



RAMTUC Consignment Issues Working Group (CIWG)			
Chair Person	Mrs Gill King (EDF)	Secretary	Miss Kirsty Barnes (Sellafield) (Acting Secretary)
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## MINUTES OF THE 28<sup>th</sup> RAMTUC CONSIGNMENT ISSUES WORKING GROUP

**Date:** Thursday 28<sup>th</sup> February 2019

**Present:**

Gill King (GK)	EDF - Chairperson
Kirsty Barnes (KB)	Sellafield Ltd - Acting Secretary
Martin Porter (MP)	Sellafield Ltd - RAMTUC Chair
Martin Quick (MQ)	Rolls Royce
Graeme Hewson (GH)	EDF
Vijay Bhatti (VB)	INS
Ruth Norbury (RN)	Magnox
Rachel McNicholas (RMcN)	Magnox
Jim Hair (JH)	Dounreay

### 1. Apologies for Absence

LLWR, Urenco

### 2. Chair persons Welcome, Comments and Safety Share

Prior to today's meeting a teleconference was held to discuss key items that need to be added to the agenda.

MP attended the meeting to give guidance from RAMTUC Main Group and provide some agenda items for the CIWG to take forward. RAMTUC Main Group will also be given guidance on the strategy the groups should take. CIWG needs to be moving away from non-value add LFE and looking more in-depth into consignment operations.

The training subgroup has been working with John Simpson to plan for his retirement and how the industry, including WNTI and the National Collage, can work together to ensure there is still suitable training available.

RAMTUC turns fifty this year, MP asked all members to consider how they want to celebrate this landmark. MP has stated that some funds will be available but caution should be exercised when requesting imaging on freebies and potential for longevity of stock that may be held after this year.

**Action 28/01:** All suggestions for RAMTUC fiftieth celebrations to be forwarded to GK who will take to the next main group meeting.

#### Safety Share

Magnox had an event with the Novapak package not being constructed to the correct specification. These packages were leased from LLWR, however, the regulator stated that the consignor should have known and ensured the package meets the package spec before consigning. How do we as consignors ensure that information provided by third parties is correct? How do we as consignors ensure we have all relevant documentation? This does

not just cover package owners/manufactures but also carriers and consignors to our sites. Since the event Magnox have been under a lot of scrutiny from ONR and are in the process of reviewing their management system to look for improvements that can be made to ensure that this does not happen again.

### 3. Minutes from the last meeting –RAMTUC/CIWG/M27

Minutes from the last meeting were accepted subject to a few minor alterations.

### 4. Actions

A review of earlier actions was undertaken and reallocated to current CIWG members as appropriate. See Action Table below.

### 5. Forum Feedback

It was agreed that forum feedback will be done outside this meeting. Anyone who attends one of the following forums is to forward minutes or suitable notes on to all members.

- RAMTUC Main Meeting
- TCSC
- RADSAFE Working Group
- WNTI
- Regulator Forum Update
- DGAG/BADGP

Anything that needs raised from these can be discussed under AOB.

### 6. LFE Trending Metric (Considering Class 7 & Non-Class 7)

There are several companies that do not contribute to LFE on a regular basis or indeed at all; neither does a member representative attend the CIWG meetings.

**Action 28/02:** GK to take the suggested changes to the data management for LFE to the Main Group for approval.

**Action 28/03:** GH to cull non-contributory members of LFE following the Main Group meeting.

There are still a lot of events raised post and during consignment, is this because events are not being captured at the point of non-conformance and only being raised after shipment of the consignment?

The LFE to date and the industry as a whole has a tendency to focus on the negative impacts; as a group we should remember that within the UK there is an unlikely possibility of a major incident involving transport of radioactive material. There is a huge array of shipments that are completed with the transport regulations despite the fact that there is often a vast amount of work that has gone on before the transport gets to leave consigning site. It is this learning as a group that we should focus on. We need to be sharing success stories, not just failures.

It was decided that JH would present an event at the next CIWG meeting and GH would present at the following meeting.

It was agreed that the LFE will still be collated on a quarterly basis for ease of collation/review but the report will only be produced on an annual basis.

## 7. Operational (Considering Class 7 & Non-Class 7)

### Packages/Packing Issues

See Safety Share item details of the Magnox event.

Ensuring compliance in all aspects of package management is a concern for a number of member organisations and for ONR, some of which have a process how they manage it.

**Action 28/04:** Magnox are to share how they are going to manage the compliance of leased packages in due course.

**Action 28/05:** GK to share third party off the shelf form and design form used by EDF.

There is a draft guidance note for the Operational Checks for Work Place Review of Package Operations. This needs to be added to the list of Guidance Notes and review. See appendix 2 below.

MP commented that when talking to others outside of transport, the roles and responsibilities of persons involved in the transport chain and the implication of each role is not widely understood.

**Action 28/06:** SL to share guides on packers, loaders, fillers SQEP roles.

JH contributed that it was a familiar situation at DSRL and to assist with this DSRL have a checklist of documents required for the transport of dangerous goods to try and achieve a common understanding.

**Action 28/07;** GH to produce a RAMTUC Guidance Note to capture the documents/information for a RAM shipment overseas.

### Carrier Issues

ONR have visited Circle Express Depot in Glasgow, the feedback was OK, and no major issues were raised. Most members choose still not to use them.

A RADSAFE call-out was stopped by NCEC when a carrier used by EDF called the number to report a vehicle breakdown. The vehicle which was carrying an excepted package to Hinkley B Power Station developed a fault and required an overnight stop. The driver called the RADSAFE number as opposed to his breakdown recovery provider. EDF contacted Magnox requesting permission to overnight at the Oldbury site.

**Action 28/08:** All to identify what circumstances will allow Member organisations to utilise their respective sites for transit during a journey.

## 8. General Topics (Considering Class 7 & Non-Class 7)

#### ONR Site Specific Audits

SL have a LC5 inspection coming up.

JH shared the ONR's feedback on how inspections will happen going forward. With more themes to help auditees prepare.

EDF mentioned that the ONR are interested in sharing and reporting of learning.

#### Carrier Audits

GK is struggling to get the carrier audits added to the RAMTUC website.

Previously there has been a contract with MFQ to undertake carrier audits. This contract is no longer live and will need to be re-instated. RAMTUC Main Group has agreed to fund three audits. GK to request that four be funded to cover those that have been identified below.

**Action 28/09:** GK to re-engage with MFQ and identify which Carriers have been identified for a visit this year.

**Action 28/10:** GK to request funding for four carrier audits this financial year.

The carrier audit schedule has been produced for this year. Unitech are next on the list to be audited; lead by Magnox.

EDF will audit DRS and Magnox will audit E&Z and Topspeed. SL are willing to assist with audits.

LLWR will audit all carriers contracted through their framework agreement.

**Action 28/11:** All to send a list of carriers used to GK to ensure all carriers are on the audit schedule. Note: details for waste carriers are not being collated at this time.

EDF have a three tiered approach for the use of carriers, accredited, station drivers and known of carriers (where they are familiar to or used by other Member organisations). All are listed for each station to use. The term "approved" carrier is not used as this implies that there are fully agreed terms and conditions between contracting parties. EDF do have a set of terms & conditions available although they have not been used to date to obtain an approved carrier. EDF also have the capability to contract for a on- off urgent carrier if required.

During a recent transport of a gas circulator between EDF stations, EDF were required to obtain transport at short notice using a carrier that was aligned with the EDF procurement system. The gas circulator when loaded into its package became an Abnormal Indivisible Load (AIL) – 54 tonnes - and required a significant amount of work to make this move happen.

**Action 28/12:** GH to share process used with the challenging consignment of move 54 T gas circulator as an LFE event in due course.

#### Emergency Exercises

Towards the end of last year Sellafield undertook a recovery exercise that involved a large number of stakeholders.

**Action 28/13:** Invite William Kwan (SL Emergency Planning) to share the outcome of SL's recovery exercise.

EDF's Hunterston site held an exercise, participants credibility was questioned, how do you confirm you are who you say you are in an emergency situation? The main issues were poor communications and the emergency services not knowing who the RASAFE Responders were.

## 9. Common Process (Considering Class 7 & Non-Class 7)

### Training Courses/Seminars

Level 3 training is being held next week. This course is running at a loss due to some SL people dropping out last minute.

Phil McNamara is retiring as the Training Group Chair; a new Chair will be needed.

RAMTUC (GK) gave an introduction of RAM transport to BADGP. AWE on behalf of RAMTUC delivered a training presentation and Nuvia gave an overview of RPP. ONR were present. During the seminar it was noted that the police can have one DGSA covering several constabularies. In the event of an incident the aim of the Officer on the ground is able to put the police DGSA in touch with the consigning organisations DGSA so that they are able to have conversation without relying on the driver as the SME. The police carry out targeted campaigns e.g. Instructions in Writing, emergency equipment.

The Chartered Institute of Logistics and Transport (CILT) have invited MP to become a Fellow Member. GK and RN are members of CILT. The group deals with general transport but has a good structure.

Work is ongoing with the National College in review of more competency based training for the transport of dangerous goods.

### Legislative Updates

The amended CDG has got lost in Brexit and is waiting to go through the House of Lords.

ONR will be providing guidance on emergency arrangements, there will be a consultation period for changes to CDG.

The updates include acceptance acknowledgements of deliveries and formal handovers at events.

RAMTUC and TCSC went to BEIS and the ONR to ask for more time to implement changes. There will be a national plan; however, each consignor will need to meet their obligations. It was recommended a new working group be set up with RADSAFE to how we are affected as an industry.

**Action 28/14:** GK to ask members of RADSAFE to support the understanding of the new CDG emergency arrangements with the view of setting up a new Working Group?

There will be a twelve month period for changes to be implemented.

### Regulator Changes

There have been no changes to Neutron Monitors as it was hoped and the Authorisation that did applied has expired.

Brexit will revoke all old legislation and implement new. West Law is a site that makes draft legislation available to users ahead of changes; the website has a lot of information available.

**New Action 28/15:** GK to ask Prospect Law whether they have access to the West Law website and if not ask if they access can be obtained.

TFS forms will change.

## 10. Guidance Notes

The Guidance Notes table has been reviewed and GN's which are still relevant will be divided up and be reviewed and if they are still needed any amendments are to be made then they can be added to the website.

RN asked if there could be a GN for Asbestos and other dangerous goods rather than the focus just being on RAM. It was agreed that this would be discussed once the existing GN's were viewed and reviewed.

**New Action 28/16:** GH to send RN the list of GN's available with EDF for non-RAM advice.

## 11. Any other Business

### New Secretary

Ruth Norbury offered to take up the secretary role. It was agreed that the roles of Chair, Secretary and LFE Coordinator should be done on a rota basis for a two year period; the expectation is that each role is taken by a different Member organisation.

**Action 28/17:** GK/ET/KB to produce a rota for the Chair, Secretary and LFE Coordinator.

### CDG

Discussed earlier in the minutes.

### Standardisation of Communications

**Action 28/18:** Each company to update their contact list and share with the group.

### Good Practice Guides

This will be added as an agenda item for future meetings.

What as a group can we do to our best endeavours to ensure that we are complaint in all aspects of consignments? What reasonable checks can be put in place to prevent events like the Novapak happening again? (see safety share).

Pactec bags have different manufactures code and should be checked against the certificates to ensure compliance with packing.

We need to ensure we are sharing all learning is shared within the group.

### Packers Accountabilities

SL have some handouts that explain participants accountabilities, KB to share these.

Review of Guidance Notes

The existing GN's will be divided up and be reviewed and if they are still needed any amendments are to be made then they can be added to the website.

Agenda Review

The agenda will be updated and issued for comments.

RAMTUC Website

If everyone can have a look at the revamped website and pass comments to the secretary.

Summary of targeted areas for the CIWG to considers for future meetings:

- Good Practice Guides – third party package acceptance.
- Guidance Notes – current status and proposed new documents.
- Transit arrangements at Member organisation sites.
- Success stories for LFE.
- Carrier Audits.
- Understanding of CDG 2019 with RADSAFE.
- 50<sup>th</sup> celebrations.

**12. Date of Future Meeting**

Date in May to be agreed.

Kirsty Barnes

Acting Secretary to RAMTUC CIWG

## APPENDIX 1.1 MAIN ACTIONS TABLE

Action No	Action	Comments/ Status	Actionee	Target Completion Date
22/09	<p>MG to develop a problem statement in relation to LC5 / NLI requirements in order that a task request can be submitted to RAMTUC legal for provision of a clarification / guidance paper. Action remains on MG to feedback progress from the main RAMTUC mtg.</p> <p>Meeting note: Action transferred to ET. Tony Grange has done some work to look at sending nuclear Matter to NLI and where liability ends.</p>	On-going	E Tallantire	June Mtg
23/01	<p>GK to outline the process EdF use to allow the cross usage of IP and UN rated drums.</p> <p>Meeting Note: To be sent out on Gill's return to the office.</p>	On-going	G King	Feedback Feb Mtg
23/06	<p>MG to contact Paul Unsworth to seek advice on how the CIWG LFE could be used to further reduce Human Factors events.</p> <p>Feedback from the HF group within SDF to be provide by MG at next mtg.</p> <p>Meeting Note: Action transferred to Graeme Hewson and Gill King</p>	On-going	G Hewson, G King	June Mtg
23/10	<p>ALL Participating sites to provide current material Delivery Notification forms to MG for review of commonalities.</p> <p>Meeting 28 Note: Some companies had provided their documents and it was agreed that a standard form could not be implemented as each companies had additional information that they required. It was agreed that a new action would be raised to produce a Guidance Note on requirements for an RMT.</p>	Complete	ALL MEMBERS	Complete
23/11	<p>MG to review basis for delivery notification requirement, review forms for commonalities &amp; arrange conference call to agree basis for new form.</p> <p>Meeting 28 Note: See above</p>	Complete	M Geldard	Complete
24/01	MG to confirm with RAMTUC Secretary how RESCALC feedback can be obtained	Complete	M Geldard	Complete
24/02	<p>ALL to provide names of volunteers for LFE coordinator role.</p> <p>G Hewson has since picked up this role.</p>	Complete	ALL members	Feb Complete
24/03	KE to add a means of identifying events as class 7 or other DG within the LFE spreadsheet.	Complete	K Eden	Complete



24/05	Each consignor to confirm if any carrier audits are planned for next year	Complete	ALL members	Complete
24/06	MG to raise the suggestion that RAMTUC may wish to request a trade stand at BADGP seminar in March.  Meeting 28 Note: This action has been closed new action 28/02 raised.	Complete	M Geldard	Complete
24/07	ALL sites to make DGSA Report Exec Summaries available for discussion at next mtg.  Meeting 28 Note: Action closed – covered as a standard agenda item.	Complete	ALL members	Complete
24/08	RMc to provide feedback as to position of RAMTUC website review and update.  Meeting 28 Note: Live and on the website.	Complete	R McNicholas	Complete
24/09	MG to review TOR for CIWG and Non Class 7 group and amalgamate.  Meeting 28 Note: Action transferred to ET, GK.	Ongoing	E Tallantire, G King	June Mtg
25/02	DGSA annual reports are to be brought to the November meeting. Update: The reports were brought to the meeting. It was discussed what the best way of sharing the information would be and questioned whether everyone used the RAMTUC Guidance to produce their reports. There is also guidance on the ONR website which Gill King shared; however, this is very onerous.  Meeting 28 Note: – covered as a standard agenda item.	Complete	All	Complete
25/03	RB to confirm what needs to be done for overseas carriers in regards to IRR2017 notification of registration? Update: RB was not present at the meeting, this action is ongoing. Meeting 28 Note: Carriers have to register with the HSE, including ports in the UK. There may be a need to register in overseas ports.	Complete	R Brownlow	Complete
27/01	ET to forward the information she has regarding the reg updates. Issued	Complete	E Tallantire	Complete
27/02	GH to confirm the monitoring requirements in the POMM for fuel flasks moves are clear.	Ongoing	G Hewson	June Mtg
27/03	GH to review the last 12 month LFE to package preparation events for review at the next meeting.	Complete	G Hewson	Complete
27/04	ET to share information she has on Regulatory Updates.	Complete	E Tallantire	Complete
27/05	IAEA draft documents are out for consultation. JH to share via KB. Meeting 28 Note: Review timeframe has expired. Action closed.	Complete	J Hair	Complete

27/06	JH to share the CORWN (Committee of Radioactive Waste Management) paper.	Complete	J Hair	Complete
28/01	All suggestions for RAMTUC fiftieth celebrations to be forwarded to GK who will take to the next main group meeting.	New	All	20/03/2019
28/02	GK to take the suggested changes to the data management for LFE to the Main Group for approval.	New	G King	June Mtg
28/03	GH to cull non-contributory members of LFE following the Main Group meeting.	New	G Hewson	June Mtg
28/04	Magnox are to share how they are going to manage the compliance of leased packages in due course.	New	G King	June Mtg
28/05	GK to share third party off the shelf form and design form used by EDF.	New	G King	June Mtg
28/06	SL to share guides on packers, loaders, fillers SQEP roles.	New	K Barnes	June Mtg
28/07	GH to produce a RAMTUC Guidance Note to capture the documents/information for a RAM shipment overseas.	New	G Hewson	June Mtg
28/08	All to identify what circumstances will allow Member organisations to utilise their respective sites for transit during a journey.	New	All	June Mtg
28/09	GK to re-engage with MFQ and identify which Carriers have been identified for a visit this year.	New	G King	June Mtg
28/10	GK to request funding for four carrier audits this financial year.	New	G King	June Mtg
28/11	All to send a list of carriers used to GK to ensure all carriers are on the audit schedule. Note: details for waste carriers are not being collated at this time.	New	All	June Mtg
28/12	GH to share process used with the challenging consignment of move 54 T gas circulator as an LFE event in due course.	New	G Hewson	June Mtg
28/13	Invite William Kwan (SL Emergency Planning) to share the outcome of SL's recovery exercise.	New	R Norbury	June Mtg

28/14	GK to ask members of RADSAFE to support the understanding of the new CDG emergency arrangements with the view of setting up a new Working Group?	New	G King	June Mtg
28/15	GK to ask Prospect Law whether they have access to the West Law website and if not ask if they access can be obtained.	New	G King	June Mtg
28/16	GH to send RN the list of GN's available with EDF for non-RAM advice.	New	G Hewson	June Mtg
28/17	GK/ET/KB to produce a rota for the Chair, Secretary and LFE Coordinator.	New	G King/E Tallantire/K Barnes	June Mtg
28/18	Each company to update their contact list and share with the group	New	All	June Mtg

## APPENDIX 1.2 NON-CLASS 7 ACTIONS TABLE

Action No	Action	Comments/ Status	Actionee	Target Completion Date
05/01	KB to discuss with Mark Geldard (CIWG Chair) about meeting dates going forward.	Closed	Complete	Complete
05/02	GK to ask the CAA for a copy of the minutes from the last meeting.	Complete	G King	Complete
05/03	GK to share with RB how EDF justify using IP rated packages to meet UN Packing Group requirements.	Captured in action 23/01	G King	Complete
05/04	GK to issue their carrier audit schedule.	Complete	G King	
05/05	GK to share the LFE of the injured driver event caused by a pipe blockage	Complete	G King	Complete
05/06	All to provide LFE for sharing at the group.	Closed - Will be provided in conjunction with Class 7 LFE	Complete	Complete
05/07	EDF will share feedback from their dangerous goods self-assessment process	Complete	G King	Complete
05/08	All to determine what contractor emergency arrangements are in place for other DG consignments? Meeting 28 Update: How do we control carriers? Are they using exemptins correctly. RN to feedback at the next meeting.	On-going	R Norbury	June Mtg
05/09	GK to speak to Caroline Raine to see if any of the seminars can be linked	Complete	G King	Complete

## APPENDIX 2

## CURRENT STATUS OF GUIDANCE NOTES

Guidance Note	Title	Other DG/ RAM	Date	Revision	Author	Responsible person	Website	Status
RAMTUC(10)GN04	Guidance for purchasing goods & services (on behalf of RAMTUC)	Other DG/ RAM	Aug-11	Rev no. TBA	John Harvey	Gill King	No	Review and revise as appropriate
RAMTUC(13)GN06	Dangerous Good Annual Report	RAM	Apr-14	2	Alison Fotheringham	Gill King	Yes	Review and revise as appropriate
RAMTUC(13)GN07	Fissile Exceptions Guidance & Flow Chart	RAM			Ceinion Thomas		No	Transferred to FESG
RAMTUC(13)GN08	Excepted Matter, Nuclear Liability & Marine Cargo Insurance	RAM			Steve Capner		No	Withdrawn
RAMTUC(13)GN09	Transfrontier Shipment of Radioactive Waste and Spent Fuel	RAM	Jul-14	Draft 1	Alison Fotheringham	Gill King	No	Deferred - Awaiting Brexit impact
RAMTUC(13)GN10	Placarding of vehicles for sea and road & Exclusive Use	RAM	Aug-14	Rev no. TBA	Steve Capner/ Kerrie Ross	Jim Hair	No	
RAMTUC(13)GN12	Environmentally Hazardous Substances				Steve Capner			Withdrawn
RAMTUC(16)GN14	LSA material Activity Distribution Interpretation Guidance	RAM	Dec-16	1		Rachel McNicholas	Yes	Tech document available to supplement this
RAMTUC(17)GN15	Placarding of wagons for rail shipments including Exclusive Use	RAM	Oct-16	0		Jim Hair	No	Review and revise as appropriate
RAMTUC(17)GNxx	Excepted packages with a sub-hazard (SP290)	RAM	Sep-17	0	Duncan Chase	Graeme Hewson	No	Review and revise as appropriate
RAMTUC(17)GNxx	Radioactive materials with a sub-hazard (SP172)	RAM	Sep-17	0	Duncan Chase	Graeme Hewson	No	Review and revise as appropriate
RAMTUC(19)GNxx	Compliance Checks for workplace review of package operations	RAM	Jul-14	Draft	???	Gill King	No	Draft 2014. Never issued. Review and revise as

								appropriate
RAMTUC(19)GNxx	Transport terminology, roles and responsibilities	RAM			Kirsty Barnes			New
RAMTUC(19)GNxx	Guide to transport - documents to consider	RAM			Jim Hair			New
RAMTUC(19)GNxx	Asbestos	Other DG			Rachel McNicholas			New
RAMTUC(19)GNxx	Nuclear Liability Insurance (NLI)	RAM			Jim Hair			New

APPENDIX 3



Radioactive Materials Transport Users Committee  
Consignment Issues Working Group (CIWG)  
Terms of Reference

**PURPOSE:-**

To strive to continuously improve the standard of Dangerous Goods Transport with member organisations.

The group will work collaboratively in the field of Dangerous Goods Transport Legislation and relevant Site Licence Conditions with regard to:-

Identification and promulgation of industry best practice at consignor level

Development of common approaches and interpretation, seeking harmonisation

Identify training requirements and issues for dissemination to the training working group

Consolidation and consideration of intelligence from other industry sources and working groups

Sharing and retention of knowledge including DGSA reports, operational experience and lessons learned from exercises, incident/events, non-conformances and audits

Production of LFE table from all RAMTUC organisation members and annual trending associated with LFE

Ownership/maintenance of RAMCALC

Reporting back and issues from RAMTUC and feeding down any issues arising at RAMTUC of interest to consignors

**Adopted 14<sup>th</sup> November 2012**