

<b>CH2M HILL Hanford Group, Inc.</b>	<b>Manual</b>	<b>HNF-IP-0842</b>
<b>DOCUMENTATION FOR HAZARDOUS MATERIAL TRANSPORTATION AND PACKAGING</b>	<b>Volume XVIII, Waste Management</b>	<b>1.2, REV 0a</b>
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## **1.0 PURPOSE AND SCOPE**

This procedure outlines the requirements associated with identifying, preparing, maintaining, reviewing, and approving documentation and records associated with hazardous material transportation and packaging operations and associated activities at the Hanford site. This applies to all transportation and packaging operations and activities under CHG cognizance where documentation and record keeping are required. This procedure is based on specific requirements for all documentation and records (including quality records) as outlined in policies, procedures, DOE Orders, and directives referenced in this section. The most common transportation and packaging-related documents and records and their retention periods are identified in Table 1.

## **2.0 PROCEDURE**

### **2.1 Preparing Controlled Policies, Procedures, and Other Transportation and Packaging-related Documentation**

Policies, procedures, and related documents such as checklists, inspection forms etc., prepared for the purpose of conducting hazardous material transportation and packaging operations, or referencing requirements for transportation and packaging operations per provisions in the CHG contract must be reviewed and approved by the appropriate department within either WMNW Transportation Logistics and/or Packaging Engineering.

To ensure that transportation and packaging documentation is reviewed by the appropriate organizations within the Transportation and Packaging Function, refer to Table VII-2, "Documentation Review Matrix." Transportation and packaging documentation prepared for external publication must meet the requirements of HNF-PRO-184 and HNF-PRO-210.

All documents intended for publication that contain or reference transportation and packaging policies, procedures, requirements, and/or guidance shall be reviewed by the Waste Management organization.

### **2.2 Engineering Documentation**

Engineering documentation associated with transportation and packaging operations and activities shall be identified, prepared, reviewed, and controlled according to the requirements of ~~RPP-PRO-1819~~ HNF-IP-0842, Volume IV, Section 1.2, "Engineering Requirements." HNF-IP-0842, Volume IV, Section 4.29, "Engineering Document Change Control Requirements," and Volume IV, Section 4.30, "Engineering Data Transmittal Requirements," describe engineering document identification, preparation, review, and control requirements.

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All engineering documentation prepared for use during transportation and packaging operations or prepared for inclusion in and/or in support of safety analysis documentation must be reviewed and approved by the Waste Management organization and appropriate oversight organizations.

### 3.0 RECORDS

Records for purposes of transportation and packaging operations include the following:

- Policies
- Procedures
- Documentation (e.g., SARPs, SEPs, DAPs, RSRs, COCs, bills of lading, UHWMs)
- Engineering Studies
- Drawings
- Reports (e.g., test reports)
- Maintenance/test records
- Package design criteria and documentation.

Records shall be maintained in accordance with HNF-PRO-210.

The following transportation and packaging documents are considered quality assurance records:

- Safety analysis documentation (e.g., SARPs, SEPs, DAPs)
- Package procurement specifications
- Training course completion rosters signed by an authorized instructor.
- Successfully completed training course examinations (tests).

Hazardous Material Transportation and packaging-related quality assurance records shall be controlled in a systematic manner according to the requirements of this procedure. The method of control for such quality records shall be defined, implemented, and controlled. All procedures used to control transportation and packaging-related quality assurance records shall be reviewed and approved by the Waste Management Federal Services Inc. Northwest Transportation and Packaging Function in accordance with ~~HNF-PRO-154~~.

### 4.0 DEFINITIONS

Documentation. Any written or graphic information that describes, specifies, defines, reports, or certifies activities, requirements, procedures, or results associated with transportation and packaging operations. Examples of transportation and packaging documentation are as follows:

1. Safety analysis documentation (e.g., Safety Analysis Report for Packaging [SARP], Safety Evaluation for Packaging [SEP], or Documentation Analysis for Packaging [DAP])
2. Analytical calculations associated with documenting packaging(s)
3. Test reports demonstrating a package's ability to meet established packaging standards

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4. Certificates of Compliance (COCs)
5. Radioactive Shipment Records (RSRs) (e.g., onsite, offsite, routine)
6. Hazardous Material Shipment Records
7. Uniform Hazardous Waste Manifests (UHWMs)
8. Training course completion rosters authenticated by an instructor
9. Successfully completed training course examinations (tests).

## 5.0 SOURCES

### 5.1 Requirements

Documentation associated with transportation and packaging operations must be controlled using established policies and procedures identified in the following controlled documents:

1. HNF-IP-0842, RPP Administration.  
Volume III, Training.  
Volume IV, Section 2.18, "Engineering Release and Approval Requirements."  
Volume XI, Section 3.5, "Review and Approval of Documents."
2. HNF-PRO-210, "Records Management Program Standards."
3. HNF-PRO-224, "Document Control Program Standards."
4. ~~RPP-HNF-PRO-222~~, "Quality Assurance Records."
- ~~5. RPP-PRO-233, "Review and Approval of Documents."~~

### 5.2 References

1. DOE 1324.5B, "Records Management Program."
2. HNF-IP-0842, RPP Administration.  
Volume III, Training.  
Volume IV, Section 4.25, "Engineering Data Transmittal Requirements."  
Volume IV, Section 4.29, "Engineering Document Change Control Requirements."  
Volume XVIII, Section 2.1, "Radioactive Material/Waste Shipments."  
Volume XVIII, Section 2.2, "Nonradioactive Hazardous Materials/Hazardous Waste Shipments."

- ~~3. HNF-PRO-154, "Responsibilities and Procedures for All Hazardous Material Shipments."~~

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4. RPP-HNF-PRO-222, "Quality Assurance Records."
5. RPP-MP-003, "Integrated Environment, Safety and Health Management System Description for the Tank Farm Contractor."

**Table 1. Transportation and Packaging-Related Documentation Records Retention Matrix.**

Description	Retention Period for Onsite Shippers, Generators and Transportation and Packaging (T&P)	Implementation Procedure
Hazardous Material Shipment Records (HMSRs)	Onsite Shippers: 1 year prior to disposal  T&P: (Offsite Shipments) 3 years prior to transfer to records storage, then retained indefinitely.	HNF-IP-0842, Volume XVIII, Section 2.2.
Onsite Routine Radioactive Shipment Records (ORRSRs)	Onsite Shippers: Once completed, immediately return to T&P (Hazardous Material Operations)  T&P: 1 year prior to disposal.	HNF-IP-0842, Volume XVIII, Section 2.1
Radioactive Material Shipment Records (RSRs)	Certifiers/Originators: 3 years as supporting documentation prior to disposal (copy only).  T&P: 3 years as supporting documentation prior to transfer to records storage, then retained indefinitely.	HNF-IP-0842, Volume XVIII, Section 2.1
Bills of Lading	T&P: 3 years as supporting documentation prior to transfer to records storage, then retained indefinitely.	HNF-IP-0842, Volume XVIII, Section 2.1
Uniform Hazardous Waste Manifest (UHWB)	All Shippers/Generators: (Onsite/offsite Manifests) 3 years after offered for transportation to initial carrier.  T&P: (Offsite Manifests) 3 years after offered for transportation to initial carrier, prior to transfer to records storage, then retained indefinitely. (Onsite Manifests) 1 year prior to disposal.	HNF-IP-0842, Volume XVIII
Certificates of Compliance (CoCs)	All Shippers: 3 years after last shipment.  T&P: 5 years after expiration, then disposal.	HNF-IP-0842, Volume XVIII
Safety Analysis Documentation for Onsite and Offsite approved packages (including: SARPs, SEPs, DAPs, and Procurement Specifications)	All Shippers: 1 year after last shipment for onsite package documentation (copy only), then disposal. 3 years for packages approved for offsite use (copy only) then disposal.  T&P: 5 years after expiration date, then disposal (record copy retained at records storage at all times unless considered "In Process.").	<del>HNF-PRO-154</del>
DOT Hazardous Material Awareness and Certification Training course rosters and tests with a score of 80% or greater	T&P: Copy retained for 3 years or until employee recertifies (for information only). Original records of test and roster transported to Training Records in a period not to exceed 20 days. Records are retained indefinitely at records storage.	HNF-PRO-166

**Table 2. Documentation Review Matrix.**

Activity	Reviewing Group
Packaging design, package procurement, DOT approved packaging system development, packaging needs assessment.	Waste Management Services
Packaging safety analysis, packaging selection and application, modifications to existing packaging documentation, packaging procedures, package supporting documentation (SARP, SEP, DAP).	Waste Management Services
Freight billing, including hazardous material documentation, offsite shipping documentation.	Waste Management Services
Package testing, offsite packaging programs, DOE Transportation Management Division (TMD) packaging programs.	Waste Management Services
Onsite hazardous material transfer documentation, operating procedures, controlled manual revisions, hazardous material inspection and shipment (onsite and prior to release from the point of origin to 1100 Area for offsite destinations).	Waste Management Services
Offsite/onsite hazardous material transportation and packaging training, DOE Transportation Management Division (TMD) transportation programs.	Waste Management Services