



RAMTUC Consignment Issues Working Group (CIWG)			
<b>Chairperson:</b>	M Geldard (Sellafield Ltd)	<b>Secretary:</b>	R Brownlow (WEC UK)
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## MINUTES OF THE 22nd RAMTUC CONSIGNMENT ISSUES WORKING GROUP

**Date:** Tuesday 2<sup>nd</sup> May 2017

**Present:**

Mark Geldard (MG)	Sellafield Ltd - Chairperson
Rachel Brownlow (RB)	WEC UK - Secretary
Kirsty Barnes (KB)	LLWR Ltd
Kirstie Eden (KE)	Rolls Royce
Penny Atkin (PA)	Magnox
Duncan Chase (DC)	EDF
Gary Faulkner (GF)	Babcock Marine & Technology, Devonport
Jarod Bowden (JB)	INS

### 1. Apologies

Apologies received from R McNicolas, M Britt

### 2. Chairpersons welcome and comments

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

### 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.

Actions 19/22 & 21/11 relate to Level 3 training provision. It is noted that feedback from the course has been received and reviewed and the course is being revised for next year (Feb 2018).

Actions 20/08 & 20/09 relate to the sharing of EdF produced guidance notes for special provisions SP172 & SP290. It was noted that the original guidance document stated "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." On consultation with RAMTUC main group it was suggested that this wording should not be used within a guidance note meant for wider use and it should be removed and each site should consider their own local rules regarding the issue of considering IP rated packages equivalent to UN rated packages. It was subsequently queried whether the main RAMTUC committee could provide any further guidance relating to cross usage of IP & UN rated drums. Thus an additional action is placed in this regard.

#### **Action 22/01: MG to discuss with the main RAMTUC group the issue of cross usage of IP & UN rated drums**

Action 21/08 relating to RAMTUC sponsored carrier audits. It is noted that RAMTUC members undertake the initial carrier audit only. If there are any findings from this then the onus is on individual members to ensure any issues have been dealt with prior to use of the carrier.

## 5. Forum Feedback

### RAMTUC

MG indicated that he provided CIWG LFE information to the main RAMTUC meeting in order to gain buy-in to progress with SDF re 'Human Factors' issues. There was a request to provide the main group with further information:

- Summarise type of events which had occurred where HF was the main cause – were the errors due to 'human error' or 'bad process';
- Provision of a matrix to indicate what tools and techniques have been used to reduce re-occurrences of HF related events

MG agreed to pull this information together, in conjunction with KE.

**Action 22/02: MG to pull human factors related events information together (RAMTUC request) from historic LFE data.**

MG re-iterated that we will continue to compile and analyse LFE data to drive continuous improvement.

LLWR are wanting to provide a facility for customers to develop loading plans more easily and there is a group looking at this – RESCALC – which may take ~2 years to develop / implement fully. DC indicated he was on the list to attend this group and would be able to provide feedback on progress.

**Action 22/03: RB to add 'RESCALC' feedback as an agenda item for CIWG mtg.**

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

**Action 22/04: MG to keep the CIWG group updated on the progress of the re-submission of authorisation 465**

It is noted that BEIS (previously DECC) were represented at the meeting to discuss work on-going to align current regulations relating to emergency arrangements (ie, CDG, IRR, REPPIR). JB indicated he had notes relating to the discussion which he could circulate.

**Action 22/05: JB to forward notes relating to discussion with BEIS.**

### TCSC

Next meeting is end May so feedback will be provided next time.

### RADSAFE

It is noted that NCEC have been awarded the RADSAFE contract and KB issued the NCEC overview presentation to CIWG members. There is a RADSAFE group meeting arranged in the next few weeks and thus it is anticipated more information regarding any changes will be available for the next CIWG mtg.

### WNTI

Next meeting is in June and so feedback will be provided next time.

### Regulator Forum Update

No specific feedback

### RAMCALC

V1.4 of the RAMCALC has been tested and no significant comments received and thus can be issued.

## 6. LFE

The majority of events can be attributed to 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

2017/01&02 – it was noted that it would be useful to receive feedback on these events from GE Healthcare.

**Action 22/06: MG to request from GE Healthcare that any learning from these AIR events be shared with the group.**

2017/03 – event related to the UN packing certificate and on interrogation the package was only approved for one UN number only, even though it initially appeared to be a common use package. This event highlights the need to scrutinise the package approvals and the suitability for the material.

2017/04 – related to consignors being put under time pressure during paperwork preparation as packing was not completed to expected timescales

2017/07 – involved consigning the wrong package from a storage area. Possible improvements from this event have involved the use of traffic light labels to indicate when packages are ready for despatch.

EdF event for sharing – slides provided during the meeting and the event related to the despatch of reactor samples in Type B(U) flask. The flask arrived by rail and was loaded onto a trailer for road transport. Upon vehicle inspection it was apparent that the chassis of the vehicle was compromised and unsuitable for onward transport. The flask was therefore lifted back onto the rail wagon and returned. Emergency arrangements were not required in this case, however, the incident provided learning with respect to improved contingency arrangements and lines of communication (for every stage of the journey) which are especially important when dealing with international shipments.

### Annual Report

Nothing further – presented at previous mtg.

## 7. Operational

### Packages/packing issues

There was a general discussion relating to future package requirements & EdF highlighted they were looking at the needs for plant decommissioning operations and waste storage and disposal. This included personnel involved in these specific disciplines to look at more accurate forecasting for the future.

SL are also looking at decommissioning a number of transport packages and considering how this can be undertaken with the aim of decontaminating the main components to free release levels. In addition, SL indicated they had significant amounts of asbestos contaminated soils to deal with. MG noted that <0.1% asbestos in a material is not classified as hazardous waste and the Waste Management area had assumed that this also meant it was not classed as Dangerous Goods. However, on investigation it is noted that there is no lower limit for asbestos contamination in relation to DG. This essentially would result in asbestos contam soils needing to be packaged, rather than moved as a bulk material. SL are now looking to compile an argument as to why this particular waste stream need not be classified as class 9.

### Carrier issues

Nothing specific to report

## 8. General topics

### ONR Audits/Site Specific Audits

EdF had an ONR audit covering:

- package management, looking at recovery of design and maintenance records
- training – records of what people in different transport roles are trained to do, along with the systems to manage training.

EdF also noted that they were concentrating on non-RAM internal audits over the next 18 months in order to improve their non class 7 processes.

### Emergency exercises

Nothing specific for this meeting

### Legislative updates

Nothing specific, however JB recalled reading about some changes relating to transport logistics, which he will forward to MG.

**Action 22/07: JB to forward information relating to transport logistics legislation changes to MG for future discussion.**

## 9. Training

### RAMTUC level 3

Feedback from the recent level 3 training is being considered and the intention is to revise for next year.

### Training/seminars

The VCA seminar is being held in June 2017. DC / MG are attending so will be able to feedback at the next meeting.

## 10. Guidance notes

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

## 11. AOB

It was noted that there was some concern that due to changes in personnel at the different sites that the meeting invitations and LFE requests were not reaching the right people.

**Action 22/08: MG to send out tester emails (for meeting invitations, and for LFE feedback) to the group to confirm we have appropriate contacts at all the relevant sites.**

There was a discussion around NLI and the classification of Nuclear Material vs Excepted Matter, and it was highlighted that it could be an area which requires further clarification & guidance.

**Action 22/09: MG to develop a problem statement in relation to LC5 / NLI requirements**

It was noted that the Secretariat role for RAMTUC has changed and website issues are no dealt with by Ryan Lynch.

**Action 22/10: MG to confirm requirements of CIWG to Ryan in order that our area of the website is updated and contains the appropriate documentation (eg Guidance notes, LFE etc).**

LFE/TS07 – it was noted that it was the intention of the ONR to modify the definition of report under TS07 to refer to a need for 'safety significant' issues only. It is noted that we need to keep abreast of the requirements going forward. In addition there is an ONR review underway relating to the way they charge out there time, which may impact SLCs / carriers.

## **12. Future meeting dates**

It was suggested that going forward there may be the potential to combine the CIWG Non Class 7 meeting.

**Action 22/11: MG to discuss with GK the feasibility of combining the CIWG & Non class 7 mtg & consider agenda going forward.**

The next CIWG meeting will be held in Manchester, with a suggested date of Tues 1<sup>st</sup> Aug., as the main RAMTUC meeting is 20<sup>th</sup> Sept.

## APPENDIX 1 ACTIONS TABLE

Action No	Action	Comments/ Status	Actionee	Target Completion Date
18/07	RMcN to send out tool box talk from Dep U event if permitted	Complete		Complete
19/05	AF to share the diagram which defines RADSAFE's involvement in the stage of a transport incident.	Ongoing		Complete
19/12	GK to confirm with Phil McNamara that all course handbooks have been updated.	Complete  Note: mtg 22. After Level 3 course feedback a review of this course & material is underway		Complete
20/02	RMcN to share the brief from the Magnox drum event.	Complete		Complete
20/03	GK to present the LFE from the EDF trailer breakdown at the next meeting.	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.	Complete – see 21.08 below		Complete
20/06	AG to circulate the matrix that she has compiled following responses from other companies detailing their training requirements.	Complete		Complete
20/08	DC to produce two Guidance Notes on SP 172 and SP 290.	Ongoing	Duncan Chase	Prior to Aug mtg
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
21/01	MG to confirm with the Secretariat on the progress of the website changes. Noted that FH is retiring and website maintenance is handed over to Ryan Lynch. <b>Further confirmation required as to who will deal with other secretariat duties, eg, event organisation etc</b>	On-going	Mark Geldard	Prior to Aug Meeting
21/02	RMcN is going to issue the RAMTUC minutes through KB to the CIWG members.	Complete		Complete
21/03	KB to issue the NCEC presentation to CIWG members.	Complete		Complete

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.	Complete		Complete
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.	Complete		Next RAMTUC Meeting.
21/06	KB to request a document number from the RAMTUC Secretariat for a document number of the annual LFE report.	Complete		Complete
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.	Complete		Complete
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.	Complete		Complete
21/09	GK to issue any correspondence from the SSR-6 120 day review.	On-going	Gill King	Aug mtg
21/10	GK to ask Phil McNamara whether EDF could share their training updates with CIWG members.	On-going	Gill King	Aug mtg
21/11	MG to speak to the Training Subgroup about the Level 3 training.	Complete		Complete
22/01	To discuss with the main RAMTUC group the issue of cross usage of IP & UN rated drums	New Action	M Geldard	Feedback Aug Mtg
22/02	To pull human factors related events information together (RAMTUC request) from historic LFE data	New Action	M Geldard	Prior to Aug Mtg
22/03	To add 'RESCALC' feedback as an agenda item for CIWG mtg	New Action	R Brownlow	Prior to Aug Mtg
22/04	To provide updates to CIWG on progress of 465 re-submission (& add to CIWG agenda)	New Action	M Geldard / R Brownlow	Aug Mtg
22/05	To forward notes relating to BEIS discussions	New Action	J Bowden	Prior to Aug Mtg
22/06	To request from GE Healthcare that any learning from the AIR LFE events be shared with the group	New Action	M Geldard	Prior to Aug Mtg
22/07	To forward information relating to transport logistics legislation changes to MG for future discussion	New Action	J Bowden	Prior to Aug Mtg
22/08	To send out tester emails (for meeting invitations, and for LFE feedback) to the group to confirm we have appropriate contacts at all the relevant sites	New Action	M Geldard	Prior to Aug Mtg
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22/10	to confirm requirements of CIWG to Ryan in order that our area of the website is updated and contains the appropriate documentation (eg Guidance notes, LFE etc	<b>New Action</b>	<b>M Geldard</b>	<b>Prior to Aug Mtg</b>
22/11	To discuss with GK the feasibility of combining the CIWG & Non class 7 mtg & consider agenda going forward	<b>New Action</b>	<b>M Geldard</b>	<b>Prior to Aug Mtg</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	
RAMTUC(13)GN08	<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(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 14<sup>th</sup> November 2012**