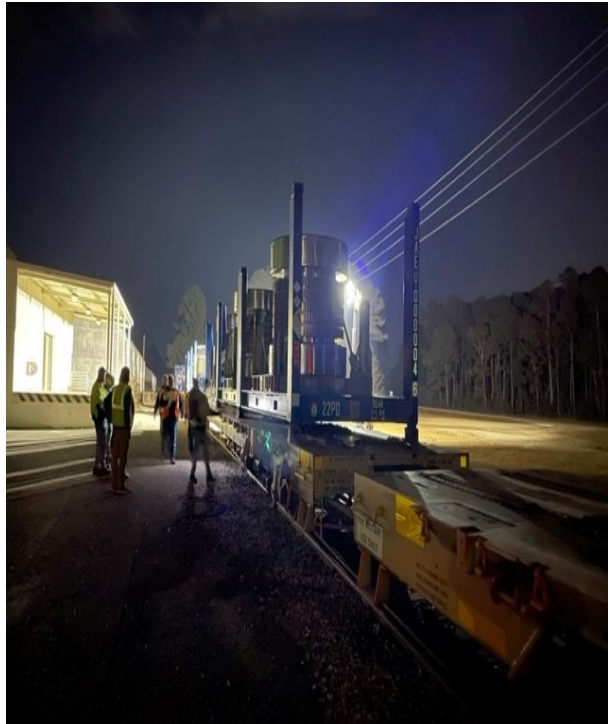


Midwest Radioactive Materials Transportation Committee (MRMTC)



June 5, 2024

*A presentation by;
Jeffrey Moore,
Federal Railroad Administration
Hazardous Materials Specialist,
Radioactive Materials*



General Topics to Discuss



- FRA General Structure, Purpose and Overall Regulatory Authority including a Hazmat Operational Overview.
- Comparing the original 1998 Safety Compliance and Oversight Plan (SCOP) vs. the new 2023 Safety Coordination and Compliance Oversight Plan (SCCOP) and the reasons for the change/updates.
- Discussions on the elements of the 2023 SCCOP including its purpose as it relates to FRA inspections for regulatory compliance and outreach.
- Introducing the AAR OT-55 (*Railroad Operational Industry Standards that includes the railroads national standards for moving Spent Nuclear Fuel (SNF)*)



FRA's Hazardous Materials Divisions

Regulatory Authority



- FRA enforces rail safety regulations, including hazardous materials regulations promulgated by DOT's Pipeline and Hazardous Materials Safety Administration (PHMSA).
- FRA's duties include compliance oversight of rail movements of Class 7 (Radioactive Materials (RAM)) material. This includes multimodal shipments when at least one leg of transportation is by rail.
- FRA works with other federal, state and local response and regulatory agencies through Memorandums of Understandings (MOU) to jointly inspect, investigate and potentially enforce any applicable transportation regulations.



FRA's Other Outreach Functions

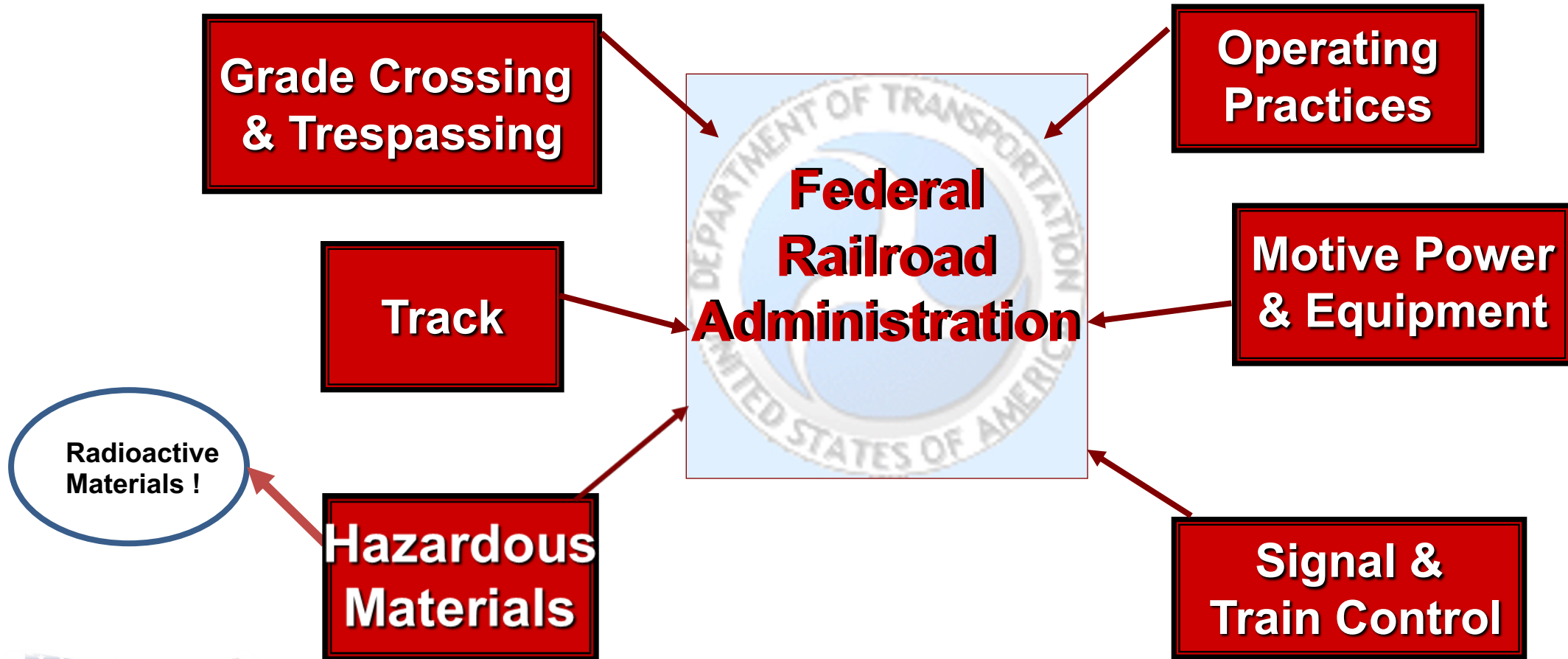


FRA develops partnerships between rail labor, shipper organizations, hazardous materials package manufacturers, and rail management to address systemic initiatives and involve them in the regulatory process with their input. This includes..

- Tribal Radioactive Materials Transportation Committee (TRMTC)
- Northeast High-Level Radioactive Waste Transportation Task Force (CSG-East)
- CSG-Mid West
- The Western Interstate Energy Board (WEIB)
- The Southern States Energy Board (SSEB)



FRA's Six Operating Disciplines, or our Subject Matter Experts (SME's)



The Development of the SCCOP



The Federal Railroad Administration (FRA) created the original SCOP in 1998 for FRA field personnel to use as a reference for inspections of Spent Nuclear Fuel Movements by Rail.

In June 2023, the FRA updated the original SCOP its current purpose and renamed the document the “Safety Coordination and Compliance Oversight Plan for Rail Transportation of High-Level Radioactive Waste and Spent Nuclear Fuel” (SCCOP).

FRA SCCOP Link;

<https://railroads.dot.gov/elibrary/safety-coordination-and-compliance-oversight-plan-rail-transportation-high-level>



Safety Coordination and Compliance Plan (SCCOP) Background and Purpose



The 2023 SCCOP was generated to show industry and our inspectors how we will prioritize and pre-plan our inspections. Part of the planning processes will include;

- Reviewing prior inspection data,
- Reviewing accident data of any determined route,
- Examining all investigations and other related data that addresses any corrections to regulatory deficiencies on potential routes across all the FRA operating disciplines.

This may include but will not be limited to;

- any equipment that may be involved
- any hazardous materials training shortages
- other infrastructure issues on potential routes prior to a Spent Nuclear Fuel Train moving to ensure the safest possible movement to its destination.





Why was the SCCOP Updated?



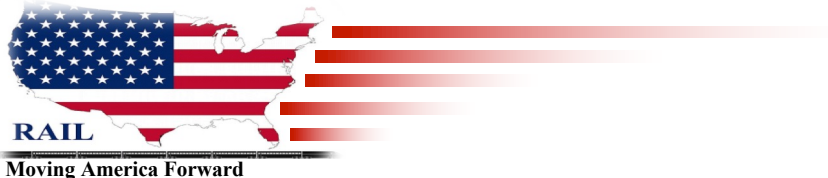
- The changes in the 2023 SCCOP were necessary to account for updated regulatory changes from the time of the original published 1998 SCOP. Some of the regulatory changes included some of the following items;
 - The creation of the DOT Security Regulations (route related information requirements for rail carriers)
 - Automations of inspection systems across all FRA disciplines
 - Advancements from the nuclear industry for on-board survey equipment (less stops to take surveys!)
 - Advancements in emergency response and information sharing



Why was the SCCOP Updated (Continued)?



- The 2023 SCCOP was written with the cooperation with all the FRA operating disciplines in a general format.
 - *In short, as each train movement is detailed and planned out, a more focused transportation plan will be created that is tailored to the intended route, the potential obstacles and any individualized obstacles that may be exclusive to that route.*
- The new SCCOP document is a universally applied standard to both national security shipments transported in accordance with Title 49 Code of Federal Regulations (CFR) Section 173.7(b) and any private (or non-government) industry generated shipments of these materials.



The Previous SCOP vs the New SCCOP



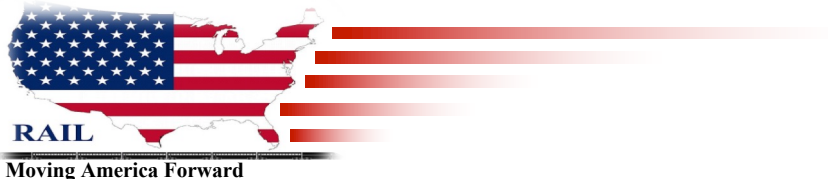
(Specifically the inspection charts listed in the SCCOP!)

Old SCOP Inspection Processes in 1998

- Specified locations for each inspection, by discipline, that required a commitment of staff and resources from each FRA discipline.
- Indicated reviews of employee training in each operating craft of railroading, specifically including bridge inspection programs, dispatch centers, and field inspection points.
- No specific HM regulations or guidance by DOT on carrier routes.

New SCCOP Inspection Processes in 2023

- FRA's Radioactive Materials Specialist(s) will review the previous inspection data across all disciplines and any new inspections addressing rail infrastructure that focus on the primary and alternative routes selected for the movements.
- FRA field inspection personnel will inspect the alternative routes and safety compliance functions.
- Most of the SCCOP inspections are not “route dependent” and will accomplish the same degree of safety assurance regardless of the route used.





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Federal Regulations vs. Industry Standards



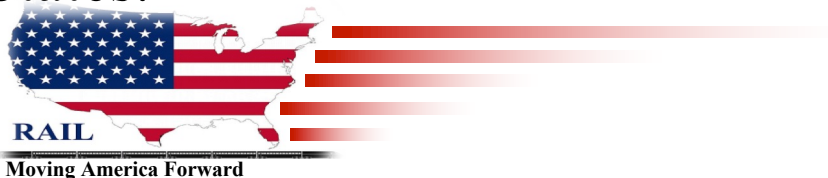
Federal Regulations are the minimum safety standards for commercial transportation.

The Association of American Railroads (AAR) created the OT-55 Circular, *Recommended Railroad Operating Practices for Transportation of Hazardous Materials*. (We are now on a new version OT55-R (in Draft))

Link to the OT-55 document is;

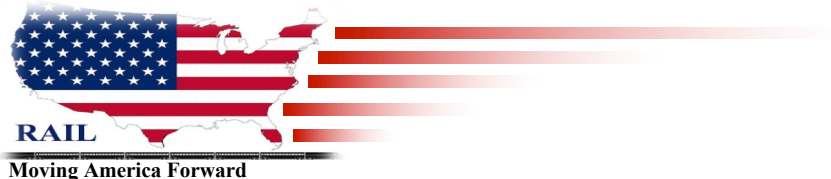
<https://www.aar.org/wp-content/uploads/2023/09/2023-10-01-OT-55-R-Draft.pdf>

This document is an industry standard adopted by all the railroads that operate in the United States.



ANY QUESTIONS?

Jeffrey Moore
215-327-6851 or
Jeffrey.moore@dot.gov



FRA – Office of Railroad Safety

5/22/24



U.S. Department
of Transportation
**Federal Railroad
Administration**