



RAMTUC Consignment Issues Working Group (CIWG)			
<b>Chairperson:</b>	Mark Geldard (Sellafield Ltd)	<b>Acting Secretary:</b>	Emma Tallantire (Sellafield Ltd)
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## MINUTES OF THE 18<sup>th</sup> RAMTUC CONSIGNMENT ISSUES WORKING GROUP (CIWG) MEETING

**Date:** Wednesday 27<sup>th</sup> April 2016

**Present:** Mark Geldard (MG) (Sellafield Ltd) (Chairperson)  
 Emma Tallantire (ET) (Sellafield Ltd) (Acting Secretary)  
 Jarod Bowden (WJ) (INS)  
 Kirstie Eden (KE) (Rolls Royce)  
 Rachel Brownlow (RB) (UAM)  
 Rachel McNicholas (RMcN) (Magnox – Harwell)  
 Duncan Chase (DC) (EDF)  
 Alison Green (AG) (Babcock International)

### 1. APOLOGIES FOR ABSENCE

Apologies were received from DSRL, Studsvik and LLWR.

### 2. CHAIRPERSONS WELCOME AND COMMENTS

MG thanked everyone for attending. Introductions were given around the table.

#### Safety Share

The safety share was around the 30<sup>th</sup> anniversary of the Chernobyl disaster.

### 3. MINUTES OF LAST MEETING

The minutes from the previous meeting we accepted with some alterations. It was noted that final versions of the minutes were not sent out and requested that these were issued before adding to the website.

### 4. ACTIONS

See Appendix 1.

**Action 18/01: ET to ask for action 15/01 to be transferred to the Main Members Meeting.**

### 5. FORUM FEEDBACK (Consignor Specific Info)

#### RAMTUC Main Meeting (AG)

The last meeting was held 3<sup>rd</sup> March 2016.

Support was shown for the improvements to RAMCALC.

It has been confirmed that the Seminar will be held in November but the exact date and location has not yet been provided.

CooperRepco have been chosen as an administrator and organiser for the Level 3 Training course.

Regulatory changes discussed: – requirement for all lettering to be 12mm not just UN Number. A new requirement in IMDG for documented evidence about the gross mass of a container to be provided separately from the DGN. There will be a session on this at the VCA.

The LFE summary was discussed and the group requested that the summary should emphasise that no significant reportable ONR events were recorded during the year.

**Action 18/02: MG to request attendance at the next meeting from the SL Human Factors Team.**TCSC (JB)

The following guidance documents are being updated:

- 1087 – Finite element analysis – this is due for comment.
- 1068 – Leak testing on packages – GVH has worked on this with the aim being a reduction in processes.
- 1078 – Self assessment and approval of packages.
- 1086 – Testing of packages.
- 1088 – Surface finish guide for containers – only minimum updates required.
- 1089 – Excepted packages – under review by EDF and Magnox.
- 1094 – Procurement – under review by Nuvia.

RADSAFE (AF)

AF was not present at the meeting but had sent in updates by email. AF forwarded an ONR guidance note to the group that all RADSAFE WG members will have commented on. The overall feedback was that ONR expectations are high and organisations may have issues with demonstrating expectations.

Notes from the minutes:

Terry Kelly advised that all documents that had been issued for the meeting would be uploaded to the website.

RADSAFE have been invited to sit on the Scottish Nuclear Resilience Group. The first meeting is due to be held in April and draft Terms of Reference are to be sent out.

The Working Group that the Working Group meeting in June had been cancelled. In late May the Board meeting, AGM, Working Group meeting and a Strategy planning meeting will be combined into one day.

**FEEDBACK FROM ONR MEETING –**

ONR recognise RADSAFE as a significant and important stakeholder, demonstrating a cost-effective response, joint collaboration and working together.

Over the last few years the restructuring transferring DfT inspectors into ONR has had an impact on the observation of exercises, which they are looking to address and improve.

ONR have identified a number of areas that they see as important to get right and emergency arrangements is one of these.

ONR want to provide advice and guidance on emergency arrangements, including how exercises will be assessed.

ONR have identified three phases of phases to the response to an emergency, the initial phase, the urgent phase (when RADSAFE responds) and the recovery/remediation phase. During the initial phase RADSAFE have developed their general advice/guidance however there are other parties involved in this stage and it is how these parties respond and work together in this initial stage before the RADSAFE response arrives; the emergency services may not have access to some of the important information e.g. the driver is not able to communicate or documentation is lost (consignment notes, placarding etc.). It is this initial stage that needs to be discussed with the regulators and organisations need to confirm that their transport organisation understand the emergency arrangements and drivers have a procedure to follow to help to fill any gaps during this initial stage.

ONR have published a TAG for non-nuclear and a TAG for nuclear is being developed. ONR are also seeing a number of organisations claiming RADS SAFE as the totality of their arrangements, however RADS SAFE is not comprehensive as it does not necessarily cover the transport organisation/driver as described above and therefore the ONR need to be content that arrangements are in place to ensure they cover the initial phase before the RADS SAFE Response arrive at the incident.

It was agreed that RADS SAFE need to develop a clear definition of their involvement within the three stages of a response to an incident, possibly pictorial. RADS SAFE also need to review what was proposed in the letters from DfT (from Danny Vince and Edmond Morgan-Warren) to RADS SAFE, which are included in the RADS SAFE Exercise Guidance, which is part of the Resource Library

It was agreed that Ian Mackay and Ian Orr, plus support from LLWR would form a subgroup: Sub-group to develop a diagram to clearly define RADS SAFE's involvement in the stages of a transport incident. ACTION : Sub-group to review and update the RADS SAFE Exercise Guidance.

Michael Banks reported that the recent exercise at LLWR demonstrated the impact that information provided by a driver can have on the response and therefore they need to understand the level of risk presented by their consignment. It is also important for CNC to be able to communicate to emergency responders, especially with regard to the level of risk. As a result of the letter from ONR following this exercise, drivers will become more integrated within the emergency arrangements and Alison Fotheringham has liaised with the haulier.

ACTION: Alison Fotheringham to circulate details of the information that has been provided to hauliers following the recent exercise.

Terry asked the Working Group Members to plan for the Strategy workshop that is planned to be held in May 2016. Members should consider how many movements they will be making each year for the next 5-10 years; will New Build be making a contribution to movements and how should RADS SAFE organised membership going forward? How can we accommodate smaller members and organisations that cannot provide a 24/7 response? Terry also asked Members to identify what is important to you as Members and is there anything that should change?

It was discussed that ONR are interested in company's arrangements outside of RADS SAFE.

**Action 18/03: RMc and AG to send out the driver emergency response cards that they use.**

#### WNTI

No meeting has taken place since the last CIWG meeting.

#### Regulatory Forum Update (MG)

The stakeholder meeting took place on the 8<sup>th</sup> March and was mainly focused on package licensing and approvals. The new Applicants Guide was discussed; it is quite different from the previous version and has more focus on upfront work. The new emergency response guidance was discussed.

Presentations on working with regulator were given by Ann Walker (ONR), Jen Nugent (INS) and Martin Porter (SL).

A discussion on SSR6 para 624 and the 20% increase, if packages are currently licensed the advice was to keep using these. A proposal in relation to this has been put forward by the US: More than a 20% increase in the maximum *dose equivalent rate* at any external surface of the package, except when the maximum *dose equivalent rate* on the external surface is below 10  $\mu\text{Sv/h}$ . In this case, there shall be no increase of more than 2  $\mu\text{Sv/h}$  in the maximum *dose equivalent rate* at any external surface of the *package*.

RSRL now request that the unpackaged item is monitored to ensure compliance with this requirement.

The next edition of SSR6 will instruct the removal of package marks as well as labels when consigning a package as a different type to its licence.

Presentations from this meeting will be available on the ONR website.

### RAMCALC

Definite clarification of funding being granted for these improvements is needed as this was not clear in the Main Members Meeting minutes. Once this has been received the improvements should take around 4-5 weeks. A possible stand at the Seminar to demonstrate the improvements was discussed.

## 6. LFE Trending Metrics

MG thanked AG for her previous work on LFE and thanked KE for volunteering to take the work over.

KE stated that overall the results were very similar to the last quarter.

It was noted that there had been a significant increase in SC4 events which relate to conveyance tie-downs, these are aligned to the event in relation to the LLWR Framework tie-down procedures. SL, RSRL and EDF had opposed the blanket reporting to ONR proposed by LLWR.

The summary and spreadsheet containing the base data was reviewed, it was noted that Loading was not an option for 'Stage of Consignment'. There was a significant rise in the number of events 'post' rather than 'pre' consignment

**Action 18/04: ET to look at 2016-08 as to whether this was recorded as a TS07.**

**Action 18/05: KE to remove RSRL and Synergy Health from the report.**

The next meeting will concentrate on post transport events and look at what could have been done differently.

RSRL use dispatch checklists as do some other companies, there would be some value in comparing checklists.

**Action 18/06: All to share checklists at the next meeting if they are used.**

It was noted that Steve Capner (UAM) had previously put together a guidance note on consignor checks.

A summary report of this quarter LFE will go to the main group.

### LFE Presentation

RMc gave a presentation to the group on some Dep U items which were sent to Springfields. The items were sent as Unpackaged LSA I Dep U. The material was monitored four months after receipt where a 500 uSv/hr dose rate was picked up and Cs137 detected. The high reading had come from a fission plate.

RSRL were given an ONR enforcement letter. ONR went through the management arrangements and visited the facility. No findings were raised and the action was closed out.

**Action 18/07: RMc to share tool box talk from DepU event if permitted.**

Internal investigations have put a new QP in place to ensure data is available in the case of staff turnover. This event is particularly relevant as these types of items will become more common due to decommissioning.

**Action 18/08: ET to put presentation together on Waste flask event.**

## 7. OPERATIONAL (Consignor Specific)

### Packages/Packaging Issues

RR have a shipment which is due to be sent to them which consists of small parts in a box, the proposed packaging method is to then put the box in a large ISO container, this packaging method is driven by the TCSC tie-down guidance which they were unable to meet when using drums as the packaging. RR is unable to accept the ISO.

EDF have 120 drums of Uranium Oxide at 1.1%, this is currently packed in drums which are not licenced for >1% material so will require repacking into another package. INS are working on a >1% ISO but this will not be available until the end of this calendar year at the earliest. RSRL Magnox stated that they were granted a Special Arrangement by ONR for the movement of some Type A drums where the contents slightly exceeded the Type A limits.

### Carrier Issues

EDF have carried out a full audit of Aplas and Circle Express.

SL had an issue with a carrier that was being used under the LLWR Framework not having the correct orange plates for an exclusive use shipment.

There have been some issues with fire extinguishers – out of date or not the correct amount of extinguishers for the vehicle size.

MG raised the issue of how the site code is applied to RADSAFE placards. For the flasks which are used for the fuel cycle the SL Fuel Handling Plant use a chinagraph pen to enter the SL site code onto the placards, they have recently noted that the inbound code has been entered onto the placard using a dry wipe marker. The consignors at SL have carried out some tests and the marking has stayed in place, so the question was raised whether it was thought appropriate for SL to start doing this also. DC is going to get confirmation from EDF that dry wipe markers are being used.

**Action 18/09: DC to confirm that EDF are using dry wipe markers for the site code on RADSAFE placards.**

## 8. GENERAL TOPICS (Consignor Specific)

### ONR/Audits

ONR have visited SL to carry out checks in the Residue Export Facility of the loading of the VRR Swiss returns in the Castor HAW package. A rating of green 'adequate' was given for this visit.

SL have also undergone an SLC5 (nuclear matter) inspection by their own internal audit department with no major findings. They noted that the tiered auditing approach used by SL does not align with the auditing requirements of a DGSA.

EDF have had an inspection by ONR CNS on SLC5 arrangements in nuclear matter transport. They are due to undergo an audit by ONR Transport in Q3 which will be focusing on updated emergency and package management arrangements.

### Emergency Exercises

RR is ramping up their refresher training for emergency exercises.

EDF have moved their RADSAFE responder centre from Sizewell A to B and an exercise will need to be carried out to test these arrangements.

The vehicles at SL which are used jointly as ITERT (international transport emergency response team) and RADSAFE response vehicles have recently been reviewed and some improvements have been identified. It was queried whether there was a checklist for these vehicles stating all of the required equipment.

**Action 18/10: MG to find out whether a vehicle checklist exists for ITERT/RADSAFE vehicles.**

#### Legislative updates

Proposed updates to SSR6 include – changes to large objects, the introduction of SCO III, dual use packages and the removal of the leaching test for LSA III.

There is due to be a change to CAA certification for air training. Gill King from EDF is attending a meeting next month to ensure that small users are covered.

### 9. TRAINING

#### RAMTUC level 3

CooperRepco have been chosen as an administrator and organiser for the Level 3 Training course. The next Level 3 is due to be planned for early 2017.

#### Training/seminars

The RAMTUC seminar is planned for November 2016. The VCA seminar is due to be held 7/8 June 2016.

AG is looking at consignor competence and the different standards used by members. She is going to put together a questionnaire on training standards, looking at the following: frequency/refreshers, what roles within the company does the training apply to (packers, loaders, consignors etc), whether formal appointments are issued.

MG said that SL packer/loader training was aimed at the Head of Manufacturing for that area and wondered what level other organisations aimed this at?

### 10. GUIDANCE NOTES

The placarding guidance note is being completed by EDF and will be issued before the next meeting.

MG questioned whether the group thought there were any other guidance notes required.

DC suggested that a potential new note could be on SP172/290 focusing on RAM shipments with a non-class 7 sub-risk and non-class 7 primary hazard with an excepted package sub-risk. MG said he was happy to work with someone on this.

It was questioned whether there is a list of all guidance notes and their associated review dates.

**Action 18/11: All to review placarding guidance note before the next meeting.**

**Action 18/12: MG to check whether there are any guidance notes in existence that are not on the list.**

### 11. AOB

MG explained that a teleconference was to be held for all sub-group chairs to discuss progress the previous year and forecasted work for the next year.

It was agreed that the following information would be submitted as forecasted work:

- New guidance note on shipments containing RAM with a non-class 7 subrisk and non-class 7 primary hazard with excepted package subrisk.
- Review of training requirements.
- Looking at post transport events.
- One specific event to be presented every meeting as learning.
- Summary of the main changes in LFE trends quarter by quarter.

A question was raised on the derogation for public roads – is there a set transport distance where this can be used. There is some guidance on the HSE website but no distance is quoted. The group were unsure and this had not been tested.

New Secretary – there is some interest in taking over this role within Magnox, this will be confirmed in early May following the Management of Change implementation.

JB raised the ONR restructure which is getting rid of the cross ONR programme.

ONR witnessing of testing and emergency exercises allows intervention by ONR if they see a reason to do so.

ONR intervention reports – these currently allow the organisation 10 days to comment, INS has requested that this be extended to 28 days. A project summary from this report will be available on the ONR website.

## **12. Meeting Location:**

### **Future Meeting Dates:**

The next meeting will be held: -

In August, exact date to be confirmed. There is a possibility that the ordering of the human factors and guidance notes meeting will be swapped around.

**Emma Tallantire**  
**Acting RAMTUC CIWG Secretary**

## APPENDIX 1 ACTIONS TABLE

Action No	Action	Comments/ Status	Target Completion Date
12/01	EDF and Magnox members to provide information on what their company transport via rail and any comments on the Guidance Note from Placarding – Rail.	<p><b>Ongoing:</b> Note Meeting 13: Need comments prior to the next meeting (April).</p> <p>Note, Meeting 15: The scope document has been updated; KB will ask John Simpson whether he would allow us to use his images for the document. Document will be issued to key rail users for production.</p> <p>Note. Meeting 16: John Simpson will provide images, DC to provide KB with a list of what images are required and KB will request these from John Simpson.</p> <p>Note: Meeting 16: DC will provide this information prior to the next meeting</p>	<b>Complete</b>
15/01	KB to ask JMP for a copy of the proposal paper on the development of relationship with ONR with respect to the LFE, and issue to CIWG members.	<p><b>Ongoing:</b> Note. Meeting 16: JMP has a meeting with ONR on Wednesday 25<sup>th</sup> November, following this meeting JMP will provide feedback to CIWG members.</p> <p>Note: Meeting 16: KB has asked JMP for the paper and is still waiting for a response.</p> <p>SL's current stance is that if an event is non safety significant and on the quarterly report (which is submitted to ONR) then it is reported by teleconference to the ONR, if the local ONR representative decided that an INF-1 needs to be raised then one would be. All at the group agreed that if a joint way of reporting could be agreed then this could be formalised across CIWG member sites if the teleconference was formalised with an email. This will be taken to the main group for discussion.</p> <p>Note: Meeting 18 – transfer to new action on ET to transfer to main group.</p>	<b>Complete</b>
15/06	EDF have produced a guidance note for their sites for legacy drums of Class 9 material with a RAM sub-risk and the use of non UN drums if these are designed above UN specification.	<p><b>Ongoing:</b></p> <p>Note: Meeting 16: The documents have been issued; however, they do</p>	<b>August meeting</b>

	AF stated that MF was looking into the use of IP-2 packages for Asbestos. AF to provide an update on the state of this.	not talk about packaging and how to manage asbestos which needs to be grouted. DC to send out EDF's guidance document, this will be added to the member's website.  <b>Note: Meeting 18: EDF need to update this document in-line with the latest version of ADR then it will be issued.</b>	
16/02	MG to ask Marc Flynn as to whether the funding is available to progress with the RAMCALC.	<b>Ongoing.</b>  Note: Meeting 16: RMcN will forward the costs, breakdown and a justification to MG for funding approval.  <b>Note Meeting 18: Main Group minutes do not reflect the fact that the funding was agreed at the last meeting. RMc to get email confirmation from Marc Flynn.</b>	<b>August meeting</b>
16/03	MG to speak to PMcN about the future of Level 1 and 2 training.	<b>Ongoing.</b>  Note: Meeting 16: It was questioned if there is a training group out there that would be willing to take on the delivery of this course. MG to speak to PMcN  <b>Note Meeting 18: John Simpson is currently due to continue with the Level 1 and Level 2 training as Class 7 for the time being.</b>	<b>Complete</b>
16/04	Babcocks asked what in house training is provided for onsite drivers. Magnox do toolbox talks and online dangerous goods training. All to share competence criteria with AG.	<b>Ongoing.</b>  <b>Note:</b> Meeting 16: UAM and LLWR provide general awareness training. All to share at the next meeting.  MB asked how do sites manage drivers carrying subrisks, as the regulations only require them to be trained in the main class. LLWR and SL do not have this issue as they use drivers trained in classes 2-9. All agreed that if the law says that the main hazard only need covered by training, then a duty of care should be considered.	<b>Complete</b>
17/01	AF to forward KB the guidance note on the testing of emergency arrangements for issue to members.	<b>Complete – sent out 28/02/16</b>	<b>Complete</b>
17/02	MB to forward KB the presentation on tiedowns so it can be issued to members.	<b>Complete – sent out 08/04/16</b>	<b>Complete</b>

17/03	RMcN to share the learning from event 2015/96 at the next CIWG meeting.	<b>Complete – presentation given at meeting held on 28/04/16</b>	<b>Complete</b>
17/04	DC to share the learning from the audit carried out on Unitech.	<b>Complete – exec summary brought to meeting on 28/04/16 due to commercially sensitive information.</b>	<b>Complete</b>
17/05	MG to look and see if there are any updated available. MG will also confirm how RAMTUC will provide updates once John Simpson retires.	<b>Complete – covered under action 16/03.</b>  <b>Note Meeting 18: MG mentioned that information on the next ADR updates are available on the UNECE website and there is a TRANSSC document for SSR6 changes.</b>	<b>Complete</b>
17/06	Feed in comments for dates of RAMTUC seminar.	<b>Complete – the Seminar will be held in November 2016</b>	<b>Complete</b>
18/01	ET to ask for the transfer of action 15/01 to the Main Group	<b>New Action</b>	<b>August Meeting</b>
18/02	MG to request attendance at the next meeting from the SL Human Factors Team	<b>New Action</b>	<b>August Meeting</b>
18/03	RMc and AG to send out driver emergency response cards that they use.	<b>New Action</b>	<b>August Meeting</b>
18/04	ET to find out whether event 2016-08 was raised as a TS07.	<b>New Action</b>	<b>August Meeting</b>
18/05	KE to remove RSRL and Synergy Health from the LFE figures	<b>New Action</b>	<b>August Meeting</b>
18/06	All to share dispatch checklists if they use them.	<b>New Action</b>	<b>August Meeting</b>
18/07	RMc to send out tool box talk from Dep U event if permitted	<b>New Action</b>	<b>August Meeting</b>
18/08	ET put together presentation on Waste flask event	<b>New Action</b>	<b>August Meeting</b>
18/09	DC to confirm that EDF are using dry wipe markers for the site code on RADSAFE placards.	<b>New Action</b>	<b>August Meeting</b>
18/10	MG to find out whether a vehicle checklist exists for ITERT/RADSAFE vehicles	<b>New Action</b>	<b>August Meeting</b>
18/11	All to review Placarding Guidance Note before next meeting	<b>New Action</b>	<b>August Meeting</b>
18/12	MG to check whether there are any Guidance Notes in existence which are not on the list	<b>New Action</b>	<b>August Meeting</b>

## APPENDIX 2

## CURRENT STATUS OF GUIDANCE NOTES

Reference & Issue	Title	Author	Status	Review Date
RAMTUC(13)GN06	Dangerous Goods Safety Advisor (DSGA) Annual Report	Alison Fotheringham	Now on Website.	
RAMTUC(13)GN07	Fissile Exceptions Guidance & Flow Chart **	Ceinion Thomas	Transferred to FESG	
<del>RAMTUC(13)GN08</del>	<del>Excepted Matter, Nuclear Liability &amp; Marine Cargo Insurance</del>	<del>Steve Capner (Lead)</del>	<del>No longer required</del>	
RAMTUC(13)GN09	Transfrontier Shipment of Radioactive Waste & Spent Fuel	Alison Fotheringham/ Clare Spour	Approved by CIWG members, Now on Website	
RAMTUC(13)GN10	Placarding – Road/Exclusive Use (based on TCSC 1073)	Steve Capner/Kerrie Ross	Complete	
RAMTUC(13)GN12	Environmentally Hazardous Substances	Steve Capner	This has been published; however, it will now be withdrawn.	
RAMTUC	Placarding – Rail (General & Exclusive Use)	Class 7	Scope of Work to be produced and then contracted out.	

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**