

**Commercial Vehicle Safety Alliance
Level VI Program 2010 Inspection Report
For Inspections in CY 2008 and CY 2009**

Prepared for
U.S. Department of Energy

Prepared by
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Introduction

The Commercial Vehicle Safety Alliance (CVSA), a nonprofit organization of federal, state, and provincial government agencies and representatives from private industry in the United States, Canada and Mexico, is dedicated to improving commercial vehicle safety. The Alliance is comprised of all 50 states, two U.S. territories, twelve Canadian provinces and territories, and Mexico. CVSA promotes an environment free of commercial vehicle accidents and incidents. Its mission is to promote commercial motor vehicle safety and security by providing leadership to enforcement, industry and policy makers. This is accomplished by establishing effective transportation safety standards for motor carriers, drivers, vehicles and inspectors through compliance, education, training and enforcement programs.

Member agencies include state police, highway patrol organizations, public service and utility commissions, departments of transportation, motor vehicle and public safety departments, Canadian provincial governments, the Mexican government and supporting groups such as the U.S. Department of Transportation, the U.S. Department of Energy (DOE), Canadian Transport Officials and more than 500 associate industry members.

CVSA serves as a critical, central point for bringing state/provincial officials together with the truck/bus industries and federal governments in a unique discussion and problem-solving exchange of ideas. Member agencies sign a Memorandum of Understanding (MOU) and recognize and agree to uniform inspection standards and procedures as developed by CVSA. One of the MOU's significant elements is a reciprocity agreement between members to honor inspections conducted by other member agencies authorized to affix the CVSA decal.

The CVSA/DOE Cooperative Agreement

In 1986, the DOE Office of Civilian Radioactive Waste Management (OCRWM) and CVSA entered into a cooperative agreement to develop inspection standards for transporting radioactive materials. This standard became known as the Enhanced North American Standard Inspection for Radioactive Materials or CVSA Level VI inspection program. OCRWM extended the agreement to conduct a pilot study to evaluate the soundness of the procedures, develop training curricula, conduct training, perform inspections and generate statistical data on the inspections. A final report on this phase of the Cooperative Agreement, including the Pilot Study, was issued in October 1999. The *CVSA/DOE Cooperative Agreement Interim Report* was published in October 2002, which updated the program's progress to that point. In 2004 CVSA and DOE began a multiyear program to keep interested parties updated on the progress of the CVSA Level VI inspection program with a focus on DOE radioactive waste shipments to the Waste Isolation Pilot Plant (WIPP) in Carlsbad, New Mexico. At that time the only radioactive materials shipments receiving a CVSA Level VI inspection were those shipped by DOE. There was no regulation for a Level VI inspection of other radioactive material shipments.

HRCQ Radioactive Material Shipments

Effective January 1, 2005, the U.S. Department of Transportation required all vehicles and carriers transporting Highway Route Control Quantities (HRCQ) of radioactive material to obtain a Safety Permit. One of the requirements to obtain the permit requires the carriers to pass a CVSA Level VI inspection prior to the shipment being allowed to travel in the United States. All HRCQ radioactive material shipments entering into the United States must also pass the CVSA Level VI inspection either at the shipment's point of origin or when the shipment enters the United States.

As a result of this new regulation, CVSA began to receive a large number of inspection forms for CVSA Level VI inspections of other radioactive material shipments. Many of these inspections were for shipments either originating outside the United States or having destinations outside the United States. These shipments and associated inspections involved different trucking companies, vehicles, and drivers as compared to the shipments for DOE. Hence, beginning with the inspection report for CY 2006, CVSA presents and compares Level VI inspection data for both DOE WIPP shipments and other types of DOE and non-DOE shipments (referred to as "non-WIPP shipments").

CVSA Level II and Level III Inspections of En Route Shipments

CVSA guidelines and training to members are that a shipment inspected to the "defect free" level at the point of origin need not be re-inspected to the same degree while en route. Some states have laws or statutes that require all radioactive material shipments to be inspected and/or escorted. It was suggested in previous inspection reports that en route states with these laws choose to complete one of the other CVSA Level inspections and randomly inspect to the CVSA Level VI inspection standard instead of the practice of completing a full CVSA Level VI inspection on each shipment. Implementation of this suggestion was seen in the CY 2006 inspection data. States that previously conducted full CVSA Level VI inspections on all en route shipments were completing more CVSA Level II and Level III inspections in lieu of CVSA Level VI inspections.

A CVSA Level II inspection (also known as the Walk-Around Driver/Vehicle Inspection) includes an examination of the items specified under the North American Standard Inspection but does not require physically getting under the vehicle to inspect. As a minimum, Level II inspections must include examination of: driver's license; medical examiner's certificate and Skill Performance Evaluation Certificate (if applicable); alcohol and drugs; driver's record of duty status as required; hours of service; seat belt; vehicle inspection report (if applicable); brake systems; coupling devices; exhaust systems; frame; fuel systems; lighting devices (turn signals, brake lamps, tail lamps, head lamps and lamps/flags on projecting loads); safe loading; steering mechanism; suspension; tires; van and open-top trailer bodies; wheels and rims; windshield wipers; emergency exits on buses, and Hazardous Materials (HM) requirements as applicable. HM required inspection items are inspected by certified HM inspectors.

The CVSA Level III inspection (or Driver/Credential Inspection) includes at a minimum an examination of the driver's license; medical examiner's certificate and Skill Performance Evaluation Certificate; driver's record of duty status; hours of service; seat belt; vehicle inspection report; and HM requirements.

States may opt to perform a CVSA Level II or Level III inspection instead of a Level VI inspection on an en route shipment. However, for en route shipments only the Level VI inspection data are considered in this Level VI inspection report.

CVSA Level VI Inspection Report

This is the fifth CVSA Level VI Program inspection report (CY 2008 and CY 2009 Report). All previous and current reports may be obtained through CVSA's website at www.cvsa.org. Once on the website, to locate a report, select "Programs" at the top of the page then select the "North American Standard Level VI Inspection Program" link and then select the "CVSA/WIPP Updates & Reports" link.

Previous inspection reports were produced annually with the most recent report published in January 2008, which covers inspections through CY 2006. The data for these reports were obtained directly from the hardcopy inspection forms submitted by the reporting agencies. As more and more agencies were beginning to submit their inspection forms electronically and the capability to retrieve the Level VI inspection data electronically from the Federal Motor Carrier Safety Administration's (FMCSA's) Analysis & Information (A&I) Online website was being developed, it was decided to postpone producing the next inspection report until complete data were available electronically from the A&I Online website. This report covers CY 2008 and CY 2009. CY 2007 is not included because it was determined that a significant number of 2007 inspection forms were not submitted electronically. Beginning with 2008 there is high confidence that most Level VI inspection forms are submitted electronically and inspection data are available on the A&I Online website.

The Analysis & Information (A&I) Online Data Used for this Report

The CY 2008 and CY 2009 inspection data used for this report were retrieved from the Roadside Inspections module of the A&I Online website (<http://ai.fmcsa.dot.gov/SafetyProgram/RoadsideInspections.aspx>) with the Data Source being the FMCSA Motor Carrier Management Information System (MCMIS) data snapshot as of 7/23/2010. That is, the data retrieved are current with the state of the MCMIS on 7/23/2010.

Selected for retrieval were national Level VI inspections for all vehicles for CY 2008 and CY 2009. This generated 1,929 inspections for CY 2008 and 2,374 inspections for CY 2009. However, one of the critical pieces of information for this report, shipment destination, is not coded for the Level VI inspections in the A&I Online database. Shipment destination would reveal if the inspection is for a WIPP shipment. So a sequence of logical steps was developed from information that is available from the

database to determine the type of shipment as 1) WIPP, 2) DOE but not WIPP, or 3) non DOE.

The logic used was (A&I Online database field names are in all capital letters):

- 1) If TRUWASTE is checked and the CARRIER NAME/DOT NUMBER is for one of the 2 carriers designated for WIPP shipments then it is a WIPP shipment.
- 2) If TRUWASTE is not checked and DOE FLAG is checked then it is a DOE shipment but not a WIPP shipment.
- 3) If TRUWASTE and DOE FLAG are both not checked then it is a non DOE shipment if HRCQ is checked.

Seven inspections for CY 2008 and 32 inspections for CY 2009 could not be automatically categorized using this logic. From a review of the hardcopy inspection forms it was possible to assign one of the 3 shipment types to 4 of the 7 inspections for CY 2008 and 30 of the 32 inspections for CY 2009. Also it was determined that the remaining 3 inspections for CY 2008 and 2 inspections for CY 2009 were incorrectly coded as Level VI inspections and these 5 inspections were removed from the analyses. The resulting totals are 1,926 inspections for CY 2008 and 2,372 inspections for CY 2009.

Another critical piece of information for this report that is not coded in the A&I Online database for the Level VI inspections is the type of out-of-service violation, that is, Level VI or NAS (Level I). For both the WIPP and non-WIPP shipments in CY 2008 and CY 2009 there were 57 out-of-service violations identified from 54 inspections. To determine the type of out-of-service violation it was necessary to conduct an expert review of the hardcopy inspection forms for these inspections. From the expert review it was possible to code 41 of the 57 out-of-service violations as either Level I or Level VI out-of-service violations. The review discovered that six of the violations coded as out-of-service in the A&I Online database were actually not out-of-service violations. Hardcopy forms were not found for 8 of the inspections that identified 10 out-of-service violations. It was decided to include these violations in the analyses but not as out-of-service violations since the accuracy of the out-of-service designation could not be verified.

Other Data Used for this Report

After the initial review of the Level VI inspection data from the A&I Online database it was determined that Level VI inspections conducted by California were not in the database. This is because California did not begin to submit inspection reports electronically until after 2009. Subsequent follow up with California resulted in California providing information on their 2009 Level VI inspections (no Level VI inspections were conducted in 2008) and these inspections are included in the report.

The Tables in this Report

The following tables are the same tables used in previous inspection reports in order to maintain consistency. Once a state is added to the table it is never removed for the reason that from one year to the next a state may or may not have an inspection. For WIPP shipments, Tennessee submitted inspection data for the first time in 2008 and Arizona submitted inspection data for the first time in 2009. For non-WIPP shipments six states (Arizona, Florida, Georgia, Nevada, Pennsylvania and Washington) submitted inspection data for the first time in 2008 and two states (Indiana and Oregon) submitted inspection data for the first time in 2009.

Number of Shipments

Table 1A identifies the number and type of inspections by state for WIPP shipments in 2008. Data from a total of 1,614 inspections were submitted by the states during this time period. The largest number of point of origin inspections occurred in Idaho with 502 while the largest number of en route inspections occurred in Colorado with 494.

Table 1B identifies the number and type of inspections by state for WIPP shipments in 2009. Data from a total of 2,166 inspections were submitted by the states during this time period. The largest number of point of origin inspections occurred in Idaho with 703 while the largest number of en route inspections occurred in Colorado with 660.

**Table 1A. WIPP Shipments: Number and type of inspections by state
(January 1, 2008 – December 31, 2008)**

| State | Point of Origin | En Route | Point of Destination | Total |
|----------------|-----------------|------------|----------------------|-------------|
| California | 0 | 0 | 0 | 0 |
| Colorado | 0 | 494 | 0 | 494 |
| Georgia | 0 | 0 | 0 | 0 |
| Idaho | 502 | 0 | 0 | 502 |
| Illinois | 11 | 0 | 0 | 11 |
| Nevada | 0 | 0 | 0 | 0 |
| New Mexico | 59 | 383 | 0 | 442 |
| Oregon | 0 | 11 | 0 | 11 |
| South Carolina | 98 | 0 | 1 | 99 |
| Tennessee | 4 | 0 | 0 | 4 |
| Washington | 51 | 0 | 0 | 51 |
| Total | 725 | 888 | 1 | 1614 |

**Table 1B. WIPP Shipments: Number and type of inspections by state
(January 1, 2009 – December 31, 2009)**

| State | Point of Origin | En Route | Point of Destination | Total |
|----------------|------------------------|-----------------|-----------------------------|--------------|
| Arizona | 0 | 10 | 0 | 10 |
| California | 21 | 0 | 0 | 21 |
| Colorado | 0 | 660 | 0 | 660 |
| Georgia | 0 | 0 | 0 | 0 |
| Idaho | 703 | 1 | 0 | 704 |
| Illinois | 15 | 0 | 0 | 15 |
| Nevada | 7 | 0 | 0 | 7 |
| New Mexico | 130 | 472 | 4 | 606 |
| Oregon | 0 | 0 | 0 | 0 |
| South Carolina | 131 | 0 | 0 | 131 |
| Tennessee | 12 | 0 | 0 | 12 |
| Washington | 0 | 0 | 0 | 0 |
| Total | 1019 | 1143 | 4 | 2166 |

Number of Shipments – Non-WIPP

Table 2A identifies the number and type of inspections by state for non-WIPP shipments in 2008. Data were submitted for a total of 312 CVSA Level VI inspections by the states during this time period.

Table 2B identifies the number and type of inspections by state for non-WIPP shipments in 2009. Data were submitted for a total of 227 CVSA Level VI inspections by the states during this time period.

**Table 2A. Non-WIPP Shipments: Number and type of inspections by state
(January 1, 2008 – December 31, 2008)**

| State | Point of Origin | En Route | Point of Destination | Total |
|----------------|------------------------|-----------------|-----------------------------|--------------|
| Arizona | 0 | 2 | 0 | 2 |
| Colorado | 0 | 14 | 0 | 14 |
| Florida | 1 | 1 | 0 | 2 |
| Georgia | 1 | 0 | 0 | 1 |
| Idaho | 8 | 0 | 0 | 8 |
| Illinois | 21 | 40 | 0 | 61 |
| Maryland | 8 | 0 | 0 | 8 |
| Massachusetts | 1 | 0 | 0 | 1 |
| Michigan | 66 | 0 | 0 | 66 |
| Missouri | 2 | 0 | 0 | 2 |
| Nevada | 4 | 0 | 0 | 4 |
| New Jersey | 7 | 0 | 0 | 7 |
| New Mexico | 7 | 42 | 0 | 49 |
| New York | 34 | 11 | 0 | 45 |
| Ohio | 2 | 0 | 0 | 2 |
| Pennsylvania | 4 | 0 | 0 | 4 |
| South Carolina | 2 | 1 | 0 | 3 |
| Tennessee | 13 | 6 | 2 | 21 |
| Virginia | 3 | 0 | 0 | 3 |
| Washington | 9 | 0 | 0 | 9 |
| Total | 193 | 117 | 2 | 312 |

**Table 2B. Non-WIPP Shipments: Number and type of inspections by state
(January 1, 2009 – December 31, 2009)**

| State | Point of Origin | En Route | Point of Destination | Total |
|----------------|-----------------|-----------|----------------------|------------|
| Arizona | 0 | 5 | 0 | 5 |
| Colorado | 0 | 4 | 0 | 4 |
| Florida | 1 | 1 | 0 | 2 |
| Georgia | 0 | 0 | 0 | 0 |
| Idaho | 6 | 0 | 0 | 6 |
| Illinois | 7 | 13 | 0 | 20 |
| Indiana | 0 | 16 | 0 | 16 |
| Maryland | 14 | 0 | 0 | 14 |
| Massachusetts | 0 | 0 | 0 | 0 |
| Michigan | 39 | 0 | 0 | 39 |
| Missouri | 3 | 0 | 0 | 3 |
| Nevada | 9 | 0 | 0 | 9 |
| New Jersey | 4 | 0 | 0 | 4 |
| New Mexico | 7 | 34 | 0 | 41 |
| New York | 26 | 6 | 2 | 34 |
| Ohio | 1 | 0 | 0 | 1 |
| Oregon | 2 | 0 | 0 | 2 |
| Pennsylvania | 0 | 0 | 0 | 0 |
| South Carolina | 9 | 0 | 0 | 9 |
| Tennessee | 12 | 5 | 0 | 17 |
| Virginia | 0 | 0 | 0 | 0 |
| Washington | 1 | 0 | 0 | 1 |
| Total | 141 | 84 | 2 | 227 |

Number of Violations

Tables 3A and 3B (WIPP shipments: CY 2008 and CY 2009, respectively) and Tables 4A and 4B (non-WIPP shipments: CY 2008 and CY 2009, respectively) identify the number and type of violations found by state. The first column displays the number of inspections that identified violations and the second column displays the number of violations identified during those inspections. The other columns display the number of non out-of-service violations and out-of-service violations.

Table 3A includes a total of 103 inspections identifying 123 violations during CY 2008. Of those 123 violations 18 were out-of-service violations (6 CVSA Level I out-of-service violations and 12 CVSA Level VI out-of-service violations).

Table 3B includes a total of 100 inspections identifying 114 violations during CY 2009. Of those 114 violations 19 were out-of-service violations (14 CVSA Level I out-of-service violations and 5 CVSA Level VI out-of-service violations).

The appendices to this report contain lists of the violations for WIPP and non-WIPP shipments by year. Note that the violations are listed as reported by A&I Online with the exception of the out-of-service violation types. These values were assigned during expert review of the out-of-service violations.

Table 3A. WIPP Shipments: Number and type of violations found listed by state and type of inspection (January 1, 2008 – December 31, 2008)

| State | Type of Inspection | Number of Inspections Identifying Violations | Number of Violations Identified | NOT Out-of-Service Violations | Out-of-Service Violations | | |
|----------------|--------------------|--|---------------------------------|-------------------------------|---------------------------|-----------|-----------|
| | | | | | NAS | Level VI | Total |
| California | | 0 | 0 | 0 | 0 | 0 | 0 |
| Colorado | En Route | 15 | 17 | 16 | 0 | 1 | 1 |
| Georgia | | 0 | 0 | 0 | 0 | 0 | 0 |
| Idaho | Point of Origin | 49 | 59 | 51 | 4 | 4 | 8 |
| Illinois | | 0 | 0 | 0 | 0 | 0 | 0 |
| Nevada | | 0 | 0 | 0 | 0 | 0 | 0 |
| New Mexico | Point of Origin | 1 | 1 | 0 | 1 | 0 | 1 |
| | En Route | 32 | 40 | 32 | 1 | 7 | 8 |
| Oregon | En Route | 1 | 1 | 1 | 0 | 0 | 0 |
| South Carolina | Point of Origin | 1 | 1 | 1 | 0 | 0 | 0 |
| Tennessee | Point of Origin | 1 | 1 | 1 | 0 | 0 | 0 |
| Washington | Point of Origin | 3 | 3 | 3 | 0 | 0 | 0 |
| Total | | 103 | 123 | 105 | 6 | 12 | 18 |

Table 3B. WIPP Shipments: Number and type of violations found listed by state and type of inspection (January 1, 2009 – December 31, 2009)

| State | Type of Inspection | Number of Inspections Identifying Violations | Number of Violations Identified | NOT Out-of-Service Violations | Out-of-Service Violations | | |
|----------------|----------------------|--|---------------------------------|-------------------------------|---------------------------|----------|-----------|
| | | | | | NAS | Level VI | Total |
| Arizona | En Route | 2 | 3 | 3 | 0 | 0 | 0 |
| California | | 0 | 0 | 0 | 0 | 0 | 0 |
| Colorado | En Route | 42 | 47 | 37 | 8 | 2 | 10 |
| Georgia | | 0 | 0 | 0 | 0 | 0 | 0 |
| Idaho | Point of Origin | 32 | 38 | 34 | 2 | 2 | 4 |
| Illinois | Point of Origin | 1 | 2 | 2 | 0 | 0 | 0 |
| Nevada | Point of Origin | 3 | 4 | 4 | 0 | 0 | 0 |
| New Mexico | Point of Origin | 1 | 1 | 0 | 0 | 1 | 1 |
| | En Route | 16 | 16 | 13 | 3 | 0 | 3 |
| | Point of Destination | 1 | 1 | 1 | 0 | 0 | 0 |
| Oregon | | 0 | 0 | 0 | 0 | 0 | 0 |
| South Carolina | Point of Origin | 2 | 2 | 1 | 1 | 0 | 1 |
| Tennessee | | 0 | 0 | 0 | 0 | 0 | 0 |
| Washington | | 0 | 0 | 0 | 0 | 0 | 0 |
| Total | | 100 | 114 | 95 | 14 | 5 | 19 |

Table 4A includes a total of 24 inspections identifying 32 violations during CY 2008. Of those 32 violations 2 were out-of-service violations (both CVSA Level VI out-of-service violations).

Table 4B includes a total of 25 inspections identifying 32 violations during CY 2009. Of those 32 violations 2 were out-of-service violations (both CVSA Level I out-of-service violations).

Table 4A. Non-WIPP Shipments: Number and type of violations found listed by state and type of inspection (January 1, 2008 – December 31, 2008)

| State | Type of Inspection | Number of Inspections Identifying Violations | Number of Violations Identified | NOT Out-of-Service Violations | Out-of-Service Violations | | |
|----------------|--------------------|--|---------------------------------|-------------------------------|---------------------------|----------|----------|
| | | | | | NAS | Level VI | Total |
| Arizona | En Route | 1 | 2 | 2 | 0 | 0 | 0 |
| Colorado | | 0 | 0 | 0 | 0 | 0 | 0 |
| Idaho | Point of Origin | 2 | 4 | 4 | 0 | 0 | 0 |
| Illinois | En Route | 3 | 4 | 4 | 0 | 0 | 0 |
| Maryland | | 0 | 0 | 0 | 0 | 0 | 0 |
| Massachusetts | | 0 | 0 | 0 | 0 | 0 | 0 |
| Michigan | Point of Origin | 8 | 11 | 11 | 0 | 0 | 0 |
| Missouri | | 0 | 0 | 0 | 0 | 0 | 0 |
| New Jersey | Point of Origin | 1 | 2 | 2 | 0 | 0 | 0 |
| New Mexico | En Route | 1 | 1 | 1 | 0 | 0 | 0 |
| New York | Point of Origin | 2 | 2 | 1 | 0 | 1 | 1 |
| | En Route | 3 | 3 | 3 | 0 | 0 | 0 |
| Ohio | | 0 | 0 | 0 | 0 | 0 | 0 |
| South Carolina | | 0 | 0 | 0 | 0 | 0 | 0 |
| Tennessee | En Route | 1 | 1 | 1 | 0 | 0 | 0 |
| Virginia | | 0 | 0 | 0 | 0 | 0 | 0 |
| Washington | Point of Origin | 2 | 2 | 1 | 0 | 1 | 1 |
| Total | | 24 | 32 | 30 | 0 | 2 | 2 |

Table 4B. Non-WIPP Shipments: Number and type of violations found listed by state and type of inspection (January 1, 2009 – December 31, 2009)

| State | Type of Inspection | Number of Inspections Identifying Violations | Number of Violations Identified | NOT Out-of-Service Violations | Out-of-Service Violations | | |
|----------------|--------------------|--|---------------------------------|-------------------------------|---------------------------|----------|----------|
| | | | | | NAS | Level VI | Total |
| Arizona | En Route | 3 | 4 | 4 | 0 | 0 | 0 |
| Colorado | | 0 | 0 | 0 | 0 | 0 | 0 |
| Idaho | Point of Origin | 4 | 8 | 7 | 1 | 0 | 1 |
| Illinois | Point of Origin | 1 | 1 | 1 | 0 | 0 | 0 |
| | En Route | 1 | 1 | 1 | 0 | 0 | 0 |
| Maryland | | 0 | 0 | 0 | 0 | 0 | 0 |
| Massachusetts | | 0 | 0 | 0 | 0 | 0 | 0 |
| Michigan | Point of Origin | 7 | 9 | 9 | 0 | 0 | 0 |
| Missouri | | 0 | 0 | 0 | 0 | 0 | 0 |
| Nevada | Point of Origin | 1 | 1 | 1 | 0 | 0 | 0 |
| New Jersey | | 0 | 0 | 0 | 0 | 0 | 0 |
| New Mexico | | 0 | 0 | 0 | 0 | 0 | 0 |
| New York | Point of Origin | 4 | 4 | 4 | 0 | 0 | 0 |
| | En Route | 1 | 1 | 1 | 0 | 0 | 0 |
| Ohio | | 0 | 0 | 0 | 0 | 0 | 0 |
| South Carolina | Point of Origin | 1 | 1 | 1 | 0 | 0 | 0 |
| Tennessee | Point of Origin | 1 | 1 | 0 | 1 | 0 | 1 |
| | En Route | 1 | 1 | 1 | 0 | 0 | 0 |
| Virginia | | 0 | 0 | 0 | 0 | 0 | 0 |
| Washington | | 0 | 0 | 0 | 0 | 0 | 0 |
| Total | | 25 | 32 | 30 | 2 | 0 | 2 |

Percentage of Inspections with No Violations and Violations

Table 5A and Table 5B identify the percentage of inspections having no violations or violations, listed by state and type of inspection for WIPP shipments for CY 2008 and CY 2009, respectively.

Table 6A and Table 6B identify the percentage of inspections having no violations or violations, listed by state and type of inspection for non-WIPP shipments for CY 2008 and CY 2009, respectively.

For WIPP shipments in CY 2008 the percentage of violations is less than 10 percent for each state and type of inspection with the exception of point of origin inspections for Tennessee (25 percent). However this is based on a relatively low number (4) of inspections. For WIPP shipments in CY 2009 the percentage of violations is less than 7 percent for each state and type of inspection with the exception of point of origin inspections for Nevada (43 percent), point of destination inspections for New Mexico (25 percent) and en route inspections for Arizona (20 percent). Again these are based on relatively low numbers (7, 4, and 10 respectively) of inspections.

Table 6A and Table 6B show that for non-WIPP shipments the percentages tend to be higher than for WIPP shipments for inspections finding violations.

Table 5A. WIPP Shipments: Percentage of inspections having no violations or violations listed by state and type of inspection (January 1, 2008 – December 31, 2008)

| State | Type of Inspection | Number of Inspections | No Violations | Violations |
|----------------|----------------------|-----------------------|---------------|------------|
| California | | 0 | 0.00% | 0.00% |
| Colorado | En Route | 494 | 96.96% | 3.04% |
| Georgia | | 0 | 0.00% | 0.00% |
| Idaho | Point of Origin | 502 | 90.24% | 9.76% |
| Illinois | Point of Origin | 11 | 100.00% | 0.00% |
| Nevada | | 0 | 0.00% | 0.00% |
| New Mexico | Point of Origin | 59 | 98.31% | 1.69% |
| | En Route | 383 | 91.64% | 8.36% |
| Oregon | En Route | 11 | 90.91% | 9.09% |
| South Carolina | Point of Origin | 98 | 98.98% | 1.02% |
| South Carolina | Point of Destination | 1 | 100.00% | 0.00% |
| Tennessee | Point of Origin | 4 | 75.00% | 25.00% |
| Washington | Point of Origin | 51 | 94.12% | 5.88% |

**Table 5B. WIPP Shipments: Percentage of inspections having no violations or violations listed by state and type of inspection
(January 1, 2009 – December 31, 2009)**

| State | Type of Inspection | Number of Inspections | No Violations | Violations |
|----------------|---------------------------|------------------------------|----------------------|-------------------|
| Arizona | En Route | 10 | 80.00% | 20.00% |
| California | Point of Origin | 21 | 100.00% | 0.00% |
| Colorado | En Route | 660 | 93.64% | 6.36% |
| Georgia | | 0 | 0.00% | 0.00% |
| Idaho | Point of Origin | 703 | 95.45% | 4.55% |
| Idaho | En Route | 1 | 100.00% | 0.00% |
| Illinois | Point of Origin | 15 | 93.33% | 6.67% |
| Nevada | Point of Origin | 7 | 57.14% | 42.86% |
| New Mexico | Point of Origin | 130 | 99.23% | 0.77% |
| | En Route | 472 | 96.61% | 3.39% |
| | Point of Destination | 4 | 75.00% | 25.00% |
| Oregon | | 0 | 0.00% | 0.00% |
| South Carolina | Point of Origin | 131 | 98.47% | 1.53% |
| Tennessee | Point of Origin | 12 | 100.00% | 0.00% |
| Washington | | 0 | 0.00% | 0.00% |

**Table 6A. Non-WIPP Shipments: Percentage of inspections having no violations or violations listed by state and type of inspection
(January 1, 2008 – December 31, 2008)**

| State | Type of Inspection | Number of Inspections | No Violations | Violations |
|----------------|----------------------|-----------------------|---------------|------------|
| Arizona | En Route | 2 | 50.00% | 50.00% |
| Colorado | En Route | 14 | 100.00% | 0.00% |
| Florida | Point of Origin | 1 | 100.00% | 0.00% |
| Florida | En Route | 1 | 100.00% | 0.00% |
| Georgia | Point of Origin | 1 | 100.00% | 0.00% |
| Idaho | Point of Origin | 8 | 75.00% | 25.00% |
| Illinois | Point of Origin | 21 | 100.00% | 0.00% |
| Illinois | En Route | 40 | 92.50% | 7.50% |
| Maryland | Point of Origin | 8 | 100.00% | 0.00% |
| Massachusetts | Point of Origin | 1 | 100.00% | 0.00% |
| Michigan | Point of Origin | 66 | 87.88% | 12.12% |
| Missouri | Point of Origin | 2 | 100.00% | 0.00% |
| Nevada | Point of Origin | 4 | 100.00% | 0.00% |
| New Jersey | Point of Origin | 7 | 85.71% | 14.29% |
| New Mexico | Point of Origin | 7 | 100.00% | 0.00% |
| | En Route | 42 | 97.62% | 2.38% |
| New York | Point of Origin | 34 | 94.12% | 5.88% |
| | En Route | 11 | 72.73% | 27.27% |
| Ohio | Point of Origin | 2 | 100.00% | 0.00% |
| Pennsylvania | Point of Origin | 4 | 100.00% | 0.00% |
| South Carolina | Point of Origin | 2 | 100.00% | 0.00% |
| South Carolina | En Route | 1 | 100.00% | 0.00% |
| Tennessee | Point of Origin | 13 | 100.00% | 0.00% |
| Tennessee | En Route | 6 | 83.33% | 16.67% |
| Tennessee | Point of Destination | 2 | 100.00% | 0.00% |
| Virginia | Point of Origin | 3 | 100.00% | 0.00% |
| Washington | Point of Origin | 9 | 77.78% | 22.22% |

**Table 6B. Non-WIPP Shipments: Percentage of inspections having no violations or violations listed by state and type of inspection
(January 1, 2009– December 31, 2009)**

| State | Type of Inspection | Number of Inspections | No Violations | Violations |
|----------------|----------------------|-----------------------|---------------|------------|
| Arizona | En Route | 5 | 40.00% | 60.00% |
| Colorado | En Route | 4 | 100.00% | 0.00% |
| Florida | Point of Origin | 1 | 100.00% | 0.00% |
| Florida | En Route | 1 | 100.00% | 0.00% |
| Georgia | | 0 | 0.00% | 0.00% |
| Idaho | Point of Origin | 6 | 33.33% | 66.67% |
| Illinois | Point of Origin | 7 | 85.71% | 14.29% |
| Illinois | En Route | 13 | 92.31% | 7.69% |
| Indiana | En Route | 16 | 100.00% | 0.00% |
| Maryland | Point of Origin | 14 | 100.00% | 0.00% |
| Massachusetts | Point of Origin | 0 | 0.00% | 0.00% |
| Michigan | Point of Origin | 39 | 82.05% | 17.95% |
| Missouri | Point of Origin | 3 | 100.00% | 0.00% |
| Nevada | Point of Origin | 9 | 88.89% | 11.11% |
| New Jersey | Point of Origin | 4 | 100.00% | 0.00% |
| New Mexico | Point of Origin | 7 | 100.00% | 0.00% |
| | En Route | 34 | 100.00% | 0.00% |
| New York | Point of Origin | 26 | 84.62% | 15.38% |
| | En Route | 6 | 83.33% | 16.67% |
| | Point of Destination | 2 | 100.00% | 0.00% |
| Ohio | Point of Origin | 1 | 100.00% | 0.00% |
| Oregon | Point of Origin | 2 | 100.00% | 0.00% |
| Pennsylvania | | 0 | 0.00% | 0.00% |
| South Carolina | Point of Origin | 9 | 88.89% | 11.11% |
| Tennessee | Point of Origin | 12 | 91.67% | 8.33% |
| Tennessee | En Route | 5 | 80.00% | 20.00% |
| Virginia | | 0 | 0.00% | 0.00% |
| Washington | Point of Origin | 1 | 100.00% | 0.00% |

In the fourth inspection report it is stated that the percentages of inspections of WIPP shipments with no violations found for almost all states increased over time, meaning fewer and fewer inspections were finding violations. This is again the case. For example, Idaho saw an increase in the percent of point of origin inspections finding no violations from 87.33 percent in the fourth inspection report to 90.24 percent in CY 2008 and 95.45 percent in CY 2009. Figure 1 shows the percentages of inspections with no violations over the last four inspection reports for states with inspections included in all four reports. Note that Washington had no inspections of WIPP shipments in CY 2009.

Figure 1. WIPP Shipments: Percentage of inspections with no violations found for states with inspections included in all of the last four inspection reports



Percentage of Point of Origin and En Route Inspections with No Violations and Violations

Table 7A and Table 7B show the overall percentage of inspections having no violations and violations at the point of origin and en route for WIPP shipments for CY 2008 and 2009, respectively.

Table 8A and Table 8B show the overall percentage of inspections having no violations and violations at the point of origin and en route for non-WIPP shipments for CY 2008 and 2009, respectively.

For WIPP shipments, the percentage of inspections finding violations at the point of origin decreased by about half from CY 2008 to CY 2009 while the percentage of inspections finding violations en route remained about the same for both years.

For non-WIPP shipments the percentages tend to be higher than for WIPP shipments for inspections finding violations.

Table 7A. WIPP Shipments: Percentage of point of origin and en route inspections with no violation and with violations (January 1, 2008 – December 31, 2008)

| Inspection Location | Number of Inspections | No Violations | Violations |
|---------------------|-----------------------|---------------|------------|
| Point of Origin | 725 | 92.41% | 7.59% |
| En Route | 888 | 94.59% | 5.41% |

Table 7B. WIPP Shipments: Percentage of point of origin and en route inspections with no violation and with violations (January 1, 2009 – December 31, 2009)

| Inspection Location | Number of Inspections | No Violations | Violations |
|---------------------|-----------------------|---------------|------------|
| Point of Origin | 1019 | 96.17% | 3.83% |
| En Route | 1143 | 94.75% | 5.25% |

Table 8A. Non-WIPP Shipments: Percentage of point of origin and en route inspections with no violation and with violations (January 1, 2008 – December 31, 2008)

| Inspection Location | Number of Inspections | No Violations | Violations |
|---------------------|-----------------------|---------------|------------|
| Point of Origin | 193 | 92.23% | 7.77% |
| En Route | 117 | 92.31% | 7.69% |

Table 8B. Non-WIPP Shipments: Percentage of point of origin and en route inspections with no violation and with violations (January 1, 2009 – December 31, 2009)

| Inspection Location | Number of Inspections | No Violations | Violations |
|---------------------|-----------------------|---------------|------------|
| Point of Origin | 141 | 86.52% | 13.48% |
| En Route | 84 | 92.86% | 7.14% |

Comparison with Non-WIPP Shipments and Federal Motor Carrier Safety Administration Data

Table 9A and Table 9B are the comparisons of WIPP and non-WIPP CVSA Level VI inspections for CY 2008 and CY 2009, respectively. For CY 2008, the percentages of inspections finding violations and the out-of-service rates for WIPP and non-WIPP shipments are about the same. For CY 2009 the percentage of inspections finding violations is more than double for non-WIPP shipments than for WIPP shipments (11.01 percent and 4.66 percent, respectively).

Table 10A and Table 10B allow comparisons of CVSA Level VI inspection information reported under the WIPP transportation program to roadside inspection data for the same time periods (CY 2008 and CY 2009) from the Federal Motor Carrier Safety Administration (FMCSA).

Of the 103 WIPP inspections in CY 2008 that found violations, 17 inspections found Level I or Level VI out-of-service violations. One of the 17 inspections found a driver out-of-service violation for a driver out-of-service rate of 0.06 percent. Sixteen of the inspections found vehicle out-of-service violations for a vehicle out-of-service rate of 0.99 percent.

Of the 100 WIPP inspections in CY 2009 that found violations, 19 inspections found Level I or Level VI out-of-service violations. These 19 inspections found only vehicle out-of-service violations for a vehicle out-of-service rate of 0.88 percent.

In general there is a trend over time towards lower percentages of violations found and lower out-of-service rates for CVSA Level VI inspections of both WIPP and non-WIPP shipments. All rates are considerably lower than those reported by FMCSA for roadside and hazardous materials inspections during the same time periods.

It is CVSA's opinion that DOE, WIPP, the states, the carriers, and other interested parties are to be commended for the more than ten years of hard work and dedication that has gone into the WIPP shipping program and inspections that continue to show progress and improvement. It is important to keep up this dedication to continue insuring that the WIPP shipping campaign is as safe as possible.

Table 9A. WIPP Shipments in CY 2008: Comparison with Non-WIPP shipments

| CVSA Level VI Inspection Data for WIPP Shipments (January 1, 2008 – December 31, 2008) | | | | |
|---|--------|---------|---------------------|----------------------|
| Inspection Activity | Number | Percent | Level I OOS Percent | Level VI OOS Percent |
| Number of Inspections | 1,614 | | | |
| With no Violations | 1,511 | 93.62% | | |
| With Violations | 103 | 6.38% | | |
| Driver OOS* Rate | 1 | 0.06% | 0.06% | 0.00% |
| Vehicle OOS Rate | 16 | 0.99% | 0.31% | 0.68% |

| CVSA Level VI Inspection Data for Non-WIPP Shipments (January 1, 2008 – December 31, 2008) | | | | |
|---|--------|---------|---------------------|----------------------|
| Inspection Activity | Number | Percent | Level I OOS Percent | Level VI OOS Percent |
| Number of Inspections | 312 | | | |
| With no Violations | 288 | 92.31% | | |
| With Violations | 24 | 7.69% | | |
| Driver OOS Rate | 0 | 0.00% | 0.00% | 0.00% |
| Vehicle OOS Rate | 2 | 0.64% | 0.00% | 0.64% |

*OOS = Out-of-Service

Table 9B. WIPP Shipments in CY 2009: Comparison with Non-WIPP shipments

| CVSA Level VI Inspection Data for WIPP Shipments (January 1, 2009 – December 31, 2009) | | | | |
|---|--------|---------|---------------------|----------------------|
| Inspection Activity | Number | Percent | Level I OOS Percent | Level VI OOS Percent |
| Number of Inspections | 2,166 | | | |
| With no Violations | 2,066 | 95.38% | | |
| With Violations | 100 | 4.62% | | |
| Driver OOS* Rate | 0 | 0.00% | 0.00% | 0.00% |
| Vehicle OOS Rate | 19 | 0.88% | 0.65% | 0.23% |

| CVSA Level VI Inspection Data for Non-WIPP Shipments (January 1, 2009 – December 31, 2009) | | | | |
|---|--------|---------|---------------------|----------------------|
| Inspection Activity | Number | Percent | Level I OOS Percent | Level VI OOS Percent |
| Number of Inspections | 227 | | | |
| With no Violations | 202 | 88.99% | | |
| With Violations | 25 | 11.01% | | |
| Driver OOS Rate | 0 | 0.00% | 0.00% | 0.00% |
| Vehicle OOS Rate | 2 | 0.88% | 0.88% | 0.00% |

*OOS = Out-of-Service

Table 10A. 2008 FMCSA inspection data

| FMCSA Roadside Inspection Data for the Year 2008* | | | FMCSA HAZMAT Inspection Data for the Year 2008* | | |
|--|-----------|---------|--|---------|---------|
| Inspection Activity | Number | Percent | Inspection Activity | Number | Percent |
| Number of Inspections | 3,489,531 | | Number of Inspections | 203,068 | |
| With no Violations | 1,104,220 | 31.64% | With no Violations | N/A*** | N/A |
| With Violations | 2,385,311 | 68.36% | With Violations | N/A | N/A |
| Driver OOS** Rate | 213,306 † | 6.38% | OOS Rate | 10,018 | 4.93% |
| Vehicle OOS Rate | 531,840 † | 22.25% | | | |

† The number of inspections is a combination of some Driver, some Vehicle and some combination of both. The OOS Rates are for only those types of inspections.

*Data Source: FMCSA Motor Carrier Management Information System (MCMIS) August 27, 2010 data snapshot from <http://ai.fmcsa.dot.gov/SafetyProgram/RoadsideInspections.aspx>

**OOS = Out-of-Service

***N/A = Data not available

Table 10B. 2009 FMCSA inspection data

| FMCSA Roadside Inspection Data for the Year 2009* | | | FMCSA HAZMAT Inspection Data for the Year 2009* | | |
|---|-----------|---------|---|---------|---------|
| Inspection Activity | Number | Percent | Inspection Activity | Number | Percent |
| Number of Inspections | 3,558,909 | | Number of Inspections | 223,012 | |
| With no Violations | 1,198,692 | 33.68% | With no Violations | N/A*** | N/A |
| With Violations | 2,360,217 | 66.32% | With Violations | N/A | N/A |
| Driver OOS** Rate | 192,006 † | 5.55% | OOS Rate | 10,212 | 4.58% |
| Vehicle OOS Rate | 502,867 † | 21.24% | | | |

† The number of inspections is a combination of some Driver, some Vehicle and some combination of both. The OOS Rates are for only those types of inspections.

*Data Source: FMCSA Motor Carrier Management Information System (MCMIS) August 27, 2010 data snapshot <http://ai.fmcsa.dot.gov/SafetyProgram/RoadsideInspections.aspx>

**OOS = Out-of-Service

***N/A = Data not available

Overall CVSA Level VI Program – WIPP Shipments

Table 11 is a summary of the Level VI inspection program for WIPP shipments through December 31, 2009 (excluding the CY 2007 data for reasons discussed at the beginning of this report). Since March 24, 1999, there have been 14,838 CVSA Level VI inspections analyzed. Of these inspections, 92.40 percent found no violations, a slight increase from the 91.64 percent in the fourth inspection report. The combined Level I and Level VI out-of-service rate for vehicles decreased from 2.11 percent in the fourth annual report to 1.81 percent for this report. Driver out-of-service also continues to drop (from 0.10 percent in the second inspection report to 0.09 percent in the third inspection report to 0.07 percent in the fourth inspection report to 0.06 percent in this report).

With the addition of the 2008-2009 Level VI inspection data, the number of inspections with Level I out-of-service violations continues to be less than 1 percent for the entire program. Most notable is that the percentage of Level I out-of-service violations continues to decrease. Adding this report's data to the entire program, the Level I out-of-service rate for drivers decreased from 0.06 percent (stated in the CY 2006 Report) to 0.05 percent and the Level I out-of-service rate for vehicles decreased from 0.66 percent (stated in the CY 2006 Report) to 0.62 percent.

Table 11. Review of entire CVSA Level VI Inspections for WIPP shipments

| CVSA Level VI Inspection Data for WIPP Shipments (March 24, 1999 – December 31, 2006 and January 1, 2008 – December 31, 2009) | | | | |
|--|--------|---------|---------------------|----------------------|
| Inspection Activity | Number | Percent | Level I OOS Percent | Level VI OOS Percent |
| Number of Inspections | 14,838 | | | |
| With no Violations | 13,710 | 92.40% | | |
| With Violations | 1,128 | 7.60% | | |
| Driver OOS* Rate | | 0.06% | 0.05% | 0.01% |
| Vehicle OOS Rate | | 1.81% | 0.62% | 1.19% |

*OOS = Out-of-Service

Conclusions

Data for this report were obtained electronically from the A&I Online website. There are some deficiencies with this data source with respect to producing this report. Data for CY 2007 is incomplete and was not included in the analyses. The shipment destination is not identified and out-of-service violations are not identified as either Level I or Level VI out-of-service violations. Manual intervention was needed to obtain this information necessary for the report. This has the potential to introduce errors in the analysis as well as limit the accuracy of the results. For example, 10 out-of-service violations were treated only as violations because hardcopy inspection forms were not available to determine if the out-of-service violations were Level I or Level VI out-of-service violations. Shipment destination and type of out-of-service violation are data items on the inspection form. These items should be available for retrieval from the database. For future use CVSA will request from FMCSA that enhancements be made to the A&I Online website to provide access to needed information.

In the process of reviewing the hardcopy inspection forms to obtain shipment destination and type of out-of-service violation data, it was discovered that some inspections were incorrectly identified as Level VI inspections and some violations were incorrectly coded as out-of-service violations. These errors suggest a need for care in submitting inspection data and a need for additional inspector training to distinguish out-of-service violations. CVSA will provide Level VI inspectors with the information to address these issues.

Even with the data limitations described above there is enough data to conclude that the out-of-service rates from Level VI inspections of WIPP shipments are declining over time. The ultimate goal of the CVSA Level VI inspection program is and will continue to be the safe and uneventful shipments of radioactive materials from point of origin to destination. The states, carriers, and DOE can be proud of their continued safety program excellence as supported by the overall reduction of the out-of-service rates. The program should continue to strive for low out-of-service rates, which ultimately lead to a low number of incidents. WIPP shipments continue to be one of the safest commercial truck shipments today.

Appendix A

List of WIPP Shipment Violations - CY 2008

| Unit | Inspection Date | Location | Inspection Type | Violation | Level I OOS | Level VI OOS |
|--------|-----------------|----------------------|-----------------|---|-------------|--------------|
| Driver | 1/4/2008 | Raton Mcss | En Route | 396.13C - No Reviewing Driver'S Signature On Dvir | | |
| Driver | 2/18/2008 | Inl | Point of Origin | 391.43H - Improper Medical Examiners Certificate Form | | |
| Driver | 2/18/2008 | Inl | Point of Origin | 391.43H - Improper Medical Examiners Certificate Form | | |
| Driver | 2/19/2008 | Inl | Point of Origin | 391.43H - Improper Medical Examiners Certificate Form | | |
| Driver | 2/19/2008 | Inl | Point of Origin | 391.43H - Improper Medical Examiners Certificate Form | | |
| Driver | 2/26/2008 | Richland Wipp | Point of Origin | 395.8F1 - Drivers Record Of Duty Status Not Current | | |
| Driver | 3/1/2008 | Ft Collins,Co | En Route | 395.8 - Log Violation (General/Form And Manner) | | |
| Driver | 3/11/2008 | Santa Fe Enforcement | En Route | 392.3 - Operating A Cmv While Ill/Fatigued | X | |
| Driver | 3/13/2008 | Inl | Point of Origin | 395.8 - Log Violation (General/Form And Manner) | | |
| Driver | 3/24/2008 | Inl | Point of Origin | 391.43H - Improper Medical Examiners Certificate Form | | |
| Driver | 4/18/2008 | Inl | Point of Origin | 395.15C - Onboard Rcdng Devc Improper Form And Manner | | |
| Driver | 4/18/2008 | Inl | Point of Origin | 395.15I5 - Onboard Rcdng Devc Doesn'T Display Req. Info | | |
| Driver | 4/18/2008 | Inl | Point of Origin | 395.15C - Onboard Rcdng Devc Improper Form And Manner | | |
| Driver | 4/19/2008 | Inl | Point of Origin | 392.2 - Local Laws (General) | | |
| Driver | 5/5/2008 | Inl | Point of Origin | 395.3A1/R - 11 Hour Rule Violation (Property) | | |
| Driver | 5/13/2008 | Umatilla Poe | En Route | 395.8F1 - Drivers Record Of Duty Status Not Current | | |
| Driver | 5/28/2008 | Inl | Point of Origin | 395.15C - Onboard Rcdng Devc Improper Form And Manner | | |
| Driver | 7/9/2008 | Inl | Point of Origin | 395.8 - Log Violation (General/Form And Manner) | | |
| Driver | 7/24/2008 | Inl | Point of Origin | 391.43H - Improper Medical Examiners Certificate Form | | |

| Unit | Inspection Date | Location | Inspection Type | Violation | Level I OOS | Level VI OOS |
|------------------|-----------------|------------------------|-----------------|--|-------------|--------------|
| Driver | 9/24/2008 | Inl | Point of Origin | 395.3A2/R - 14 Hour Rule Violation (Property) | | |
| Driver | 11/2/2008 | Raton Mcss | En Route | 395.8 - Log Violation (General/Form And Manner) | | |
| Driver | 11/11/2008 | Eunice Weigh Pad | En Route | 395.8 - Log Violation (General/Form And Manner) | | |
| Intermdl Chassis | 9/30/2008 | Hanford | Point of Origin | 393.9 - Inoperable Required Lamp | | |
| Other | 5/21/2008 | Los Alamos, New Mexico | Point of Origin | 393.75A - Flat Tire Or Fabric Exposed | X | |
| Semi-Trailer | 1/4/2008 | Raton Mcss | En Route | 393.11 - No/Defective Lighting Devices/Ref/Projected | | |
| Semi-Trailer | 1/8/2008 | Raton Mcss | En Route | 393.9 - Inoperable Required Lamp | | |
| Semi-Trailer | 1/8/2008 | Loving Inspection Site | En Route | 172.516C6 - Placard Damaged, Deteriorated, Or Obscured | | |
| Semi-Trailer | 1/10/2008 | Savannah River Site | Point of Origin | 393.75A1 - Tire-Ply Or Belt Material Exposed | | |
| Semi-Trailer | 1/24/2008 | Loving Weigh Pad | En Route | 393.47E - Clamp/Roto Type Brake(S) Out-Of-Adjustment | | X |
| Semi-Trailer | 1/24/2008 | Inl | Point of Origin | 396.3A1 - Inspection/Repair And Maint Parts & Accssries | | |
| Semi-Trailer | 1/25/2008 | Raton Enforcement | En Route | 393.9TS - Inoperative Turn Signal Right | | X |
| Semi-Trailer | 2/18/2008 | Inl | Point of Origin | 393.55E - Abs Malfunct Lamps Towed Cmv Mfg>2/98mfg | | |
| Semi-Trailer | 3/1/2008 | Ft Collins,Co | En Route | 393.55D3 - Abs Malf Indctr Conec From Towed Cmv Mfg>2/01 | | |
| Semi-Trailer | 3/1/2008 | Ft Collins,Co | En Route | 393.110D - Large/Odd-Shaped Cargo Not Adeq. Secured | | X |
| Semi-Trailer | 3/12/2008 | Raton Poe | En Route | 393.9 - Inoperable Required Lamp | | |
| Semi-Trailer | 3/13/2008 | Inl | Point of Origin | 393.55D3 - Abs Malf Indctr Conec From Towed Cmv Mfg>2/01 | | |
| Semi-Trailer | 3/17/2008 | Inl | Point of Origin | 393.9 - Inoperable Required Lamp | | |
| Semi-Trailer | 3/18/2008 | Inl | Point of Origin | 393.104F3 - Loose/Unfastened Tiedown. | | X |
| Semi-Trailer | 3/25/2008 | Inl | Point of Origin | 393.110D - Large/Odd-Shaped Cargo Not Adeq. Secured | | |

| Unit | Inspection Date | Location | Inspection Type | Violation | Level I OOS | Level VI OOS |
|--------------|-----------------|-----------------------------|-----------------|--|-------------|--------------|
| Semi-Trailer | 3/25/2008 | Fort Collins Poe Southbound | En Route | 393.47G - Insufficient Drum/Rotor Thickness | | |
| Semi-Trailer | 3/26/2008 | Raton Mcss | En Route | 396.3A1 - Inspection/Repair And Maint Parts & Accssries | | |
| Semi-Trailer | 4/2/2008 | Raton Mcss | En Route | 396.3A1 - Inspection/Repair And Maint Parts & Accssries | | |
| Semi-Trailer | 4/7/2008 | Inl | Point of Origin | 393.55C2 - Abs All Other Cmvs Mfg >2/98 Air Brake System | | |
| Semi-Trailer | 4/8/2008 | Inl | Point of Origin | 393.11 - No/Defective Lighting Devices/Ref/Projected | | |
| Semi-Trailer | 4/14/2008 | Inl | Point of Origin | 396.3A1 - Inspection/Repair And Maint Parts & Accssries | | |
| Semi-Trailer | 4/14/2008 | Inl | Point of Origin | 393.9TS - Inoperative Turn Signal Right | | X |
| Semi-Trailer | 4/22/2008 | Inl | Point of Origin | 396.3A1 - Inspection/Repair And Maint Parts & Accssries | | |
| Semi-Trailer | 4/23/2008 | Loving Weigh Pad | En Route | 396.5B - Oil And/Or Grease Leak | | |
| Semi-Trailer | 5/8/2008 | Inl | Point of Origin | 393.75F - Tire-Load Weight Rating/Under Inflated | X | |
| Semi-Trailer | 5/10/2008 | Raton Mcss | En Route | 393.110D - Large/Odd-Shaped Cargo Not Adeq. Secured | | |
| Semi-Trailer | 5/10/2008 | Raton Mcss | En Route | 396.3A1 - Inspection/Repair And Maint Parts & Accssries | | |
| Semi-Trailer | 5/16/2008 | Inl | Point of Origin | 393.9 - Inoperable Required Lamp | | |
| Semi-Trailer | 5/16/2008 | Raton Enforcement | En Route | 396.3A1 - Inspection/Repair And Maint Parts & Accssries | | |
| Semi-Trailer | 5/17/2008 | Ft Collins Port Of Entry | En Route | 393.55C2 - Abs All Other Cmvs Mfg >2/98 Air Brake System | | |
| Semi-Trailer | 5/20/2008 | Inl | Point of Origin | 393.75A3 - Tire-Flat And/Or Audible Air Leak | X | |
| Semi-Trailer | 5/27/2008 | Inl | Point of Origin | 393.102A - Improper Securement Syst (Tiedown Assemblies) | | X |

| Unit | Inspection Date | Location | Inspection Type | Violation | Level I OOS | Level VI OOS |
|--------------|-----------------|-------------------|-----------------|--|-------------|--------------|
| Semi-Trailer | 5/28/2008 | Inl | Point of Origin | 393.55E - Abs Malfunct Lamps Towed Cmv Mfg>2/98mfg | | |
| Semi-Trailer | 5/28/2008 | Raton Mcss | En Route | 393.9 - Inoperable Required Lamp | | |
| Semi-Trailer | 5/28/2008 | Raton Mcss | En Route | 393.9 - Inoperable Required Lamp | | |
| Semi-Trailer | 5/31/2008 | Ft Collins,Co | En Route | 393.55D1 - Abs Malf Circ/Signl Mfg>2/97,Sgl Cmv Mfg>2/98 | | |
| Semi-Trailer | 6/4/2008 | Raton Enforcement | En Route | 396.3A1BA - Brake-Out Of Adjustment | | X |
| Semi-Trailer | 6/17/2008 | Raton Enforcement | En Route | 393.55E - Abs Malfunct Lamps Towed Cmv Mfg>2/98mfg | | |
| Semi-Trailer | 6/28/2008 | Ft Collins,Co | En Route | 393.55E - Abs Malfunct Lamps Towed Cmv Mfg>2/98mfg | | |
| Semi-Trailer | 7/8/2008 | Inl | Point of Origin | 393.9 - Inoperable Required Lamp | | |
| Semi-Trailer | 7/13/2008 | Raton Enforcement | En Route | 393.55D3 - Abs Malf Indctr Conec From Towed Cmv Mfg>2/01 | | |
| Semi-Trailer | 7/14/2008 | Inl | Point of Origin | 393.75A - Flat Tire Or Fabric Exposed | X | |
| Semi-Trailer | 7/18/2008 | Loving Weigh Pad | En Route | 393.110D - Large/Odd-Shaped Cargo Not Adeq. Secured | | X |
| Semi-Trailer | 7/18/2008 | Loving Weigh Pad | En Route | 393.110D - Large/Odd-Shaped Cargo Not Adeq. Secured | | X |
| Semi-Trailer | 7/26/2008 | Raton Mcss | En Route | 393.55A - Abs All Cmv's Mfg >2/99 With Hydraulic Brakes | | |
| Semi-Trailer | 7/30/2008 | Raton Enforcement | En Route | 393.25A - Improper Lamp Mounting | | |
| Semi-Trailer | 7/30/2008 | Raton Enforcement | En Route | 393.55D3 - Abs Malf Indctr Conec From Towed Cmv Mfg>2/01 | | |
| Semi-Trailer | 7/31/2008 | Inl | Point of Origin | 393.45 - Brake Tubing And Hose Adequacy | X | |
| Semi-Trailer | 8/3/2008 | Raton Enforcement | En Route | 393.25A - Improper Lamp Mounting | | |
| Semi-Trailer | 8/3/2008 | Raton Enforcement | En Route | 393.25A - Improper Lamp Mounting | | |
| Semi-Trailer | 9/13/2008 | Raton Mcss | En Route | 393.9 - Inoperable Required Lamp | | X |
| Semi-Trailer | 9/13/2008 | Raton Mcss | En Route | 393.9 - Inoperable Required Lamp | | |

| Unit | Inspection Date | Location | Inspection Type | Violation | Level I OOS | Level VI OOS |
|--------------|-----------------|---------------------|-----------------|--|-------------|--------------|
| Semi-Trailer | 9/13/2008 | Raton Mcss | En Route | 393.19 - No/Defective Turn/Hazard Lamp As Required | | |
| Semi-Trailer | 9/15/2008 | Inl | Point of Origin | 393.110D - Large/Odd-Shaped Cargo Not Adeq. Secured | | X |
| Semi-Trailer | 9/15/2008 | Inl | Point of Origin | 393.110D - Large/Odd-Shaped Cargo Not Adeq. Secured | | |
| Semi-Trailer | 9/17/2008 | Inl | Point of Origin | 393.45D - Brake Connections With Leaks/Constrictions | | |
| Semi-Trailer | 9/24/2008 | Inl | Point of Origin | 393.45D - Brake Connections With Leaks/Constrictions | | |
| Semi-Trailer | 9/24/2008 | Energx-Us Doe | Point of Origin | 396.3A1BA - Brake-Out Of Adjustment | | |
| Semi-Trailer | 9/25/2008 | Inl | Point of Origin | 396.5B - Oil And/Or Grease Leak | | |
| Semi-Trailer | 9/27/2008 | Inl | Point of Origin | 393.55D1 - Abs Malf Circ/Signl Mfg>2/97,Sgl Cmv Mfg>2/98 | | |
| Semi-Trailer | 10/1/2008 | Raton Enforcement | En Route | 393.45B2 - Brake Hose/Tubing Chaffing And/Or Kinking | | |
| Semi-Trailer | 10/2/2008 | Inl | Point of Origin | 393.9 - Inoperable Required Lamp | | |
| Semi-Trailer | 10/11/2008 | Inl | Point of Origin | 393.55E - Abs Malfunct Lamps Towed Cmv Mfg>2/98mfg | | |
| Semi-Trailer | 10/15/2008 | Fort Collins Poe Sb | En Route | 393.55D3 - Abs Malf Indctr Conec From Towed Cmv Mfg>2/01 | | |
| Semi-Trailer | 10/19/2008 | Fort Collins Poe Sb | En Route | 393.47A - Inadequate Brakes For Safe Stopping | | |
| Semi-Trailer | 10/21/2008 | Inl | Point of Origin | 393.55E - Abs Malfunct Lamps Towed Cmv Mfg>2/98mfg | | |
| Semi-Trailer | 10/24/2008 | Raton Enforcement | En Route | 396.5 - Excessive Oil Leaks | | X |
| Semi-Trailer | 10/24/2008 | Ft Collins,Co | En Route | 393.110D - Large/Odd-Shaped Cargo Not Adeq. Secured | | |
| Semi-Trailer | 10/25/2008 | Inl | Point of Origin | 396.5B - Oil And/Or Grease Leak | | |

| Unit | Inspection Date | Location | Inspection Type | Violation | Level I OOS | Level VI OOS |
|---------------|-----------------|-----------------------------|-----------------|--|-------------|--------------|
| Semi-Trailer | 10/25/2008 | Inl | Point of Origin | 393.28 - Improper Or No Wiring Protection As Required | | |
| Semi-Trailer | 11/7/2008 | Fort Collins Poe Southbound | En Route | 177.842D - Blocking And Bracing Of Ram Packages | | |
| Semi-Trailer | 11/9/2008 | Raton Enforcement | En Route | 393.45B2 - Brake Hose/Tubing Chaffing And/Or Kinking | | |
| Semi-Trailer | 11/14/2008 | Alamogordo Enforcement | En Route | 396.3A1B - Brakes (General) | | |
| Semi-Trailer | 11/15/2008 | Ft Collins,Co | En Route | 393.55E - Abs Malfunc Lamps Towed Cmv Mfg>2/98mfg | | |
| Semi-Trailer | 11/15/2008 | Ft Collins,Co | En Route | 393.55E - Abs Malfunc Lamps Towed Cmv Mfg>2/98mfg | | |
| Truck Tractor | 1/13/2008 | Roadside | En Route | 396.3A1 - Inspection/Repair And Maint Parts & Accssries | | |
| Truck Tractor | 2/11/2008 | Inl | Point of Origin | 393.55D2 - Abs Malf Indctr To Cab Of Towing Cmv Mfg>2/01 | | |
| Truck Tractor | 2/12/2008 | Richland/Wipp | Point of Origin | 396.3A1B - Brakes (General) | | |
| Truck Tractor | 2/13/2008 | Loving Weigh Pad | En Route | 393.9 - Inoperable Required Lamp | | |
| Truck Tractor | 2/16/2008 | Inl | Point of Origin | 393.45B2 - Brake Hose/Tubing Chaffing And/Or Kinking | | |
| Truck Tractor | 2/18/2008 | Inl | Point of Origin | 396.3A1B - Brakes (General) | | |
| Truck Tractor | 2/19/2008 | Ft Collins,Co | En Route | 393.55D2 - Abs Malf Indctr To Cab Of Towing Cmv Mfg>2/01 | | |
| Truck Tractor | 2/20/2008 | Inl | Point of Origin | 172.600C - Er Info Not Available | | |
| Truck Tractor | 3/1/2008 | Inl | Point of Origin | 393.24A - Non-Compliance With Headlamp Requirements | | |
| Truck Tractor | 3/18/2008 | Raton Enforcement | En Route | 393.60C - Damaged Or Discolored Windshield | | |
| Truck Tractor | 4/11/2008 | Inl | Point of Origin | 390.21A - Not Marked In Accordance With Regulations | | |
| Truck Tractor | 5/8/2008 | Inl | Point of Origin | 393.45 - Brake Tubing And Hose Adequacy | | |

| Unit | Inspection Date | Location | Inspection Type | Violation | Level I OOS | Level VI OOS |
|---------------|-----------------|-----------------------------|-----------------|--|-------------|--------------|
| Truck Tractor | 5/29/2008 | Inl | Point of Origin | 393.45D - Brake Connections With Leaks/Constrictions | | |
| Truck Tractor | 5/29/2008 | Inl | Point of Origin | 393.45D - Brake Connections With Leaks/Constrictions | | |
| Truck Tractor | 6/4/2008 | Inl | Point of Origin | 393.45B2 - Brake Hose/Tubing Chaffing And/Or Kinking | | |
| Truck Tractor | 7/1/2008 | Raton Mcss | En Route | 393.60C - Damaged Or Discolored Windshield | | |
| Truck Tractor | 7/22/2008 | Inl | Point of Origin | 393.45D - Brake Connections With Leaks/Constrictions | | |
| Truck Tractor | 7/31/2008 | Inl | Point of Origin | 396.3A1T - Tires (General) | | |
| Truck Tractor | 9/19/2008 | Fort Collins Poe Southbound | En Route | 107.620B - No Copy Of Us Dot Hm Registration Number | | |
| Truck Tractor | 9/27/2008 | Inl | Point of Origin | 393.55C1 - Abs All Tractors Mfg >2/97 Air Brake System | | |
| Truck Tractor | 10/4/2008 | Inl | Point of Origin | 396.3A1 - Inspection/Repair And Maint Parts & Accssries | | |
| Truck Tractor | 10/15/2008 | Fort Collins Poe Sb | En Route | 393.55D2 - Abs Malf Indctr To Cab Of Towing Cmv Mfg>2/01 | | |
| Truck Tractor | 10/15/2008 | Fort Collins Poe Sb | En Route | 393.83G - Exhaust Leak Under Truck Cab And/Or Sleeper | | |
| Truck Tractor | 11/15/2008 | Alamogordo Enforcement | En Route | 393.83H - Exhaust System Not Securely Fastened | | |

Appendix B

List of WIPP Shipment Violations - CY 2009

| Unit | Inspection Date | Location | Inspection Type | Violation | Level I OOS | Level VI OOS |
|--------------|-----------------|----------------------------|----------------------|--|-------------|--------------|
| Driver | 1/30/2009 | I-25 | En Route | 395.8 - Log Violation (General/Form And Manner) | | |
| Driver | 3/20/2009 | Ft Collins,Co | En Route | 392.2 - Local Laws (General) | | |
| Driver | 7/31/2009 | Inl | Point of Origin | 391.43H - Improper Medical Examiners Certificate Form | | |
| Driver | 9/18/2009 | Inl | Point of Origin | 395.3A2/R - 14 Hour Rule Violation (Property) | | |
| Driver | 9/27/2009 | Inl | Point of Origin | 391.43H - Improper Medical Examiners Certificate Form | | |
| Driver | 10/26/2009 | Fort Collins Port Of Entry | En Route | 395.8F1 - Drivers Record Of Duty Status Not Current | | |
| Driver | 10/27/2009 | Interstate 40 | En Route | 395.8 - Log Violation (General/Form And Manner) | | |
| Driver | 10/27/2009 | Interstate 40 | En Route | 395.8 - Log Violation (General/Form And Manner) | | |
| Driver | 11/2/2009 | Inl | Point of Origin | 395.8F1 - Drivers Record Of Duty Status Not Current | | |
| Driver | 11/2/2009 | Inl | Point of Origin | 395.8 - Log Violation (General/Form And Manner) | | |
| Other | 4/8/2009 | Santa Fe Enforcement | Point of Origin | 393.75C - Tire-Other Tread Depth Less Than 2/32 Of Inch | | X |
| Semi-Trailer | 2/4/2009 | Inl | Point of Origin | 393.55D3 - Abs Malf Indctr Conec From Towed Cmv Mfg>2/01 | | |
| Semi-Trailer | 2/9/2009 | Inl | Point of Origin | 393.110D - Large/Odd-Shaped Cargo Not Adeq. Secured | | X |
| Semi-Trailer | 2/14/2009 | Raton Mcss | Point of Destination | 393.9 - Inoperable Required Lamp | | |
| Semi-Trailer | 2/25/2009 | Ft Collins,Co | En Route | 393.55E - Abs Malfuncnt Lamps Towed Cmv Mfg>2/98mfg | | |
| Semi-Trailer | 3/12/2009 | Ft Collins,Co | En Route | 393.55D3 - Abs Malf Indctr Conec From Towed Cmv Mfg>2/01 | | |
| Semi-Trailer | 3/17/2009 | Ft Collins Poe Sb | En Route | 393.53B - Auto Brake Adjuster Cmv Mfg >10/19/94 Air Brk | | |
| Semi-Trailer | 3/17/2009 | Ft Collins Poe Sb | En Route | 393.47E - Clamp/Roto Type Brake(S) Out-Of-Adjustment | | |

| Unit | Inspection Date | Location | Inspection Type | Violation | Level I OOS | Level VI OOS |
|--------------|-----------------|----------------------------|-----------------|---|-------------|--------------|
| Semi-Trailer | 3/17/2009 | Ft Collins Poe Sb | En Route | 396.3A1BOS - Brakes Out Of Service: The Number Of Defective Brakes Is Equal To Or Greater Tha | | X |
| Semi-Trailer | 4/23/2009 | Nts | Point of Origin | 393.75F - Tire-Load Weight Rating/Under Inflated | | |
| Semi-Trailer | 4/23/2009 | Nts | Point of Origin | 393.110D - Large/Odd-Shaped Cargo Not Adeq. Secured | | |
| Semi-Trailer | 4/24/2009 | Inl | Point of Origin | 393.45D - Brake Connections With Leaks/Constrictions | | |
| Semi-Trailer | 4/29/2009 | Fort Collins Port Of Entry | En Route | 393.110D - Large/Odd-Shaped Cargo Not Adeq. Secured | | |
| Semi-Trailer | 5/4/2009 | Inl | Point of Origin | 393.45D - Brake Connections With Leaks/Constrictions | | |
| Semi-Trailer | 5/5/2009 | Ft Collins,Co | En Route | 393.55D3 - Abs Malf Indctr Conec From Towed Cmv Mfg>2/01 | | |
| Semi-Trailer | 5/9/2009 | Ft Collins,Co | En Route | 393.110D - Large/Odd-Shaped Cargo Not Adeq. Secured | | |
| Semi-Trailer | 5/15/2009 | Eunice Weigh Pad | En Route | 396.3A1 - Inspection/Repair And Maint Parts & Accssries | | |
| Semi-Trailer | 5/26/2009 | Savannah River Site | Point of Origin | 393.75A3 - Tire-Flat And/Or Audible Air Leak | X | |
| Semi-Trailer | 5/31/2009 | Raton Enforcement | En Route | 393.55E - Abs Malfunct Lamps Towed Cmv Mfg>2/98mfg | | |
| Semi-Trailer | 6/5/2009 | Inl | Point of Origin | 393.100A - No Or Improper Load Securement | | |
| Semi-Trailer | 6/16/2009 | Inl | Point of Origin | 396.3A1 - Inspection/Repair And Maint Parts & Accssries | | |
| Semi-Trailer | 6/20/2009 | Ft Collins,Co | En Route | 393.110D - Large/Odd-Shaped Cargo Not Adeq. Secured | | |
| Semi-Trailer | 6/20/2009 | Raton Enforcement | En Route | 393.55E - Abs Malfunct Lamps Towed Cmv Mfg>2/98mfg | | |
| Semi-Trailer | 6/22/2009 | Inl | Point of Origin | 393.28 - Improper Or No Wiring Protection As Required | | |

| Unit | Inspection Date | Location | Inspection Type | Violation | Level I OOS | Level VI OOS |
|--------------|-----------------|------------------------------|-----------------|--|-------------|--------------|
| Semi-Trailer | 6/23/2009 | Savannah River Site | Point of Origin | 396.3A1 - Inspection/Repair And Maint Parts & Accssries | | |
| Semi-Trailer | 6/26/2009 | Inl | Point of Origin | 393.28 - Improper Or No Wiring Protection As Required | | |
| Semi-Trailer | 6/28/2009 | Fort Collins Poe Southbound | En Route | 393.75A1 - Tire-Ply Or Belt Material Exposed | | X |
| Semi-Trailer | 7/9/2009 | Fort Collins Port Of Entry S | En Route | 393.48B1 - Defective Brake Limiting Device | | |
| Semi-Trailer | 7/9/2009 | Nts, Nv | Point of Origin | 393.100A - No Or Improper Load Securement | | |
| Semi-Trailer | 7/15/2009 | Inl | Point of Origin | 177.801 - Accepting/Transporting Hm Not Prepared Proper | | |
| Semi-Trailer | 7/31/2009 | Argon National Labs | Point of Origin | 172.201A4 - Additional Info Not After Hm Basic Descrip. | | |
| Semi-Trailer | 7/31/2009 | Argon National Labs | Point of Origin | 172.403G - Failed To Label Ram Properly | | |
| Semi-Trailer | 8/16/2009 | Fort Collins Port Of Entry | En Route | 393.55E - Abs Malfunct Lamps Towed Cmv Mfg>2/98mfg | | |
| Semi-Trailer | 8/20/2009 | Ft Collins,Co | En Route | 393.55D3 - Abs Malf Indctr Conec From Towed Cmv Mfg>2/01 | | |
| Semi-Trailer | 8/25/2009 | Ft Collins,Co | En Route | 393.55D3 - Abs Malf Indctr Conec From Towed Cmv Mfg>2/01 | | |
| Semi-Trailer | 8/31/2009 | Inl | Point of Origin | 172.310A - No Gross Weight On Ram Package>50kg | | |
| Semi-Trailer | 9/9/2009 | Ft Collins,Co | En Route | 393.55D3 - Abs Malf Indctr Conec From Towed Cmv Mfg>2/01 | | |
| Semi-Trailer | 9/11/2009 | Inl | Point of Origin | 393.75A - Flat Tire Or Fabric Exposed | | |
| Semi-Trailer | 9/13/2009 | Fort Collins Port Of Entry | En Route | 393.55E - Abs Malfunct Lamps Towed Cmv Mfg>2/98mfg | | |
| Semi-Trailer | 9/19/2009 | Gallup Port Of Entry | En Route | 396.5B - Oil And/Or Grease Leak | | |
| Semi-Trailer | 9/28/2009 | Inl | Point of Origin | 393.45D - Brake Connections With Leaks/Constrictions | | |

| Unit | Inspection Date | Location | Inspection Type | Violation | Level I OOS | Level VI OOS |
|---------------|-----------------|----------------------------|-----------------|--|-------------|--------------|
| Semi-Trailer | 9/28/2009 | Colo 25 @ Mp 267 | En Route | 393.55E - Abs Malfuncnt Lamps Towed Cmv Mfg>2/98mfg | | |
| Semi-Trailer | 9/28/2009 | Inl | Point of Origin | 393.11 - No/Defective Lighting Devices/Ref/Projected | | |
| Semi-Trailer | 10/5/2009 | Inl | Point of Origin | 393.11 - No/Defective Lighting Devices/Ref/Projected | | |
| Semi-Trailer | 10/5/2009 | Inl | Point of Origin | 393.48A - Inoperative/Defective Brakes | | X |
| Semi-Trailer | 10/7/2009 | Raton Mcss | En Route | 393.75A3 - Tire-Flat And/Or Audible Air Leak | X | |
| Semi-Trailer | 10/14/2009 | Inl | Point of Origin | 396.3A1 - Inspection/Repair And Maint Parts & Accssries | | |
| Semi-Trailer | 10/15/2009 | Interstate 40 | En Route | 396.3A1 - Inspection/Repair And Maint Parts & Accssries | | |
| Semi-Trailer | 10/24/2009 | Inl | Point of Origin | 393.28 - Improper Or No Wiring Protection As Required | | |
| Semi-Trailer | 11/3/2009 | Fort Collins Port Of Entry | En Route | 393.110D - Large/Odd-Shaped Cargo Not Adeq. Secured | | |
| Semi-Trailer | 11/3/2009 | Fort Collins Port Of Entry | En Route | 393.110D - Large/Odd-Shaped Cargo Not Adeq. Secured | | |
| Semi-Trailer | 11/7/2009 | Fort Collins Poe | En Route | 396.3A1 - Inspection/Repair And Maint Parts & Accssries | | |
| Semi-Trailer | 11/10/2009 | Raton Mcss | En Route | 393.45 - Brake Tubing And Hose Adequacy | | |
| Semi-Trailer | 11/18/2009 | Inl | Point of Origin | 393.9 - Inoperable Required Lamp | | |
| Truck Tractor | 1/15/2009 | Nevada Test Site | Point of Origin | 396.5B - Oil And/Or Grease Leak | | |
| Truck Tractor | 1/30/2009 | Ft Collins,Co | En Route | 393.24A - Non-Compliance With Headlamp Requirements | | |
| Truck Tractor | 2/3/2009 | Ft Collins,Co | En Route | 393.43A - No/Improper Tractor Protection Valve | X | |
| Truck Tractor | 2/5/2009 | Ft Collins,Co | En Route | 393.43A - No/Improper Tractor Protection Valve | X | |
| Truck Tractor | 2/20/2009 | Raton Enforcement | En Route | 393.55D3 - Abs Malf Indctr Conec From Towed Cmv Mfg>2/01 | | |

| Unit | Inspection Date | Location | Inspection Type | Violation | Level I OOS | Level VI OOS |
|---------------|-----------------|----------------------------|-----------------|--|-------------|--------------|
| Truck Tractor | 2/24/2009 | Fort Collins Poe | En Route | 396.3A1BL - Brake-Reserve System Pressure Loss | | |
| Truck Tractor | 3/6/2009 | Eunice Weigh Pad | En Route | 396.3A1B - Brakes (General) | | |
| Truck Tractor | 3/13/2009 | Ft Collins,Co | En Route | 393.43A - No/Improper Tractor Protection Valve | X | |
| Truck Tractor | 3/17/2009 | Ft Collins Poe Sb | En Route | 393.45 - Brake Tubing And Hose Adequacy | X | |
| Truck Tractor | 3/29/2009 | Fort Collins Port Of Entry | En Route | 396.3A1 - Inspection/Repair And Maint Parts & Accssries | | |
| Truck Tractor | 4/26/2009 | Fort Collins Port Of Entry | En Route | 393.83G - Exhaust Leak Under Truck Cab And/Or Sleeper | X | |
| Truck Tractor | 4/28/2009 | Fort Collins Port Of Entry | En Route | 393.55E - Abs Malfunc Lamps Towed Cmv Mfg>2/98mfg | | |
| Truck Tractor | 4/28/2009 | Fort Collins Port Of Entry | En Route | 393.83G - Exhaust Leak Under Truck Cab And/Or Sleeper | X | |
| Truck Tractor | 5/4/2009 | Inl | Point of Origin | 393.209D - Steering System Components Worn/Welded/Missng | X | |
| Truck Tractor | 5/15/2009 | Raton Mcss | En Route | 393.9 - Inoperable Required Lamp | | |
| Truck Tractor | 5/15/2009 | Ft Collins,Co | En Route | 393.24A - Non-Compliance With Headlamp Requirements | | |
| Truck Tractor | 5/17/2009 | Fort Collins Port Of Entry | En Route | 393.55D1 - Abs Malf Circ/Signl Mfg>2/97,Sgl Cmv Mfg>2/98 | | |
| Truck Tractor | 6/5/2009 | Alamogordo Enforcement | En Route | 393.75A - Flat Tire Or Fabric Exposed | X | |
| Truck Tractor | 6/12/2009 | Inl | Point of Origin | 396.3A1 - Inspection/Repair And Maint Parts & Accssries | | |
| Truck Tractor | 6/13/2009 | Inl | Point of Origin | 393.95A - No/Discharged/Unsecured Fire Extinguisher | | |
| Truck Tractor | 6/20/2009 | Raton Enforcement | En Route | 393.75A - Flat Tire Or Fabric Exposed | X | |
| Truck Tractor | 7/1/2009 | I-25 | En Route | 393.83G - Exhaust Leak Under Truck Cab And/Or Sleeper | | |
| Truck Tractor | 7/1/2009 | Raton Mcss | En Route | 393.79 - Defroster / Defogger Inoperative | | |

| Unit | Inspection Date | Location | Inspection Type | Violation | Level I OOS | Level VI OOS |
|---------------|-----------------|----------------------------|-----------------|--|-------------|--------------|
| Truck Tractor | 7/7/2009 | Ft Collins,Co | En Route | 393.83G - Exhaust Leak Under Truck Cab And/Or Sleeper | | |
| Truck Tractor | 7/31/2009 | Inl | Point of Origin | 393.9H - Inoperable Head Lamps | | |
| Truck Tractor | 8/11/2009 | Ft Collins,Co | En Route | 393.45B2 - Brake Hose/Tubing Chaffing And/Or Kinking | | |
| Truck Tractor | 8/11/2009 | Inl | Point of Origin | 393.209D - Steering System Components Worn/Welded/Missng | X | |
| Truck Tractor | 8/16/2009 | Fort Collins Port Of Entry | En Route | 393.48B1 - Defective Brake Limiting Device | | |
| Truck Tractor | 8/16/2009 | Fort Collins Port Of Entry | En Route | 393.48B1 - Defective Brake Limiting Device | | |
| Truck Tractor | 8/16/2009 | Fort Collins Port Of Entry | En Route | 393.55D2 - Abs Malf Indctr To Cab Of Towing Cmv Mfg>2/01 | | |
| Truck Tractor | 8/20/2009 | Inl | Point of Origin | 393.45D - Brake Connections With Leaks/Constrictions | | |
| Truck Tractor | 8/21/2009 | Inl | Point of Origin | 396.3A1 - Inspection/Repair And Maint Parts & Accssries | | |
| Truck Tractor | 8/22/2009 | Ft Collins,Co | En Route | 393.45B2 - Brake Hose/Tubing Chaffing And/Or Kinking | | |
| Truck Tractor | 8/23/2009 | Fort Collins Port Of Entry | En Route | 393.48B1 - Defective Brake Limiting Device | | |
| Truck Tractor | 8/25/2009 | Inl | Point of Origin | 393.83G - Exhaust Leak Under Truck Cab And/Or Sleeper | | |
| Truck Tractor | 9/2/2009 | San Jon Mcss | En Route | 396.3A1 - Inspection/Repair And Maint Parts & Accssries | | |
| Truck Tractor | 9/11/2009 | Ft Collins,Co | En Route | 393.75A - Flat Tire Or Fabric Exposed | X | |
| Truck Tractor | 9/15/2009 | Ft Collins,Co | En Route | 393.9T - Inoperable Tail Lamp | | |
| Truck Tractor | 9/20/2009 | Inl | Point of Origin | 396.3A1 - Inspection/Repair And Maint Parts & Accssries | | |
| Truck Tractor | 9/22/2009 | Raton Mcss | En Route | 393.55D3 - Abs Malf Indctr Conec From Towed Cmv Mfg>2/01 | | |
| Truck Tractor | 9/28/2009 | Inl | Point of Origin | 393.84 - Inadequate Floor Condition | | |

| Unit | Inspection Date | Location | Inspection Type | Violation | Level I OOS | Level VI OOS |
|---------------|-----------------|----------------------------|-----------------|---|-------------|--------------|
| Truck Tractor | 9/28/2009 | Inl | Point of Origin | 393.28 - Improper Or No Wiring Protection As Required | | |
| Truck Tractor | 10/5/2009 | Fort Collins Port Of Entry | En Route | 393.48A - Inoperative/Defective Brakes | | |
| Truck Tractor | 10/8/2009 | Inl | Point of Origin | 396.3A1 - Inspection/Repair And Maint Parts & Accssries | | |
| Truck Tractor | 10/14/2009 | Eunice Weigh Pad | En Route | 393.9H - Inoperable Head Lamps | | |
| Truck Tractor | 10/26/2009 | Inl | Point of Origin | 393.9 - Inoperable Required Lamp | | |
| Truck Tractor | 10/27/2009 | Inl | Point of Origin | 393.45D - Brake Connections With Leaks/Constrictions | | |
| Truck Tractor | 11/2/2009 | Fort Collins Port Of Entry | En Route | 393.65 - Fuel System Requirements | X | |
| Truck Tractor | 11/2/2009 | Inl | Point of Origin | 393.28 - Improper Or No Wiring Protection As Required | | |
| Truck Tractor | 11/18/2009 | Eunice Weigh Pad | En Route | 393.9H - Inoperable Head Lamps | | |

Appendix C

List of Non-WIPP Shipment Violations - CY 2008

| Unit | Inspection Date | Location | Inspection Type | Violation | Level I OOS | Level VI OOS |
|---------------|-----------------|------------------------------|-----------------|---|-------------|--------------|
| Driver | 4/10/2008 | Inl | Point of Origin | 395.8 - Log Violation (General/Form And Manner) | | |
| Driver | 10/10/2008 | Blue Water Bridge | Point of Origin | 395.8 - Log Violation (General/Form And Manner) | | |
| Driver | 11/22/2008 | Blue Water Bridge | Point of Origin | 395.8 - Log Violation (General/Form And Manner) | | |
| Driver | 12/29/2008 | Kirkwood (Nb) | En Route | 395.8 - Log Violation (General/Form And Manner) | | |
| Semi-Trailer | 2/12/2008 | Richland/Wipp | Point of Origin | 393.45D - Brake Connections With Leaks/Constrictions | | X |
| Semi-Trailer | 2/16/2008 | Marshall - I-70 W/B | En Route | 172.403G - Failed To Label Ram Properly | | |
| Semi-Trailer | 2/16/2008 | Marshall - I-70 W/B | En Route | 172.203D6 - No Ram Transport Index | | |
| Semi-Trailer | 2/24/2008 | Highland,Il. | En Route | 177.834A - Package Not Secure In Vehicle | | |
| Semi-Trailer | 4/10/2008 | Inl | Point of Origin | 393.13C1 - Side Retroreflect Sht/Reflx Reflect Mfg | | |
| Semi-Trailer | 4/10/2008 | Inl | Point of Origin | 393.13C1 - Side Retroreflect Sht/Reflx Reflect Mfg | | |
| Semi-Trailer | 5/1/2008 | Interstate 10 | En Route | 172.507 - Ram Highway Route Controlled Quantity | | |
| Semi-Trailer | 5/1/2008 | Interstate 10 | En Route | 172.403A - Ram Label Requirement | | |
| Semi-Trailer | 6/23/2008 | Blue Water Bridge | Point of Origin | 393.45B2 - Brake Hose/Tubing Chaffing And/Or Kinking | | |
| Semi-Trailer | 9/27/2008 | Orleans (Wellesley Island) | Point of Origin | 393.45D - Brake Connections With Leaks/Constrictions | | X |
| Semi-Trailer | 10/10/2008 | Blue Water Bridge | Point of Origin | 393.9 - Inoperable Required Lamp | | |
| Semi-Trailer | 10/27/2008 | Kirkwood (Nb) | En Route | 393.207F - Air Suspension Pressure Loss | | |
| Semi-Trailer | 12/8/2008 | Inl | Point of Origin | 172.334 - Prohibited Id Number Marking | | |
| Truck Tractor | 2/13/2008 | Richland/Wipp | Point of Origin | 396.3A1B - Brakes (General) | | |
| Truck Tractor | 4/3/2008 | Newark City(Tyler/Corbin) | Point of Origin | 393.207A - Axle Positioning Parts Defective/Missing | | |
| Truck Tractor | 4/3/2008 | Newark City(Tyler/Corbin) | Point of Origin | 385.415A1 - No Hm Safety Permit In Vehicle | | |
| Truck Tractor | 4/23/2008 | Kirkwood (Nb) | En Route | 396.3A1 - Inspection/Repair And Maint Parts & Accssries | | |
| Truck Tractor | 6/12/2008 | Blue Water Bridge | Point of Origin | 393.9 - Inoperable Required Lamp | | |
| Truck Tractor | 7/22/2008 | I-270 Eb@Mp9 Edwardsville,Il | En Route | 177.817E - Shipping Paper Accessibility | | |

| Unit | Inspection Date | Location | Inspection Type | Violation | Level I OOS | Level VI OOS |
|---------------|-----------------|-----------------------------|-----------------|---|-------------|--------------|
| Truck Tractor | 8/14/2008 | Alb Enforcement/ Gallup Poe | En Route | 396.3A1 - Inspection/Repair And Maint Parts & Accssries | | |
| Truck Tractor | 9/3/2008 | Blue Water Bridge | Point of Origin | 393.83G - Exhaust Leak Under Truck Cab And/Or Sleeper | | |
| Truck Tractor | 9/18/2008 | Blue Water Bridge | Point of Origin | 396.3A1B - Brakes (General) | | |
| Truck Tractor | 9/29/2008 | Orleans (Wellesley Island) | Point of Origin | 393.83G - Exhaust Leak Under Truck Cab And/Or Sleeper | | |
| Truck Tractor | 10/10/2008 | Blue Water Bridge | Point of Origin | 396.3A1 - Inspection/Repair And Maint Parts & Accssries | | |
| Truck Tractor | 10/12/2008 | Blue Water Bridge | Point of Origin | 393.75H - Under Inflated Tire | | |
| Truck Tractor | 10/12/2008 | Blue Water Bridge | Point of Origin | 393.75A3 - Tire-Flat And/Or Audible Air Leak | | |
| Truck Tractor | 10/24/2008 | I-40 East Scales | En Route | 396.3A1 - Inspection/Repair And Maint Parts & Accssries | | |
| Truck Tractor | 10/30/2008 | Blue Water Bridge | Point of Origin | 393.45D - Brake Connections With Leaks/Constrictions | | |

Appendix D

List of Non-WIPP Shipment Violations - CY 2009

| Unit | Inspection Date | Location | Inspection Type | Violation | Level I OOS | Level VI OOS |
|--------------|-----------------|----------------------------|-----------------|---|-------------|--------------|
| Driver | 1/8/2009 | Kirkwood (Nb) | En Route | 395.8 - Log Violation (General/Form And Manner) | | |
| Driver | 1/22/2009 | Blue Water Bridge | Point of Origin | 392.2 - Local Laws (General) | | |
| Driver | 1/22/2009 | Blue Water Bridge | Point of Origin | 387.7F - No Proof Of Financial Responsibility- Foreign | | |
| Driver | 2/23/2009 | Blue Water Bridge | Point of Origin | 395.8 - Log Violation (General/Form And Manner) | | |
| Driver | 4/5/2009 | Blue Water Bridge | Point of Origin | 395.8 - Log Violation (General/Form And Manner) | | |
| Driver | 4/8/2009 | Topock Port Of Entry | En Route | 395.8 - Log Violation (General/Form And Manner) | | |
| Driver | 6/28/2009 | Blue Water Bridge | Point of Origin | 397.101D - No Written Route Plan - Ram | | |
| Driver | 6/28/2009 | Blue Water Bridge | Point of Origin | 395.8 - Log Violation (General/Form And Manner) | | |
| Driver | 12/22/2009 | Inl | Point of Origin | 395.8 - Log Violation (General/Form And Manner) | | |
| Semi-Trailer | 1/22/2009 | Savannah River Site | Point of Origin | 393.9 - Inoperable Required Lamp | | |
| Semi-Trailer | 1/23/2009 | Marshall - I-70 W/B | En Route | 172.504A - Vehicle Not Placarded As Required | | |
| Semi-Trailer | 2/12/2009 | Inl | Point of Origin | 393.9 - Inoperable Required Lamp | | |
| Semi-Trailer | 2/12/2009 | Inl | Point of Origin | 392.2 - Local Laws (General) | | |
| Semi-Trailer | 3/8/2009 | Orleans (Wellesley Island) | Point of Origin | 393.126B - Damaged/Missing Tiedown/Securement Device | | |
| Semi-Trailer | 3/26/2009 | Ornl | Point of Origin | 393.75A - Flat Tire Or Fabric Exposed | X | |
| Semi-Trailer | 5/26/2009 | Inl | Point of Origin | 393.45B2 - Brake Hose/Tubing Chaffing And/Or Kinking | X | |
| Semi-Trailer | 5/26/2009 | Inl | Point of Origin | 396.3A1 - Inspection/Repair And Maint Parts & Accssries | | |
| Semi-Trailer | 5/26/2009 | Inl | Point of Origin | 393.45B2 - Brake Hose/Tubing Chaffing And/Or Kinking | | |
| Semi-Trailer | 5/26/2009 | Inl | Point of Origin | 393.48A - Inoperative/Defective Brakes | | |
| Semi-Trailer | 7/10/2009 | Kirkwood (Nb) | Point of Origin | 393.55E - Abs Malfunct Lamps Towed Cmv Mfg>2/98mfg | | |
| Semi-Trailer | 7/18/2009 | Blue Water Bridge | Point of Origin | 393.47A - Inadequate Brakes For Safe Stopping | | |

| Unit | Inspection Date | Location | Inspection Type | Violation | Level I OOS | Level VI OOS |
|---------------|-----------------|----------------------------|-----------------|--|-------------|--------------|
| Semi-Trailer | 7/18/2009 | Blue Water Bridge | Point of Origin | 396.5 - Excessive Oil Leaks, Center Axle, Leaking / Dripping Oil From Case | | |
| Semi-Trailer | 10/25/2009 | Interstate 10 | En Route | 172.516C2 - Placard Not Clear Of Appurtenance | | |
| Semi-Trailer | 10/25/2009 | Interstate 10 | En Route | 172.403G - Failed To Label Ram Properly | | |
| Semi-Trailer | 10/30/2009 | Orleans (Wellesley Island) | Point of Origin | 393.55E - Abs Malfunct Lamps Towed Cmv Mfg>2/98mfg | | |
| Semi-Trailer | 11/1/2009 | Interstate 10 | En Route | 172.516C2 - Placard Not Clear Of Appurtenance | | |
| Semi-Trailer | 11/25/2009 | Hickory Mill Road | En Route | 177.842D - Blocking And Bracing Of Ram Packages | | |
| Truck Tractor | 1/15/2009 | Suffern (Double Yard) | Point of Origin | 172.332 - Id# Marking For (B) Panel (C) Placards | | |
| Truck Tractor | 4/26/2009 | Marshall - I-70 W/B | Point of Origin | 393.9H - Inoperable Head Lamps | | |
| Truck Tractor | 4/29/2009 | Nevada Test Site | Point of Origin | 396.5 - Excessive Oil Leaks | | |
| Truck Tractor | 6/27/2009 | Blue Water Bridge | Point of Origin | 393.9 - Inoperable Required Lamp | | |
| Truck Tractor | 12/3/2009 | Inl | Point of Origin | 393.45B2 - Brake Hose/Tubing Chaffing And/Or Kinking | | |