

**State of Utah
Generator Site Access
(GSA) Draft Overview
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State of Utah's Objectives



- Ensure compliance with state and federal rules and regulations
- Inspect vehicles, transporters, and transport containers of waste
- Review shipping paper information
- Conduct contamination & exposure surveys

Generator Site Access Program

- Radiation Control Rule R313-26 prescribes the requirements for the issuance of permits to generators and waste collectors for accessing a land disposal facility located within the State and requirements for shippers.



Generator Site Access Permit Enforcement Policy

The enforcement policy supports the DRC's overall safety mission to protect the public and the environment from undue hazards and their associated risks through the uniform application of enforcement action.

<http://www.radiationcontrol.utah.gov/>

A stylized, low-poly silhouette of a mountain range in shades of brown and tan, positioned at the bottom of the slide against a blue gradient background.

Generator Site Access Permit Enforcement Policy Revisions

- Incorporation of DRC Policy
- Permittees are required to offer shipments that are compliant with EnergySolutions Radioactive Material License.
- Shipments containing DOT non-regulated material be packaged adequately to assure package integrity and containment of waste.



Example: Assessment Table Penalty Revision (App. A)

Permit:		
Failure to obtain the appropriate GSA permit and/or number of permits (i.e. obtaining a Waste Generator permit instead of Processor permit)	R313-26-2 (see definitions) R313-26-3(9)(a); (b); and (c)	150



Assessment Table Penalty Revisions

- Shipping Paper Information:
- The 49 CFR reference numbers have changed
- The basic description specified in 49 CFR 172.202 must be shown in sequence with either the proper shipping name first or the UN Identification number first, by 2013 the UN Identification number must be entered first.



Example: Assessment Table Revisions (App. A)

Shipping papers:		
Failure to include an identification number or use an incorrect number	R313-19- 100(3)(a)(i)(E) 49 CFR 172.202(a)(3) (1)	125
Failure to include a proper shipping name or using an incorrect proper shipping name	R313-19- 100(3)(a)(i)(E) 49 CFR 172.202(a)(1) (2)	100 125
Using a shipping description not in the required sequence	49 CFR 172.202(b)	50
Failure to list the number and type of packages	R313-19- 100(3)(a)(i)(E) 49 CFR 172.202(a)(7)	25
Failure to include the words "fissile excepted" for a package containing fissile Class 7 (radioactive) materials that is excepted	49 CFR 172.203(d)(6)(i)	25
Failure to accurately complete the NRC Form 541	(NUREG/BR 0204)	10- 300

Assessment Table Penalty Guideline Revisions

- Placarding:
- Bulk package (more than 640 cubic feet) placarded on all four sides
- Bulk packagings (less than 640 cubic feet) placarded on at least two opposing sides or labeled



Assessment Table Penalty Guideline Revisions

- Package
- Failure to use the proper packaging
- Failure to assure the package compatibility with the material
- Failed package integrity and/or failure to contain the material in the package
- Type A packaging must incorporate a seal



Example of Point Value Assessment Table (App. A)

Package:		
Failure to utilize the proper packaging	49 CFR 173.22(a)(2)	300
Failure to assure the package compatibility with material	49 CFR 173.24(b)(2)	300
Failed package integrity and/or failure to contain waste material adequately (non regulated material)	DRC Policy	125
Package breach (no spilled material) fail to use strong tight package	49 CFR 173.410 49 CFR 173.475(b) 10 CFR 71.87(b)	250
Package breach in transit to the facility - results in contamination but does not impact health or the environment	49 CFR 173.24(b)	350
Package breach resulting in contamination that impacts health or the environment	R313-15	525
Multiple packages with the same package ID number (exclusive package ID required, per package)	10 CFR 71.13	20
Packages in a transport vehicle exceeds a TI of more than 50 (exclusive use shipments are excepted)	49 CFR 174.700(b) & 177.842(a)	250
Packages non-exclusive use in a transport vehicle exceeds a CSI of more than 50, exclusive use not to exceed 100	49 CFR 173.457(d) 49 CFR 173.457(e)	250
Type A packaging must incorporate a tamper proof seal or similar	49 CFR 173.412(a)	20

Penalty Assessment

- **Point Value Totals / Action by DRC**

0 - 100 A

101-500 A+B

> 500 A+B and C or D

A - Telephone call and Letter of Deficiency to shipper/generator regarding unsafe and/or noncompliant issue.

B - Notice of Violation. (May include Imposition of Civil Penalty; Executive Secretary has discretion)

C - Suspension of Order (Temporary)

D - Revocation Order (Permanent).



More Examples of Problems Encountered

- Marking / Labeling / Placarding



Problems Encountered Marking/Labeling/Placarding



More Examples of Problems Encountered

- Load Bracing



Failed Load Bracing



Failure to Brace Packages



More Examples of Problems Encountered

- Package Securement



Secure Package Closures



Failure to Secure Package

