



RAMTUC Consignment Issues Working Group (CIWG)			
<b>Chairperson:</b>	E Tallantire (Sellafield Ltd)	<b>Secretary:</b>	K Barnes (Sellafield Ltd) Acting Secretary
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## MINUTES OF THE 27<sup>th</sup> RAMTUC CONSIGNMENT ISSUES WORKING GROUP

**Date:** Tuesday 14<sup>th</sup> November 2017

**Present:**

Emma Tallantire (ET)	Sellafield Ltd - Chairperson
Kirsty Barnes (KB)	Sellafield Ltd - Acting Secretary
Alison Fotheringham (AF)	LLWR Ltd
Martin Quick (MQ)	Rolls Royce
Graeme Hewson (GH)	EDF
Vijay Bhatti (VB)	INS
Ruth Norbury (RN)	RSRL
Jim Hair (JH)	Dounreay

### 1. Apologies

Apologies received from G Faulkner, G summers, J Remington, J Kendrick, P Mancheta.

### 2. Chairpersons welcome, comments & Safety Share

ET thanked everyone for attending and introduced herself as co-chairperson to the CIWG. Introductions were given around the table.

KB was acting as secretary for this meeting.

Safety Share – ET shared an event which happened at NNL which involved an IBC. When a valve on an IBC was opened, the handle came away in the operator's hand, leading to the chemical leaking from the top of the valve. The operator was able to close the valve. After the area was made safe the contents of the IBC were transferred into another IBC with a valve that was fit for purpose. On investigation it became clear that a locking screw was in place to secure the valve, which should have been removed before opening the valve. As the operators had been unaware of this, this valve had been repeatedly opened without removing the locking-screw, causing damage which eventually led to the handle coming away.

### 3. Minutes of the last meeting

Due to illness the minutes from the last meeting have not been issued. KB issued some informal notes; however, minutes will be issued once RB returns to work. Action from previous meetings were not reviewed.

### 4. Actions

**Action:** ET to provide a scope statement on the Type W package to be shared with CIWG members. This is currently going through WNTI, the package will be IP-4 rated. It could take up to ten years to get these packages licenced.

**Action** - DGSA annual reports are to be brought to the November meeting.

The reports were brought to the meeting. It was discussed what the best way of sharing the information would be and questioned whether everyone used the RAMTUC Guidance to produce their reports. There is also guidance on the ONR website which Gill King shared; however, this is very onerous.

**Action** – RB to confirm what needs to be done for overseas carriers in regards to IRR2017 notification of registration?

RB was not present at the meeting, this action is ongoing.

## 5. Forum Feedback

### RAMTUC

Sara Bryson (RWM) has been appointed as a new director.

Tradebe (Inutec) application for membership has been supported, they will be given Observer status for twelve months.

The Young Nuclear Professionals Forum have approached RAMTUC to see if they could send someone to meetings and get an idea of the industry, they have been invited to the December meetings.

Ben Whittard is the new chair of the Nuclear Security Safety Forum.

Barry Mellor from LLWR gave a presentation on RESCAL, it was questioned whether this is need and if it is cost effective? Awaiting a response from Martin Porter (SL).

WNTI have asked if RAMTUC would like to join. A vote needs to take place on this.

Work is ongoing with the National College looking at formalising training standards.

Level 3 training took place in October.

### TCSC

Wood still considering Membership

TCSC 1079 Lifting Points – SL to update in consultation with Lifting forum

2 ONR Research tasks

Dual Purpose Casks – Contract given, but do not know who

Loose lid bolts

TCSC 1086 – Package testing, awarded to ARUP

TCSC Technical guide on Applications - Fraser Nash progressing, 1<sup>st</sup> draft available at end of Nov.

ISO committee

Hex Standard – 18 months for revision, question to Steve Whittingham (IAEA) regarding how to bring in new standard into IAEA documentation.

New leak tightness standard on website

GE Healthcare – Will not produce any sources post 2017 at Grove Centre site. (will only produce waste).

RADSAFE

National Waste have been producing a spreadsheet of all packages being used across the industry. It was questioned whether RADSAFE could link into this work for their handbook.

Issues were identified in a recent large scale package recovery exercise at LLWR around the notification process, particularly the time it took NCEC to make the first call to LLWR. Terry Kelly of RADSAFE has had extensive discussions with NCEC over this matter as the contract is between RADSAFE and NCEC. Following these discussions two new forms have been developed which members have been invited to review and feedback comments to Terry these have been reviewed and feedback passed on to Terry.

When NAIR is invoked the responsibility lies firmly with PHE, SEPA & the EA, not RADSAFE. At the moment the site licence companies are under increasing pressure to do the right thing when NAIR is invoked and take the offending article out of the public domain by taking it back to their site. Sadly some sites have been prosecuted for doing just this. However, the working group have been developing a series of credible arguments to counter being responsible for this. Terry Kelly was writing to PHE, EA & SEPA outlining RADSAFE's concerns.

WNTI

Nothing to report.

Regulator Forum Update

**New Action:** ET to forward the information she has regarding the reg updates.

RAMCALC / RESCALC

RAMCALC is now working. A link will be added to the RAMTUC website.

**6. LFE**

DSRL asked SL to provide further information on the event in the LFE. It was questioned whether this was the correct forum to raise these events as they are usually reported to the NFTF? Are the monitoring requirements clear in the POMM? The consignee contacted the Regulator directly; contact should have been made by the consignor.

**New Action:** GH to confirm the monitoring requirements in the POMM for fuel flasks moves are clear.

EDF have had two bolt events in two years, the investigation is nearly complete.

While carrying a fuel flask DRS jumped a red light, this was seen by a member of the public and ended up in the local paper. DRS did not inform the consignor. DRS did not have an updated contact list. All to ensure that contact details are correct for reporting of events.

There has been an increase in post receipt events with people not following procedures.

There were a number of events involving package preparation. It was agreed that a review of the last twelve months LFE should take place to see if there is a trend. This will be added to the agenda for discussion at the next meeting.

**New Action:** GH to review the last 12 month LFE to package preparation events for review at the next meeting.

Magnox have different variants of containers, one which carries liquids and one which cannot. Checks were not being carried out on the Certificate of Approval and the Packing and Handling Instructions to ensure compliance when loading.

## **7. Operational**

### Packages/packing issues

There has been a delay in the licence for the 2816L variant of the SAFKEG. The original seals would not hold pressure below 0°C. New O rings have been fitted and passed the pressure tests.

### Carrier issues

Gill King has issued carrier checks that have been carried out. These will be added to the RAMTUC website.

An audit was completed on SL transport, this will be put onto the correct RAMTUC template and added to the website.

HTSL were using Circle Express to deliver a source to DRSL. JH carried out an audit on the carrier and discovered that no orange plates were displayed, when asked why the driver said he did not want to attract any terrorist interest. There was no emergency equipment. Emergency contact details were incorrect. HTSL have been informed and an email was sent direct to Circle Express. ONR have been informed.

Circle Express have been blacklisted by EDF for similar issues.

Magnox are having issues with non-class 7 carriers not having DGSA's. They are now putting together a list of approved carriers and will share with the group.

Carrier HSE notification: EDF has been advised that the overseas carriers we use are expected to register their intent to 'transport' RAM within UK and pay the appropriate fee ahead of any transports made

## **8. General topics**

### ONR Audits/Site Specific Audits

ONR are at SL looking into the VRR process.

### Emergency exercises

SL emergency exercise – as this was the first exercise in a long time, ET believed that too many external bodies were involved & she believed that it would have been better to have an internal desktop prior to invites being sent. The recovery phase of the exercise will be carried out next week. Additional feedback will be given following this.

RR will provide feedback from their exercise at the next meeting.

RADSAFE exercise will be held at Hunterston B at the end of November.

Dounreay have completed a table top exercise.

The emergency services would not respond to any casualties in a UF6 incident. However, EDF said during an exercise they completed the fire services completed a full BA snatch test.

LLWR found the fire services had more knowledge of dangerous goods than the police.

Fire services have an RPA, however they were not aware that each site had their own.

DSRL are producing a top level document for transport emergency plans. ONR want to see similar documents across the board.

LLWR have one in place which includes recovery details for each package type and a checklist of emergency equipment needed for recovery. Each recovery item is tested.

## **9. Training**

### Training/seminars

Labeline DG seminar tomorrow. KB is attending and agreed to share her notes with CIWG members.

The next level 3 training course is planned for march 2019.

Class 7 e-learning regulatory learning is now available.

### Legislative Updates

SSR 6 will not come in to force until 2021.

Some of the new legislative changes include the need to do a sum of TI's. New UN entries including BF3 Neutron Detectors.

**New Action:** ET to share information she has on Regulatory Updates.

**New Action:** IAEA draft documents are out for consultation. JH to share via KB.

CDG 2018 – changes to the emergency response – schedule 2.

What will happen when we leave the EU?

## **10. Guidance notes**

It was recommended that all guidance notes are reviewed to see if they are still valid and a review dated added.

## **11. AOB**

The Hazardous Waste Regs exempt asbestos below 1%, however, it was agreed that under ADR there is no such exemption in line with the transport regulations.

**New Action:** JH to share the CORWN (Committee of Radioactive Waste Management) paper.

MQ – RR are wanting to place metal sheeting in the TC14 containers, however it wasn't clear in the CoA how to do this without damaging the packages. The group recommended using packing material.

## **12. Future meeting dates**

The next meeting will be held in February in Birmingham, Gill King to chair.

## 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	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
23/06	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
23/10	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
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	Complete	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
25/01	ET to provide a scope statement on the Type W package to be shared with CIWG members. Update: This is currently going through WNTI, the package will be IP-4 rated. Could take up to ten years to get these packages licenced.	New	E Tallantire	Complete
25/02	DGSA annual reports are to be brought to the November meeting. Update: The reports were brought to the meeting. It was discussed what the	Ongoing	All	

	best way of sharing the information would be and questioned whether everyone used the RAMTUC Guidance to produce their reports. There is also guidance on the ORN website which Gill King shared; however, this is very onerous.			
25/03	RB to confirm what needs to be done for overseas carriers in regards to IRR2017 notification of registration?  Update: RB was not present at the meeting, this action is ongoing.	Ongoing	R Brownlow	
27/01	ET to forward the information she has regarding the reg updates.	New	E Tallantire	Feb Meeting
27/02	GH to confirm the monitoring requirements in the POMM for fuel flasks moves are clear.	New	G Hewson	Feb Meeting
27/03	GH to review the last 12 month LFE to package preparation events for review at the next meeting.	New	G Hewson	Feb Meeting
27/04	ET to share information she has on Regulatory Updates.	New	E Tallantire	Feb Meeting
27/05	IAEA draft documents are out for consultation. JH to share via KB	New	J Hair	Feb Meeting
27/06	JH to share the CORWN (Committee of Radioactive Waste Management) paper.	New	J Hair	Feb Meeting

#### 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	<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	
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 14<sup>th</sup> November 2012**