

CLASSIFICATION OF ONSITE DOE TRANSPORTATION OPERATIONAL EMERGENCIES

QUESTION: According to DOE O 151.1C, some onsite shipments or between-facility transfers of hazardous materials do not require a Hazards Survey/ Emergency Planning Hazards Assessment (EPHA) because they satisfy governing DOT regulations and specifications for commercial hazardous materials transport. In the event of an accident, protective actions would be implemented using the DOT Emergency Response Guidebook (ERG), but is it the intent of the Order that an onsite accident involving these DOT compliant shipments also be classified?

ANSWER: DOE 151.1C (2005) provides an option to exclude certain onsite shipments from the Order requirement to develop a Technical Planning Basis using Hazards Surveys (HSs) and Emergency Planning Hazards Assessments (EPHAs), if the shipments satisfy governing DOT regulations and specifications for commercial hazardous materials transport. The following excerpts from DOE O 151.1C, Para 3.a. (6) and Attachment 2, *Contractors Requirements Document*, Para 3.b. (1) g. address onsite transport:

“An EPHA must be developed for shipments that do not satisfy governing DOT regulations and specifications for commercial hazardous materials transport. However, if a shipment satisfies DOT regulations and specifications, then an EPHA is not required.”

The Emergency Management Guide (EMG), DOE G 151.1-2, Appendix D, p. D-1 provides further clarification:

“Non-DOE (commercial) shipments of hazardous materials to, from, or across the site are governed by DOT regulations and specifications for commercial hazardous materials transport and do not require a Hazard Survey or Hazards Assessment. Also exempt from the Hazards Survey/Hazards Assessment requirements is inter-facility transport of hazardous materials, which complies with all DOT regulations and specifications applicable to the movement of those same materials over public transportation arteries. Protective actions (i.e., applicable “Initial Isolation” and “Protective Action” distances) for emergencies involving these shipments on DOE/NNSA sites should be determined by information in the DOT ERG, using the substance ID number and Guide number. Analysis requirements for DOE or NNSA shipments moving on or off the site will also depend on the governing DOT regulations and specifications.”

Neither the Order nor the EMG provides explicit direction related to the classification of accidents involving DOT compliant onsite shipments.

DOE O 151.1C FAQ

Program Elements: Categorization and Classification; Hazards Survey/Hazards Assessment (Technical Planning Basis)

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It is the intent of the Order that all accidents involving hazardous materials in transport on a DOE site be classified and protective actions implemented, as appropriate. As indicated in DOE G 151.1-2, Appendix D, *Onsite Transportation Analysis*, Section D.1, p. D-1: "Planning and preparedness for transportation-related hazardous material emergencies on DOE or NNSA sites should be an integral part of the site comprehensive emergency management program. Successful integration requires that the approach to hazard identification, analysis, and the application of the results be consistent with the process used for fixed-facility EPHAs." Therefore, although no EPHA is produced for DOT compliant shipments, the ERG provides substitute analysis results that can be applied to the development of classification and protective action criteria to ensure a consistent and seamless integration of planning and preparedness activities for ALL onsite hazardous material release Operational Emergencies (OEs). Emergency planners should note that materials shipped onsite fall under the full requirements of the Operational Emergency Hazardous Material Program at the shipping and receiving facilities. Hence, *successful integration* suggests that a site response for transportation accidents analyzed in the ERG (and supporting docs) should be consistent (i.e., classification and initial protective actions) with its response to emergency events that are specifically analyzed in EPHAs.