

Commercial Vehicle Safety Alliance Level VI Program 2020 Inspection Report

For Inspections in CY 2018 and CY 2019

Prepared for
U.S. Department of Energy

Prepared by
Commercial Vehicle Safety Alliance

October 2020

For information concerning this report contact
Commercial Vehicle Safety Alliance
6303 Ivy Lane, Suite 310
Greenbelt, MD 20770
Phone: (301) 830-6143
Fax: (301) 830-6144
www.cvsa.org

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; and vehicle inspection report.

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.

*In 2018 CVSA' Board of Directors amended CVSA Operational Policy 4 to disallow a Level III inspection to count as a hazardous materials inspection.

CVSA Level VI Inspection Report

This is the ninth CVSA Level VI Program inspection report (CY 2018 and CY 2019 Report). It covers inspections conducted in CY 2018 and CY 2019. 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. Next select "News, Updates and Reports" on the left navigation bar and then select the "CVSA/WIPP Updates and Reports" link that subsequently appears.

Previous inspection reports were produced periodically with the most recent report published in September 2018, which covers inspections through CY 2017. The data for these reports were initially obtained from the hardcopy inspection forms submitted by the reporting agencies. Then beginning with the November 2010 report (which covers inspections through CY 2009, but excludes CY 2007), it was decided to obtain data exclusively from the Federal Motor Carrier Safety Administration's (FMCSA's) Analysis & Information (A&I) Online website because by that time almost all agencies were submitting their inspection forms electronically and the capability to retrieve the Level VI inspection data from the A&I Online database became available. However, for that report CY 2007 inspection data were not included as it was determined that a significant number of 2007 inspection forms were not submitted electronically. Beginning with 2008 there is high confidence that almost all Level VI inspection forms are submitted electronically and nearly all inspection data are available on the A&I Online website.

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

The CY 2018 and CY 2019 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's Motor Carrier Management Information System (MCMIS) data snapshot as of 6/26/2020. That is, the data retrieved are current with the state of the MCMIS on 6/26/2020. Selected for retrieval were national Level VI inspections for all vehicles for CY 2018 and CY 2019. This generated 943 inspections for CY 2018 and 992 inspections for CY 2019.

One of the critical pieces of information for this report (and the previous reports relying on data from the A&I Online database) is shipment destination, which 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.

Fifty-six inspections for CY 2018 and 68 inspections for CY 2019 could not be automatically categorized using this logic. From an expert review of information from the A&I Online database and consultation with the agencies that submitted some of the inspection reports, it was possible to assign one of the three shipment types to all of these 124 inspections. Also, a review of the automatically assigned shipment types revealed 9 inspections (6 for CY 2018 and 3 for CY 2019) for which data were not correctly entered into the A&I Online database. Consequently, they were automatically assigned a non-WIPP shipment type when in actuality they were inspections of WIPP shipments. For this report the 9 inspections were assigned the correct shipment type (WIPP).

Another critical piece of information for this report (and the previous reports relying on data from the A&I Online database) that is not coded consistently in the A&I Online database for the Level VI inspections is if the violation is an out-of-service violation and if it is an out-of-service violation what type of out-of-service violation, that is, Level VI or NAS (Level I). CVSA had requested that FMCSA address this issue after the 2013 Inspection Report was published and again prior to the 2016 Inspection Report being published. Unfortunately, this issue has not been resolved. In earlier reports that relied on data from the A&I database, an expert review was conducted using information from the A&I database and available inspection forms for each inspection with violations to attempt to code each violation as a Level VI out-of-service violation, a Level I out-of-service violation, or neither. However, beginning with the July 2016 report (which covers inspections through CY 2014) it was decided to forgo the expert review and use only the information obtained from the A&I database. The only out-of-service violation information obtainable from the A&I database is whether or not a violation is a Level VI out-of-service violation. Additionally, the A&I database does not include the inspector comments that would be useful to determine if a violation is a Level I out-of-service violation. Consequently, this report like the July 2016 and September 2018 reports (and

unlike the earlier reports) does not have statistics on NAS (Level I) out-of-service violations and out-of-service violations in general.

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, Mississippi submitted inspection data for the first time in 2019. For non-WIPP shipments, New Hampshire submitted inspection data for the first time in 2018. Note that in this report the states and other agencies (i.e., federal and territorial) submitting inspection data are referred to as “states” in the tables and associated discussions.

Number of Shipments – WIPP

Table 1A identifies the number and type of inspections by state for WIPP shipments in 2018. Data from a total of 723 inspections were submitted by the states during this time period. The largest number of point of origin inspections occurred in Idaho with 242 while the largest number of en route inspections occurred in Colorado with 245.

Table 1B identifies the number and type of inspections by state for WIPP shipments in 2019. Data from a total of 757 inspections were submitted by the states during this time period. The largest number of point of origin inspections occurred in Idaho with 231 and the largest number of en route inspections occurred in New Mexico with 231 (Colorado is a close second with 226 en route inspections).

**Table 1A. WIPP Shipments: Number and type of inspections by state
(January 1, 2018 – December 31, 2018)**

State	Point of Origin	En Route	Point of Destination	Total
Arizona	0	0	0	0
California	0	0	0	0
Colorado	0	245	0	245
Georgia	0	0	0	0
Idaho	242	1	0	243
Illinois	0	0	0	0
Nevada	0	0	0	0
New Mexico	4	169	0	173
Oregon	0	0	0	0
New York	0	0	0	0
Pennsylvania	0	0	0	0
South Carolina	1	0	0	1
Tennessee	48	0	0	48

State	Point of Origin	En Route	Point of Destination	Total
Texas	12	0	1	13
Washington	0	0	0	0
Wyoming	0	0	0	0
Total	307	415	1	723

Table 1B. WIPP Shipments: Number and type of inspections by state (January 1, 2019 – December 31, 2019)

State	Point of Origin	En Route	Point of Destination	Total
Arizona	0	0	0	0
California	0	0	0	0
Colorado	2	226	0	228
Georgia	0	0	0	0
Idaho	231	0	0	231
Illinois	2	0	0	2
Mississippi	0	1	0	1
Nevada	0	0	0	0
New Mexico	27	231	0	258
Oregon	0	0	0	0
New York	0	0	0	0
Pennsylvania	0	0	0	0
South Carolina	5	0	0	5
Tennessee	30	0	0	30
Texas	2	0	0	2
Washington	0	0	0	0
Wyoming	0	0	0	0
Total	299	458	0	757

Number of Shipments – Non-WIPP

Table 2A identifies the number and type of inspections by state for non-WIPP shipments in 2018. Data were submitted for a total of 220 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 2019. Data were submitted for a total of 235 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, 2018 – December 31, 2018)**

State	Point of Origin	En Route	Point of Destination	Total
Arizona	0	5	0	5
Arkansas	0	0	0	0
California	3	0	0	3
Colorado	0	1	0	1
Florida	0	0	0	0
Georgia	0	0	0	0
Idaho	0	0	0	0
Illinois	0	0	0	0
Indiana	0	0	0	0
Kentucky	0	1	0	1
Louisiana	0	0	0	0
Maine	0	0	0	0
Maryland	11	0	0	11
Massachusetts	3	0	0	3
Michigan	30	0	0	30
Minnesota	0	0	0	0
Missouri	3	0	0	3
Nebraska	1	0	0	1
Nevada	0	0	0	0
New Hampshire	2	0	0	2
New Jersey	3	0	0	3
New Mexico	1	13	0	14
New York	30	2	0	32
North Carolina	8	0	0	8
North Dakota	3	0	0	3
Ohio	0	0	0	0
Oklahoma	0	0	0	0
Oregon	0	0	0	0
Pennsylvania	8	0	0	8
Puerto Rico	1	3	0	4
South Carolina	1	0	0	1
Tennessee	21	3	0	24
Texas	1	0	0	1
Vermont	0	0	0	0
Virginia	0	0	0	0
Washington	60	2	0	62
Wisconsin	0	0	0	0
federal	0	0	0	0

State	Point of Origin	En Route	Point of Destination	Total
Total	190	30	0	220

**Table 2B. Non-WIPP Shipments: Number and type of inspections by state
(January 1, 2019 – December 31, 2019)**

State	Point of Origin	En Route	Point of Destination	Total
Arizona	0	1	0	1
Arkansas	1	0	0	1
California	4	0	0	4
Colorado	0	0	0	0
Florida	0	0	0	0
Georgia	0	1	0	1
Idaho	0	0	0	0
Illinois	0	0	0	0
Indiana	0	0	0	0
Kentucky	0	1	0	1
Louisiana	0	0	0	0
Maine	0	0	0	0
Maryland	0	0	0	0
Massachusetts	2	0	0	2
Michigan	39	0	0	39
Minnesota	0	0	0	0
Missouri	3	0	0	3
Nebraska	2	0	0	2
Nevada	0	0	0	0
New Hampshire	0	0	0	0
New Jersey	2	0	0	2
New Mexico	3	16	0	19
New York	31	2	1	34
North Carolina	1	0	0	1
North Dakota	4	0	0	4
Ohio	1	0	0	1
Oklahoma	0	0	0	0
Oregon	0	0	0	0
Pennsylvania	17	0	0	17
Puerto Rico	1	1	0	2
South Carolina	3	0	0	3
Tennessee	26	4	0	30
Texas	2	0	0	2
Vermont	1	0	0	1

State	Point of Origin	En Route	Point of Destination	Total
Virginia	0	0	0	0
Washington	65	0	0	65
Wisconsin	0	0	0	0
federal	0	0	0	0
Total	208	26	1	235

Number of Violations

Tables 3A and 3B (WIPP shipments: CY 2018 and CY 2019, respectively) and Tables 4A and 4B (non-WIPP shipments: CY 2018 and CY 2019, 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 if known. For this report, only information on Level VI out-of-service violations is known. Information that is unknown is indicated in the tables by an “*”.

Table 3A includes a total of 8 inspections identifying 10 violations during CY 2018. Of those 10 violations 3 were CVSA Level VI out-of-service violations.

Table 3B includes a total of 6 inspections identifying 6 violations during CY 2019. Of those 6 violations 3 were CVSA Level VI out-of-service violations.

Table 3A. WIPP Shipments: Number and type of violations found listed by state and type of inspection (January 1, 2018 – December 31, 2018)

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		0	0	0	0	0	0
California		0	0	0	0	0	0
Colorado	En Route	5	7	*	*	2	*
Georgia		0	0	0	0	0	0
Idaho	Point of Origin	2	2	*	*	1	*
Illinois		0	0	0	0	0	0
Nevada		0	0	0	0	0	0
New Mexico		0	0	0	0	0	0
Oregon		0	0	0	0	0	0
South Carolina		0	0	0	0	0	0
Tennessee	Point of Origin	1	1	*	*	0	*
Washington		0	0	0	0	0	0
Total		8	10	*	*	3	*

Table 3B. WIPP Shipments: Number and type of violations found listed by state and type of inspection (January 1, 2019 – December 31, 2019)

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		0	0	0	0	0	0
California		0	0	0	0	0	0
Colorado	Point of Origin	1	1	*	*	0	*
Georgia		0	0	0	0	0	0
Idaho	Point of Origin	2	2	*	*	0	*
Illinois		0	0	0	0	0	0
Nevada		0	0	0	0	0	0
New Mexico	En Route	2	2	0	0	2	2
Oregon		0	0	0	0	0	0
South Carolina		0	0	0	0	0	0
Tennessee	Point of Origin	1	1	0	0	1	1
Washington		0	0	0	0	0	0
Total		6	6	*	*	3	*

Table 4A includes a total of 12 inspections identifying 15 violations during CY 2018. Of those 15 violations 3 were CVSA Level VI out-of-service violations.

Table 4B includes a total of 14 inspections identifying 22 violations during CY 2019. Of those 22 violations 7 were 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 data are listed as reported by the A&I Online database and therefore there is no information on NAS (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, 2018 – December 31, 2018)

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		0	0	0	0	0	0
California	Point of Origin	1	1	*	*	0	*
Colorado		0	0	0	0	0	0
Georgia		0	0	0	0	0	0
Idaho		0	0	0	0	0	0
Illinois		0	0	0	0	0	0

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
Maryland		0	0	0	0	0	0
Massachusetts		0	0	0	0	0	0
Michigan		0	0	0	0	0	0
Missouri	Point of Origin	1	1	0	0	1	1
Nevada		0	0	0	0	0	0
New Hampshire	Point of Origin	1	1	0	0	1	1
New Jersey		0	0	0	0	0	0
New Mexico		0	0	0	0	0	0
New York	Point of Origin	3	3	*	*	1	*
	En Route	1	1	*	*	0	*
North Carolina		0	0	0	0	0	0
Pennsylvania	Point of Origin	2	3	*	*	0	*
Puerto Rico	En Route	2	4	*	*	0	*
Ohio		0	0	0	0	0	0
South Carolina		0	0	0	0	0	0
Tennessee		0	0	0	0	0	0
Vermont		0	0	0	0	0	0
Virginia		0	0	0	0	0	0
Washington	Point of Origin	1	1	*	*	0	*
Total		12	15	*	*	3	*

Table 4B. Non-WIPP Shipments: Number and type of violations found listed by state and type of inspection (January 1, 2019 – December 31, 2019)

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		0	0	0	0	0	0
California	Point of Origin	1	2	*	*	1	*
Colorado		0	0	0	0	0	0
Georgia		0	0	0	0	0	0
Idaho		0	0	0	0	0	0
Illinois		0	0	0	0	0	0
Maryland		0	0	0	0	0	0
Massachusetts		0	0	0	0	0	0
Michigan	Point of Origin	1	2	0	0	2	2
Missouri		0	0	0	0	0	0
Nevada		0	0	0	0	0	0
New Hampshire		0	0	0	0	0	0

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
New Jersey		0	0	0	0	0	0
New Mexico		0	0	0	0	0	0
New York	Point of Origin	1	1	*	*	0	*
	En Route	1	1	0	0	1	1
	Point of Dest.	1	1	*	*	0	*
North Carolina		0	0	0	0	0	0
Pennsylvania	Point of Origin	2	2	*	*	0	*
Puerto Rico	En Route	1	1	*	*	0	*
Ohio		0	0	0	0	0	0
South Carolina		0	0	0	0	0	0
Tennessee	Point of Origin	3	6	*	*	1	*
	En Route	1	1	*	*	0	*
Vermont		0	0	0	0	0	0
Virginia		0	0	0	0	0	0
Washington	Point of Origin	2	5	*	*	2	*
Total		14	22	*	*	7	*

Percentage of Inspections with No Violations and Violations

Tables 5A and 5B (WIPP shipments: CY 2018 and CY 2019, respectively) and Tables 6A and 6B (non-WIPP shipments: CY 2018 and CY 2019, respectively) identify the percentage of inspections having no violations or violations, listed by state and type of inspection.

For WIPP shipments in CY 2018 three states reported violations found. The percentage of violations is about 2 percent or less for each state and type of inspection. For WIPP shipments in CY 2019 four states reported violations found. The percentage of violations is less than 1 percent for point of origin inspections for Idaho and for en route inspections for New Mexico. The percentage of violations for point of origin inspections for Tennessee is about 3 percent. With only two inspections and one violation found the percentage of violations is 50 percent for point of origin inspections for Colorado.

Tables 6A and 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, 2018 – December 31, 2018)

State	Type of Inspection	Number of Inspections	No Violations	Violations
-------	--------------------	-----------------------	---------------	------------

State	Type of Inspection	Number of Inspections	No Violations	Violations
Arizona		0	0.00%	0.00%
California		0	0.00%	0.00%
Colorado	En Route	245	97.96%	2.04%
Georgia		0	0.00%	0.00%
Idaho	Point of Origin	242	99.17%	0.83%
	En Route	1	100.00%	0.00%
Illinois		0	0.00%	0.00%
Nevada		0	0.00%	0.00%
New Mexico	Point of Origin	4	100.00%	0.00%
	En Route	169	100.00%	0.00%
New York		0	0.00%	0.00%
Oregon		0	0.00%	0.00%
Pennsylvania		0	0.00%	0.00%
South Carolina	Point of Origin	1	100.00%	0.00%
Tennessee	Point of Origin	48	97.92%	2.08%
Texas	Point of Origin	12	100.00%	0.00%
	Point of Destination	1	100.00%	0.00%
Washington		0	0.00%	0.00%
Wyoming		0	0.00%	0.00%

Table 5B. WIPP Shipments: Percentage of inspections having no violations or violations listed by state and type of inspection (January 1, 2019 – December 31, 2019)

State	Type of Inspection	Number of Inspections	No Violations	Violations
Arizona		0	0.00%	0.00%
California		0	0.00%	0.00%
Colorado	Point of Origin	2	50.00%	50.00%
	En Route	226	100.00%	0.00%
Georgia		0	0.00%	0.00%
Idaho	Point of Origin	231	99.13%	0.87%
Illinois	Point of Origin	2	100.00%	0.00%
Mississippi	En Route	1	100.00%	0.00%
Nevada		0	0.00%	0.00%
New Mexico	Point of Origin	27	100.00%	0.00%
	En Route	231	99.13%	0.87%
New York		0	0.00%	0.00%
Oregon		0	0.00%	0.00%

State	Type of Inspection	Number of Inspections	No Violations	Violations
Pennsylvania		0	0.00%	0.00%
South Carolina	Point of Origin	5	100.00%	0.00%
Tennessee	Point of Origin	30	96.67%	3.33%
Texas	Point of Origin	2	100.00%	0.00%
Washington		0	0.00%	0.00%
Wyoming		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, 2018– December 31, 2018)

State	Type of Inspection	Number of Inspections	No Violations	Violations
Arizona	En Route	5	100.00%	0.00%
Arkansas		0	0.00%	0.00%
California	Point of Origin	3	66.67%	33.33%
Colorado	En Route	1	100.00%	0.00%
Florida		0	0.00%	0.00%
Georgia		0	0.00%	0.00%
Idaho		0	0.00%	0.00%
Illinois		0	0.00%	0.00%
Kentucky	En Route	1	100.00%	0.00%
Louisiana		0	0.00%	0.00%
Maine		0	0.00%	0.00%
Maryland	Point of Origin	11	100.00%	0.00%
Massachusetts	Point of Origin	3	100.00%	0.00%
Michigan	Point of Origin	30	100.00%	0.00%
Minnesota		0	0.00%	0.00%
Missouri	Point of Origin	3	66.67%	33.33%
Nebraska	Point of Origin	1	100.00%	0.00%
Nevada		0	0.00%	0.00%
New Hampshire	Point of Origin	2	50.00%	50.00%
New Jersey	Point of Origin	3	100.00%	0.00%
New Mexico	Point of Origin	1	100.00%	0.00%
	En Route	13	100.00%	0.00%
New York	Point of Origin	30	90.00%	10.00%
	En Route	2	50.00%	50.00%
North Carolina	Point of Origin	8	100.00%	0.00%
North Dakota	Point of Origin	3	100.00%	0.00%

State	Type of Inspection	Number of Inspections	No Violations	Violations
Ohio		0	0.00%	0.00%
Oklahoma		0	0.00%	0.00%
Oregon		0	0.00%	0.00%
Pennsylvania	Point of Origin	8	75.00%	25.00%
Puerto Rico	Point of Origin	1	100.00%	0.00%
	En Route	3	33.33%	66.67%
South Carolina	Point of Origin	1	100.00%	0.00%
Tennessee	Point of Origin	21	100.00%	0.00%
	En Route	3	100.00%	0.00%
Texas	Point of Origin	1	100.00%	0.00%
Virginia		0	0.00%	0.00%
Vermont		0	0.00%	0.00%
Washington	Point of Origin	60	98.33%	1.67%
	En Route	2	100.00%	0.00%
Wisconsin		0	0.00%	0.00%
federal		0	0.00%	0.00%

Table 6B. Non-WIPP Shipments: Percentage of inspections having no violations or violations listed by state and type of inspection (January 1, 2019– December 31, 2019)

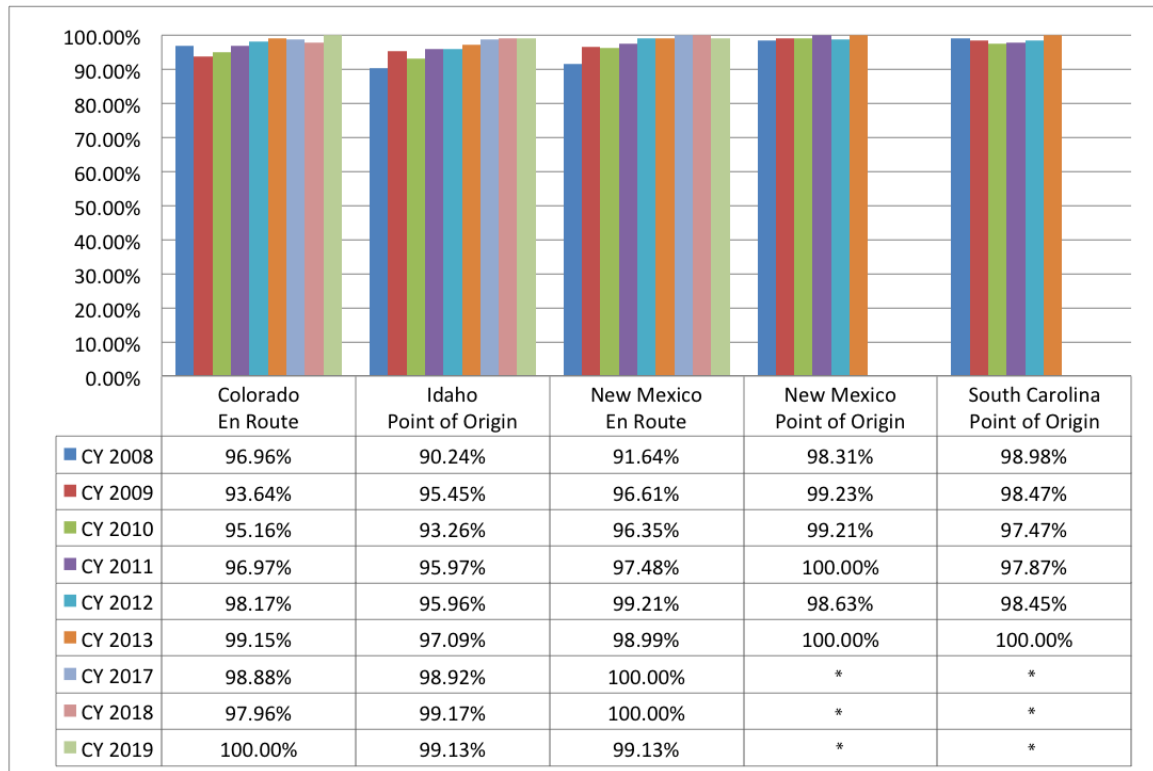
State	Type of Inspection	Number of Inspections	No Violations	Violations
Arizona	En Route	1	100.00%	0.00%
Arkansas	Point of Origin	1	100.00%	0.00%
California	Point of Origin	4	75.00%	25.00%
Colorado		0	0.00%	0.00%
Florida		0	0.00%	0.00%
Georgia	En Route	1	100.00%	0.00%
Idaho		0	0.00%	0.00%
Illinois		0	0.00%	0.00%
Kentucky	En Route	1	100.00%	0.00%
Louisiana		0	0.00%	0.00%
Maine		0	0.00%	0.00%
Maryland		0	0.00%	0.00%
Massachusetts	Point of Origin	2	100.00%	0.00%
Michigan	Point of Origin	39	97.44%	2.56%
Minnesota		0	0.00%	0.00%
Missouri	Point of Origin	3	100.00%	0.00%

State	Type of Inspection	Number of Inspections	No Violations	Violations
Nebraska	Point of Origin	2	100.00%	0.00%
Nevada		0	0.00%	0.00%
New Hampshire		0	0.00%	0.00%
New Jersey	Point of Origin	2	100.00%	0.00%
New Mexico	Point of Origin	3	100.00%	0.00%
	En Route	16	100.00%	0.00%
New York	Point of Origin	31	96.77%	3.23%
	En Route	2	50.00%	50.00%
	Point of Destination	1	0.00%	100.00%
North Carolina	Point of Origin	1	100.00%	0.00%
North Dakota	Point of Origin	4	100.00%	0.00%
Ohio	Point of Origin	1	100.00%	0.00%
Oklahoma		0	0.00%	0.00%
Oregon		0	0.00%	0.00%
Pennsylvania	Point of Origin	17	88.24%	11.76%
Puerto Rico	Point of Origin	1	100.00%	0.00%
	En Route	1	0.00%	100.00%
South Carolina	Point of Origin	3	100.00%	0.00%
Tennessee	Point of Origin	26	88.46%	11.54%
	En Route	4	75.00%	25.00%
Texas	Point of Origin	2	100.00%	0.00%
Virginia		0	0.00%	0.00%
Vermont	Point of Origin	1	100.00%	0.00%
Washington	Point of Origin	65	96.92%	3.08%
Wisconsin		0	0.00%	0.00%
federal		0	0.00%	0.00%

In the fifth inspection report (covering Level VI inspections conducted in CY 2008 and CY 2009) 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 was also noted in the sixth inspection report (covering the CY 2010 - CY 2012 time frame) and the seventh inspection report (covering CY 2013 and CY 2014, but considered only the CY 2013 inspections of WIPP shipments due to the WIPP closure in 2014). For CY 2017 (eighth inspection report) the trend continued as only 2 states had one inspection that found one violation. For CY 2018 and CY 2019 the percentages of WIPP inspections with no violations found are higher at over 99 percent (with one exception) for the states (Colorado, Idaho and New Mexico) with more than 50 inspections each year.

Figure 1 shows the percentages of inspections of WIPP shipments with no violations found for CY 2008 – CY 2019 for those states with more than 50 inspections in each year. Data for 2014-2016 are not included in Figure 1 due to the WIPP closure from February 2014 to January 2017.

Figure 1. WIPP Shipments: Percentage of inspections with no violations found for states with more than 50 inspections in each year



*No data since less than 51 inspections for the year

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

Tables 7A and 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 2018 and CY 2019, respectively.

Tables 8A and 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 2018 and CY 2019, respectively.

For WIPP shipments, there has been a general trend over time in a higher percentage of inspections finding no violations. In recent years (CY 2013 - CY 2019) the percentages of inspections having no violations (with one exception) have been between 98.5 and 100 percent. For non-WIPP shipments the percentages are noticeably higher than for WIPP shipments for inspections finding violations in CY 2018 and CY 2019. In recent years

(CY 2013 - CY 2019) the percentages of inspections finding no violations for non-WIPP shipments have varied between 86 and 98 percent.

Table 7A. WIPP Shipments: Percentage of point of origin and en route inspections with no violation and with violations (January 1, 2018 – December 31, 2018)

Inspection Location	Number of Inspections	No Violations	Violations
Point of Origin	307	99.02%	0.98%
En Route	415	98.80%	1.20%

Table 7B. WIPP Shipments: Percentage of point of origin and en route inspections with no violation and with violations (January 1, 2019 – December 31, 2019)

Inspection Location	Number of Inspections	No Violations	Violations
Point of Origin	299	98.66%	1.34%
En Route	458	99.56%	0.44%

Table 8A. Non-WIPP Shipments: Percentage of point of origin and en route inspections with no violation and with violations (January 1, 2018 – December 31, 2018)

Inspection Location	Number of Inspections	No Violations	Violations
Point of Origin	190	95.26%	4.74%
En Route	30	90.00%	10.00%

Table 8B. Non-WIPP Shipments: Percentage of point of origin and en route inspections with no violation and with violations (January 1, 2019 – December 31, 2019)

Inspection Location	Number of Inspections	No Violations	Violations
Point of Origin	208	95.19%	4.81%

Inspection Location	Number of Inspections	No Violations	Violations
En Route	26	88.46%	11.54%

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

Tables 9A and 9B are the comparisons of WIPP and non-WIPP CVSA Level VI inspections for CY 2018 and CY 2019, respectively. Note that due to the lack of identification of Level I out-of-service violations in the A&I Online database there are no statistics on NAS (Level I) out-of-service violations and out-of-service violations in general (indicated in the tables by a “-”). Continuing a trend found in previous years, the percentages of inspections finding violations and the Level VI out-of-service rates are considerably larger for non-WIPP shipments than for WIPP shipments.

Tables 10A and 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 2018 and CY 2019) from the Federal Motor Carrier Safety Administration (FMCSA).

Of the 8 WIPP inspections in CY 2018 that found violations, 2 inspections found Level VI vehicle out-of-service violations for a Level VI vehicle out-of-service percent of 0.28. Due to the lack of identification of Level I out-of-service violations in the A&I Online database there are no statistics on NAS (Level I) out-of-service violations and out-of-service violations in general.

Of the 6 WIPP inspections in CY 2019 that found violations, 3 inspections found Level VI vehicle out-of-service violations for a Level VI vehicle out-of-service percent of 0.40. Due to the lack of identification of Level I out-of-service violations in the A&I Online database there are no statistics on NAS (Level I) out-of-service violations and out-of-service violations in general.

There continues to be a trend over time towards lower percentages of violations found and lower Level VI out-of-service rates for CVSA Level VI inspections of WIPP shipments. For non-WIPP shipments the percentages over time of violations found remains between 4% and 11% and the Level VI out-of-service rates over time are typically below 5%. With one exception (the 2017 non-WIPP Level VI out-of-service rate), these percentages are considerably lower than those reported by FMCSA for roadside and hazardous materials inspections during the same time periods.

The data collected over the past decade continue to show a trend of a significantly low percentage of violations discovered, much lower than the collective data for the commercial vehicle industry.

It is CVSA’s opinion that DOE, WIPP, the states, the carriers, and other interested parties are to be commended for the more than twenty years of hard work and dedication that have 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 2018: Comparison with Non-WIPP shipments

CVSA Level VI Inspection Data for WIPP Shipments (January 1, 2018 – December 31, 2018)				
Inspection Activity	Number	Percent	Level I OOS Percent	Level VI OOS Percent
Number of Inspections	723			
With no Violations	715	98.89%		
With Violations	8	1.11%		
Driver OOS* Rate	-	-	-	0.00% (N=0)
Vehicle OOS Rate	-	-	-	0.28% (N=2)
CVSA Level VI Inspection Data for Non-WIPP Shipments (January 1, 2018 – December 31, 2018)				
Inspection Activity	Number	Percent	Level I OOS Percent	Level VI OOS Percent
Number of Inspections	220			
With no Violations	208	94.55%		
With Violations	12	5.45%		
Driver OOS* Rate	-	-	-	0.00% (N=0)
Vehicle OOS Rate	-	-	-	1.36% (N=3)

*OOS = Out-of-Service

Table 9B. WIPP Shipments in CY 2019: Comparison with Non-WIPP shipments

CVSA Level VI Inspection Data for WIPP Shipments (January 1, 2019 – December 31, 2019)				
Inspection Activity	Number	Percent	Level I OOS Percent	Level VI OOS Percent
Number of Inspections	757			
With no Violations	751	99.21%		
With Violations	6	0.79%		
Driver OOS* Rate	-	-	-	0.00% (N=0)
Vehicle OOS Rate	-	-	-	0.40% (N=3)
CVSA Level VI Inspection Data for Non-WIPP Shipments (January 1, 2019 – December 31, 2019)				
Inspection Activity	Number	Percent	Level I OOS Percent	Level VI OOS Percent
Number of Inspections	235			
With no Violations	221	94.04%		
With Violations	14	5.96%		
Driver OOS* Rate	-	-	-	0.00% (N=0)

Vehicle OOS Rate	-	-	-	2.13% (N=5)
------------------	---	---	---	-------------

*OOS = Out-of-Service

Table 10A. 2018 FMCSA inspection data

FMCSA Roadside Inspection Data for the Year 2018*			FMCSA HAZMAT Inspection Data for the Year 2018*		
Inspection Activity	Number	Percent	Inspection Activity	Number	Percent
Number of Inspections	3,515,788		Number of Inspections	202,063	
With no Violations	1,492,389	42.45%	With no Violations	N/A ***	N/A
With Violations	2,023,399	57.55%	With Violations	N/A	N/A
Driver OOS** Rate†	161,195	4.74%	OOS Rate	8,437	4.18%
Vehicle OOS Rate†	501,710	20.81%			

†The number of inspections is a combination of some Driver, some Vehicle, and some combination of both. The OOS Rate is for this subgroup of all inspections.

*Data Source: FMCSA's Motor Carrier Management Information System (MCMIS) data snapshot as of 6/26/2020 from <http://ai.fmcsa.dot.gov/SafetyProgram/RoadsideInspections.aspx>

**OOS = Out-of-Service

***N/A = Data not available

Table 10B. 2019 FMCSA inspection data

FMCSA Roadside Inspection Data for the Year 2019*			FMCSA HAZMAT Inspection Data for the Year 2019*		
Inspection Activity	Number	Percent	Inspection Activity	Number	Percent
Number of Inspections	3,467,901		Number of Inspections	202,874	
With no Violations	1,495,650	43.13%	With no Violations	N/A ***	N/A
With Violations	1,972,251	56.87%	With Violations	N/A	N/A
Driver OOS** Rate†	171,010	5.10%	OOS Rate	9,148	4.51%
Vehicle OOS Rate†	491,987	20.64%			

†The number of inspections is a combination of some Driver, some Vehicle, and some combination of both. The OOS Rate is for this subgroup of all inspections.

*Data Source: FMCSA's Motor Carrier Management Information System (MCMIS) data snapshot as of 6/26/2020 from <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, 2019 (excluding the CY 2007 data for reasons discussed at the beginning of this report). Since March 24, 1999, there have been 24,324 CVSA Level VI inspections analyzed. Of these inspections, 94.40 percent found no violations, an increase from the 94.10 percent in the eighth (CY 2015 - CY 2017) inspection report. The Level VI out-of-service rate for vehicles decreased from 1.09 percent in the eighth inspection report to 1.04 percent for this report. The Level VI driver out-of-service rate remains essentially the same at 0.01 percent. Note that due to the lack of identification of Level I out-of-service violations in the A&I Online database there are no statistics on NAS (Level I) out-of-service violations and out-of-service violations in general (indicated in the table by a “-”).

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, 2019)				
<i>Inspection Activity</i>	<i>Number</i>	<i>Percent</i>	<i>Level I OOS Percent</i>	<i>Level VI OOS Percent</i>
Number of Inspections	24,324			
With no Violations	22,962	94.40%		
With Violations	1,362	5.60%		
Driver OOS* Rate	-	-	-	0.01% (N=2)
Vehicle OOS* Rate	-	-	-	1.04% (N=254)

*OOS = Out-of-Service

Conclusions

Data for this report were obtained electronically from the A&I Online website. As noted in the previous CY 2008 – CY 2009, CY 2010 – CY 2012, CY 2013 - CY 2014, and CY 2015 - CY 2017 reports, there continues to be deficiencies with this data source with respect to producing this report. The shipment origin and destination are not identified, Level I out-of-service violations are not identified, and inspector comments are not provided. Some of the statistics given in past reports are not included in this report due to this lack of information available from the A&I Online website. Shipment origin and destination, type of out-of-service violation, and inspector comments are data items on the inspection form and CVSA again recommends that these items be made available on the A&I Online website.

In the process of reviewing the available data from the A&I Online website, CVSA again noted a deficiency in the reporting of inspection data similar to that found in the previous inspection reports. That is, inconsistent reporting of shipments as TRU waste, DOE, or HRCQ. Although over time noted deficiencies in inspection reporting have been reduced, this suggest a continuing need for care in submitting inspection data and additional emphasis for inspector training and inspection review at the state level to insure correct data are being submitted to SAFETYNET. CVSA will continue to provide Level VI inspectors with the information to address these issues.

Even with the limitations described above there are sufficient data to conclude that the violation rates from Level VI inspections, particularly for WIPP shipments remain very low 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 data show a continuing trend of a low percentage of violations and Level VI out-of-service violations at the point of origin. The data also continue to show a low number of violations and Level VI out-of-service violations from en-route Level VI inspections. Many states that are required to conduct an en-route inspection have chosen to exercise their option and conduct a Level II or Level III inspection in lieu of a complete Level VI en-route inspection. This information has been verified during Level VI Peer Reviews conducted over the past 15 years. The states, carriers, DOE, and private industry can be proud of their continued safety program excellence as supported

by the overall reduction of the violation 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 2018

Unit	Inspection Date	Location	Inspection Type	Violation	Level I OOS *	Level VI OOS
Driver	10/9/2018	Inl	Point of Origin	395.3A2-PROP - Driving Beyond 14 Hour Duty Period (Property Carrying Vehicle)		
Semi-Trailer	2/21/2018	Fort Collins Poe Sb	En Route	396.3A1T - Tires (General)		Y
Semi-Trailer	2/21/2018	Fort Collins Poe Sb	En Route	393.207F - Air Suspension Pressure Loss		Y
Semi-Trailer	2/21/2018	Fort Collins Poe Sb	En Route	393.110D - Large Or Odd-Shaped Cargo Not Adequately Secured		
Semi-Trailer	2/28/2018	Inl	Point of Origin	396.5B-HLOW - Hubs - Oil And/Or Grease Leaking From Hub - Outer Wheel		Y
Semi-Trailer	5/1/2018	Fort Collins Poe Sb	En Route	393.48A - Inoperative/Defective Brakes		
Semi-Trailer	5/1/2018	Fort Collins Poe Sb	En Route	393.48A - Inoperative/Defective Brakes		
Semi-Trailer	6/12/2018	Fort Collins Poe Sb	En Route	393.45D - Brake Connections With Leaks Or Constrictions		
Semi-Trailer	6/27/2018	Wipp Rd	Point of Origin	393.9 - Inoperable Required Lamp		
Truck Tractor	8/23/2018	Fort Collins Poe Sb	En Route	393.45PC - Brake Tubing And Hose Adequacy - Connections To Power Unit		

* The A&I Online database does not provide information on NAS (Level I) out-of-service violations

Appendix B

List of WIPP Shipment Violations - CY 2019

Unit	Inspection Date	Location	Inspection Type	Violation	Level I OOS *	Level VI OOS
Semi-Trailer	2/7/2019	Inl	Point of Origin	172.301A1 - No Proper Shipping Name And/Or Id# Marking On Non-Bulk Package		
Semi-Trailer	3/26/2019	Fort Collins Poe Sb	Point of Origin	393.48A - Inoperative/Defective Brakes		
Semi-Trailer	7/9/2019	Sp District 2 Raton Poe	En Route	393.75A3 - Tire-Flat And/Or Audible Air Leak		Y
Semi-Trailer	8/14/2019	Wipp Rd	Point of Origin	393.25F - Stop Lamp Violations		Y
Semi-Trailer	10/2/2019	Inl	Point of Origin	393.45D - Brake Connections With Leaks Or Constrictions		
Truck Tractor	12/4/2019	Sp District 2 Raton Poe	En Route	393.9TS - Inoperative Turn Signal		Y

* The A&I Online database does not provide information on NAS (Level I) out-of-service violations

Appendix C

List of Non-WIPP Shipment Violations - CY 2018

Unit	Inspection Date	Location	Inspection Type	Violation	Level I OOS *	Level VI OOS
Semi-Trailer	2/23/2018	Sc33 Bow Hill (Poe)	Point of Origin	393.50 - Inadequate Reservoir For Air/Vacuum Brakes		
Semi-Trailer	8/22/2018	Research Park Dr @ Mo 163	Point of Origin	393.45UV - Brake Tubing And Hose Adequacy Under Vehicle		Y
Semi-Trailer	11/28/2018	1401 Morgan Circle	Point of Origin	393.201A - Frame Cracked / Loose / Sagging / Broken		
Truck Tractor	1/8/2018	Orleans (Wellesley Island)	Point of Origin	393.45B2UV - Brake Hose Or Tubing Chafing And/Or Kinking Under Vehicle		
Truck Tractor	1/15/2018	Orleans (Wellesley Island)	Point of Origin	393.11TL - Truck-Tractor Lower Rear Mud Flaps Retroreflective Sheeting / Reflex Reflective Material Requirements For Vehicles Manufactured After July 1997		
Truck Tractor	1/21/2018	Orleans (Wellesley Island)	Point of Origin	393.45PC - Brake Tubing And Hose Adequacy - Connections To Power Unit		Y
Truck Tractor	4/30/2018	Derby Line Welcome Center	Point of Origin	393.207A - Axle Positioning Parts Defective/Missing		Y
Truck Tractor	6/23/2018	Kirkwood (Nb)	En Route	393.45B2 - Brake Hose Or Tubing Chafing And/Or Kinking		
Truck Tractor	7/18/2018	Isla Grande, Pr	En Route	172.203D1 - Radionuclide Name Not On Shipping Paper		
Truck Tractor	7/18/2018	Isla Grande, Pr	En Route	172.203D9 - No Exclusive Use Notation		
Truck Tractor	7/18/2018	Isla Grande, Pr	En Route	172.203D10 - No Indication For Highway Route Controlled Quantity Of Class 7 'Hrcq' On Shipping Paper		
Truck Tractor	10/29/2018	San Juan, Pr	En Route	396.3A1 - Inspection, Repair And Maintenance Of Parts And Accessories		

Unit	Inspection Date	Location	Inspection Type	Violation	Level I OOS *	Level VI OOS
Truck Tractor	11/16/2018	Penn Terminals Eddystone	Point of Origin	393.60E-WS - Windshield - Obstructed		
Truck Tractor	12/28/2018	Tioga Marine Terminal	Point of Origin	393.95A - No/Discharged/Unsecured Fire Extinguisher		
Truck Tractor	12/28/2018	Tioga Marine Terminal	Point of Origin	393.45DLPC - Brake Connections With Leaks - Connection To Power Unit		

* The A&I Online database does not provide information on NAS (Level I) out-of-service violations

Appendix D

List of Non-WIPP Shipment Violations - CY 2019

Unit	Inspection Date	Location	Inspection Type	Violation	Level I OOS *	Level VI OOS
Intermodal Chassis	8/9/2019	Everett Port / Terminal Ave.	Point of Origin	396.3A1B - Brakes (General) Explain:		
Intermodal Chassis	8/9/2019	Everett Port / Terminal Ave.	Point of Origin	396.3A1B - Brakes (General) Explain:		
Intermodal Chassis	10/6/2019	Orleans (Wellesley Island)	Point of Origin	393.207B - Adjustable Axle Locking Pins Missing Or Not Engaged		
Semi-Trailer	4/18/2019	Ornl	Point of Origin	393.47E - Clamp Or Roto Type Brake Out-Of-Adjustment		
Semi-Trailer	4/18/2019	Ornl	Point of Origin	393.53B - Cmv Manufactured After 10/19/94 Has An Automatic Airbrake Adjustment System That Fails To Compensate For Wear		
Semi-Trailer	6/11/2019	Tva Watts Bar	Point of Origin	393.47E - Clamp Or Roto Type Brake Out-Of-Adjustment		
Semi-Trailer	6/11/2019	Tva Watts Bar	Point of Origin	393.25F - Stop Lamp Violations		
Semi-Trailer	6/26/2019	I-24 Eb Rest Area	En Route	392.2 - Violation Of Local Laws - Explain:		
Semi-Trailer	9/6/2019	Hauppauge	Point of Destination	393.55E - No Or Defective Abs Malfunction Indicator Lamp For Trailer Manufactured After 03/01/1998		
Truck Tractor	1/22/2019	Tioga Marine Terminal	Point of Origin	393.9 - Inoperable Required Lamp		
Truck Tractor	2/12/2019	Blue Water Bridge	Point of Origin	393.48A - Inoperative/Defective Brakes		Y
Truck Tractor	2/12/2019	Blue Water Bridge	Point of Origin	396.3A1BL - Brake System Pressure Loss		Y
Truck Tractor	4/18/2019	Ornl	Point of Origin	393.45DLUV - Brake Connections With Leaks Under Vehicle		
Truck Tractor	5/13/2019	Kirkwood (Nb)	En Route	393.75A3 - Tire-Flat And/Or Audible Air Leak		Y
Truck Tractor	6/4/2019	1401 Morgan Circle	Point of Origin	396.3A1B - Brakes (General) Explain:		

Unit	Inspection Date	Location	Inspection Type	Violation	Level I OOS *	Level VI OOS
Truck Tractor	6/4/2019	1401 Morgan Circle	Point of Origin	393.45B2 - Brake Hose Or Tubing Chafing And/Or Kinking		Y
Truck Tractor	7/3/2019	San Juan, Pr	En Route	172.203D10 - No Indication For Highway Route Controlled Quantity Of Class 7 'Hrcq' On Shipping Paper		
Truck Tractor	7/11/2019	Ornl Hfir	Point of Origin	393.75A1 - Tire-Ply Or Belt Material Exposed		Y
Truck Tractor	8/9/2019	Everett Port / Terminal Ave.	Point of Origin	393.9 - Inoperable Required Lamp		
Truck Tractor	10/31/2019	Perma-Fix Richland	Point of Origin	393.75A3 - Tire-Flat And/Or Audible Air Leak		Y
Truck Tractor	10/31/2019	Perma-Fix Richland	Point of Origin	393.45DLPC - Brake Connections With Leaks - Connection To Power Unit		Y
Truck Tractor	12/9/2019	Tioga Marine Terminal	Point of Origin	393.11 - No Or Defective Lighting Devices Or Reflective Material As Required		

* The A&I Online database does not provide information on NAS (Level I) out-of-service violations