



RAMTUC Consignment Issues Working Group (CIWG)			
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MINUTES OF THE 22nd RAMTUC CONSIGNMENT ISSUES WORKING GROUP

Date: Tuesday 14th November 2017

Present:

Martin Porter (MP)	Sellafield Ltd - Chairperson
Rachel Brownlow (RB)	WEC UK - Secretary
Kirstie Eden (KE)	Rolls Royce
Jarod Bowden (JB)	INS
Rachel McNicolas (RMc)	RSRL
Ruth Norbury (RN)	RSRL
Kirsty Barnes (KB)	Sellafield
Dave Evans (DE)	GE Healthcare
Kerrie Ross (KR)	Dounreay
Gary Faulkner (GF)	Culham

1. Apologies

Apologies received from M Britt, G King, A Fotheringham

2. Chairpersons welcome and comments

MP thanked everyone for attending and introductions were given around the table. MP opened discussions relating further information relating to the finding of potentially flammable chemicals within laboratories at Sellafield. He noted that the event commenced with 2 new apprentices within the laboratories asking questions relating to aging and potentially unstable chemicals within store cupboards. This resulted in a safety standown in the laboratory areas and the further identification of significant numbers of chemicals in small quantities across the site. A programme of chemical destruction was undertaken and less hazardous chemicals are being treated / disposed of. This event has highlighted that the site has a lack of focus on chemical hazards which will need to be addressed going forward. The 2 apprentices were recognised for their questioning attitude.

In addition RMcN had a safety share relating to a domestic fridge fire which highlighted the importance of having a working fire alarm in the home, having an escape plan that all family members are aware of, and making sure all internal doors are closed at night when you go to bed.

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 this will be progressed with the Legal team to develop a briefing note.

Actions 23/06 – With regard to the LFE highlighting that Human Factors issues are the most significant issues to contend with (as would be expected) it has been suggested that as these events tend to be of low safety significance these will continue to be tracked and used as learning; the tools continue to be

used and standards re-enforced across each of the sites. It was not felt that any trends of concern had been highlighted and so nothing additional was required at this time.

5. Forum Feedback

Feedback from each forum was not available for this meeting so it was requested that representatives provide a summary prior to the CIWG meeting which can be circulated and discussed at the meeting.

Action 25/01: Members to provide forum summaries prior to CIWG meeting (see action table for details).

RAMTUC

Discussions were undertaken regarding RAMTUC governance issues, and that Martin Porter is currently the only Director as Mark Flynn has resigned from LLWR and has therefore had to step down from his RAMTUC Director role. LLWR will be required to review whether they wish to nominate a replacement. In addition, there is currently a review of RAMTUC membership going forward, whether the range of members should be widened (to carriers as well as consignors), and if this were the case whether it would be preferable to have 2 levels of membership, ie, companies could be full members or associate members.

Radsafe

It was noted that a letter had been sent from ONR to RADS SAFE to request assurances that RADS SAFE sites are all able to provide an appropriate response to the range of potential transport incidents which could occur across the nuclear estate. MP indicated there are likely to be further questions on this subject.

Action 25/02: MP to forward the ONR-RADS SAFE letter for information.

TCSC, WNTI

No feedback available – meetings later in Feb.

Regulator Forum Update

BSSD stakeholder event in relation to IRR17 registration for carriers. It was noted that some (mainly overseas) carriers were experiencing difficulties in registering on the HSE website.

RAMCALC / RESCALC

RN will be able to provide feedback in relation to these fora in future.

RESCALC is currently going through a tendering process and people being identified to assist with the scoring of the tenders.

RAMCALC testing has been completed and is ready to go live. A folder of testing evidence needs to be compiled. It is understood that LLWR undertook some testing and this would be useful evidence.

Action 25/03: AF to provide RAMCALC testing evidence to RMcN.

DGAG / BADGP

No feedback available.

6. LFE

A review of the LFE was undertaken by GL & KB who provided feedback on the coding of the events. However, it was highlighted that it was very difficult to perform an accurate review of causes with the limited amount of information that is provided within the form. Thus it was determined that this additional 3rd party review of the causes was not of benefit and that the idea should be to seek advice if unsure as to how an event should be coded.

The Annual LFE report was discussed and it was summarised that the main causes of events were:

- Procedures not being followed;
- Inadequate training;
- Inadequate attention to detail.

It was noted that these causes are not seen as being specific to transport incidents and they are common themes to be found in incidents across the operational sites. It was also highlighted that regulatory expectations within the 'transport arena' are very prescriptive and require perfection, whereas plant based operations are enabling regulations which allow for flexibility and employment of ALARP. This can be difficult for operations personnel in other areas (eg, package filling, loading) to comprehend. There are Human Performance programmes on-going on each of the sites to raise awareness, and encourage personnel to use various tools to identify potential error likely situations to prevent their occurrence.

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.

SL PUC event – investigation into a consignment of compacted PUCs to LLWR highlighted that designation of the correct material fingerprint is key to ensuring correct controls and checks are applied to the material.

7. Operational

Packages/packing issues

RMcN noted the lack of PCM package availability means that Magnox are behind schedule with regard to moving PCM. It was queried as to what the 'return to service' plan was for these packages.

Action 25/04: AF to provide PCM package status

RN highlighted issues with corroding IP2 rated drums as these are being used for material storage / movements but without considering the chemical properties of the material. In addition it is being found that drums are being used for consignments of materials which are very different (physically / chemically) to the types of materials for which the drums have been tested and hence the tests may not be valid in this case.

Action 25/05: RN to provide feedback on the learning from events relating to drum corrosion.

A concern was highlighted that because of the requirement to ensure no increase in package dose rate during transport that personnel were sometimes loading packages such that highest dose rate items were at the edge of the package such that radiation monitoring results show the worst case dose. This would not be considered as ALARP and should be discouraged.

Carrier issues

A discussion around whether individual carrier audits would / should be shared going forward as this may prove detrimental to the business of these small carriers. It was thus decided that carrier issues would be best picked up within the LFE programme where problems could be acknowledged and learning identified.

8. General topics

ONR Audits/Site Specific Audits

No ONR audits / feedback to report.

Emergency exercises

Nothing at this meeting

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 and so there was a discussion relating to what members were going to do with regard to training when John Simpson decided to retire. This was seen as a significant risk going forward as there was a heavy reliance on John's 'Class 7' training courses. This is an issue which will be raised at RAMTUC main members meeting.

10. Guidance notes

Nothing further at this meeting

11. AOB

The request to consider nominations for a suitable chairman to replace Mark Geldard was repeated to the group.

12. Future meeting dates

TBC.

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APPENDIX 1.1 MAIN ACTIONS TABLE

Action No	Action	Comments/ Status	Actionee	Target Completion Date
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	CIWG Chair	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
23/06	MG to contact chair of Human Factors working group 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.	Closed	M Geldard	Feb mtg
23/10	ALL Participating sites to provide current material Delivery Notification forms to MG for review of commonalities	Complete	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. <i>Action passed to K Barnes to progress</i>	On-going	K Barnes	Feb mtg
24/01	MG to confirm with RAMTUC Secretary how RESCALC feedback can be obtained <i>Ruth Norbury Magnox will be able to provide feedback going forward</i>	Complete	M Geldard	Feb mtg
24/02	ALL to provide names of volunteers for LFE coordinator role. <i>EdF agreed to provide support & named Graeme Hewson.</i>	Complete	ALL members	Feb mtg
24/03	KE to add a means of identifying events as class 7 or other DG within the LFE spreadsheet.	Complete	K Eden	Feb mtg
24/04	KB & GK to provide review of LFE data / report at next (Feb) meeting	Complete	K Barnes / G King	Feb mtg
24/05	Each consignor to confirm if any carrier audits are planned for next year <i>Carriers audits / issues will be picked up as part of the LFE process</i>	Complete	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 <i>Will not be possible this year due to time constraints</i>	Complete	M Geldard	Feb mtg

24/07	ALL sites to make DGSA Report Exec Summaries available for discussion at next mtg	On going	ALL members	May mtg
24/08	RMc to provide feedback as to position of RAMTUC website review and update. <i>Work has been on-going and is undergoing testing.</i> The group requested further feedback as to when it was anticipated the site would be functioning / usable once again	On-going	R McNicholas	May mtg
24/09	MG to review TOR for CIWG and Non Class 7 group and amalgamate <i>TOR reviewed during meeting and no changes required</i>	Complete	M Geldard	Feb mtg
25/01	Following members to provide feedback from the following forums before each CIWG mtg: RAMTUC main meeting – CIWG Chair TCSC – Lisa Mugan RADSAFE working group – Alison Fotheringham WNTI – CIWG Chair RAMCALC / RESCALC – Ruth Norbury BADGP / DGAG – Gill King	New	ALL	May mtg
25/02	Forward the ONR-RADSAFE letter for information.	New	M Porter	May mtg
25/03	Provide RAMCALC testing evidence to RMcN.	New	A Fotheringham	May mtg
25/04	Provide PCM package status and plan for use going forward	New	A Fotheringham	May mtg
25/05	Provide feedback on the learning from events relating to drum corrosion.	New	R Norbury	May mtg

APPENDIX 1.2 NON-CLASS 7 ACTIONS TABLE

Action No	Action	Comments/ Status	Actionee	Target Completion Date
05/02	GK to ask the CAA for a copy of the minutes from the last meeting.	Complete	G King	Feb 18
05/05	GK to share the LFE of the injured driver event caused by a pipe blockage	Complete	G King	Feb 18
05/07	EDF will share feedback from their dangerous goods self-assessment process	On-going	G King	Feb 18
05/08	ALL to confirm what contractor emergency arrangements are in place for other DG consignments	On-going	ALL MEMBERS	Feb 18
05/09	GK to speak to Caroline Raine to see if any of the seminars can be linked	Complete	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