new estimated date of arrival if the shipment's estimated date of arrival should change. Since the last audit, no instances of changes to estimated date of arrival while in transit were identified.	S
14	**OBJECTIVE: Verify processes are in place to make required notifications in the event of an incident**		
	IN-TRANSIT NOTIFICATIONS Are processes/controls in place to ensure that:		
	a. The WCO notifies the NNSA/NFO EMO Manager of a transportation delay, incident, or emergency situation. [6.4]	MCP-17500 Section 4.4.4.28 requires the NNSA/NFO EMO manager be notified if there is a transportation delay, incident, or emergency situation. Review of shipments sampled since the last audit identified no instances of transportation delay, incident, or emergency situation requiring notifies the NNSA/NFO EMO Manager.	S

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Item No.	Requirement [Citation]	Objective Evidence	Status*
	b. The Generator instructs the carrier to make notification to the NNSA/NFO Operations Command Center [at 702-295-0311] when there is a transportation delay, incident, or emergency situation, in accordance with DOE/NNSA policy letter dated October 17, 2016. [6.4]	NNSS Driver Briefing Form 435.B04 instructs the carrier to make notification to the NNSA/NFO Operations Command Center [at 702-295-0311] as well as the WCO when there is a transportation delay, incident, or emergency situation. Each package reviewed provided objective evidence that the driver acknowledged this requirement.	S
	DATA COLLECTION QUESTIONS		
A.	Does the Generator perform an examination of the vehicle/trailer prior to loading? (including door restraints on vans) Provide any forms used.	ATLAS pulls carriers from the most current MCEP list. BEA verifies the carrier they select has been assessed in accordance with MCEP and performs due diligence for all shipments to NNSS. P&T expects the MCEP approved carriers to maintain their vehicles in accordance with applicable regulations and standards. Additionally, P&T verifies the DOT annual vehicle maintenance inspection certification sticker is current.	S
B.	Does Generator calculate/plan/document load placement to ensure size/weight is distributed correctly?	Packages from BEA are typically not heavy or large enough to require formal load planning. No overweight permit requests were identified for NNSS shipments since the last audit during the course of this assessment. A planning meeting is conducted with the driver to discuss the packages to be shipped and the weights of containers. The driver then supervises load placement. Radiation planning is considered to minimize exposure to the driver and public. VSDS Standard Map Survey Reports document the results. Each package reviewed contained a documented VSDS Standard Map Survey Report.	S
C.	Does Generator calculate/document the number and type of load devices for the shipment and check bolt head markings? [49 CFR Subtitle B, Chapter III, Subchapter B, Part 393, Subpart I]	The number of load devices are documented in a rigging certifications and lift plan, which is sent to NNSS for approval prior to shipment. 435.89 section IV item 5.e documents if the rigging certifications and lift plan has been sent. NEL19020 for a cask includes a rigging certification. The rigging certifications and lift plan item of the checklist is recorded as satisfactory. Bolt head markings are verified in accordance with LWP-13410, Planning, Performing and Documenting Inspection for Acceptance, section 4.3, and LWP-13510, Identifying and Controlling Suspect/Counterfeit Items, by BEA personnel.	S

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Item No.	Requirement [Citation]	Objective Evidence	Status*
D.	Are shipments being transported using a service contract or rate tender?	Shipments are transported using a rate tender. Wilcox Truck line, Inc. Tender for Motor Carrier Rates and Charges was reviewed during the course of this assessment.	S
E.	Is the carrier made aware that drivers are to be US citizens and be able to provide objective evidence of such when accessing the NNSS?	NNSS Driver Briefing Form 435.B04 requires the Driver to sign that they understand that to gain access to the NNSS they must provide proof of citizenship by one of the acceptable methods discussed in the briefing. Each package reviewed indicated that the requirement was met. During the Driver briefing for NEL19021, the driver was made aware that drivers are to be US citizens and be able to provide objective evidence of such when accessing the NNSS. Proof of citizenship was verified by the WCO.	S
F.	Is the driver made aware of the responsibility and methods to provide objective evidence that they are U.S. citizens when accessing the NNSS?	NNSS Driver Briefing Form 435.B04 requires the Driver to sign that they understand that to gain access to the NNSS they must provide proof of citizenship by one of the acceptable methods discussed in the briefing. Each package reviewed provided objective evidence that the driver made aware of the responsibility and methods to provide objective evidence that they are U.S. citizens when accessing the NNSS. During the Driver briefing for NEL19021, proof of citizenship was verified by the WCO.	S
G.	Is the Generator aware of the carrier's policies concerning storage incidental to transportation of equipment/shipments while in transit?	The route to NNSS from Idaho National Laboratory is a two day drive. BEA specifically ships on Mondays and Tuesdays to ensure storage incidental to transportation of equipment/shipments while in transit is not required. Since the last audit, no instances of delays that would cause storage incidental to transportation of equipment/shipments while in transit were identified.	S
H.	If loaded trailers are staged prior to offering, what process is in place to ensure the correct trailer is shipped?	If loaded trailers are staged prior to offering, P&T personnel escort the driver to the location of the trailer they are to transport. Once at the location, P&T personnel verify the trailer against the document package. Since the last audit, no instances of shipping an incorrect trailer were identified.	S

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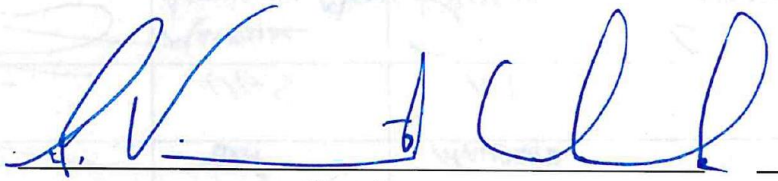
Item No.	Requirement [Citation]	Objective Evidence	Status*
I.	Is the carrier's dispatcher made aware of the OCC notification requirements?	The NNSS OCC would be notified by both the driver and the Generator in the event of a reportable Incident. NNSS Driver Briefing Form 435.B04 instructs the carrier to make notification to the NNSA/NFO Operations Command Center [at 702-295-0311] as well as the WCO when there is a transportation delay, incident, or emergency situation. The carrier's requirements for Dispatcher notification are not identified in the NNSS WAC or invoked by the Rate Tender. While interviewing the Driver for NEL19021 however, he indicated that P&T, the WCO, the dispatcher, and the NNSS Operations Control Center are notified in the event OCC notification is required.	S
J.	How is NNSS OCC notified of a reportable incident? • Driver • Dispatcher • WCO (from driver/dispatcher)	The NNSS OCC would be notified by both the driver and the Generator in the event of a reportable Incident. NNSS Driver Briefing Form 435.B04 instructs the carrier to make notification to the NNSA/NFO Operations Command Center [at 702-295-0311] as well as the WCO when there is a transportation delay, incident, or emergency situation. Each package reviewed provided objective evidence that the requirement was communicated to the driver. Interviews with P&T indicated that the P&T Manager would contact NNSS OCC.	S
K.	How do you ensure that SC/I are not included in the tie down assemblies used by the motor carrier?	BEA only uses carriers that have been verified as assessed and authorized to be on the MCEP list. P&T expects the MCEP approved carriers to ensure that SC/I are not included in the tie down assemblies. While interviewing the Driver for NEL19021, he indicated that his company purchases tie down assemblies from specific suppliers: Kenworth, or Utility Trailer.	S

ASSESSMENT ACTIVITY FORM

17. Assessment Approval:

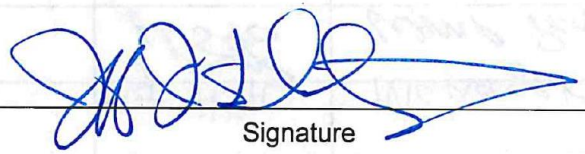
Submitted by:

A. Vincent Chermak		4/1/2019
Lead Assessor/Auditor Printed name	Signature	Date

Approved by:

Kent L. Miller		4/1/2019
Sponsoring Director or Manager / MSL Printed Name	Signature	Date

Approved by:

Jeffrey J. Fluckiger		4-1-19
Sponsoring Director or Manager / MSL Printed Name	Signature	Date

18. Attachments: (Required for QA Audits, Optional for other assessments)

Attachment 1: Assessment Meeting/Contact Record

Idaho National Laboratory

ASSESSMENT ACTIVITY FORM

ATTACHMENT 1
ASSESSMENT MEETING/CONTACT RECORD

Conducted By: A Vincent Chermak (Print/Type Name) | [signature] (Signature) | Surveillance Lead (Lead Auditor) (Function) | 3/12/2019 (Entrance Date) | 4/1/2019 (Exit Date)

Printed Name	Signature	Organization	Function	Entrance	In-Process	Exit
Kent L. Miller		Mgt HS10	Manager	✓		✓
Rob Black		WMP HS40	WMP Program	✓		
Paul A. J. Velasquez		HS40	WMP SFR	✓		✓
Donald C Darrington		P&T	Supervisor, Fac Support Svcs	✓		✓
Timothy W. Brown		WGS	WCO, 53	✓	✓	
Marcie A. Anderson		J540	Packaging & Transportation		✓	
Rodney O. Bell		WGS	PRODUCTION MANAGER	✓	✓	
Jeffery J. Fluckiger		QA	MANAGER	✓		✓
Allen D. Cain		WGS	PM	✓	✓	✓
RUBEN J. MITTELSTADT		MATERIAL ACQUISITION MGR	PROCUREMENT SPECIALIST		✓	
Fred Hofmeister		Wilcox	Driver		✓	
Marshall Marlow		WGS	AWCO		✓	