



RAMTUC Consignment Issues Working Group (CIWG)			
Chairperson:	Mark Geldard (Sellafield Ltd)	Secretary:	Kirsty Barnes (LLWR Ltd)
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MINUTES OF THE 21st RAMTUC CONSIGNMENT ISSUES WORKING GROUP

Date: Tuesday 1st November 2016

Present:

Mark Geldard (MG)	(Sellafield Ltd) (Chairperson)
Kirsty Barnes (KB)	(LLWR Ltd) (Secretary)
Kirstie Eden (KE)	(Rolls Royce)
Rachel Brownlow (RB)	(WEC Ltd)
Rachel McNicholas (RMcN)	(Magnox – Harwell)
Gill King (GK)	(EDF)
Gary Faulkner (GF)	(Babcock Marine & Technology, Devonport)
Jarod Bowden (JB)	(INS)
Jennifer Evans (JE)	(URENCO)

1. APOLOGIES FOR ABSENCE

Apologies were received from GE Healthcare, DSRL.

2. CHAIRPERSONS WELCOME AND COMMENTS

MG thanked everyone for attending and introductions were given around the table.

Safety Share

Due to the adverse weather on the day of the meeting, all present were asked to take care on their journey home.

GF raised an incident that occurred when wearing too much PPE which resulted in the individual tripping and not having their hands free to stop the fall and dislocating their collarbone.

3. Minutes of the last meeting

The minutes from the last meeting were accepted and will be added to the RAMTUC website.

4. Actions

See appendix 1.

One new action was assigned to MG in the review of the actions.

New Action 21/01: MG to confirm with the Secretariat on the progress of the website changes.

5. Forum Feedback

RAMTUC

The authorisation from DfT for carrying Asbestos in IP-2 containers has expired and has not yet been extended; this is causing Magnox some issues. This work is not with the RAMTUC chair to progress.

New Action 21/02: RMcN is going to issue the RAMTUC minutes through KB to the CIWG members.

TCSC

John Harvey is retiring at the end of march, Sean Duvall from INS will become the new chairman. Iain Phimister is replacing John as TCSC Ref for RWM and Lisa Mughan (RWM) is to replace Iain as Technical Secretary.

ONR have issued 3 Technical Assessment Guides (TAG) on Engineering, Shielding and Criticality. The TCSC Low Temperature Sub-group meeting was held to present four options:

- Reasoned argument
- Extrapolated analysis
- Calculated data and
- Validated Data.

Codes of Practice Update:

- TCSC 1006 – Tie-down. Work on-going.
- TCSC 1078 – Self-approved Packages – Working group to be set up to develop requirement of revision.
- TCSC 1096 – Testing SA Packages – to be updated in parallel with TCSC 1078.
- TCSC 1089 – Excepted Packages – Work on going.
- TCSC 1087 – FEA Work ongoing.
- Package Licence Applications scope is being developed by Crofts.

RADSAFE

There was supposed to be two presentations to the new contract to provide the Emergency Notification Call Centre (ENCC) to RADSAFE, however CNC were not ready to present at the meeting. NCEC gave their presentation. NCEC are a true 24 hour, 365 day response team, the company was set up 43 years ago to respond to major hazardous road incidents, known as Chemsafe. All emergency responders are chemistry graduates and are trained for six months, followed by a two day test.

New Action 21/03: KB to issue the NCEC presentation to CIWG members.

At the RADSAFE meeting Gerry Wood shared the changes to be made within ONR from April 2017, the cross Programme will cease to exist; all other programmes will remain. The work of the sub programmes will continue.

WNTI

At the last semi-annual meeting in December, the first back end transport meeting was held for two years and looked at the requirement for new work streams for the future of the group. These included flask decommissioning and waste characterisation.

John Mulkern is the new Secretary General.

The next meeting will be held in Washington DC in June 2017, followed by London at the end of the year

A YouTube video "The White Rose of Drachs" was shown at the Security sub group meeting that showed a student taking control of a vessel and changed its path by 10 degrees without the Captains knowledge.

Regulator Forum Update

MG stated that Martin Porter was working with the regulators regarding flexible permissioning of the use of IP-1 Pactec bags for LSA-II material, the regulator stated that they would prefer if the bags could be IP-2 rated, work is ongoing.

RAMCALC

V1.4 of the RAMCALC has been tested by RMcN how would like others to carry out some reassurance testing especially on LSA material.

New Action 21/04: RMcN to issue V1.4 of the RAMCALC to KB who will issue to CIWG members for testing. All feedback to be sent to RMcN or KB.

6. LFE

The majority of events are still caused by human performance issues, as a group we have looked at the tools each site uses and all sites have similar processes in place.

Quarter 4 Events

There was a peak in training events this quarter.

2016/72 - old labels not removed or replaced with new labels so packages displayed the incorrect UN numbers. Everyone involved in the process should understand their responsibilities, WEC UK have carried out awareness training.

GK stated that EDF have had several issues with Circle Express contracted drivers.

SL Transport Team Leader sent a consignment off site without any documentation. The driver had asked his Team Leader for the paperwork but was told that he didn't need any. The paperwork was in the Team Leaders office for the driver.

2016/73 – Missing Labels. The levels of checks within a procedure were reduced and one of the packages was not labelled. Procedures should not be too onerous but also need the correct level of detail to ensure that all relevant checks take place.

The use of check lists could reduce some events but they should not be relied on completely.

2016/78 - Bottles incorrectly labelled. It was not clear if the stillage or the bottle were the package. Ensure all guidance provided is clear and concise.

2016/81 – Damage to a trailer. The trailer was loaded and had travelled to the port for onward consignment, when it was discovered that the trailer was damaged, upon investigation it was discovered that the damage was pre-existing prior to loading. The flask was recovered and sent back to EDF under the same consignment note. The trailer was repaired and the shipment was consigned two weeks later. This was good learning to share as the contingency plans were tested. Need to consider the impact that one event can lead to another.

Annual Report

MG thanked KE for producing a good report.

KE offered to put the report in a more formal template.

All companies to ensure they report pre-consignment near misses.

There was a spike in S.P.1 events (Shipments, packages) Is this due to changes in the regulations or because of the industry we work in? Is there anything we can do to reduce these events?

We need to address any peaks and look at how, as a group, we can address these issues. The introduction of checklists should see a reduction in events going forward. We need to keep using the human performance tools and reviewing training for all participants and ensure that they are aware of their responsibilities.

On completion of DGSA reports some companies hold formal meetings were any actions can be assigned so any learning can be embedded in their organisations.

EDF sites safety shares include one full week throughout the year of dangerous goods, EDF recognised that 40% of their employees are involved in dangerous goods. They have just spent two years educating personnel on the dangerous goods.

RB recommended that simplifying processes would reduce the error traps.

MG asked whether the CIWG annual LFE report should be taken to the Safety Directors Forum to influence sites on changes that need to be made to reduce LFE. It was agreed that this was a good idea.

New Action 21/05: MG to request the CIWG annual LFE report is discussed between RAMTUC and the Safety Directors Forum for their support influencing sites to reduce the number of events.

New Action 21/06: KB to request a document number from the RAMTUC Secretariat for a document number of the annual LFE report.

New Action 21/07: All companies to provide the number of moves to KE for 2016 to put the events into perspective. Please can this be done by 03/03/2016 to allow KE to complete the report by the middle of March for submission to the main meeting.

MG to peer review the annual LFE report prior to submission to the main group.

7. Operational

Packages/packing issues

On receipt of a UN approved composite drum at NNL Springfield's, the weight was higher, upon investigation it was found that the liner seam had detached from the opening, there had been an ingress of rain water. Four drums were affected by this issue.

The Certificate of Approval for a radiography source still references TS-R-1; JB advised GF that there should be a Design Safety Report (DSR) to provide a justification for the use of this certificate. JB to forward the information to GF outside the meeting.

Magnox use a Croft FHSIO for LSA-II material, the associated DSR is very restrictive and only allows four radionuclides. RMcN advised that the DRS was difficult to obtain so ensure that the contract with package owners specify that the DSR will need to be viewed and check any restrictions prior to purchasing.

SL were shipping 1,000 Smart lift IBC's of VLLW, which was non-RAM but contained Asbestos, the UN certificate was provided, however there was an annex to the certificate that stated that only UN3077 could be consigned using this certificate. The certificate has since been updated to include UN2212, so the use of these IBC's is still very restrictive.

INS received a certificate from an Italian company for a Type A ISO; however, ISO's cannot be certificated as Type A as they cannot be drop tested.

The Novapak licence is in draft, the first new pair are at Magnox Harwell site. PCM moves will restart soon.

Carrier issues

EDF have had a number of issues with Circle Express, who have been subcontracted by HTSL, including drivers not carrying their ADR licences or not having the correct class training, missing

placards. They were also using a transport hub to change drivers and vehicle. HTSL now use Top Speed.

KE stated that RR have had the same issues with Circle Express.

JE stated that one of Circle Express drivers was abusive with the security guards at the entrance to their site.

Circle Express are not on the carriers audit list.

A Top Speed driver arrived at LLWR to take a RAM package he was not trained to carry class 7, another driver was sent to take the package.

Due to increases in security SL only allow material being consigned to and from their site in vehicles, no other RAM is allowed, this can be very costly.

The findings from the carriers audit undertaken on Geodies are now with them to address. It was questioned whether there was a follow up process after the completion of the audits, but the group were not aware that there was. Harwell and other members would like feedback as they were planning on using Geodies in the future.

New Action 21/08: MG to ask the main group for feedback from the Carrier audits and confirm if there is a follow up process to resolve any issues highlighted during the audits and if they can be shared through the CIWG.

EDF and Magnox both carried out an audit on Furnells and found no issues.

LLWR had an event where a Furnells driver missed the turn off for their site, he thought he had found a suitable place to turn on the other side of a bridge, however, he could not driver over the bridge due to the size of the load and vehicle, he attempted to reverse but misjudged the turning circle of the trailer and made contact with the bridge dislodging a number of bricks. The container suffered minor damage; there was not breach of containment.

GK asked whether CTS had approached anyone of offer carrier services. They had contacted Tony Grange at WEC UK. EDF are considering using them for low level moves.

8. General topics

ONR Audits/Site Specific Audits

EDF have an ONR audit on 14/15th March, they have received a draft agenda, and the audit will cover packaging, maintenance and design.

Magnox had the same audit two weeks ago; the only finding was the record retention schedule did not align.

SL found the agenda that they were sent for the audit which was carried out on Site Licence 5 was vague.

JE evens also stated that URENCO's ONR audit also looked at documentation retention.

ONR will audit INS on their cyber security in the next twelve months.

Emergency exercises

INS had a Cat I shipment with enhanced arrangements, ORN agreed that two additional RPA's should follow the consignment, but due to adverse weather they had to deviate from the planned route, the plan

allowed for deviation. There was some confusion over who was in control of decision making; this should be clear in the plan upfront. Ensure that all calls are logged.

RR have a convoy commander in control.

EDF carried out a full scale exercise in quarter 3. Furnells were involved as carrier; they found the experience very beneficial.

Magnox are carrying out a full review of their procedures and where RADSAFE fits into these.

RR carried out a multi-agency exercise involving the police and fire department, all involved picked up some good points for learning. There was an issue with the police rushing in.

EDF are planning a control of contamination exercise.

Legislative updates

The 120 day review of SSR-6 is now closed.

New Action 21/09: GK to issue any correspondence from the SSR-6 120 day review.

The Class 7 website has two free presentations which give an overview of changes to the regulations, one for class 7 and one for all other dangerous goods.

Phil McNamara is carrying out update training for all EDF sites. It was asked whether this could be shared with CIWG members and any future regulatory changes could be put together by members of the CIWG for dissemination of training through member companies.

New Action 21/10: GK to ask Phil McNamara whether EDF would share their training updates with CIWG members.

9. Training

RAMTUC level 3

The RAMTUC level 3 training was held in Manchester 21st – 23rd February 2016. Two attendees of the CIWG were on the training course and provided some feedback.

The room as too small, especially for the amount of hand-outs each individual needed.
There were numerous mistakes in the course hand-outs.
The slides from the course were not available for the delegates.
Some of the course was rushed to cover all subjects in the allocated time.
It was good to have a regulator on the course for their view point.

MG asked who the course was pitched at. Are we expecting the course to be aimed at company Subject Matter Experts (SME's)?

JB questioned whether everyone who goes needs to go and whether each company has the correct training requirements for their personnel. Could the course be linked to training requirements?

The course needs to be right. Are the joining instructions clear?

Should the DGSA course and exam have a specialist Class 7 section for those who need it?

New Action 21/11: MG to speak to the Training Subgroup about the Level 3 training.

Training/seminars

The VCA seminar is being held in June 2017.

GF had attended the LLWR Waste Loading Plan training, it was a two day course and he found it very helpful.

10. Guidance notes

The rail placarding guidance note will be published on the RAMTUC member's website.

11. AOB

The Secretariat for RAMTUC has asked all subgroup chairs to provide her with the delivery from the last year and what is expected to be delivered for the year to come.

This year the CIWG has completed the rail placarding guidance note, the introduction of detailed sharing from one event at each meeting and the RAMCAL will be issues following final checks.

Next year the CIWG will produce and publish a guidance note for Special provisions 172 & 290, improvements will be made to the RAMTUC website and the continued sharing of LFE.

12. Future meeting dates

The next meeting will be held in Birmingham, the non-class 7 meeting will be held the afternoon of Tuesday 2nd may and the CIWG meeting will held the following day, Wednesday 3rd May.

The main RAMTUC meetings have been set up for 2017 so the dates for the CIWG meetings will be aligned to these meetings and the period end for the LFE.

APPENDIX 1 ACTIONS TABLE

Action No	Action	Comments/ Status	Target Completion Date
18/03	RMcN and AG to send out driver emergency response cards that they use.	Complete. Emergency response cards have been issued.	Complete
18/07	RMcN to send out tool box talk from Dep U event if permitted	Ongoing.	Following February 2017 Meeting
18/11	All to review Placarding Guidance Note before next meeting	Complete. The guidance note has been reviewed and will be published on the member's area of the RAMTUC website.	Complete
19/01	MG to speak to ONR via RAMTUC to see if they would issue a standard reporting criteria for companies and to see whether they can review the process to allow feedback from the reports.	Complete. Note Meeting 20: Martin Porter has sent a proposal paper to ONR for the possible changing of the wording of the reporting criteria to include "safety significant". Note Meeting 21: This action is now with ONR; feedback will be given once the action has been progressed.	Complete
19/04	MG to consider the impact of UN3363 requiring Competent Authority approval.	Complete. Note Meeting 20: This action has been transferred to MG. Note Meeting 21: MG has checked and there is no impact. Action can be closed.	Complete
19/05	AF to share the diagram which defines RADSAFE's involvement in the stage of a transport incident.	Ongoing.	May Meeting
19/06	AF to share a copy of the briefings provided to drivers for what they need to do	Complete.	Complete

	during an emergency.	AF has shared the briefings with CIWG members.	
19/07	KB to send calendar invites for the dates for LFE submission and date the report is due out.	Complete. Note Meeting 20: This action will be handed over once a new secretary has been identified. Note meeting 21: this will now be completed by the new Secretary.	Complete
19/08	KE to add a column to the spreadsheet as to why the TS codes were selected.	Complete. Spreadsheet has been updated.	Completed
19/11	KB to issue SL presentation to all CIWG members.	Complete. Document has been issued.	Complete
19/12	GK to confirm with Phil McNamara that all course handbooks have been updated.	Ongoing. Note Meeting 20: Only some of the handbooks have been updated, GK will confirm once they are all done. Note Meeting 21: Feedback was given following the RAMTUC Level 3 training.	May Meeting
19/13	Any existing guidance notes will need to be reviewed in line with the new regulations when they are published. This will be added to the agenda for discuss at Novembers meeting.	Complete. A review has been carried	Complete
20/01	MQ/KE to add one more TS07 to quarterly report that was submitted late, once added the report can be re-issued.	Complete. This will be done for the next quarter.	Complete
20/02	RMcN to share the brief from the Magnox drum event.	Ongoing	Following February Meeting
20/03	GK to present the LFE from the EDF trailer breakdown at the next meeting.	Ongoing	February Meeting
20/04	RMcN is to add the codes to the Magnox events on the LFE spreadsheet.	Complete	Complete

20/05	GK to raise the question at the Main Group as to how to progress as Geodis are important Contractors for Magnox and EDF.	New Action	February Meeting
20/06	AG to circulate the matrix that she has compiled following responses from other companies detailing their training requirements.	Ongoing	May Meeting
20/07	All to review the Rail Guidance Note and Mixed Ram/Non RAM Guidance Note prior to the meeting in February, then they can be finalised and published.	Complete. The GN is now ready to publish on the RAMTUC website.	Complete
20/08	DC to produce two Guidance Notes on SP 172 and SP 290. It was asked whether a guidance note is required for Special Provisions 172 and 290, RMcN and AF are to check as it is believed there is a flowchart that could be updated.	Ongoing.	May Meeting
20/09	MG to ask RAMTUC if the following statement is OK to use in the two guidance notes for SP 172 and SP 290. "It is the interpretation of the DGSAs that any IP-2 or higher package may alternatively be claimed as a PG II package, under ADR 6.1.1.2, provided that it physically meets the requirements of the Packing Instruction. If using a package in this manner, contact a DSGA for approval."	Complete. The wording cannot be used in the Guidance Note. Each Site needs to consider the wording carefully for their local rules.	Complete
20/10	MG to confirm what LFE can be put on the member's area of the website.	Complete. It was agreed only the executive summary would be used.	Complete.
20/11	Members to review the website and comment what improvements they would like to see.	Complete. Ideas were shared at the November meeting. A new action was placed on MG to confirm with the Secretariat on the progress of the website changes.	Complete
20/12	DC to share electronic copy of EDF's Dangerous Goods Note.	Complete. Dangerous Goods Note has been issued.	Complete
20/13	KB will issue a document outlining the tasks required by the secretary to all members.	Complete Information has been handed over to the new	Complete

		secretary, Rachel Brownlow.	
21/01	MG to confirm with the Secretariat on the progress of the website changes.	New Action	May Meeting
21/02	RMcN is going to issue the RAMTUC minutes through KB to the CIWG members.	New Action	Prior To May Meeting
21/03	KB to issue the NCEC presentation to COIWG members.	New Action	Prior to May Meeting
21/04	RMcN to issue V1.4 of the RAMCALC to KB who will issue to CIWG members for testing. All feedback to be sent to RMcN or KB.	New Action	May Meeting
21/05	MG to request the CIWG annual LFE report is discussed between RAMTUC and the Safety Directors Forum for their support influencing sites to reduce the number of events.	New Action	Next RAMTUC Meeting.
21/06	KB to request a document number from the RAMTUC Secretariat for a document number of the annual LFE report.	New Action	Prior to May Meeting
21/07	All companies to provide the number of moves to KE for 2016 to put the events into perspective. Please can this be done by 03/03/2016 to allow KE to complete the report by the middle of March for submission to the main meeting.	New Action	03/03/2017
21/08	MG to ask the main group for feedback from the Carrier audits and confirm if there is a follow up process to resolve any issues highlighted during the audits and if they can be shared through the CIWG.	New Action	May Meeting
21/09	GK to issue any correspondence from the SSR-6 120 day review.	New Action	Following Februarys Meeting
21/10	GK to ask Phil McNamara whether EDF would share their training updates with CIWG members.	New Action	May Meeting
21/11	MG to speak to the Training Subgroup about the Level 3 training.	New Action	May Meeting

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	
RAMTUC(13)GN08	Excepted Matter, Nuclear Liability & Marine Cargo Insurance	Steve Capner (Lead)	No longer required	
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(17)GN15	Placarding – Rail (General & Exclusive Use)	Duncan Chase	Approved – Waiting to be published.	
RAMTUC	SP 172 and SP 290.	Duncan Chase	In progress.	

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 14th November 2012