



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

Date: Tuesday 19th September 2017

Present:

Mark Geldard (MG)	Sellafield Ltd - Chairperson
Rachel Brownlow (RB)	WEC UK - Secretary
Alison Fotheringham (AF)	LLWR Ltd
Kirstie Eden (KE)	Rolls Royce
Gill King (GK)	EDF
Gary Faulkner (GF)	Babcock Marine & Technology, Devonport
Jarod Bowden (JB)	INS
Mark Britt (MB)	WEC UK
Lucy Mugan (LM)	NDA
Jonathan Kendrick (JK)	Urenco UK
Dave Evans (DE)	GE Healthcare
Mark Flynn (MF)	LLWR (Part time)
Phil McNamara (PMc)	EdF (Part time)

1. Apologies

Apologies received from R McNicolas, K Barnes

2. Chairpersons welcome and comments

MG thanked everyone for attending and introductions were given around the table. A recent safety share from NHS was discussed in relation to the dangers of wearing identity lanyards at inappropriate times. In this instance a nurse had attached keys to her lanyard which she continued to wear during her car journey home. An unfortunate accident occurred and her vehicle airbag deployed which compressed the lanyard and keys into the chest area causing significant injury. This highlights the risks associated with incorrect / unnecessary use of the lanyard.

GK noted that Duncan Chase (EdF) will be moving roles and thus it is unlikely he will be attending any further meetings. MG thanked him for his contribution to the group, including the recent guidance notes which will prove very useful.

3. Minutes of the last meeting

The minutes from the last meeting were accepted, after removal of Action 22/7 which was deemed to be a duplicate of 22/5. These minutes will be added to the RAMTUC website.

4. Actions

See appendix 1.

Action 21/01 – Ryan Lynch is the contact for website issues, and Elysha Foley is the contact for secretariat issues.

Actions 22/01 relates 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 DGSA 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. MF indicated that it was unlikely that blanket package approvals could be provided for the cross usage of drums, due to the variability of materials, and it would be more appropriate to look at specific types of material. EdF have a process to allow the cross usage of IP and UN rated drums & thus it was requested that they outline the process used in order that other sites can determine whether they can put something similar in place.

Action 23/01: GK to outline the process EdF use to allow the cross usage of IP and UN rated drums.

Action 22/04: Re-submission of Authorisation 465 has been completed and issued as Authorisation 501, which covers mainly the use of IP2 and Type A packages for material containing asbestos. MG noted that this means that there will still be issues in relation to the movement of bulk quantities of material that are contaminated with asbestos.

Action 22/05: JB provided some feedback regarding communications with BEIS – this has been circulated amongst the group.

Action 22/09 – further discussion around LC5 / NLI requirements plus it was highlighted that new Excepted Matter Regulations would come into force next year, which also impacts on NLI. It was noted that there was confusion regarding the application of these regulations and clarification from RAMTUC lawyers would be useful. Thus action 22/09 is expanded to

Action 22/09: 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.

5. Forum Feedback

RAMTUC

Discussions are ongoing with BEIS in relation to the implementation of the Basic Safety Standards Directive, and specifically transport Emergency Response Arrangements (see action 22/05 response). The aim is to try and reduce any additional burden on the industry.

It was noted that there is only the funding for 1 RAMTUC carrier audit per year going forward and any additional audits will need to be covered by individual users. Ideally individual companies will perform audits using the RAMTUC model and share these audits, if requested.

Discussion relating to RAMTUC subgroups was also undertaken, in relation to rationalising peoples' time / travel required. In relation to the CIWG Class 7 and non-class 7 it was thought these could be combined. It was suggested that the CIWG mtg could do more in respect of promoting the best practice that has been developed as a result of events, which all sites could then use to prevent other events. This should be considered when discussing LFE and any particular areas of good practice brought to the RAMTUC main group for discussion. There was also a challenge put to the CIWG non-class 7 group to provide more information with regard to site's non-class 7 transports (DG transported / suppliers / carriers) to highlight common elements for audits etc.

WNA – the group noted there is a perceived gap within current NLI provision and so work is ongoing to see if this gap can be filled. The reduction in fissile quantities allowed to be carried under fissile exception rules was also discussed and the potential impact of this.

TCSC

It was noted that there was an aim to provide a paper for the RAMTRANS conference next year regarding the work of RAMTUC / RADS SAFE / TCSC. Also further consideration of the application of para 648 issue (20% increase in dose rate) is on-going; whether there should be a deminimus level below which this need not be demonstrated, and whether the regulations can be changed to reflect this.

RADS SAFE

Note: NCEC is the new contractor for provision of the RADS SAFE service. In addition the contacts for the RADS SAFE working group have changed to Terry Kelly and Rose Morris and emails addresses have changed.

Action 23/02: AF to forward new RADS SAFE contact information to the group.

Regarding Emergency Exercises, RADS SAFE is producing a draft guidance document. In addition, Magnox have put forward a risk based matrix to assist with deciding how detailed an exercise is required, considering the number of shipments / type of packages & material / competency of resources. Industry is awaiting feedback on this approach. Also there will be a quarterly test of the RADS SAFE on-call personnel to test the response.

WNTI

No feedback available.

Regulator Forum Update

No specific feedback

RAMCALC / RESCALC

It was noted that RAMCALC feedback / assistance has been difficult to obtain this quarter and this will need monitoring going forward.

6. LFE

There were a number of late submissions of LFE this quarter which makes it difficult to collate any meaningful data. ***Thus, it was re-iterated that the requirement is that LFE be provided at least 3 weeks before the CIWG meeting***, with the aim of circulating the report a week before the meeting to give people the opportunity to review.

With regard to air transports DE agreed to provide feedback on recent air transports; points of learning and good practice.

Action 23/03: DE from GE Healthcare to share learning / good practice gained from their significant experience with air transports.

AF brought up that it appeared that there were a number of events related to driver training / licence suitability, however they were not all categorised in the same way (eg 2017/36 & 2017/43). It was noted that people would find it be useful for a peer review of LFE to be undertaken to confirm whether similar events are being categorised in a consistent manner across the sites. It was agreed that the members would take it in turns to review the LFE (in terms of code assignation and identification of common issues) to provide feedback at each meeting in order to prompt further discussion:

23/04: MB & AF to provide feedback on LFE at next meeting (in terms of code assignation and identification of common issues)

It was highlighted that it would be useful to be able to sort the events in relation to causal codes.

23/05: KE to amend LFE spreadsheet to allow sorting via causal codes.

2017/38 – an event relating to an increase in package radiation readings on package receipt. An investigation is underway but it is thought that the increase occurred as a result of a shift within the load due to changes in material packing orientation.

2017/41 – historically, contamination swabs on flasks were only undertaken for α if high levels of $\beta\gamma$ were obtained. However, this event shows that higher levels of α have been found when $\beta\gamma$ levels are low. Thus, a revised monitoring protocol for alpha contamination has been proposed and is awaiting roll out across the EDF Fleet.

MF noted that Paul Unsworth is chair for the SDF sub-group looking at Human Factors and suggested it may be worth getting in contact to seek further advice on further progress to be made in relation to the Transport area Human Factors events.

Action 23/06: MG to contact Paul Unsworth to seek advice on how the CIWG LFE could be used to further reduce Human Factors events.

An issue was identified relating to potential differences in contamination monitoring & calculation, and also how this is reported to the Regulator & by whom (ie, consignor / consignee). This issue will be reviewed in greater detail in next quarter LFE but has led to a desire for increased harmonisation between sites in relation to contamination monitoring.

JB advised that INS EH&S department have been highlighting human performance at local briefs and at both internal and external LFE meetings this year, with the human performance tool ‘the deadly dozen’ being promoted. JB had briefly reviewed against the human performance events from 2016 and it seemed the majority of deadly dozen / problem areas could be applicable for each event. JB felt this was a good starting point for development of or reviewing of instructions/procedures etc and would make it available to members.

Action 23/07: RB to circulate ‘The Deadly Dozen’ brief for review / comment at next meeting.**7. Operational**Packages/packing issues

MF highlighted a few on-going package issues worthy of note:

- Issues with package lids being placed such that they cut into the seals – further work on-going to resolve these issues;
- Record retention in relation to packages and the importance of retaining package test information for package re-licensing. This could prevent the need for package re-testing;

MG noted that SL were looking at becoming the design authority for cuboid flasks going forward and this approval process is underway and the WAGR box is currently being relicensed by INS for SL.

Carrier issues

WEC highlighted the difficulties when reliant on using 1 carrier as they were experiencing difficulties with TRANSRAD (France) not making timely & correct notifications to appropriate Regulators.

There was a discussion relating to the number of Class B carriers going forward and the number may reduce due to increasing ONR audit costs, which may cause the industry issues in the longer term. The upcoming Class A & B carrier meeting with the ONR was also mentioned (19th Oct) and a brief would be provided at the next meeting.

Action 23/08: MB to provide brief on issues raised at ONR Carrier Stakeholder meeting.

EdF feedback that they were happy with services provided by Topspeed, as they provided a good service at short notice.

8. General topics

ONR Audits/Site Specific Audits

No ONR audits / feedback to report.

EdF reported an internal audit at Heysham which brought out no significant issues but highlighted areas where different levels of procedures needed to be consistent / join up.

Emergency exercises

LLWR noted that they were holding an exercise during October which is to include 3 distinct stages:

- Stage 1 – desktop for Transport Ops to deal with initial response;
- Stage 2 – desktop to develop a Recovery Plan;
- Stage 3 – implementation of the Recovery Plan.

EdF stated that an emergency exercise based at Sizewell B power station involving external Emergency Services (ES) had been undertaken during the month of September. Initial feedback is that it took a long time for information from the event scene to reach the Consignor and there was a subsequent delay to establish the Emergency Control Centre. The ES seemed to rely on their own RPAs for advice and focused on retrieving the casualties. A possible explanation is that this was the first exercise involving Sizewell B Power Station in an area that does not have regular contact with a Nuclear Licensed Site; hence the ES may not have been aware of RADS SAFE assistance

Legislative updates

The update of 'The Excepted Matter Regulations' was highlighted which is available on ONR website and which are scheduled to come into force April 2018. Also on the website are the proposed changes to ADR for 2018. The new SSG-26 is also available for comment, closing date Nov 17, and SSR-6 (2018) should also be available from Dec 2017.

9. Training

Training/seminars

The VCA seminar was held in June 2017. MG feedback indicated that there was nothing significant of interest to Class 7 transport operations this time. MG did not pick up anything particularly useful and there was no ONR presence this year.

10. Guidance notes

DC produced guidance notes on SP172 & SP290. Any feedback will be review at the next meeting before the documents are agreed and published on the RAMTUC member's website.

Action 23/09: ALL MEMBERS to review and provide feedback on guidance notes for SP172 & SP290.

11. AOB

RB suggested that there may be benefit in agreeing a common 'Delivery Notification Form' that is acceptable to member sites such that duplicate information does not need to be provided on similar multiple forms for material to be accepted onto a site. It was noted that there would be value in this work and so an action was placed on participating sites to provide their forms for review.

Action 23/10 ALL Participating sites to provide current material Delivery Notification forms to MG for review of commonalities

Action 23/11: MG to review basis for delivery notification requirement, review forms for commonalities & arrange conference call to agree basis for new form.

The next CIWG meeting will incorporate non-Class 7 issues and as such the non-class 7 agenda items need to be included within the main CIWG meeting agenda.

Action 23/12: RB to include Non-class 7 agenda items in main CIWG agenda.

MG reminded members that Sellafield now had a new electronic system for booking deliveries on to site.

Action 23/13: MG to send information regarding the new Sellafield electronic booking system to the members.

12. Future meeting dates

TBC

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APPENDIX 1 ACTIONS TABLE

Action No	Action	Comments/ Status	Actionee	Target Completion Date
20/08	DC to produce two Guidance Notes on SP 172 and SP 290.	Complete	Duncan Chase	Prior to Aug mtg
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 and secretariat duties have moved to Elysha Foley.	Complete	Mark Geldard	Prior to Aug Meeting
21/09	GK to issue any correspondence from the SSR-6 120 day review.	Complete	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
22/01	To discuss with the main RAMTUC group the issue of cross usage of IP & UN rated drums (see minutes for detail)	Complete	M Geldard	Feedback Aug Mtg
22/02	To pull human factors related events information together (RAMTUC request) from historic LFE data	On-going	M Geldard	Prior to Aug Mtg
22/03	To add 'RESCALC' feedback as an agenda item for CIWG mtg	Complete	R Brownlow	Prior to Aug Mtg
22/04	To provide updates to CIWG on progress of 465 re-submission (& add to CIWG agenda)	Complete	M Geldard / R Brownlow	Aug Mtg
22/05	To forward notes relating to BEIS discussions	Complete	J Bowden	Aug Mtg
22/06	To request from GE Healthcare that any learning from the AIR LFE events be shared with the group. Note this will be shared at the next meeting	Complete	M Geldard	Prior to Aug Mtg
22/07	Not required			
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 Contact list sent by EF	Complete	M Geldard	Prior to Aug Mtg
22/09	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.	On-going (action re-worded)	M Geldard	Feedback Nov Mtg
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)	Complete	M Geldard	Prior to Aug Mtg
22/11	To discuss with GK the feasibility of combining the CIWG & Non class 7 mtg & consider agenda going forward A combined meeting will be trialled	Complete	M Geldard	Prior to Aug Mtg
23/01	GK to outline the process EdF use to allow the cross usage of IP and UN rated drums.	New	G King	Nov mtg

Action No	Action	Comments/ Status	Actionee	Target Completion Date
23/02	AF to forward new RADSAFE contact information to the group.	New	A Fotheringham	Nov mtg
23/03	DE from GE Healthcare to share learning / good practice gained from their significant experience with air transports.	New	D Evans	Nov mtg
23/04	MB & AF to provide feedback on LFE at next meeting (in terms of code assignation and identification of common issues)	New	M Britt / A Fotheringham	Nov mtg
23/05	KE to amend LFE spreadsheet to allow sorting via causal codes.	New	K Eden	Nov mtg
23/06	MG to contact Paul Unsworth to seek advice on how the CIWG LFE could be used to further reduce Human Factors events.	New	M Geldard	Nov mtg
23/07	RB to circulate 'The Deadly Dozen' brief for review / comment at next meeting.	New	R Brownlow	Nov mtg
23/08	MB to provide brief on issues raised at ONR Carrier Stakeholder meeting.	New	M Britt	Nov mtg
23/09	ALL MEMBERS to review and provide feedback on guidance notes for SP172 & SP290.	New	ALL MEMBERS	Nov mtg
23/10	ALL Participating sites to provide current material Delivery Notification forms to MG for review of commonalities	New	ALL MEMBERS	Nov mtg
23/11	MG to review basis for delivery notification requirement, review forms for commonalities & arrange conference call to agree basis for new form.	New	M Geldard	Nov mtg
23/12	RB to include Non-class 7 agenda items in main CIWG agenda.	New	R Brownlow	Nov mtg

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 –	
RAMTUC	SP 172 and SP 290.	Duncan Chase	Complete – awaiting group approval	

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