



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 14th November 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 Sumner (GS)	Urenco UK
Jarod Bowden (JB)	INS
Rachel McNicolas (RMc)	RSRL
Kirsty Barnes (KB)	Sellafield
Jack Rimington (JR)	UNS
Dave Evans (DE)	GE Healthcare
Kerrie Ross (KR)	Dounreay
Peter Macheta (DE)	Culham

1. Apologies

Apologies received from M Britt, G Faulkner

2. Chairpersons welcome and comments

MG thanked everyone for attending and introductions were given around the table. A recent personal safety share was discussed around the potential for human error in relation to sending SNI via email using regular 'Official / Commercial' networks rather than through the 'Egress Switch' encrypted network. It was highlighted how easy it was to send transport movement plans via the incorrect system which leads to additional work for the IT team to retrieve the documents from the servers, plus re-work by the transport team as transport schedule changes are then required.

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 1.1.

Action 22/09 – the issue was taken forward and discussed at the main RAMTUC mtg, where Tony Grange agreed to progress with the Legal team to develop a briefing note. **Action remains for MG to feedback any progress on this issue.**

Action 23/02 RADS SAFE contact information is confirmed as - Terence Kelly talkemergency@gmail.com and Rose Morris is the group secretary, rose.m.morris@hotmail.co.uk.

Actions 23/06 – MG has been in contact with Human Factors group of SDF and is due to attend the next mtg (end Nov) to discuss progress and issues and seek advice on how to take this forward. MG will feed back at the next CIWG. **Action to remain on-going for MG to feedback at the next mtg.**

It is noted that the latest actions from the Non-Class 7 meeting have also been added to these minutes in Appendix 1.2

5. Forum Feedback

RAMTUC

Discussions were undertaken regarding the various RAMTUC sub-groups, with a note that there was a need for the meeting Chair of the sub-groups to attend the main meeting, and for the groups to be supported / attended.

Training group – the expectation was that the next L3 course would be early next year.

CIWG – it was re-iterated that members needed to submit LFE in a timely manner.

It was noted that French Regulator ASN have produced an Event Reporting Guide (which is similar to that of ONR) and needs to be considered if transporting to / through France, and that they are now undertaking audits (outside French territory) of packages travelling into France.

Due to the restructuring of Transport Regulation, ONR are also the main point of contact with regard to DG (non-class 7) issues for Site License Companies going forward.

TCSC

No feedback available.

RADSAFE

RADSAFE has produced a draft guidance document relating to exercising emergency arrangements for transport which will be approved by Working Group Members at the December meeting. This suggests a risk based approach considering the number of shipments, type of packages & material, competency of resources. Site RADSAFE representatives can be contacted for further information.

WNTI

No feedback available – meeting in Dec.

Regulator Forum Update

No specific feedback

RAMCALC / RESCALC

A final request for RAMCALC v1.4 testing has been issued, with feedback required for the next RAMTUC meeting in Dec.

DC is no longer part of the CIWG group and so it was unclear as to who the members of the RESCALC meeting were and how progress updates could be obtained so an action was taken to confirm with main RAMTUC mtg secretary.

Action 24.01: MG to confirm with RAMTUC Secretary how RESCALC feedback can be obtained

DGAG / BADGP

No significant feedback other than the aim for increased use of competency based training for DGSA's in 2019 has been postponed – tbd.

6. LFE

Again, a reminder was issued that the requirement is that LFE should 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.

In addition KE will be coming to the end of her 2 years as LFE coordinator and a request was issued for a volunteer to take on the LFE going forward.

Action 24.02: ALL to provide names of volunteers for LFE coordinator role.

It has been commented that there have been instances of inconsistent communication of events to the Regulator (ie, no reporting by the consigning site but the receipt site has reported an event) which has caused confusion. Thus it was re-iterated that the reporting of events to the Regulator should normally be undertaken by the consigning site, as they ultimately will obtain all pertinent information such that a decision can be made whether the event is reportable or not.

A review of the LFE was undertaken by AF & MB who provided feedback on the coding of the events, such that minor modifications will be made in the final LFE report. This resulted in a clarification to the group that problem code S.P.1.1 should relate predominantly to package dose / contamination issues and S.P.1.2 relates to package preparation issues. It was also noted that it would be helpful to put a differentiator within the LFE spreadsheet to enable the incident to be identified as Class 7 or other DG.

Action 24/03: KE to add a means of identifying events as class 7 or other DG within the LFE spreadsheet.

GK noted a number of non class 7 incidents which were picked up on material receipt, and resulted in the delivery being re-organised due to the safety issues which were raised.

Action 24/04: KB & GK to provide review of LFE data / report at next (Feb) meeting

2017/53 – there is a continuing trend relating to the finding of low levels of contamination on flask footplates, and investigations are still on-going.

DE provided a very interesting presentation in relation to GE Healthcare transports, highlighting some of the challenges they face in transporting large quantities of radioactive sources to a wide range of destinations in short timescales (due to the short half-lives of the radioisotopes).

Some challenges include:

- Experience 'reduced service levels' for RAM and consignments can get bumped onto later flights;
- Consignees have noted some package damage on arrival (due to handling issues at transport hubs) as the items are generally transported in cardboard boxes, however, the items do remain intact;
- Routes can change depending on changing schedules.

Learning / good practice:

- Importance of holding regular update meetings with service suppliers in order to maintain good relationship & to prevent DE becoming a faceless person on the end of the phone;
- The need to undertake continuing requests for package status updates – there are advantages to hassling transport hubs for information;
- Advantages of having embedded freight forwarders;
- Have 'Known consignor' status for air freight prevents the need for examination and repacking by freight forwarders;
- Don't expect new routes to work flawlessly the first time, it takes time to build up contacts.

7. Operational

Packages/packing issues

LLWR noted that an amendment to package approval had taken 8 months (rather than the programmed 3 months) and so warned that these re-certifications should be commenced well in advance of the expiry date. In addition, package re-certifications have come through with additional stipulations over and above those in original approvals so the impact of this also needs to be considered.

Carrier issues

All attendees were asked to confirm if they were undertaking any carrier audits over the next year such that it can be ascertained if a RAMTUC carrier audit was required and on which carrier.

Action 24/05: Each consignor to confirm if any carrier audits are planned for next year.

DE indicated that Circle Express had been audited by GE Healthcare but it was not done following the RAMTUC guidance. DE will confirm whether the audit findings can be shared with the group.

DE also indicated that GE had previously undertaken an audit of HAZMAT – GE have a good experience of working with this company, all drivers appropriately trained (including RP training), they provide a door-to-door service and are a Regulated Agent for carriage of goods by air.

MG noted that they were looking at undertaking an audit of Sellafeld Transport and any learning would be fed back to the group.

EdF highlighted that there were significant expectations on their team with respect to internal site audits next year as they are scheduled to visit each site and undertake both 'RAM' and 'other DG' compliance reviews.

8. General topics

ONR Audits/Site Specific Audits

No ONR audits / feedback to report.

Emergency exercises

LLWR noted that they are holding an exercise including 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.

Stages 1 & 2 have been undertaken and the Recovery exercise is due before the end of the year so further feedback can be provided next meeting.

Magnox have undertaken desktop exercises recently and the reports will be out shortly and learning fed back at the next meeting.

Rolls Royce is scheduled to undertake a multi-agency exercise which should also provide useful learning.

MG noted that SL had undergone a review in relation to stores of small quantities of aging chemicals which had resulted in dealing with some of the chemicals directly on-site using external bodies, followed by the development of a plan to dispose of other chemicals from site in the near future. The strategy likely to be employed will involve packaging within a '4GV' general use UN rated box and then in TC14. MG raised the concern that for use of 4GV boxes the instructions indicate 'not suitable for Class 7 material', however, the manufacturer has indicated that are suitable for use as an 'intermediate'

packaging. RB indicated they have also used 4GV packages in this way when the main classification of the material is by the sub-risk (other than class 7, eg Corrosive), and that a review of aging chemicals was also underway at SFL site.

9. Training

Training/seminars

Class 7 on-line training – the feedback on this training was that it was not user friendly and difficult to follow. This had been fed back to the authors for consideration.

RAMTUC level 3 – revised course expected April 2018 with improved course content / handouts plus clarification of the pre-requisites (training & experience) for attendees to be able to get the most out of the course.

BADGP seminar is due in March 18, & GK is intending to attend this event. She noted that they are looking for display stands for the event and it was suggested that RAMTUC may want to put a stand forward.

GK also indicated that she was intending to join BADGP and would feed back any learning / good practice as appropriate.

Action 24/06: MG to raise the suggestion that RAMTUC may wish to request a trade stand at BADGP seminar in March.

DGSA reports – the intention (originally at the 'Non-Class 7 mtg') was for sites to discuss any learning issues arising within annual DGSA reports. Thus the following action is raised.

Action 24/07: ALL sites to make DGSA Report Exec Summaries available for discussion at next mtg.

10. Guidance notes

DC produced guidance notes on SP172 & SP290. RB fed back that they had used the guidance and found very useful. JB noted that he had minor typo comments that were provided to GK such that the document could be amended before final submission and addition to the website.

Action 24/08: RMc to provide feedback as to position of website review and update.

11. AOB

It was noted that the TOR for the Non Class 7 elements of the group were not yet incorporated into the CIWG group.

Action 24/09: MG to review TOR for CIWG and Non Class 7 group and amalgamate.

12. Future meeting dates

Tentative 6th Feb 2018 – Manchester.

APPENDIX 1.1 MAIN ACTIONS TABLE

Action No	Action	Comments/ Status	Actionee	Target Completion Date
22/02	To pull human factors related events information together (RAMTUC request) from historic LFE data	Now included in 23/06	M Geldard	
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. Action remains on MG to feedback progress from the main RAMTUC mtg.	On-going	M Geldard	Feedback Feb Mtg
23/01	GK to outline the process EdF use to allow the cross usage of IP and UN rated drums.	On-going	G King	Feedback Feb Mtg
23/02	AF to forward new RADSAFE contact information to the group.	Complete	A Fotheringham	Nov mtg
23/03	DE from GE Healthcare to share learning / good practice gained from their significant experience with air transports.	Complete	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)	Complete	M Britt / A Fotheringham	Nov mtg
23/05	KE to amend LFE spreadsheet to allow sorting via causal codes.	Complete	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. Feedback from the HF group within SDF to be provide by MG at next mtg.	On-going	M Geldard	Feb mtg
23/07	RB to circulate 'The Deadly Dozen' brief for review / comment at next meeting.	Complete	R Brownlow	Nov mtg
23/08	MB to provide brief on issues raised at ONR Carrier Stakeholder meeting.	Complete	M Britt	Nov mtg
23/09	ALL MEMBERS to review and provide feedback on guidance notes for SP172 & SP290.	Complete	ALL MEMBERS	Nov mtg
23/10	ALL Participating sites to provide current material Delivery Notification forms to MG for review of commonalities	On-going	ALL MEMBERS	Feb mtg
23/11	MG to review basis for delivery notification requirement, review forms for commonalities & arrange conference call to agree basis for new form.	On-going	M Geldard	Feb mtg
23/12	RB to include Non-class 7 agenda items in main CIWG agenda.	Complete	R Brownlow	Nov mtg
24/01	MG to confirm with RAMTUC Secretary how RESCALC feedback can be obtained	New	M Geldard	Feb mtg
24/02	ALL to provide names of volunteers for LFE coordinator role.	New	ALL members	Feb mtg
24/03	KE to add a means of identifying events as class 7 or other DG within the LFE spreadsheet.	New	K Eden	Feb mtg
24/04	KB & GK to provide review of LFE data / report at next (Feb) meeting	New	K Barnes / G King	Feb mtg

24/05	Each consignor to confirm if any carrier audits are planned for next year	New	ALL members	Feb mtg
24/06	MG to raise the suggestion that RAMTUC may wish to request a trade stand at BADGP seminar in March	New	M Geldard	Feb mtg
24/07	ALL sites to make DGSA Report Exec Summaries available for discussion at next mtg	New	ALL members	Feb mtg
24/08	RMc to provide feedback as to position of RAMTUC website review and update	New	R McNicholas	Feb mtg
24/09	MG to review TOR for CIWG and Non Class 7 group and amalgamate	New	M Geldard	Feb 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		
05/02	GK to ask the CAA for a copy of the minutes from the last meeting.	On-going	G King	Feb 18
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	
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	On-going	G King	Feb 18
05/06	All to provide LFE for sharing at the group.	Closed - Will be provided in conjunction with Class 7 LFE		
05/07	EDF will share feedback from their dangerous goods self-assessment process	On-going	G King	Feb 18
05/08	All to determine what contractor emergency arrangements are in place for other DG consignments?	On-going		Feb 18
05/09	GK to speak to Caroline Raine to see if any of the seminars can be linked	On-going	G King	Feb 18

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	
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	Approved	

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