TRANSSC 31
2 to 6 November 2015

Agenda item 4.2

A guide to the TRANSSC decision process used to determine if a revision of IAEA SSR-6 Regulations or SSG-26 Advisory Material is to be initiated

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INTRODUCTION

The purpose of the review of the Regulations is to identify the changes 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.
INTRODUCTION

SSR-6 and its Advisory companion SSG-26 are open for proposed changes in the same review cycle.

Changes to SSG-26 may be the most appropriate mechanism to provide clarification of existing SSR-6 text.

SSG-26 is not adopted into the UN Model Regulations and transport regulations developed and adopted around the world and therefore due attention should be given to the safety consequences of not revising SSR-6.
We need to recognise the benefits of maintaining stability in the regulatory requirements which promotes;

- a better understanding,
- effective training
- safety culture

all of which are essential for the effective implementation of the Regulations.
The TRANSSC Process: to revise or not revise

- Proposals for change received by Secretariat

- Proposals for change assessed by TRANSSC delegations

  - Recommend to TRANSSC
    - 'approve'
    - 'reject'
    - 'further discussion/development'

- TRANSSC decisions
  - 'approve'
  - 'reject'
  - 'further discussion/development'

- TRANSSC decisions
  - Not-to-revise SSR-6
  - To-revise SSR-6
  - Not-to-revise SSG-26
  - To-revise SSG-26

Assessment/Decisions process for each individual proposal for change using secondary set of questions

Decisions based upon assessment of all 'approved' proposals for change using primary set of questions
The following six principles are used to evaluate proposed changes:

- Optimisation
- Efficiency / practicality / regulatory stability
- Compliance with dose limits (which relies upon mechanical, thermal, criticality and containment considerations)
- 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

- 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 existing design / certificates
How do we determine the Safety Impact of a proposed change?

The decision criteria consists of a set of questions which would guide the TRANSSC review.
The questions would:

- Help assess the safety significance of a proposed change.
- 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.
Two sets of decision criteria questions have been developed.
The “Primary set of questions” is to be answered for the collective set of proposed changes and are intended to guide the determination if proposed changes to SSR-6 are sufficiently important to safety to necessitate publication of a new edition.

- (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?
THE PRIMARY QUESTIONS

• (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 a new package type or new 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?
The “Secondary set of questions” provide for a more qualitative assessment of the potential impact of the proposed change on the overall safety of transport. This set of questions should be considered for each proposed change as appropriate and are intended to provide for a more qualitative assessment.
(1)

Does the proposed change result in a change to worker dose?

Yes

Does the dose increase or decrease?

Dose decreases

Is there a consequent increase in dose to the public?

Yes

Are public dose limits still complied with?

Yes

Dose increases

Is there a net benefit in dose reduction to the public?

Yes

Are worker dose limits still complied with?
THE SECONDARY QUESTIONS

• (2) Recognizing that any change to the regulations places a cost burden on the Member States and other stakeholders:

  • (i) Are the expected impacts of the change well understood?
  • (ii) 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?
THE SECONDARY QUESTIONS

- (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?
- (i) 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?
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  - Not to revise SSR-6
  - To revise SSR-6
  - Not to revise SSG-26
  - To revise SSG-26

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Decisions based upon assessment of all ‘approved’ proposals for change using primary set of questions
Questions ?

Thank you