



### CONVERSATION RECORD

NAME OF PERSON(S)/TITLE CONTACTED OR IN CONTACT WITH YOU		DATE OF CONTACT	TYPE OF CONVERSATION	
Lydia Brownell, RSO		4/13/2020	<input type="checkbox"/> E-MAIL	<input type="checkbox"/> INCOMING <input checked="" type="checkbox"/> OUTGOING
E-MAIL ADDRESS	TELEPHONE NUMBER	(573) 508-8032	<input checked="" type="checkbox"/> TELEPHONE	
ORGANIZATION	DOCKET NUMBER(S)			
Missouri Department of Transportation	030-18363			
LICENSE NAME AND NUMBER(S)	MAIL CONTROL NUMBER(S)			
24-20415-01				
SUBJECT (COVID-19 Related) Inquiry Regarding US DOT HAZMAT Training Requirements				
<p><b>SUMMARY AND ACTION REQUIRED (IF ANY)</b>                  On April 13, 2020, Region III received a phone call from the subject licensee requesting information on potential exemptions from the recurrent HAZMAT training requirements outlined in 49 CFR 172.704. This request was prompted due to the licensee's normal training provider postponing all training due to the national COVID-19 response. The information request was consolidated into an email and sent to the Materials Inspection Branch for consideration.</p> <p>On April 13, 2020, a materials inspector (Edward Harvey) contacted the RSO to further understand the situation and provided the following information:</p> <p>(1) 49 CFR 172.702(c) states that HAZMAT training may be provided by the employer and does not necessarily have to be provided by a third party; (2) the training subjects required to be covered are outlined in 49 CFR 172.704; (3) the HAZMAT training requirements are under the jurisdiction of the US Department of Transportation (US DOT). As such, any relief or exemption from the requirement would need to be authorized by US DOT; and (4) provided additional NRC contact information should future additional regulatory issues arise.</p> <p>The RSO acknowledged the information presented by the inspector and stated that they would look into other options for training and contact the US DOT.</p>				
NAME OF PERSON DOCUMENTING CONVERSATION				
Edward Harvey, Health Physicist				
SIGNATURE			DATE OF SIGNATURE	
			04/15/2020	