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Procedure Contains NMM ECH eB REFLIB Forms: YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
Procedure Revision Type: New <input type="checkbox"/> NON-Editorial <input checked="" type="checkbox"/> Editorial <input type="checkbox"/> TC <input type="checkbox"/> Cancellation <input type="checkbox"/>

HQN Effective Date 4/8/15	Procedure Owner: Title: Site:	Alan Zelig Manager, RP PNPS	Governance Owner: Title: Site:	David Moore Manager, Fleet RP HQN
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Site	Site Procedure Champion	Title
ANO	Donnie Marvel	Manager, RP
BRP	N/A	N/A
CNS	Bob Beilke	Manager, RP
GGNS	Roy Miller	Manager, RP
IPEC	Frank Mitchell	Manager, RP
JAF	Robert Heath	Manager, RP
PLP	Doug Watkins	Manager, RP
PNPS	Alan Zelig	Manager, RP
RBS	Brad Cole	Manager, RP
W3	Daniel Frey	Manager, RP
HQN	David Moore	Manager, Fleet RP

For site implementation dates see ECH eB REFLIB using site tree view (Navigation panel).

<u>Site and NMM Procedures Canceled or Superseded By This Revision</u> None
<u>Process Applicability Exclusion:</u> All Sites: <input type="checkbox"/> Specific Sites: ANO <input type="checkbox"/> BRP <input type="checkbox"/> CNS <input type="checkbox"/> GGNS <input checked="" type="checkbox"/> IPEC <input type="checkbox"/> JAF <input type="checkbox"/> PLP <input checked="" type="checkbox"/> PNPS <input checked="" type="checkbox"/> RBS W3 <input type="checkbox"/>

<u>Change Statement</u> <ul style="list-style-type: none"> Attachment 9.2, "10 CFR Part 37 Subpart D Physical Protection in Transit Required Summary" is deleted and being replaced by other Attachments. What was formerly Attachment 9.3, now becomes Attachment 9.2. Changed reference within the procedure body to reflect this change. Added new Attachments 9.3 – 9.8 Section 4.0: deleted steps [1] and [6] as Physical Security is not responsible for transportation security (per CR-HQN-2015-00098, CA-2) Step 4.0[2]: added new responsibility for Training Manager Step 5.5[1]: reworded for clarity Step 5.5[4]: inserted new step regarding annual review of Carrier TSP (per CR-HQN-2015-0105, CA-3) Step 5.5[9]: Changed reference to Attachment from 9.3 to 9.2 to reflect change in attachment number Step 5.7.1[2]: revised to reflect new checklist attachments Step 5.7.2.1[1]: added reference to Attachment 9.3 Step 5.7.2.1[2] is separated into two steps and reworded to improve clarity and to provide reference to Attachments 9.4 and 9.5 Added new steps 5.6[4] and 5.6[5] to address hazmat training requirements identified in CR-HQN-2015-00043 Added Attachments 9.6, 9.7 and 9.8 to Section 7.0 RECORDS 	
Associated PRHQN #: 2014-00545	Procedure Writer: Ron Schwartz
Contains Proprietary Information: YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	



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1.0 PURPOSE

This document implements the requirements of the DOT Transportation Security Requirements and the NRC's Additional Security Measures for Radioactive Material – Category 1 and Category 2 Quantities. The requirements stem from the Department of Transportation as well as the Nuclear Regulatory Commission.

2.0 REFERENCES

- [1] 49 Code of Federal Regulations, Part 172-173, Hazardous Materials
- [2] EPRI Hazardous Material Transportation Security Plan Risk Assessment
- [3] 10 CFR Parts 70, 71, 72 and 73 (NRC Regulations)
- [4] 33 CFR 105, Temporary Interim Rule, Effective July 1, 2003 (US Coast Guard Regulations)
- [5] 49 CFR 172.800, Revised Regulations, Effective March 25, 2003 (DOT Regulations)
- [6] American Chemistry Council, et al; Transportation Security Guidelines for the U.S. Chemical Industry, 2001
- [7] DOE Memorandum, Jessie Roberson to Distribution, Approval of Commercial Shipments of Radioactive Materials and Waste on Behalf of the Office of Environmental Management, June 27, 2003
- [8] DOT-RSPA, Enhancing Security of Hazardous Materials Shipments Against Acts of Terrorism or Sabotage Using RSPA's Risk Management Self-Evaluation Framework (RMSEF), January 2002
- [9] DOT-RSPA, Three Case Studies for the Risk Management Framework for Hazardous Materials Transportation, November 1, 2000
- [10] DOT-RSPA, Flyer DHM50-0023-1002, Shippers and Carriers Enhanced Security Measures, not dated
- [11] DOT Slide Presentation, Hazardous Materials Transportation Security, NEI Transportation Security Meeting, May 29, 2003
- [12] DOT Federal Motor Carrier Safety Administration, Hazardous Materials Company Anti-Terrorism Tips, DOT Web Site, Internet download July 7, 2003
- [13] Federal Register, Volume 68, Number 126, page 39315-39338, 33 CFR 105, July 1, 2003

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- [14] GAO Report to Congressional Requesters, GAO-03-435 Rail Safety and Security, Some Actions Already Taken to Enhance Rail Security, but Risk-based Plan Needed, April 2003
- [15] NRC, Fact Sheet on Dirty Bombs, NRC Web Site, internet download, June 30. 2003
- [16] U.S. Department of Justice, Special Report, A Method to Assess the Vulnerability of U.S. Chemical Facilities, November 2002
- [17] NRC letter from J. E. Dyer dated July 19, 2005, "Issuance of Order for Additional Security Measures on the Transportation of Radioactive Material Quantities of Concern" EA 05-007
- [18] NEI 14-XX [Rev C], Implementation Guidelines for 10 CFR 37 Subpart D Physical Protection in Transit
- [19] 10 CFR Part 37, "Physical Protection Of Category 1 And Category 2 Quantities Of Radioactive Material"

3.0 DEFINITIONS


- [1] Acronyms:

ASM – Additional Security Measures (EA 05-007)
 COTP – Captain of the Port (US Coast Guard designation)
 DAW – Dry Active Waste
 DOT – Department of Transportation
 ENOI – Entergy Nuclear Operations, Incorporated
 EOI – Entergy Operations, Incorporated
 FBI – Federal Bureau of Investigation
 LLEA – Local Law Enforcement Agencies
 NEI – Nuclear Energy Institute
 NRC – Nuclear Regulatory Commission
 SRCP – Security Risk Control Points
 TSA – Transportation Security Administration
 TSP – Transportation Security Plan
 TSP-RA – Transportation Security Plan – Risk Assessment
 USCGS – U.S. Coast Guard Service

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- [2] **Aggregated** – Accessible by the breach of a single physical barrier that would allow access to radioactive material in any form, including any devices that contain the radioactive material, when the total activity equals or exceeds a category 2 quantity of radioactive material
- [3] **Dry Active Waste** – Dry, solid radioactive waste (as opposed to wet wastes such as resins, filters, or filter media)
- [4] **Greater Than Class C Waste (GTCC)** – Low-level radioactive waste that exceeds the concentration limits of radionuclides established for Class C waste in 10 CFR Part 61.55.
- [5] **Hazardous Material** – For the purposes of the TSP-RA, this term includes the definition in 49CFR173.403 and as listed in associated table under 49CFR172.101.
- [6] **Highway Route Control Quantities (HRCQ)** – A quantity within a single package which exceeds 3000 times the A1 value for special form or 3000 times the A2 value for normal form or 1000 TBq (27,000 Ci), whichever is the least.
- [7] **Lost or Missing Licensed Material** – Means licensed material whose location is unknown.
- [8] **Low Specific Activity (LSA)** – Radioactive material with limited specific activity which satisfies the following limits: ores containing only naturally occurring radionuclides, solid un-irradiated natural or depleted uranium or natural thorium or their solid or liquid mixtures, etc. (see 49CFR173.403 for exact definition).
- [9] **Materials of Significant Concern** – For the purposes of the TSP-RA, this refers to hazardous materials which are known or presumed to be so acutely toxic to humans as to afford a hazard to health during transportation, thereby representing a significant transportation security risk.
- [10] **Movement Control Center** – An operations center that is remote from transport activity and that maintains position information on the movement of radioactive material, receives reports of attempted attacks or thefts, provides a means for reporting these and other problems to appropriate agencies and can request and coordinate appropriate aid.

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- [11] **National Security Threat Level** – Transportation of certain types of hazmat shipments may be restricted during periods of elevated security threat levels. The degree of restriction, associated risk, and the affected hazmat shipments will affect the level of security control applied to certain hazmat shipments. The National Security Threat Level is established by the Department of Homeland Security and serves as a general guide for the security threat level established by other agencies, such as the NRC and USCGS. Also note that the NRC and USCGS may have different (higher) security threat levels than the national security threat level. Nuclear plant security activities are governed by the highest security threat level applied by the NRC and, as applicable, the USCGS.

- [12] **NO-LATER-THAN Arrival Time** – The date and time that the shipping licensee and the receiving licensee have established as the time at which an investigation will be initiated if the shipment has not arrived at the receiving facility.

- [13] **NRC Security Threat Level** – Corresponds to the National Security Threat Level. However, it is independently controlled and established by the NRC, and fluctuates independently from the National Threat Level. This is the primary threat level monitored by nuclear plants, and it encompasses a combination of threats from National, Maritime, and other sources.


- [14] **MARSEC Level** – Maritime Security [Threat] Level as identified and maintained by the USCGS. It is independently controlled and established by the USCGS, and fluctuates independently from the National Threat Level or the NRC Threat Level. The MARSEC is also monitored by the affected nuclear plants, which respond accordingly.

- [15] **Physical Security Plan (PSP)** – For a nuclear plant, this is the PSP required by 10 CFR 73. For some decommissioning nuclear plants and for other licensed nuclear support facilities (e.g., radioactive laundry vendors, waste processors, nuclear plant maintenance facilities), this refers to the “industrial security plan.” The term PSP also encompasses the USCGS FSP and all of the related requirements specified in 33 CFR 105, Subpart D.

- [16] **Radioactive Material** – For the purposes of the TSP-RA, this term includes both radioactive materials and radioactive wastes.

- [17] **Safe Haven** – Readily accessible site at which security is present or from which, in the event of an emergency, the transport crew can notify and wait for local law enforcement authorities.

- [18] **Storage Incidental to Movement** – Storage that takes place between the time that a hazardous material is offered for transportation to a carrier and the time it reaches its destination.


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- [19] **Telemetric Positioning Monitoring** – A data transfer system that captures information by instrumentation and/or measuring devices about the location and status of a transport vehicle or package between the departure and destination locations.
- [20] **TSP** - Hazardous Material (and Radioactive Material) Transportation Security Plan.
- [21] **TSP-RA** – Transportation Security Plan Risk Assessment.
- [22] **Unauthorized Persons** - An unauthorized person is any person who is not authorized by the shipper or the transportation carrier to have access to hazardous materials or transport conveyances being prepared for transportation. This includes all persons who are not employed by the shipper or the transportation carrier, including members of the general public, unless such persons are specifically authorized by the shipper or transportation carrier to have access to hazardous materials or transport vehicles being prepared for transportation.

4.0 RESPONSIBILITIES

- [1] **Materials, Purchasing & Contracts Manager** is responsible for supporting the key elements of the procedure within the requirements of Section 5.0 [3].
- [2] **Training Manager** is responsible for the key elements of the procedure to ensure that Hazardous Material (HAZMAT) **AND** 10 CFR Part 37.43(c) training requirements outlined in Section 5.0 of this procedure are developed and implemented.
- [3] **Radiation Protection Manager (RPM)** is responsible for ensuring the Risk Assessment outlined in this procedure will meet radioactive hazardous materials processing requirements and notifying MP&C of the need to ship materials, from a site warehouse, that meet the requirements of hazardous materials.
- [4] **Chemistry Superintendent** is responsible for ensuring the Risk Assessment outlined in this procedure will meet non-radioactive hazardous materials processing requirements and notifying MP&C of the need to ship materials, from a site warehouse, that meet the requirements of hazardous materials.

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5.0 DETAILS

5.1 PRECAUTIONS AND LIMITATIONS

None

5.2 GENERAL

NOTE

“Tables” referenced in this procedure are located in Attachment 9.1, “TSP-RA Tables”

Table 1: Typical Radioactive and Hazardous Material Shipments

Table 2: Hazmat Carriers, Types of Hazmat Shipments and Quantities Shipped

Table 3: Determination of Hazardous Materials of Significance to This Assessment


Table 4: Category 1 and Category 2 Threshold

Table 5: Hazardous Materials of Significant Concern Shipped from Facilities

- [1] The Physical or Industrial Security Plans already contain security procedures, access controls, requirements for employee background checks, etc. Such procedures, controls regulations and therefore need not be duplicated.
- [2] The Entergy (EOI / ENOI) standard language approach to the TSP consists of a simplified and minimal TSP document plus an attachment used in association with the procedure.

5.3 RISK ASSESSMENT

- [1] This TSP-RA is applicable to packaging, staging/storage in preparation for transport, and shipment of the radioactive and hazardous materials addressed in 49 CFR 172.800. Table 1 identifies the types of radioactive and hazardous materials shipments.
- [2] Transportation Carriers contracted to carry radioactive and/or hazardous materials and who’s TSPs are relied upon to provide all necessary security during transport and during storage incidental to movement. This includes the categories of carriers listed in Table 2.


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- [3] For bulk quantity shipments of hazardous material identified in Table 5 which will cross bridges spanning water, through tunnels under water, or on water which is patrolled by the USCGS, regardless of whether the shipment is made by highway, rail or vessel, advance notification of the shipment or of a series of shipments is to be given to the affected USCGS Port Authority. The licensee SHALL notify the USCGS at least 10 days before the shipment physically begins within the United States. For shipments where 10 days of advance notice is not possible, the notification is to be made as soon as practicable. The notification SHALL be made to the appropriate USCGS Port Authority. (The USCGS may choose to require facility-specific notification for other materials.)
- [4] In the event that a shipment of material described in 5.2[3] arrives at the intended consignee but is refused by the consignee, the Carrier maintains responsibility for security of the shipment until it arrives at an acceptable destination designated by the shipper.
- [5] **IF** the U.S. Department of Homeland Security's (DHS's) National Terrorism Advisory System (NTAS) issues an "Elevated Alert" or "Imminent Alert", **OR IF** the USCGS MARSEC Level reaches 2 or 3 (as applicable to each plant), **THEN Category 1 and Category 2** as well as **HRCQ** shipments are **not to be shipped**.
- [6] The shipment of all hazardous material described in Table 1 may have other controls implemented by the shipper (during shipment preparation & shipping coordination) or carrier (en-route security).

5.4 CARRIER TSP AND CONTRACTS MANAGEMENT

- [1] The optimum approach is for the carrier to implement its own TSP which addresses all aspects of the transportation security regulations, including hazmat employee training and driver commercial licenses and endorsements. Accordingly, MP&C will incorporate standard language in their Contracts and Purchase Orders, where applicable, that will require the transportation company to implement its own TSP. It is not necessary to review and approve each carrier's TSP prior to implementation by the carrier.
- [2] The language in Section 5.5, "Carrier Hazardous Material Transportation Security Plan," or similar language, is to appear in every carrier contract where the carrier is anticipated to transport any of the highly hazardous materials identified in 49 CFR 172.800. The end user (contract requisitioner) should identify whether the transportation of hazardous materials is anticipated when submitting a request for a new contract.

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5.5 CARRIER HAZARDOUS MATERIAL TRANSPORTATION SECURITY PLAN


- [1] The Carrier will affirm each time (i.e., separate shipment) that it has a Hazardous Material Transportation Security Plan in place prior to approval of the contract or contract amendment, that the plan meets all applicable Federal and International transportation security regulations in effect as of the contract or contract amendment date, and that said TSP will be updated in a timely manner to remain current with revised and new Federal and International transportation security regulations.
- [2] The Carrier is also responsible for implementing regulations for commercial driver licenses hazardous material endorsements.
- [3] Advanced approval of the Carrier's TSP is not required for implementation of this contract. However, it will be made available for review and approval by an authorized representative of ENTERGY (EOI / ENOI) if requested and on reasonable verbal or written notice, with due consideration given to document security and control.
- [4] The Transportation Security Plan for Carriers under contract shall be reviewed at least annually.
- [5] Prior to dispatching any driver to an ENTERGY (EOI / ENOI) facility for the purposes of transporting hazardous material, the Carrier is to verify that the driver has the appropriate commercial driver license hazardous material endorsements.
- [6] The carrier is to also notify the designated ENTERGY (EOI / ENOI) representative of the name of the driver and any other requested driver identification information, which will be used to verify that the appropriate driver has arrived to transport the shipment.
- [7] Transportation of any of the hazardous materials identified in 49 CFR 172.800 is not to be assigned or subcontracted without the prior written agreement of all parties.

NOTE

Some vendors subcontract carriers to prepare and ship hazardous materials off-site. For example, a major maintenance contractor may subcontract an independent transportation company to ship hazardous materials from one plant to the next.

- [8] All contracts **OR** purchase orders, where applicable, which potentially involve transportation of the hazardous materials covered in the TSP are to be examined to ensure that subcontracted carriers have **AND** maintain a TSP acceptable to ENTERGY (EOI / ENOI). Consideration is to be given to amending any such contracts to include the preceding language **OR** to include a restriction similar to the following:

"Transportation of any of the hazardous materials identified in 49 CFR 172.800 will not be assigned or subcontracted without the prior written agreement of all parties."


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- [9] It is recommended that an affirmation letter on carrier letterhead paper be received from the carrier prior to awarding any transportation contract or other scheduled carrier for radioactive and non-radioactive materials. A copy of the affirmation is available in Attachment 9.2, "Sample Carrier Affirmation Letter."

5.6 TRAINING

- [1] Employees involved with processing (including vehicles) and transporting hazardous material must be provided with the following personnel security awareness and transportation security training modules:
- Security Awareness Training
 - In-Depth Transportation Security Training module (including specific information on the existence of the company's TSP).
- [2] Both training modules may supplement the existing hazmat employee training program consistent with the intent of and frequency specified in 49 CFR 172.704. Re-qualification training will be provided at the same frequency as other hazmat employee training.
- [3] All new hazardous material employees must receive this training within 90 days of employment.
- [4] Hazmat employees must receive training required by 49 CFR 172.704 at least once every three years.
- [5] Hazmat employees required to have In-Depth Security Training must receive training at least once every three years **OR IF** the security plan for which training is required is revised during the three-year recurrent training cycle, **THEN** the employee must receive training within 90 days of implementation of the revised plan.

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5.7 ADDITIONAL SECURITY MEASURES FOR RADIOACTIVE SHIPMENTS – CATEGORY 1 AND CATEGORY 2 QUANTITIES

5.7.1 General

NOTE

This section is based on the 10 CFR part 37 subpart D final rule, NUREG 2155 Q & A, and NRC response to industry questions.

[1] Section 5.7 applies to the following activities

- Transfer and receipt of a category 1 and category 2 quantity of radioactive material.
- Preplanning and coordination of shipments,
- Physical protection during shipment,
- Notifications, investigations, and event reporting,


[2] Attachments 9.6 through 9.8 of this procedure includes a table of 10 CFR Part 37 Subpart D Physical Protection requirement checklists for category 1 and category 2 quantity of radioactive material shipments.

5.7.2 Transfer of Category 1 and Category 2 Quantities of Radioactive Material

5.7.2.1 License Verification

[1] Any licensee transferring a category 2 quantity of radioactive material is required to perform and document licensee verification activities based on the quantity of material being transferred. The purpose of the licensee verification is to make sure the transferee's license is valid and authorized to receive the type, form and quantity of radioactive material transferred. Use Attachment 9.3, "License Verification System Credential Guide" to obtain credentials for using the License Verification System.

[2] Except for emergencies, the licensee is required to use the Licensee Verification System (LVS) developed by the NRC or contact the regulatory agency (NRC or Agreement State) to verify that the license is valid before shipping a category 2 quantity of radioactive material.

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5.7.2.1 continued


- [3] **IF** there exists an emergency where the licensee cannot verify the license of the transferee by the LVS or regulatory agency, **THEN** the licensee may accept written verification by the transferee that it is authorized to receive the type, form and quantity of radioactive material being transferred. In which case use Attachment 9.4 "Manual License Verification Form Guide," **OR** Attachment 9.5, "Manual License Verification Procedure Guide."
- [4] The licensee is not required to perform license verification of transfers to the Department of Energy, other Federal entities, or transfers within the same organization of the licensee. Verification is not required for imports and exports, however the requirements of 10 CFR Part 110, "Export and Import of Nuclear Equipment and material," would apply

5.7.2.2 Category 2 Transfer

- [1] The licensee transferring the category 2 quantity of radioactive material will verify the transferee is authorized to receive the radioactive material prior to shipment. The licensee uses the LVS or direct contact with the applicable regulatory agency.
- [2] The licensee may not use a fax, email, or a copy of the recipient's license to verify the transferee is authorized to receive a category 2 quantity of radioactive material. The verification of each shipment is required and the licensee should document the verification process used (i.e. LVS, regulatory agency contact, or recipient licensee certification).
- [3] **IF** the licensees rely on the recipient licensee's certification, as permitted in an emergency situation above, **AND** later discover the recipient's license is not valid, **THEN** the licensee should contact the LLEA and the NRC's Operation Center if the shipment has been delivered.

5.7.2.3 Category 1 Transfer

- [1] The licensee transferring a category 1 quantity of radioactive material is required to meet the same requirements as the transfer of a category 2 quantity of radioactive material.
- [2] In addition to the requirements for transfer for category 2 transfers, verify that the receiving licensee is authorized to receive radioactive material at the address requested for delivery.

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5.7.3 Guidance for Physical Protection During Transit

NOTE


Section 5.7.3 addresses the shipping licensee responsibility for implementing 10 CFR Part 37 Subpart D requirements for preplanning and coordination and physical protection during transit.

5.7.3.1 Licensee Responsibility

- [1] The shipping licensee is responsible for meeting the requirements of 10 CFR Part 37 Subpart D unless the receiving licensee has agreed in writing to arrange for the in-transit physical protection. The licensee is also responsible for meeting the requirements of Subpart D for category 1 or category 2 quantity of radioactive material from the point that the material enters the United States for import and until the material is under the jurisdiction of a U.S. Government agency at a port, border crossing, or airport for material exported.
- [2] The licensee should have a contract with the carrier that obligates the carrier to comply with the applicable requirements in Subpart D
- [3] The shipping licensee is responsible for providing physical security of a category 2 or greater quantity of radioactive material until the carrier accepts the consignment of radioactive material for shipment and begins movement of the loaded transport vehicle. The shipping licensee's control applies outside of the protective area until the departure of the shipment.


5.7.3.2 Category 1 Shipment

- [1] The shipping licensee must conduct preplanning and coordination activities with the receiving licensee and with each state that the shipment enters. The shipping licensee preplanning and coordination procedures should address, as a minimum, the following items:
 - Shipment contract(s) with a carrier that identify carriers responsibilities for implementing applicable regulations,
 - Protocol for carrier actions to take if a shipment is rerouted during bad weather or other unusual event,
 - Shipping licensee should preplan and coordinate the shipments arrival and departure time with the receiving licensee,
 - Shipping licensee establish protocol for coordinating and contacting the governor of the State or the governor's designee,

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5.7.3.2[1] continued

- Shipping licensee works with the States to identify its intention to provide escorts and any additional State-imposed transportation security requirements',
 - Shipping licensee works with the carrier to identify safe haven(s) along the route at approximately 50 mile intervals, if available,
 - Carrier coordination with State escorts if applicable.
- [2] The licensee maintains documentation of the above activities as attachments to the shipping package.
- [3] A licensee that transports, or delivers to a carrier for transport in a single shipment by road, a category 1 quantity of radioactive material should address the following items, as a minimum:
- (a) Licensee establishes or uses a carrier that has established movement control centers (MCC). The MCC should:
- Monitor shipments on a continuous basis 24 hours a day, 7 days a week,
 - Maintain the ability to immediately communicate with LLEA in an emergency,
 - Provide positive confirmation of the location of the shipment, its status, individuals in control of the shipment,
 - Develop and implement preplanned procedures in response to deviations from the authorized route (s), **OR**
 - Provide notification of actual or attempted theft or diversion or suspicious activity related to the theft, loss, or diversion of a shipment,
 - Immediately awareness if a shipment deviates from shipping plans, planned route, unscheduled stops, or scheduled stops longer than expected,
 - Redundant communications consisting of two systems that do not rely on the same hardware or software to transmit a signal,
 - The use of telemetric monitoring system to permit the remote monitoring and reporting of the location of a transport vehicle or package,

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5.3.7.2[3](a) *continued*

- Ensure carrier provides a second individual when the driving time period is greater than the maximum number of allowable hours of service in a 24-hour duty day as established by the DOT,
 - The driver or accompanying individual or both perform the following:
 - Periodically call the MCC to provide verbal status of the shipment and delivery,
 - Maintain vigilance of the surrounding environment during transport,
 - Maintain constant visual surveillance when transport vehicle is stopped,
 - Periodically walk around vehicle while it is not in motion, to confirm no apparent safety or security related issues,
 - Confirm no evidence of tampering with the contents of the vehicle or no unusual or suspicious activity in the immediate vicinity.
 - Normal operating procedures address activities to meet regulatory requirements:
 - Refueling and comfort stops,
 - Meal stops, and
 - Routine check-in.
- (b) Contingency procedures address issues that could interfere with compliance during preparation for transport or during transport:
- Bad weather,
 - Suspicious activities,
 - Mechanical breakdown,
 - Road or bridge closures, detours, accidents, or
 - Acute illness.


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5.3.7.2[3](b) *continued*

- Communication protocol for:
 - Duress codes to enable off-site individual to signal the need for assistance,
 - Authentication codes to confirm the true identity of the employee,
 - Loss of communication actions to take.
- (c) Licensee ensures access to normal and contingency procedures by drivers, accompanying personnel, and MCC personnel.


5.7.3.3 Category 2 Shipment

- [1] A licensee that transports, or delivers to a carrier for transport in a single shipment by road, a category 2 quantity of radioactive material should include the following items as a minimum in its preplanning and coordination process:
- Coordinate the expected arrival time and the no-later-than (NLT) arrival time, and the method of notification of receipt of shipment with the receiving licensee.
 - Shipping licensee initiates investigation if shipment has not arrived by more than 6 hours past NLT
 - The receiving licensee confirms to the shipping licensee that the shipment has arrived by phone, e-mail, or facsimile as agreed in the preplanning and coordination activities.
 - Shipping licensee notifies the receiving licensee of any new NLT arrival time as soon as practicable after the driver or authorized member of the transfer crew determines the category 2 shipment cannot arrive before the NLT arrival time.
- [2] A licensee that transports category 2 quantity of radioactive material should address the following items, as a minimum:
- Establishment of a security zone around the radioactive material, the use of the transport vehicle is permitted, [37.47(a)]
 - Limit access to the security zone to authorized individuals, [37.47(c)]
 - Monitor, detect, assess, and respond to any unauthorized access, [37.49]

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5.7.3.3 continued

- [3] A licensee that transports, or delivers to a carrier for transport in a single shipment by road, a category 2 quantity of radioactive material should address the following items, as a minimum:
- The use of carriers with an established, documented package tracking system that allows shipping licensee to see the chain of custody for the package and who is accountable at each stage of the trip,
 - The shipping licensee or carrier can promptly determine if the shipment is lost or missing,
 - The tracking system requires an authorized signature (receiving licensees employee or contractor) before release for delivery or return,
 - Licensee's carrier maintains constant control and surveillance during transit with capability to immediately summon response by an armed LLEA, trained emergency services personnel to prevent or mitigate any collateral impacts of a safety event, or immediately requests assistance for emergency or urgent conditions to avoid or minimize unplanned delay of shipment.
 - Immediate communication to summon response or assistance may be met with cell or satellite phones and two-way radios. No backup communication system is required.
 - The licensee's carrier maintains a package-tracking system with a reliable on-demand capability to ascertain the last location and current status of the shipment.
- [4] A licensee who transports, or delivers to a carrier for transport in a single shipment by rail, a category 2 quantity of radioactive material should address the following items, as a minimum:
- The use of a carrier with a documented, proven, and reliable tracking system,
 - The capability to allow the shipping licensee or carrier to identify when and where package was when the train last reported, and when it will arrive at the next point of control,
 - The carrier maintains constant control and surveillance during transit and has the capability for immediately communication to summon an appropriate response or assistance,

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5.7.3.3[4] continued

- Immediate communication to summon response or assistance may be met with cell or satellite phones, and two-way radios. No backup communication system is required,
- The tracking system requires an authorized signature (receiving licensees' employee or contractor) before release for delivery or return.

5.7.4 Advance Notification of Shipment of Category 1

5.7.4.1 Advance Notification

- [1] The shipping licensee provides advance notification to the NRC and the governor of a State or the governor's designee in writing and postmarked 7 days before the shipment begins.
- [2] Notifications by fax or email are required 4 days before transport within or through the state.
- [3] The shipping licensee should confirm the notification by fax or its intended recipient receives email. The preferred notification method to the NRC is by email to RAMQC SHIPMENTS@nrc.gov or by fax to 301-816-5151. The contact information of governors and governor's designee is available on the NRC Web site at <http://nrc-stp.ornl.gov/special/designee.pdf>
- [4] The following is a summary of the information to be furnished in an Advance Notification of Shipment:
 - The name, address, and telephone number of the shipper, carrier, and receiver of the category 1 radioactive material,
 - The license numbers of the shipper and receiver,
 - A description of the radioactive material contained in the shipment, including the radionuclides and quantity,
 - The point of origin of the shipment and the estimated time and date that the shipment will commence,
 - The estimated time and date that the shipment is expected to enter each State along the route,
 - The estimated time and date of arrival of the shipment at the destination,
 - A point of contact, with a telephone number, for current shipment information.


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5.7.4.1 *continued*

- [5] The licensee is expected to include all of the above information when it makes the initial advance notification. Any missing information is required to be provided before commencement of the shipment.

5.7.4.2 Updating Advance Notification


- [1] The shipping licensee is required to provide a revision notice with any information that was not available when the initial notification was submitted.
- [2] The shipping licensee is required to notify any affected State's governor or designee as soon as it discovers or is advised of the following changes in the shipment:
- A change is made to the description of the radioactive material radionuclides or quantities,
 - A change is made in the shipment's point of origin or estimated time or date of commencement,
 - A change of 6 hours or more is made in the estimated time or date that the shipment is expected to enter each State along the route,
 - A change of 6 hours or more is made in the estimated time or date of arrival of the shipment at the destination,
 - A change is made in the name or telephone number of the point of contact for current shipment information.
- [3] The driver or other authorized member of the transfer crew is to make notification of any changes in shipment information en route as soon as the change is determined.
- [4] **IF** the shipment is canceled, **THEN** the shipping licensee is required to notify the States to which advance notification was provided **AND** the NRC, **OR** Agreement State agency with jurisdiction in the State of origin. The licensee is required to send a cancellation notice via email, facsimile, or written correspondence as soon as possible. A telephone call may be necessary to ensure timely receipt of the notice to provide a State time to cancel any planned escorts.

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5.7.5 Reporting of Events


5.7.5.1 Shipment Investigations

- [1] **IF** the licensee asks for a status of its shipment, **AND** the carrier's telemetric monitoring system or railroad's communications center cannot tell where the shipment is within a few minutes **AND** the shipping licensee is not confident that the tracking and communication system are functioning normally, **THEN** the licensee should consider the shipment lost or missing
- [2] The shipping licensee must investigate immediately if a category 1 quantity shipment is lost or missing.
- [3] The investigation of the lost or missing category 1 quantity shipment should include as a minimum the following actions:
 - Determine the time and location of the last transport crew check-in.
 - Determine where communication was lost.
 - Determine where tracking was lost.
 - Confirm that the equipment is working properly.
 - Contact the escort if one was being used.
- [4] The shipping licensee must investigate immediately if a category 2 quantity shipment does not arrive by the NLT arrival time based on the receiving licensee notification.
- [5] The investigation of the lost or missing category 2 quantity shipments should include as a minimum the following actions:
 - Determine the shipment's last known location from carrier.
 - Determine the shipment's current location.
- [6] **IF** the carrier cannot determine the location of the shipment, **THEN** the shipping licensee notifies the NRC Operations Center that a category 2 quantity shipment is lost or missing
- [7] Contact the NRC Operations Center if the shipment is still missing after 24 hours of the initial notification.

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5.7.5.2 Category 1 Notifications

- [1] The shipping licensee must make the following notifications after determining a shipment of category 1 quantities of radioactive material is lost or missing:
- Notify the LLEA as soon as the carrier has completed its first unsuccessful attempt to locate the material and confirmed its inability to trace it was not a result of human error, or a malfunction of the position monitoring system,
 - Notify the NRC Operations Center within 1 hour after determining the category 1 shipment is lost or missing. Discuss with the NRC the expected frequency of updates,
 - Notify the NRC and the LLEA as soon as possible when the lost or missing licensed material is again in the physical possession of, or in a location otherwise under the control of the carrier, shipping, or recipient licensee, authorized State or Federal agency, or an LLEA that is able to prevent or deter unauthorized access to the material.
- [2] The shipping licensee must make the following notifications as soon as possible upon discovery of any actual or attempted theft, or diversion of a shipment, or suspicious activities related to the theft or diversion of a shipment of a category 1 quantity of material:
- Notify the designated LLEA along the shipment route as soon as possible, **AND**
 - Notify the NRC Operations Center (301-816-5100). The NRC will notify other affected States and Federal partners as appropriate.
- [3] The Transportation Security Administration (TSA) has guidance for private or contract carrier employees that list a number of activities that may be considered suspicious.
- [4] A written report is required to be submitted to the NRC within 30 days of the shipping licensee's initial telephonic notifications that a shipment of category 1 material is lost or missing, or telephonic notification of actual, or attempted theft or diversion of a shipment of category 1 material.


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5.7.5.2 *continued*

- [5] The written report is provided to the Director, Division of Security Policy, Office of Nuclear Security and Incident Response and must provide the following information:
- A description of the licensed material involved, including kind, quantity, and chemical and physical form;
 - A description of the circumstances under which the loss or theft occurred;
 - A statement of disposition, or probable disposition, of the licensed material involved;
 - Actions that have been taken, or will be taken to recover the material;
 - Procedures or measures that have been, or will be, adopted to ensure against a recurrence of the loss or theft of licensed material.
- [6] After filing the written report, if the shipping licensee gathers any information not previously reported to the NRC, such as findings from a completed investigation of the loss or theft of category 1 material, the licensee has to report that additional information within 30 days.
- [7] A Condition Report will be initiated to document any actual or attempted theft or diversion of a shipment or any suspicious activity related to a shipment of category 1 quantities of radioactive material.

5.7.5.3 Category 2 Notifications

- [1] The shipping licensee is required to notify the NRC Operations Center within 4 hours of its determining a shipment of category 2 quantities of radioactive material is lost or missing. If after 24 hours from its determination the licensee still cannot locate the material, the NRC operations Center must be notified again.
- [2] The shipping licensee is also required to notify the NRC Operations Center as soon as possible after discovery of an actual or attempted theft or diversion of a category 2 quantity shipment or any suspicious activity related to a shipment.
- [3] The shipping licensee is required to notify the NRC Operations Center when a lost or missing shipment of category 2 quantities of radioactive material has been located.
- [4] A written report is required to be submitted to the NRC within 30 days of the shipping licensee initial telephonic notifications that a shipment of category 2 material is lost or missing or telephonic notification of actual or attempted theft or diversion of a shipment of category 1 material.

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5.7.5.3 continued

- [5] After filing the written report, if the shipping licensee gathers any information not previously reported to the NRC, such as findings from a completed investigation of the loss or theft of category 2 materials, the licensee has to report that additional information to the NRC within 30 days.
- [6] A Condition Report will be initiated to document any actual or attempted theft or diversion of a shipment or any suspicious activity related to a shipment of category 2 quantities of radioactive material.


5.7.6 Records

5.7.6.1 Documentation

- [1] The records that result from the activities in this procedure are to be retained a minimum of three years as required but typically through the life of the nuclear power plant's license.
- [2] The following records are generated as a result of implementing this section:
 - Licensee verification documentation
 - Documentation for preplanning and coordination, and any revision
 - Advance notification and any revision and cancellation notices
 - Written reports and additional substantive information
- [3] Records resulting from the activities in this procedure are to be retained with records generated by EN-RW-102, "Radioactive Shipping Procedure."

5.7.6.2 Protection of Information

- [1] The information to be furnished in advance notification of category 1 quantities of radioactive material shipment shall be protected against unauthorized disclosure as specified in 10 CFR 73.21 Protection of Safeguards Information: Performance requirements. The schedule information specified in 37.77(b) is provided to State officials, State employees, and other individuals that are not licensees of the NRC or an Agreement State.
- [2] The governor of a State or his or her designated State employee representative, Federal, State, or local law enforcement personnel are relieved from the fingerprinting, identification, and criminal history records checks, and other elements of background investigations and are permitted access to the category 1 shipping information.

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5.7.6.2 continued

- [3] A licensee that plans to transport or deliver to a carrier for transport, licensed material that is a category 1 quantity of radioactive material will only use carriers that certify they have an access authorization program that meets the requirements of 10 CFR 73.21 and 10 CFR 73.23. The carrier must include in the access authorization program the vehicle drivers, accompanying individuals, movement control center personnel, and any individual whose assigned duties provide access to shipment information on category 1 quantities of radioactive material.
- [4] The shipment of category 2 quantities of radioactive material does not require the commercial drivers and package handlers to meet the access authorization program requirements since these individuals are subject to DOT security requirements.
- 5.8 TYPES OF HAZMAT SHIPMENTS ADDRESSED BY THE ENTERGY (EOI / ENOI) TSP-RA
- [1] Specifically for Nuclear Power Reactors, this transportation security plan (TSP) applies to:
- (a) Radioactive laundry shipments,
 - (b) Some shipments of low-level radioactive waste (dry active waste) to offsite processors,
 - (c) Some shipments of radioactive vendor equipment offsite, and
 - (d) Shipments of processed radioactive waste and reactor hardware for offsite disposal.

NOTE

For Highway Route Controlled Quantity shipments of radioactive materials, the shipper must refer to the NRC Physical Security Plan along with the Additional Security Measures for Radioactive Shipments – Category 1 and Category 2 Quantities (Section 5.7 of this procedure).

- [2] A highway route-controlled quantity of a Class 7 (radioactive) material, as defined in Part 173.403 of this subchapter, in a motor vehicle, rail car, or freight container;
- [3] More than 25 kg (55 pounds) of a Division 1.1, 1.2, or 1.3 (explosive) material in a motor vehicle, rail car, or freight container;
- [4] More than one L (1.06 qt) per package of a material poisonous by inhalation, as defined in Part 171.8 of this subchapter, that meets the criteria for Hazard Zone A, as specified in § 173.116(a) or 173.133(a) of this subchapter;

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5.8 continued


- [5] A shipment of a quantity of hazardous materials in bulk packaging having a capacity equal to or greater than 13,248 L (3,500 gallons) for liquids or gases or more than 13.24 cubic meters (468 cubic feet) for solids;
- [6] A shipment in other than a bulk packaging of 2,268 kg (5,000 pounds) gross weight or more of one class of hazardous materials for which placarding of a vehicle, rail car, or freight container is required for that class under the provisions of subpart F of this part;
- [7] A select agent or toxin regulated by the Centers for Disease Control and Prevention under 42 CFR part 73; or
- [8] A quantity of hazardous material that requires placarding under the provisions of subpart F of this part.

5.9 INFORMATION

- [1] Attachment 9.1 provides all associated tables that are applicable to the ENTERGY (EOI / ENOI) Risk Assessment.

6.0 INTERFACES

- [1] EN-RW-102, "Radioactive Shipping Procedure"

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7.0 RECORDS

NOTE

Records resulting from the activities in this procedure are retained with records generated by EN-RW-102, "Radioactive Shipping Procedure."


- [1] Licensee verification documentation
- [2] Documentation for preplanning and coordination, and any revision
- [3] Advance notification and any revision and cancellation notices
- [4] Written reports and additional substantive information
- [5] Attachment 9.6, "10 CFR37 Subpart D Category 1 Physical Protection Requirement Checklist"
- [6] Attachment 9.7, "10 CFR37 Subpart D Category 2 Physical Protection Requirement Checklist"
- [7] Attachment 9.8, "10 CFR 37 Subpart D Category 1 Quantities of Concern State Coordination Log"

8.0 SITE SPECIFIC COMMITMENTS

None

9.0 ATTACHMENTS

- 9.1 TSP-RA Tables
- 9.2 Sample Carrier Affirmation Letter
- 9.3 License Verification System Credential Guide
- 9.4 Manual License Verification Form Guide
- 9.5 Manual License Verification Procedure Guide
- 9.6 10 CFR 37 Subpart D Category 1 Physical Protection Requirement Checklist
- 9.7 10 CFR 37 Subpart D Category 2 Physical Protection Requirement Checklist
- 9.8 10 CFR 37 Subpart D Category 1 Quantities of Concern State Coordination Log

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ATTACHMENT 9.1

TSP-RA TABLES


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[33 CFR 105.400]

TABLE 1

Typical Radioactive and Hazardous Materials Shipments

RADIOACTIVE MATERIALS SHIPMENTS	
TYPES OF MATERIALS SHIPPED	TYPICAL MATERIALS IN SHIPMENT
Radioactive Material Category 1 and Category 2 as defined in Attachment 9.1, Table 4, "Category 1 and Category 2 Threshold".	Examples include, but are not limited to: certain radioactive calibration sources, ion-exchange resin, certain activated reactor components and limited amounts of irradiated reactor fuel.
Highway route controlled quantities (HRCQ) of radioactive material.	Highly irradiated reactor components; some Greater Than Class C (GTCC) wastes.
Shipment of Type B quantities of radioactive materials in an NRC-approved shipping container.	High activity resin, filters, and irradiated reactor components, such as control rod blades and velocity limiters.
Shipment of radioactive materials in bulk packaging of 3,500 gallons or more for liquids or 468 cubic feet or more for solids.	Radioactively contaminated oil or aqueous liquids; routine sea-land and inter-modal containers of dry active waste.
Shipment in other than bulk packaging of 5,000 pounds or more of radioactive materials that is required to be placarded.	Most shipments made in Type A or Type B casks.
A quantity of radioactive material that requires placarding.	Most radioactive waste shipments, laundry shipments, vendor equipment shipments.
HAZARDOUS MATERIALS SHIPMENTS	
TYPES OF MATERIALS SHIPPED	TYPICAL MATERIALS IN SHIPMENT
A quantity of hazardous materials in a bulk packaging <u>having a capacity</u> equal to or greater than 3500 gallons (13,248 liters) for liquids or gases or more than 468 ft ³ (13.24 m ³) for solids.	Most shipments of diesel fuel, used oil, acids, caustics, sodium hypochlorite, and similar hazmat.
A quantity of hazardous material that requires placarding.	Most shipments of hazardous waste (such as paint waste, parts cleaning solutions, and lab packs), liquid and solid mixed waste, PCB waste, asbestos and waste water treatment chemicals.

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TABLE 2
Hazmat Carriers, Types of Hazmat Shipments, and Quantities Shipped

CARRIER CATEGORY	TYPICAL MATERIALS TRANSPORTED BY THIS CARRIER CATEGORY	MAXIMUM QUANTITIES PER SHIPMENT
Laundry services suppliers	<ol style="list-style-type: none"> 1. Radioactive laundry 2. Low activity DAW 	Co-60 = < 1 Ci Cs-137 = < 1 Ci
Plant maintenance equipment and services suppliers (including their subcontracted Carriers)	<ol style="list-style-type: none"> 1. Low activity radioactive material 	Co-60 = < 8.1 Ci Cs-137 = < 10 Ci
Waste processors, and other waste Carriers and Hazmat Carriers	<ol style="list-style-type: none"> 1. Radioactive materials and waste 2. Reactor components and other irradiated hardware 3. Vendor equipment 4. Hazardous waste 5. Mixed waste 6. PCB waste 7. Asbestos waste 	HRCQ, excluding spent fuel (rarely) RAMQC (rarely) Type A and Type B LSA/SCO Bulk and/or placarded hazmat
Common carrier (Federal Express, UPS)	Radioactive sources	Could be Category 1 or 2
Entergy	Radioactive material/special tools/sources	Could be Category 1 or 2

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TABLE 3
Determination of Hazardous Materials of Significance to This Assessment

(a) Hazard Class	(b) Hazard Class Division Of Concern	(c)(c) General Description of Significant Hazard or Class	(d) Typical Materials Shipped in this Hazard Class Division by these Facilities and Discussion of Relative Significance	(e) Significance to This Risk Assessment
1	1.1, 1.2, 1.3	Explosives	No significant quantity of explosives are shipped by these facilities.	None
2	2.3	Poison Gas (inhalation hazard)	Anhydrous ammonia gas, chlorine gas.	High
3	None	Flammable (liquids)	Diesel fuel, gasoline, paint, solvents. These materials are relatively low toxicity (i.e., are not acutely toxic; do not contain lethal concentrations or doses).	Low
4	4.3	Dangerous When Wet	Sodium. No significant quantities of such materials are shipped by these facilities. (Significant quantities may be shipped by sodium-moderated reactors if any are included in the facility listing in Section 1.1. Significance would be Low.)	None
5	5.2	Organic Peroxide, Type B (may be liquid or solid and are thermally controlled)	Type B organic peroxides can undergo a thermal explosion. As a general rule, they are not shipped by any of these facilities. In the event a shipment becomes necessary, the shipment is pre-approved in writing by the DOT Associate Administrator and is shipped in accordance with the instructions provided by the Associate Administrator.	None
6	6.1	Poison Inhalation Hazard (liquid poisons)	Hydrazine and most other hazmat in this division are not Hazard Zone A or B (Package Group I) and are, therefore, <u>not</u> High significance.) Note: some plants may still have stabilized acrolein on site, which would be High significance.)	Medium
8	None	Corrosives	Acids, caustics. These materials are relatively low toxicity (i.e., are <u>not</u> acutely toxic; do <u>not</u> contain lethal concentrations or doses).	Low
9	None	Miscellaneous	Hazardous waste, solid, n.o.s.; Hazardous waste, liquid, n.o.s.; asbestos; PCBs. These materials are relatively low toxicity (i.e., are <u>not</u> acutely toxic; do <u>not</u> contain lethal concentrations or doses).	Low



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TABLE 4
Category 1 and Category 2 Threshold

The terabecquerel (TBq) values are the regulatory standard. The curie (Ci) values specified are obtained by converting from the TBq value. The curie values are provided for practical usefulness only.

Radioactive material	Category 1 (TBq)	Category 1 (Ci)	Category 2 (TBq)	Category 2 (Ci)
Americium-241	60	1,620	0.6	16.2
Americium-241/Be	60	1,620	0.6	16.2
Californium-252	20	540	0.2	5.40
Cobalt-60	30	810	0.3	8.10
Curium-244	50	1,350	0.5	13.5
Cesium-137	100	2,700	1	27.0
Gadolinium-153	1,000	27,000	10	270
Iridium-192	80	2,160	0.8	21.6
Plutonium-238	60	1,620	0.6	16.2
Plutonium-239/Be	60	1,620	0.6	16.2
Promethium-147	40,000	1,080,000	400	10,800
Radium-226	40	1,080	0.4	10.8
Selenium-75	200	5,400	2	54.0
Strontium-90	1,000	27,000	10	270
Thulium-170	20,000	540,000	200	5,400
Ytterbium-169	300	8,100	3	81.0

Continued on next page

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Note: *Calculations Concerning Multiple Sources or Multiple Radionuclides*

The "sum of fractions" methodology for evaluating combinations of multiple sources or multiple radionuclides is to be used in determining whether a location meets or exceeds the threshold and is thus subject to the requirements of this procedure.

I. If multiple sources of the same radionuclide and/or multiple radionuclides are aggregated at a location, the sum of the ratios of the total activity of each of the radionuclides must be determined to verify whether the activity at the location is less than the category 1 or category 2 thresholds of Table 4, as appropriate. If the calculated sum of the ratios, using the equation below, is greater than or equal to 1.0, then the applicable requirements of this part apply.

II. First determine the total activity for each radionuclide from Table 4. This is done by adding the activity of each individual source, material in any device, and any loose or bulk material that contains the radionuclide. Then use the equation below to calculate the sum of the ratios by inserting the total activity of the applicable radionuclides from Table 4 in the numerator of the equation and the corresponding threshold activity from Table 4 in the denominator of the equation.

Calculations must be performed in metric values (i.e., TBq) and the numerator and denominator values must be in the same units.

R_1 = total activity for radionuclide 1

R_2 = total activity for radionuclide 2


R_N = total activity for radionuclide n

AR_1 = activity threshold for radionuclide 1

AR_2 = activity threshold for radionuclide 2

AR_N = activity threshold for radionuclide n

$$\sum_1^n \left[\frac{R_1}{AR_1} + \frac{R_2}{AR_2} + \frac{R_n}{AR_n} \right] \geq 1.0$$

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ATTACHMENT 9.1

TSP-RA TABLES

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TABLE 5
Hazardous Materials of Significant Concern Shipped From Facilities

Hazard Class Division Of Concern	General Description of Significant Hazard or Class	Typical Materials Shipped in this Hazard Class Division by these Facilities and Discussion of Relative Significance
2.3	Poison Gas (inhalation hazard)	Anhydrous ammonia gas, chlorine gas.

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ATTACHMENT 9.2

SAMPLE CARRIER AFFIRMATION LETTER

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EXAMPLE:

Date:

To: Entergy (EOI / ENOI)
(Appropriate Site Address)

Subject: Carrier Hazardous Material Transportation Security Plan


(Carrier Company Name) affirms that we have a Hazardous Material Transportation Security Plan in place which meets all applicable Federal and International transportation security regulations in effect as of the contract or contract amendment date, and that said Transportation Security Plan will be updated in a timely manner to remain current with revised and new Federal and International transportation security regulations. We further affirm that our Transportation Security Plan fully implements the regulations for commercial driver licenses hazardous material endorsements.

Our Transportation Security Plan will be made available for review and approval by an authorized representative of ENTERGY (EOI / ENOI) NS if requested and on reasonable verbal or written notice, with due consideration given to document security and control. We understand that we will not mail, send, or otherwise transmit any confidential documents to ENTERGY (EOI / ENOI).

Prior to dispatching any driver to an ENTERGY (EOI / ENOI) facility for the purposes of transporting hazardous material, we will verify that the driver has the appropriate commercial driver license hazardous material endorsements. We also agree to notify a designated ENTERGY (EOI / ENOI) representative of the name of the driver and any other requested driver identification information, which will be used to verify that the appropriate driver has arrived to transport the shipment.

It is further agreed that transportation of any of the hazardous materials identified in 49 CFR 172.800 will not be assigned or subcontracted without the prior written agreement of all parties.

Authorized Carrier Representative Signature Block


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NOTE

The purpose of this guide is to aid individuals in getting credentialed for using the NRC License Verification System (LVS).

The NRC LVS web site provides an on-line User Guide.

- [1] Using a web browser, go to <http://www.nrc.gov>.
- [2] Click on "Nuclear Security" tab.
- [3] Click on the "Radioactive Material Security" bulleted item.
- [4] Click on "License Verification System (LVS)" under "NRC Activities for Radioactive Material Security."
- [5] Click on "Get credentialed for LVS." A public Disclosure of Submitted Information will appear. **IF** you want to continue with getting your LVS Credentialed, **THEN** click on "I ACCEPT."
- [6] After you mouse click on I ACCEPT, the Web Page Portfolio Enrollment Module will appear. Fill out all the information requested from the Portfolio Enrollment Request Form. Once all the required information blocks are filled out, mouse click on Submit at the lower right corner of the request form.


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ATTACHMENT 9.4
MANUAL LICENSE VERIFICATION FORM GUIDE
Sheet 1 of 2

- [1] Using a web browser, go to <http://www.nrc.gov>.
- [2] Click on "Nuclear Security" tab.
- [3] Click on "Radioactive Material Security" bulleted item.
- [4] Click on "License Verification System (LVS)" under "NRC Activities for Radioactive Material Security."
- [5] Click on "Manual License Verification Form." A PDF document similar to the following should display.

NRC FORM 749 <small>REV. 2014</small> <small>10 CFR 37.75</small>		U.S. NUCLEAR REGULATORY COMMISSION		MANUAL LICENSE VERIFICATION REPORT		APPROVED BY OMB: NO. 3150-0223		EXPIRES: 07/31/2017	
<small>Submitter must get response to comply with this collection request, 8 minutes. This form is a voluntary means of fulfilling the requirements of 10 CFR 37.71. The information provided will be used to perform a license verification prior to transfer. Send comments regarding burden estimate to the FRA, Privacy, and Information Collection Branch (17-0000, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to info@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, 4010-10002, (3150-0223). Office of Management and Budget, Washington, DC 20503. If a means used to express an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.</small>									
<small>Sections A-B to be completed by LVS Help Desk (if applicable). Sections C-D to be completed by the licensee. Complete sections C and D below for NRC of Agreement State licensees needing to verify a license outside of the License Verification System. For issues with submitting this form, please contact the LVS Help Desk: 1-877-671-6787 or E-mail: lvs@help.resource@nrc.gov.</small>									
A. CONTACTED VIA		<input type="checkbox"/> Phone		<input type="checkbox"/> E-mail		B. DATE (MM/DD/YYYY)			
C. TRANSFERRING LICENSEE INFORMATION									
C.1 Agency (issuing Agency for license)									
C.2 Licensee Name									
C.3 License Number									
C.4 Contact Name and Title									
C.5 Contact Telephone Number									
C.6 Contact E-mail Address									
C.7 Contact Fax Telephone Number									
D. RECEIVING LICENSEE INFORMATION									
D.1 Agency (issuing Agency for license)									
D.2 Licensee Name									
D.3 License Number									
D.4 Amendment Number									
D.5 Issue Date									
D.6 Authorized Location									
D.7 Material(s) of concern being requested									
D.8 Chemical/Physical Form									
D.9 Quantity/Activity/Unit (being requested)									
1.									
2.									
3.									
4.									
<small>Sections E-F Instructions (Agency representative to provide): Verify the information in Section D above and make sure that all information provided is valid and the authorized location, materials and quantities being requested are authorized on the recipient's license. Record the verification outcome below. Return the completed form via e-mail to the LVS Help Desk (lvs@help.resource@nrc.gov).</small>									
E. VERIFIER'S INFORMATION									
E.1 Verifier's Name									
E.2 Verifier's Telephone Number									
E.3 Verifier's Fax Telephone Number									
E.4 Verifier's E-mail Address									
F. VERIFICATION OUTCOME									
F.1 Verification Date									
F.2 Verification Outcome									
<input type="checkbox"/> Requested materials, quantities, and authorized location are authorized on the license									
<input type="checkbox"/> Requested materials, quantities, and authorized location are not authorized on the license									
<input type="checkbox"/> Other									
F.3 If other, please explain:									

NRC FORM 749 (07-2014)
OFFICIAL USE ONLY - SECURITY-RELATED INFORMATION

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ATTACHMENT 9.4

MANUAL LICENSE VERIFICATION FORM GUIDE


Sheet 2 of 2

[6] Save the form in PDF format.

NOTE

At this time the green "Submit by E-mail" button on the form does not work.

[7] **WHEN** completed, **THEN** email the form to LVSHelp.Resource@nrc.gov.

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ATTACHMENT 9.5

MANUAL LICENSE VERIFICATION PROCEDURE GUIDE

Sheet 1 of 2


Manual License Verification

NOTE

The purpose of this attachment is to guide licensees transferring Category 1 and/or Category 2 quantities of radioactive materials in verifying licenses outside of the License Verification System (LVS).

Steps for Licensees

- [1] Contact the LVS Help Desk by phone at 1-877-671-6787 or by email at LVSHelp.Resource@nrc.gov.
- [2] Be prepared to provide the following information to the LVS Help Desk representative.
 - (a) Transferring licensee information:
 - License-issuing agency
 - Licensee name
 - License number
 - Contact name and title
 - Contact phone
 - Contact email
 - Contact fax number
 - (b) Receiving licensee information:
 - License-issuing agency
 - Licensee name
 - License number
 - Amendment number or license issue date
 - Authorized storage location address
 - Material(s) being requested
 - Chemical/Physical form of the material(s) being requested
 - Quantity/Activity being requested


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ATTACHMENT 9.5

MANUAL LICENSE VERIFICATION GUIDE

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- [3] The transferring licensee will receive notification from the LVS Help Desk of the verification outcome as soon as the verification is complete by the license issuing regulatory agency.
- [4] The verification outcome will include a notification of whether:
 - (a) The requested materials, quantities, and authorized location are authorized on the license, **OR**
 - (b) The requested materials, quantities, and/or authorized location are NOT authorized on the license, **OR**
 - (c) Other reason (with an explanation)
- [5] The licensee **must keep** a copy of the verification outcome sent by the LVS Help Desk for their records in accordance with the 10 CFR Part 37 requirements for keeping records of license verifications.

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ATTACHMENT 9.6

10 CFR 37 SUBPART D CATEGORY 1 PHYSICAL PROTECTION REQUIREMENT CHECKLIST

Sheet 1 of 4

Shipment Number: _____

- [1] Verify the recipient is authorized to receive the type, form and quantity of material per NRC's License Verification System OR License Issuing Authority in accordance with 10 CFR 37.71

(initials)

- [2] Verify the delivery address matches the location authorized in the recipient's license.

(initials)

- [3] Attach documentation of license verification.

(initials)

- [4] **IF** shipping to a licensee in an agreement state, **THEN** obtain written verification of licensee compliance with physical security requirements for Category 1 quantities of radioactive materials in accordance with 10 CFR 37. Attach verification documentation.


(initials)

- [5] Pre-plan and coordinate shipment arrival and departure times with receiving licensee.

Planned departure date and time: _____

Planned arrival date and time: _____

(initials)

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ATTACHMENT 9.6
10 CFR 37 SUBPART D CATEGORY 1 PHYSICAL PROTECTION REQUIREMENT CHECKLIST
Sheet 2 of 4

- [6] Provide advance notification to the NRC prior to transport per 10 CFR 37.77. Notification by mail must be postmarked at least seven (7) days prior to commencement of transport. Other means of notification must reach NRC at least four (4) days prior to shipment commencement.

Information required in notification. **IF** information is not available at the time of shipment, **THEN** provide the information as soon as possible, but before commencing shipment.

- Name, address, telephone number, and license number of shipper.
- Name, address, and telephone number of carrier.
- Name, address, telephone number, and license number of the recipient.
- Description of radioactive material, including radionuclides and quantities.
- Point of origin and estimated date and time shipment will commence.
- Estimated date and time shipment expected to enter each state along route.
- Estimated date and time of arrival
- Point of contact and telephone number to obtain current shipment information

Date and time of notification: _____


(initials)

- [7] Pre-plan and coordinate shipment information with the Governor, or designee, of any state through which the shipment will pass, including the State's intentions to provide law enforcement escorts and identification of safe havens. Use attachment 9.8, "Category 1 Quantities of Concern State Coordination Log," or equivalent, to document coordination activities. **IF** coordination was performed carrier or recipient, attach copy of documentation.

(initials)

- [8] Notify each state Governor or designee immediately of any changes or cancellation. Attach documentation of notification.

(initials)

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ATTACHMENT 9.6

10 CFR 37 SUBPART D CATEGORY 1 PHYSICAL PROTECTION REQUIREMENT CHECKLIST

Sheet 3 of 4

[9] Verify the carrier meets the requirements for physical protection of Category 1 quantities of radioactive material during shipments by road per 10 CFR 37.79(a).

(initials)

[10] **IF** provided, **THEN** attach carrier verification of 10 CFR 37 compliance.

(initials)

[11] Verify normal and emergency contingency procedures addressing the following are available to drivers, accompanying personnel AND the movement control center.


- Notification to communications center and law enforcement agencies
- Communication protocols that include a strategy for authentication and duress codes and provisions for refueling or other stops.
- Loss of communications
- Response to actual or attempted theft or diversion of shipment

(initials)

[12] Verify movement control center(s) established to maintain position information from a remote location comply with the following:

- The center has the ability to immediately contact appropriate law enforcement agencies.
- The center has redundant communications with transport or escort vehicle.
- The center continuously and actively monitors shipment by telemetric position monitoring, or alternative tracking system, twenty-four hours a day, seven days a week.
- The center is prepared to implement pre-planned procedures in response to deviations from authorized route or notification of suspicious activities or attempted theft or diversion of material.

(initials)

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ATTACHMENT 9.6

10 CFR 37 SUBPART D CATEGORY 1 PHYSICAL PROTECTION REQUIREMENT CHECKLIST

Sheet 4 of 4

- [13] **IF** the highway shipment driving time is greater than the maximum number of hours established by the Department of Transportation, **THEN** verify there is an accompanying individual.

(initials)

- [14] Notify Site Security (S.A.S) of shipment AND have Security make a log entry.

Date and time of notification: _____


Security point of contact: _____

Security log entry number: _____

(initials)

Performed by (print, sign, date): _____

Reviewed by (print, sign, date): _____

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ATTACHMENT 9.7 10 CFR 37 SUBPART D CATEGORY 2 PHYSICAL PROTECTION REQUIREMENT CHECKLIST
Sheet 1 of 2

Shipment Number: _____

- [1] Verify the recipient is authorized to receive the type, form and quantity of material per NRC's License Verification System OR License Issuing Authority in accordance with 10 CFR 37.71

(initials)

- [2] Attach documentation of license verification.

(initials)

- [3] **IF** shipping to a licensee in an agreement state, **THEN** obtain written verification of licensee compliance with physical security requirements for Category 2 quantities of radioactive materials in accordance with 10 CFR 37. Attach verification documentation.

(initials)

- [4] Pre-plan and coordinate shipment arrival and departure times with receiving licensee.

Planned departure date and time: _____


Planned arrival date and time: _____

No-Later-Than date and time: _____

(initials)

- [5] Verify the carrier meets the requirements for physical protection of Category 2 quantities of radioactive material during shipments by road per 10 CFR 37.79(a).

(initials)

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ATTACHMENT 9.7 10 CFR 37 SUBPART D CATEGORY 2 PHYSICAL PROTECTION REQUIREMENT CHECKLIST
Sheet 2 of 2

[6] Verify the carrier has established a package tracking system that allows the shipper or transporter to identify where the package was last and when it should arrive at the next point of control.

(initials)

[7] Verify the carrier has constant control and/or surveillance during transit and has the capability for immediate communication to summon appropriate response or assistance.

(initials)

[8] Verify the carrier has established a tracking system that requires an authorized signature prior to releasing the package for delivery or return.

(initials)

[9] **IF** provided, **THEN** attach carrier verification of 10 CFR 37 compliance.

(initials)

[10] Notify Site Security (S.A.S) of shipment AND have Security make a log entry.

Date and time of notification: _____

Security point of contact: _____

Security log entry number: _____


(initials)

[11] Refer to 10 CFR 71.97 to see if the shipment also meets the criteria for Highway Route Control Quantity limits requiring advanced notification.

(initials)

Performed by (print, sign, date): _____

Reviewed by (print, sign, date): _____

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ATTACHMENT 9.8 **10 CFR 37 SUBPART D CATEGORY 1 QUANTITIES OF CONCERN STATE COORDINATION LOG**
Sheet 1 of 1

Shipment Number: _____

State: _____

State representative name and title: _____

Date of coordination conversation: _____

Expected entry:

Date and time: _____ Location: _____

Expected exit:

Date and time: _____ Location: _____

Does the state intend to provide law enforcement escorts? _____

Safe havens identified: _____

Additional discussion items concerning shipment through state: _____

Performed by (Print, sign, date): _____

Reviewed by (Print, sign, date): _____