TRANSSC 33rd Meeting
INF-27

15th - 18th November 2016

Proposed Guidance Document based upon the structure of SSG-33 to include all SSR-6 Requirements

Terms of Reference for Working Groups 4, 5, 6 and 7

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Purpose of presentation

• Overview of the document for comment
• Explain the proposed structure of the document
• Explain the proposed format and how users would read the document
• Highlight any problems and issues with the new structure
Do we need a new document?

- "Standards are only effective if they are applied in practice"
- SSR-6 considered to be complex
- Feedback from regional networks said that SSR-6 is difficult to understand
- Aimed at all member states, but will be most beneficial to users from member states that have are either developing or have no regulatory documents and guidance
New proposed document

• Tabulated all requirements listed in SSG-33 in the 8 sub-headings for each UN number
• Developed various different structures of the document
• Final result is the new proposed document which includes the regulatory requirements from SSR-6 in the SSG-33 format.
• Aim is to provide a users with a document that has all the regulatory requirements categorised by the UN number in an easy to read structure and format
• Guidance or Technical document
Structure of document

Introduction
- Background
- Objective
- Scope
- Structure

Definitions

General Provisions
- Section II of SSR-6

Classification
- Section III of SSR-6
- Allows users to classify the material

Schedules
- Section IV of SSR-6
- UN numbers from SSG-33
- Annex to each schedule

Tests

Tables and Figures

Annexes

2. Contents Limits for Packages
3. Contamination
4. Maximum radiation levels
5. Categories and Packages and Overpacks
6. Marking and Labelling
7. Requirements before Shipments
8. Provisions concerning transport operations
Format of new document

- Requirement listed in SSG-33 is at no indent to the page margin and is not colour coded
- Subsequent regulations are indented
- Colour coding of subsequent requirements

Figure 1. The colour coding of the requirements
618. For radioactive material having other dangerous properties, the package design shall take into account those properties (see paras 110 and 507).

110. For radioactive material having subsidiary risks, and for transport of radioactive material with other dangerous goods, the relevant transport regulations for dangerous goods shall apply in addition to these Regulations.

507. In addition to the radioactive and fissile properties, any other dangerous properties of the contents of the package, such as explosiveness, flammability, pyrophoricity, chemical toxicity and corrosiveness, shall be taken into account in the packing, labelling, marking, placarding, storage and transport in order to be in compliance with the relevant transport regulations for dangerous goods of each of the countries through or into which the materials will be transported, and, where applicable, with the regulations of the cognizant transport organizations, as well as these Regulations.
Format of new document

- Regulatory text that is not applicable to the UN number is bracketed out and the text is grey
- There is no change to the regulatory text
- Clear to the user which parts of the regulation are specific to that UN number
503. Before each *shipment* of any *package*, it shall be ensured that all the requirements specified in the relevant provisions of these Regulations and in the applicable certificates of *approval* have been fulfilled. The following requirements shall also be fulfilled, if applicable:

(a) It shall be ensured that lifting attachments that do not meet the requirements of para. 608 have been removed or otherwise rendered incapable of being used for lifting the *package*, in accordance with para. 609.

(b) Each *Type B(U)*, *Type B(M)* and *Type C package* shall be held until equilibrium conditions have been approached closely enough to demonstrate compliance with the requirements for temperature and pressure, unless an exemption from these requirements has received *unilateral approval*.

(c) For each *Type B(U)*, *Type B(M)* and *Type C package*, it shall be ensured by inspection and/or appropriate tests that all closures, valve and other openings of the *containment system* through which the *radioactive contents* might escape are properly closed and, where appropriate, sealed in the manner for which the demonstrations of compliance with the requirements of paras 659 and 671 were made.

(d) For *packages* containing *fissile material*, the measurement specified in para. 677(b) and the tests to demonstrate closure of each *package* as specified in para. 680 shall be performed.

(e) For *packages* intended to be used for *shipment* after storage, it shall be ensured that all *packaging components* and *radioactive contents* have been maintained during storage in a manner such that all the requirements specified in the relevant provisions of these Regulations and in the applicable certificates of *approval* have been fulfilled.
Current Progress

- All 26 UN Schedules have been completed
- For the purpose of the meeting:
  - UN 2908 – Radioactive Material, Excepted package – empty packaging
  - UN 2915 – Radioactive Material Type A package, non-special form, non-fissile or fissile excepted
- Regulatory requirements have been included in full where possible
- In cases where the subsequent regulatory requirements are complex they have been included as an annex to the specific UN Schedule
Areas for comment

• The complexity of the regulations
• Is this a good idea?
• Is it necessary to include all SSR-6 requirements in the document?
• What should be the document type?
• How to include "difficult" regulatory requirements
  – 417 fissile exception
Summary

- This document is to be an additional resource for member states to adopt the regulations in an easy-to-read structure and format.
- It is in its early stages of development.
- The purpose of the working groups is to provide comment on how useful and effective the document is and whether it is fit-for-purpose.
Thank you!