Working Group 1: UN Issues

Participants:

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Subsidiary Risks

- Need for labeling excepted packages for subsidiary risk;
- No need for further clarification;
- Excepted quantities/Limited quantities combined with radioactive materials: not addressed in the UN Recommendations;
- Future consideration to including information of special provisions 172 and 290 in guidance document will be prepared by correspondence working group:
  - O. Kervella
  - K. Vermeersch
  - K. Rooney
  - D. Brennan
  - F. Kirchnawy
  - P. Girkens;
- UF₆: no additional clarification from IAEA regarding radioactive properties required. Determination of subsidiary hazards by other UN bodies is needed.
UN Packing Requirements

- UN packing requirements for subsidiary hazards have to be complied with for radioactive materials (see UN 4.1.9.1.5);
- No specific cases identified;
- Test procedures for UN packages: UN Recommendations do not contain all operational details. Guidance for test laboratories is needed for uniform application.

Excepted Packages

- Activity limits for excepted packages with instruments or articles are similar to Type A packages;
- There are no performance test criteria for instruments or articles;
- No significant issue with the transport of instruments or articles is known;
- Assumption: instrument or article provides a certain degree of protection/containment;
- If article/instrument does not provide required degree of protection/containment, additional method to define requirement for this article/instrument or performance criteria;
- “Completely enclosed” proposed definition:
  - Paragraph 426: “enclosed in an inactive sheath made of metal or some other substantial material.”
  - Additional criteria: related only to solids or other substantial materials;
  - Performance test
- We do not see any reasons in practice to change the activity limits of Table 4 (Paragraph 422);

Problems for transport of excepted packages -

new provisions introduced in SSR-6 (paragraph 515):

- Names of Consignor and Consignee on shipping document (INF. 15):
  - Problem for air transport because of acceptance procedures. See appendix 1;
  - Definition of consignor;
- Names of consignor and consignee on shipping document (paragraph 546): interpreting who are the consignor and consignee. Need for clarification of the definition of consignor and if there is a need for a transport document for excepted packages containing fissile material excepted under 417(c); this comes from subsidiary hazards harmonization issues with UN Recommendations;
• Clarification about the identification marks for each competent authority certificate on shipping document, for example fissile material excepted under paragraph 417(f), special form approval certificate under paragraph 546(k); member states proposed this amendment;
• Clarification about the need for signature on transport document (paragraph 550);
• The need for container packing certificate for maritime transport (paragraph 552);

Possible solutions:

  o Corrigendum to SS-R-6;
  o Administrative measures until amendment to SS-R-6;
  o Correspondence working group:
    ▪ D. Brennan
    ▪ K. Rooney
    ▪ K. Vermeersch
    ▪ O. Kervella
Appendix 1

Operational Issues – Excepted Packages

1. Custom and practice for the movement of radioactive material, excepted packages is that these move with the only the UN number shown on a commercial transport document such as a bill of lading or air waybill. While the commercial transport document indicates a “consignor” and “consignee”, in reality this is the name and address of the freight forwarder or cargo agent that has the contract of carriage with the carrier. For fully regulated radioactive materials however there are two documents provided, a dangerous goods transport document that shows the name and address of the “actual” consignor and consignee and describes the dangerous goods and the commercial transport document that will contain the information as shown for excepted packages.

2. The changes in SSR-6 to include a requirement that para 546 intro now also applies to excepted packages brings in a requirement that the name and address of the consignor and consignee must now be on the “transport documents”. This introduces potential conflicts where if current practice continues with only an air waybill or bill of lading, the “actual” consignor and consignee will not be shown, however it is likely that regulatory authorities will expect to see the “actual” consignor and consignee identified. The only way to achieve this is for excepted packages to now be described on a dangerous goods transport document.

3. The solution to this issue is to now require that excepted packages be described on the dangerous goods transport document. However, if this happens then for air transport there will be a significant cost increase for the consignors as excepted packages currently move as general cargo. Dangerous goods on a dangerous goods transport document are subject to additional charges due to the requirements for checks to the documentation and packages. This may also lead to greater problems for consignors of excepted packages due to delays and/or denials.

4. The other additional requirements brought in through reference to para 546(k) which requires that the identification mark of each competent authority certificate must be provided on the transport documents also lends weight to requiring the use of a separate dangerous goods transport document for excepted packages. Commercial transport documents such as bills of lading and air waybills are not designed to have regulatory information such as references to competent authority certificates or package design approvals. This lends further weight to having both the dangerous goods transport document on which the regulatory information is provided and the commercial transport document.

5. If there are certain radionuclides that while meeting the limits for excepted packages none the less require a competent authority approval it is suggested that the requirement for this information to be provided on the document needs to be re-evaluated as the document is not required to identify the isotope or the activity.