TRANSSC
Decision Criteria for Review of Proposed Changes
to the Transport Regulations
(TRANSSC Decision Criteria developed at TRANSSC 12 (2006))

Background:

The purpose of the review of the Regulations is to identify the change(s) which are needed to maintain and assure the safety of transport and are therefore sufficiently important for safety to necessitate publication of a revised SSR-6 as soon as possible. A proposed change to SSR-6 which does not successfully pass this evaluation screening may be appropriate to hold for later consideration in a review of SSR-6, but that the change does not on its own merits necessitate publication as soon as possible.

Principles:

The following six principles were identified to be used in evaluating proposed changes to the regulations stemming from the review cycle:

- Optimisation
- Efficiency / practicality / regulatory stability
- Compliance with dose limits
- Socio-economic considerations
- Harmonisation
- Clarification

A detailed review of each change is necessary to determine its safety importance. If a significant safety change to SSR-6 is needed to maintain and assure the safety of transport, then the change is deemed to be “sufficiently important for safety to necessitate publication as soon as possible”.

Examples of changes that may warrant a revision are:

- Consistency with other safety standards (e.g. IAEA Basic Safety Standards and UN Recommendations on the transport of dangerous goods)
- New package and/or material type classification
- Modified test requirements
- Operational events / controls
- Changes in scope to any part of SSR-6 (e.g. definitions, A1/A2 values, transport controls)
- New requirements that invalidate designs / certificates

Many proposed changes would not directly lend themselves to quantification of safety impact. Therefore, the decision criteria consist of a set of questions which will guide the TRANSSC review. The questions would help assess the safety significance of a proposed change. The questions would be structured to typically provide a “yes” or “no” answer such that a “yes” answer would imply the proposed change should be considered further while a “no” answer would imply the proposed change would not be needed to maintain and assure safety and therefore would not necessitate a publication as soon as possible.
Criteria:

Two sets of decision criteria questions have been developed. The “Primary set of questions” is to be answered for each proposed change and collectively for the set of proposed changes. The “Secondary set of questions” provides for a more qualitative assessment of the potential impact of a proposed change on the overall safety of transport and provides supporting information for the answer to the primary set of questions. The secondary set of questions should be considered for each proposed change, as appropriate.

Primary set of questions:

(These questions would guide the determination if proposed changes to SSR-6 are sufficiently important to safety to necessitate publication of a new edition of SSR-6.)

1. Is the change or set of changes needed to maintain and assure safety?

2. Is the change or set of changes sufficiently important for safety to necessitate, publication as soon as possible?

3. Does the change or set of changes have a substantial impact on the scope of SSR-6?

4. Will the change or set of changes result in a significant change to existing transport activities or invalidate existing designs or certificates?

5. Does the change or set of changes affect the established radiation protection system or the radiological basis of SSR-6?

6. Would the change or set of changes result in a reduction, or potential reduction, in overall dose?

7. Is the change or the set of changes related to new package type or material considerations?

8. Is the change or set of changes a result of improvements in testing or analysis capabilities, or from operational experience?

9. If delay in implementation of the set of changes will result in inconsistencies with other international standards, will the existing levels of safety be maintained and assured?

10. What is the risk to safety if we delay publication?

Secondary set of questions:

(These questions would provide for a more qualitative assessment.)

1. Does the proposed change result in any change to the dose to workers?
   1.1. If yes does the dose increase or decrease?
1.2. If increased is there a net benefit in terms of reduction to the dose to the public in routine, normal or accident conditions of transport?
   1.2.1. If yes are worker dose limits still complied with?
1.3. If it decreases is there a consequent increase in the dose to the public?
   1.3.1. If yes are public dose limits still complied with?

2. Recognizing that any change to the regulations places a cost burden on the Member States and other stakeholders:
   2.1. are the expected impacts of the change well understood?
   2.2. will there be a financial benefit to either the Member States or other stakeholders?

3. Are the criteria used to demonstrate that the safety benefits outweigh the costs acceptable to TRANSSC?

4. Does the proposal raised by one Member State have a significant detrimental effect on another Member State or other stakeholders?

5. If the change is implemented will SSR-6 be consistent with other international standards?

6. Will the proposed change provide for increased safety of transport in routine, normal or accident conditions?

7. Will the proposed change affect the risk of an incident or accident?
   7.1. If yes is the resultant change acceptable in terms of dose and/or cost.

8. Will the proposed change affect the consequences (dose/environmental harm/disruption to the transport infrastructure) of an incident or accident?

9. Will the proposed change achieve the existing objectives with reduced effort?

10. Does the proposed change have a broad impact on the Radioactive Materials Transport community?