TRANSSC 34 MEETING REPORT

OPENING 12 July 2017 09:00
CLOSE 13 July 2017 17:00

Preceded by TRANSSC Working Groups 10 – 11 July 2017
A1/A2 Working Group – Chaired by UK (Cabianca)
Criticality Working Group – Chaired by Germany (Reiche)
NORM Working Group – Chaired by TRANSSC Chair (Hinrichsen)

IAEA, Board Room A
## Reference Documents

<table>
<thead>
<tr>
<th>INFORMATION PAPERS</th>
<th>Agenda Item</th>
</tr>
</thead>
<tbody>
<tr>
<td>INF-1</td>
<td>TRANSSC 33 Draft Meeting Report</td>
</tr>
<tr>
<td>INF-2</td>
<td>Action Record Sheet</td>
</tr>
<tr>
<td>INF-5a</td>
<td>Terms of Reference WG’s 1,2,3,and 4</td>
</tr>
<tr>
<td>INF-5b</td>
<td>Terms of Reference WG’s 5,6,7,and 8</td>
</tr>
<tr>
<td>INF-5c</td>
<td>Table of Results of Discussions</td>
</tr>
<tr>
<td>INF-6</td>
<td>Transportable reactors</td>
</tr>
<tr>
<td>INF-7</td>
<td>IAEA NG-T-3_5 Transportable Reactors</td>
</tr>
<tr>
<td>INF-8</td>
<td>DS-495 Summary Table of MS Comments</td>
</tr>
<tr>
<td>INF-8a</td>
<td>Final DS-495 TRANSSC 34 Resolutions</td>
</tr>
<tr>
<td>INF-9</td>
<td>DS-495 STEPP 11</td>
</tr>
<tr>
<td>INF-9a</td>
<td>DS-495 SSR-6 as modified at TRANSSC 34</td>
</tr>
<tr>
<td>INF-10</td>
<td>DS-495 Paragraph Numbering System</td>
</tr>
<tr>
<td>INF-13</td>
<td>TRANSSC Work Plan</td>
</tr>
<tr>
<td>INF-14</td>
<td>Priorities for TS-G-1.3, 1.4 and 1.5</td>
</tr>
<tr>
<td>INF-15</td>
<td>Pressure Differential</td>
</tr>
<tr>
<td>INF-15a</td>
<td>Pressure Differential Appendix A</td>
</tr>
<tr>
<td>INF-15b</td>
<td>Pressure Differential Appendix B</td>
</tr>
<tr>
<td>INF-15c</td>
<td>Pressure Differential Appendix C</td>
</tr>
<tr>
<td>INF-16</td>
<td>Self-Assessment Process</td>
</tr>
<tr>
<td>INF 18</td>
<td>Harmonisation IMDG Code and SSR-6</td>
</tr>
<tr>
<td>INF-19</td>
<td>Update on NSS-OUI System</td>
</tr>
<tr>
<td>INF-20</td>
<td>TRANSSC Terms of Reference</td>
</tr>
<tr>
<td>INF-21</td>
<td>Update on Revision of ISO 7195</td>
</tr>
<tr>
<td>INF-22</td>
<td>Feedback from Criticality Working Group</td>
</tr>
<tr>
<td>INF-23</td>
<td>Criticality Working Group Temperatures</td>
</tr>
<tr>
<td>INF-24</td>
<td>Criticality Working Group Tuesday 11 July 2017</td>
</tr>
<tr>
<td>INF-25</td>
<td>Criticality Working Group CSI Value</td>
</tr>
<tr>
<td>INF-26</td>
<td>Criticality Working Group- Sub-Critical System</td>
</tr>
</tbody>
</table>

All presentations and documents can be found on the TRANSSC members' website

http://www-ns.iaea.org/committees/transsc/default.asp?fd=1690&dt=0
OPENING SESSION

Opening 15 NOVEMBER 2016 10:00/Close 15 NOVEMBER 2016 16:00

1.0 OPENING SESSION

1.1 Opening Remarks

1.1.1 Opening Remarks were given on behalf of the Director of NSRW by Mr Hilaire Mansoux, Head of the Radiation Safety Infrastructure and Transport Safety Section.

1.1.2 Opening Remarks By Chair Mr Paul Hinrichsen

TRANSSC Chair (Hinrichsen) welcomed the delegates to the Meeting.

2.0 ADMINISTRATION ITEMS

2.1 Conduct of the Meeting

2.1.1 Conduct of the Meeting and Agenda

TRANSSC Chair (Hinrichsen) outlined the process which had brought TRANSSC to the Agenda proposed for the current Meeting.

TRANSSC Chair (Hinrichsen) indicated that DS 495 would be presented and discussed for TRANSSC approval to go forward for CSS approval in October 2017.

The Proposed Meeting Agenda was adopted.

2.2 REVIEW OF PREVIOUS MEETINGS

2.2.1 Previous Meeting Report

TRANSSC Chair (Hinrichsen) reviewed the previous TRANSSC report and provided a specific review of comments that were submitted on the draft report. There was a comment from Japan and a comment from Spain, related to the TRANSSC 33 resolution on NST-044. Mr Hinrichsen agreed to clarify the responses to these comments and to amend the TRANSSC 33 Meeting Report accordingly.

Appendix 1 was added to the TRANSSC 33 Report being the text on NST 044 which had been agreed at TRANSSC 33 by the side-meeting.
2.2.2 Action Record Sheet

The Action Record Sheet was approved with regard to the Actions from TRANSSC 33 having being satisfactorily addressed.

2.2.3 Chair’s Meeting

TRANSSC Chair (Hinrichsen) provided a brief summary of the Chairs meeting held in April 2016 ahead of the 41st CSS Meeting. Three items were mentioned:

- A proposed ‘Self-Assessment of the Safety Committees’.
- The proposed new paragraph numbering system
- The ability for the submission of comments on any safety document viewed on the NS-OUI System.

2.3 TOPICAL BRIEFING AND DISCUSSION ON MEMBER STATES PRESENTATIONS, SHARING OF OPERATIONAL EXPERIENCE AND USE OF IAEA SAFETY STANDARDS

2.3.1 Netherlands

Netherlands (Mortessen) provided an overview and summary of the activities related to the regulation of transport in the Netherlands. Questions were offered by Germany (Wille), Spain (Zamora), WNA (Gorlin), Australia (Mr Sakar), Canada (Ramsay), and Russian Federation (Ershov), TIC (Schwela).

2.3.2 Sweden

Sweden (Zika) Sweden provided an overview of the Transport of Radioactive Materials Class 7 in Sweden. Questions were offered by Austria (Kirchnawy), Iran (Eshraghi), Australia (Sarkar), Russian Federation (Ershov), and the United Kingdom (Davidson).

2.3.3 Volunteers for TRANSSC 35

Tantalum-Niobium International Study Cente TIC (Chavasse) volunteered to provide a presentation to TRANSSC 35.

TRANSSC Action 34-1: TIC to prepare a presentation for TRANSSC 35.

2.4 Plenary Questions/Clarification on Posted Information Papers

There were no questions related to posted information papers.
2.5 PLENARY REVIEW OF DS 495 MEMBER STATE COMMENTS

2.5.1 Opening Remarks

Ms Capadona (IAEA) provided opening remarks on the resolution of Member State comments on the final draft of the new revision of SSR-6 (DS-495). She reviewed the production schedule for the new edition of SSR-6. She highlighted that all Safety Standard Committees (SSCs) take part in this process. TRANSSC is the last committee to meet during this cycle and has the last approval to take of the current SSR-6 draft.

She reviewed the comments received from Safety Standard Committees (Under SPESS Step 9). There were 167 comments in total and these were all addressed during a Technical Meeting held in Jan/Feb 2017. Approval from the CCS was reached in April. The final draft was posted, at that time, for review by the Safety Committees for approval.

Comments were received under SPESS Step 9 for the document from several Committee members, and Ms Capadona then reverted to a resolution table to review the comments. Resolutions to the comments were proposed by the IAEA, and presented to TRANSSC for their comment/acceptance. Most of the comments were editorial, and these were reviewed. USA (Boyle) had a question regarding the draft to be used for review. It was clarified by the Secretariat that the comments provided by Member States were based on the draft of DS 495 which was posted by the Secretariat on 10 April 2017.

2.5.2 DS-495, Step 11, Resolution of TRANSSC Member State Comments

(see Appendix 2 – TRANSSC resolution table)

The proposal was to review the editorial comments quickly, and then present the technical comments for review and discussion.

CDN/4, J/S11/02, USA/2, WNTI/1, CDN/5, CDN/6, USA/3, USA/4, WNTI/2 – Para.304 and 305

The first paragraphs discussed were 304 and 305 regarding emergency preparedness and response. Ms Capadona explained that GSR Part 7, the requirements for responding to emergencies was published after the last draft of the regulations. There must be consistency between GSR Part 7 and the new revision to SSR-6. The coordination committee (and specifically the representative from EPRReSC) proposed some changes to the wording in these two paragraphs.
The choice presented to TRANSSC was whether the proposed changes from the coordination committee were acceptable, or not.

In response to a question for clarification, it was clarified that the proposal was to reject the proposed change from Canada and revert to the text as it appeared in the 10 April 2017 document. Canada (Ramsay) indicated that they had no objection. The proposal was accepted.

For Paragraph 305, the wording was again revised, and the proposal from the secretariat was to reject the changes proposed by Canada, and accept the changes proposed by the Secretariat. Canada (Ramsay) agreed with the change. Japan (Hirose) asked if “emergency” meant a “radiological” emergency. The preference of Japan was to leave the wording as it is (including “accident”). ISO (Malesys) proposed clarifying using “nuclear or radiological” emergency. Spain (Zamora) did not agree with using the word accident.

IEC (IAEA) commented that the basic intent was to include terrorism as a (possible) cause by using the word “emergency”, since “accident” is an unintended event, excluding terrorism.

France (Ferran) indicated that to be consistent with para. 304, “emergency” should be used in 305. UK (Davidson) prefers “emergency” be used, as it is consistent with their national laws. WNTI (Desnoyers) proposed that there be a modification to the sentence in 305. US (Boyle) reminded the committee that a proposal was already made, and additional proposal could not be entertained at this time. The Chair agreed, and proceeded to ask for a vote on the proposal. The vote was taken and the proposal was accepted.

The last comment was on the references related to the Paragraphs on emergencies (304, 305). References updated in this version SSR-6 include those for emergency and security, and the proposal was whether the “new” references were to be accepted.

US (Boyle) indicated that there were no objections to the references but rather the process by which they were added. There was no notification that new references were added and no opportunity for a review of the new references proposed by TRANSSC members.

France (Ferran) noted that one of the references added was a draft standard. The Secretariat (Capadona) explained that this is possible as some references currently in draft were scheduled to be published before SSR-6 and therefore would be included in the revised SSR-6 as published references.
The Secretariat (Capadona) presented the editorial comments to plenary. One MS proposal:

**USA/11 - Para.547**

The Secretariat technical editor (Shaw) offered his view that the existing text ‘in accordance with’ is more appropriate in this context. USA (Boyle) proposed to keep the existing wording as it reflects what is in the UNOB; Canada (Ramsay) and Japan (Hirose) agreed. UNECE (Kervella) commented that the existing language has been used in the UNOB for a number of years and represents the language agreed upon by English speaking countries.

TRANSSC agreed to reject the proposal and the text to remain unchanged.

**CDN/17, USA/13 - Para 683(b)**

The Secretariat technical editor (Shaw) explained this change for internal consistency in the document and the proposals were rejected by TRANSSC.

**CDN/16, USA/12 - Para 417**

Canada (Ramsay) indicated their proposal to keep ‘per’ in the revised text. Secretariat (Shaw) responded that clarification already exists in other paragraphs of the Regulations and therefore ‘per’ should be deleted from the text. Canada (Ramsay) accepted the view offered by Shaw and TRANSSC subsequently agreed to remove ‘per’ from para.417.

In response to an intervention by Japan (Hirose), the Secretariat (Capadona) commented that the editorial changes are part of the SPESS process and editorial changes cannot be reviewed and commented on by Member States. Japan (Hirose) explained that if the draft is going to be reviewed by a technical editor again (after TRANSSC) then TRANSSC should see the document again to review the changes made to ensure that they do not change the meaning of the text.

Secretariat (Delattre) commented that the technical edit is to be done before Step 11, and then the document goes to the Standards Committees; therefore there is an opportunity to review. The next change to SPESS (in the future) will be for the technical edit to be completed before the CSS meeting so that the final text is what is approved by the CSS.

USA (Boyle) agreed with sentiment of the comments by Japan, in the past TRANSSC did review what was to be published. He proposed that the quality plan for the next revision should include this extra layer of review by TRANSSC.
USA (Boyle) would like TRANSSC to have the opportunity to decide on how ‘consistency’ is achieved in the regulations. Secretariat (Whittingham) commented that during the publication process there are attempts to make changes that will not be reviewed by the safety committees and there are continuing discussions ‘in-house’ to try and stop publications changing documents. Secretariat (Delattre) commented that is why SPESS was changed to include a technical edit at Step 10, enabling committees to examine the documents after the technical edit. There is already agreement with the publications committee that their approval will come at the same time as CSS. The main objective is to publish what is approved. UNECE (Kervella) commented that the text in SSR-6 is transferred into national and international regulations that are mandatory. At some point it is incumbent upon contracting parties to approve any changes made, and then they need to be translated into many different national languages. There are implications on non-English speaking countries when editorial changes are made to the text.

US (Boyle) commented that what was accepted by the TSU may not be acceptable to TRANSSC. In response the Chair stated that the comments are there for the TRANSSC members to review and to agree that they are editorial when the Secretariat states as such.

J/S11/03 - /11 – TABLE 1, TABLE 2 (footnote a & b), TABLE 3, TABLE 4, TABLE 6, TABLE 9, Paras 542, 535,

Proposals were accepted as editorial changes

J/S11/12, WNTI/4 – Para 549

Proposals were accepted for consistency with UNOB.

J/S11/13 – TABLE 11

Proposal was accepted as editorial.

USA/1 – Table of Contents

In response to this proposal the Secretariat stated that the Table of Contents will be the last text to be modified at the end of the publication process.

USA/8 – Para 427

The proposal was accepted.

USA/9 – Table 6

The proposal was accepted.
This proposal was discussed in a working group and the following modified proposal was agreed and approved by TRANSSC plenary:

829(e) should be edited as follows; “All information necessary to satisfy the competent authority that the requirements of para. 520(e) and the requirements of paras. 413(c)(iv) and 522, if applicable, are satisfied.”

Both proposals were rejected. France (Ferran) commented that US 7 and Canada 9 should be discussed together and this would also include USA 16.

A working group was formed to consider these proposals and recommended to TRANSSC plenary that these proposals be accepted, which was approved by TRANSSC. The working group also noted that further guidance for control of the fixed contamination on the accessible surface should be developed for SSG-26.

The Secretariat confirmed that a process is in place in which references in Safety Standards are checked before publication. Proposal was accepted.

All proposals were accepted as editorial comments.

These proposals reject the Para 809(f) which reflected editorial change by technical editor. A revised proposal submitted by Japan J/S11/14, Rev 1 was accepted by TRANSSC plenary.

Austria (Kirchnway) commented the package “design” does not degrade or corrode, but the package itself does.

IAEA Technical Editor (Shaw) commented should it not be “state” of the package?

Germany (Wille) commented from the working group: behind this is the “state” of the package itself. The package “design” was not behind this.

Secretariat (Whittingham) commented the status of package design is: has it been approved, can it be approved. State of package is the condition of the package at the time in question. The text is not clear as written.
France (Ferran) explanatory text in the SSG-26 may be clearer.

WNTI commented the gap analysis is related to the package design rather than to the package.

Russian Federation (Ershov) commented they do not see the contradiction here.

Chair queried if there was a proposal to leave the room and work on this language. A Working Group was formed and left plenary to discuss and propose a way forward.

The output from the Working Group was a revised proposal submitted by Japan J/15 Rev 1 was subsequently approved by TRANSSC and CDN/19, J/S11/15, USA/15 were rejected.

**CDN/1620, USA/16 Para 829(e)**

A working group was formed to consider this proposal and this led to the working group recommending to TRANSSC plenary the following agreed revision for TRANSSC approval:

"Para.829(e) All information necessary to satisfy the competent authority that the requirements of para. 520(e) and the requirements of paras. 413(e)(iv) and 522, if applicable, are satisfied”

TRANSSC approved the recommended text.

**CDN/12, USA 10: - Para 520(e)(iii))**

A working group was formed to consider this proposal and this led to the working group recommending to TRANSSC plenary the following agreed revision for TRANSSC approval:

The modification is that the text will be removed as proposed, but then the first sentence of 520(e)(iii) will be followed by a second sentence; “The transport plan shall demonstrate that the overall level of safety in transport is at least equivalent to that which would be provided if the requirements of para. 648 (only for the test specified in para. 724, preceded by the tests specified in paras. 720 and 721) had been met.”

TRANSSC approved the recommended text.

**WNTI/6: A1/A2 – Table 2, footnote (a)**

The proposal was to ensure the values should include contribution from their progeny at Secular equilibrium.
US (Boyle) recommended you go back and see how this comment was resolved in the January 2017 review panel.

Secretariat: change should go to the A1/A2 working group for their review and re-submitted. There was no comment on this topic from the A1/A2 working group and therefore, nothing was put in before the technical meeting or 120 day comment period.

UK (Tiberio) the A1/A2 working group does not have this in front of them right now.

Secretariat (Whittingham) the A1/A2 working group could provide feedback to the Member State that has made a proposal which would support or otherwise discourage a particular proposal.

US (Boyle) proposed to approve the WNT proposal

France (Ferran) commented it is not clear that to approve the text would be useful; the footnote in the table of the existing SSR-6 does currently address the issue.

Secretariat (Whittingham) commented this is the first time we have this proposal to change the regulations.

Secretariat (Shaw) commented there are no A1/A2 values for these radionuclides (unlimited) so you’d have to refer to the exemption values.

Secretariat (Whittingham): A proposal came in, the A1/A2 Working Group was asked their opinion, it would be discussed and it comes back to TRANSSC for their acceptance, it did not go out for 120 day member state approval and therefore the Secretariat is not comfortable with this situation.

Chair called for a vote, and TRANSSC rejected it for SSR-6, but then accepted placement of this in SSG-26.

**CDN/8, USA/6 – Para 413 (c)(iii)**

Canada (Ramsay) indicated that the version that was posted was not a redline strikeout and therefore they could not tell what had been changed. Canada led the original working group on this topic and they tried to get provisions from Appendix 7 into the regulations themselves. After years of reviewing the issue, Canada went with external contamination to be sure that during shipping you had to make accessible in order to decontaminate them. Therefore, the original proposal for “external areas” is sought for this case.

US (Boyle) commented that contamination and dose problem in inaccessible areas is a serious problem and therefore external areas are preferred.

Spain (Zamora) support the proposal as provided.
Canada (Ramsay) appears that the change was to match SCO I and SCO II but is not relevant in this situation for SCO III.

Austria (Kirchnway) this needs to have a precise definition of inaccessible…

France (Ferran): 413 (c)——

Discussion ensued on the proposal between France, the US, Germany, and Canada. Germany (Reiche) highlighted that there was no notification of the posting April 10 version of the document, there was no notification that there were comments on the document and therefore delegations did not have time to prepare for the discussions on proposals that are currently occurring. Asked that we stop and take time to reconsider. Spain (Zamora) disagreed with the position of Germany and stated that TRANSSC has the final say and this is the place to discuss the technical issues.

TSU (Whittingham) offered that if we need to take the time to review these issues in the TRANSSC meeting and put off other business in order to do this, then that is what we should do.

US commented that TRANSSC is the place to get this done.

Canada (Ramsay) proposes to take the proposed wording back to the working group to verify making the change.

France (Ferran) OK with the change, as it is presented, although it is slightly inconsistent.

Canada (Ramsay) would like to verify that “accessible” could include “external” by going back to the working group

A vote yielded 5 to 5 in Member States. More discussion is needed and consensus should be sought.——

Delattre consensus should be sought on the issue.

TSU (Whittingham) suggested a meeting of those that voted to discuss the issue and attempt to reach a consensus.

WNTI/3 was reviewed and the proposal was adopted.—

A working group was formed to consider these proposals and recommended to TRANSSC plenary that these proposals be accepted, which was approved by TRANSSC. The working group also noted that further guidance on external, internal, accessible and inaccessible should be developed for SSG-26.

2.5.3 DS 495 Paragraph numbering system
Mr Delattre provided a presentation on a new proposed numbering system for the revision of SSR-6 (DS-495). Mr Delattre stated that in general it made no sense to re-number paragraphs that have not been modified. The decision and new policy is as follows:

Whenever a paragraph is added to the existing text, the new paragraph becomes the paragraph # with an A, or B, added. Deleted paragraphs would have an explanation as to where its contents have been moved to. An overview of the paragraph numbers affected by this new numbering system for DS 495 was provided. With the current system, hundreds of changes of paragraph numbers would have to occur and all cross references would be destroyed and would need to be reworked. Every change needs to be checked by editors. It was felt, by Mr Delattre, that the new paragraph numbering would significantly reduce the work that needs to be done to check the cross references for a publication.

Discussions in plenary did not reach a consensus, nonetheless the proposed new paragraph numbering system was approved (voting) by TRANSSC.

2.6 TRANSSC WORKING GROUPS 1, 2, 3, and 4

No discussion took place due to the days focus being on DS-495.

2.7 TRANSSC WORKING GROUPS 5, 6, 7, and 8

No discussion took place due to the days focus being on DS-495.

3.0 DEVELOPMENT OF DOCUMENTS / PRODUCTS

3.1 DPP: SPESS B – STEP 4 Approval for submission to the Commission on Safety Standards (CSS)

3.1.1 DS-499 was approved by TRANSSC.

3.1.2 DS-504 was approved by TRANSSC.

3.1.3 DS-506 was approved by TRANSSC.

Secretariat (Ms Capadona) provided a brief overview of the publication schedule for the SSG-33 (Schedules) document. Step 3 of the SPESS is approval of the DPP to go to the CSS. The only safety committee that needs to approve the DPP is TRANSSC.

3.2 DPP Clearance
None submitted for approval

3.3 Draft safety Standards Approval

3.3.1 Submission to the CSS

DS-472 was approved by TRANSSC.

DS-473 was approved by TRANSSC.

DS-474 was approved by TRANSSC.

DS-479 was approved by TRANSSC.

DS-496 was approved by TRANSSC (Step 7 SPESS: approval to send draft for Member State Comment)

Secretariat (Capadona) provided a brief presentation on the status of this document, the revision of SSG-26, clearly laying out the steps that are to be followed in SPESS and also reviewed the schedule for the publication of this document.

3.3.2 Submission to Member States

DS-475 was approved by TRANSSC.

DS-479 was approved by TRANSSC.

3.4 Draft Security Recommendations Clearance

No Security Documents had been submitted to TRANSSC for clearance

3.5 Work with Other Committees

3.5.1 41st CSS Meeting

Mr Dominique Delattre provided a presentation on the 41st CSS meeting. The presentation focused on the main results of the CSS meeting held 19-21 April, 2017.

The presentation has been posted to the TRANSSC 34 website as INF-11.

3.5.2 OUI System; Registration and Uploading Comments

Mr Delattre provided a presentation on the NS OUI system and specifically demonstrated the functionality of the system related to SPESS step E and documents related to Transport Safety.

Questions were raised as to who would have access to the system the response being that those designated by their Member State would have access.
The Chair inquired about comments posted and whether TRANSSC could access the comments during the review process. The system can provide a summary of all comments submitted on the publication, by document section. A commenter will also be able to print out a summary of all their comments.

Secretariat (Whittingham) asked for clarification on topic based comments. The system will tell you which safety standards might be affected by your comment (in addition to the one you are commenting on). The tool allows for consistency between Standards on the various topical areas.

Finland (Santtu) inquired if comments posted would be visible to all members. The answer was “No”, but comments submitted could be provided to anyone who requested.

Brazil (Bruno) generally agreed with a “non-human” system watching over the regulations, but pointed out that experts from other committees (not transport experts) could offer comments on documents under the purview of TRANSSC.

Secretariat (Delattre) pointed out that this is already the situation today, and that this platform simply makes it possible to do this electronically through a different interface.

Secretariat (Delattre) suggested that a “pilot” project may be a good way to test the system to see if it fits the needs of TRANSSC members. Mr Delattre thanked the US and Japan for their contributions to the OUI system.

Secretariat (Capadona) pointed out that for SSR-6 the definitions are in Section 2. Is it possible to have a link to this section BEFORE going to the glossary in the OUI system. Links to a publication will be harmonized with definitions related to version of the document. Unique IDs will keep relationships between definitions of terms the version of the standard and the definition in that standard.

The Chair suggested that TRANSSC needed to think carefully about how such a comment system might affect the current TRANSSC Review Window.

3.5.3 Safety / Security Interface Group

Mr Hinrichsen stated there was nothing to report at this time.

3.6 Information from other UN/ International Bodies on their documents

3.6.1 UNECE (Contribution from Mr Kervella)

UNECE (Kervella) reported as follows;
Referring to the TRANSSC 33 report, section 3.6.1, Mr. Kervella (UNECE) said that the ECOSOC Committee of Experts on the Transport of Dangerous Goods and on the Globally Harmonized System of Classification and Labelling of Chemicals had adopted, on 6 December 2016, amendments to the United Nations Recommendations on the Transport of Dangerous Goods (Model Regulations and Manual of Tests and Criteria) and to the GHS, which had been published as documents ST/SG/AC.10/44/Add.1, -/Add.2 and -/Add.3. (see http://www.unece.org/trans/main/dgdb/dgcomm/ac10rep.html)

The Secretary-General of the United Nations had submitted a report on the work of the Committee and its two sub-committees during the biennium 2015-2016 (E/2017/53) to the United Nations Economic and Social Council. The report contained a draft ECOSOC resolution inviting member States and specialized agencies to give effect to the new recommendations through their respective national/international relevant instruments, which was adopted by the Council on 8 June 2017. Pursuant to this resolution, the United Nations Secretariat published, in English and French, the 20th revised edition of the Recommendations on the Transport of Dangerous Goods, Model Regulations (Orange Book) and the 7th revised edition of the Globally Harmonized System of Classification and Labelling of Chemicals (GHS) (Purple Book). Pdf versions would be made available on the UNECE website in the forthcoming weeks, and the Arabic, Chinese, Russian and Spanish versions should be available by the end of the year.

Regarding UNECE work, Mr. Kervella underlined that documents intended to implement the provisions of the 20th revised edition of the Orange Book through RID, ADR and ADN had been prepared (ECE/TRANS/WP.15/AC.1/2017/26 and Add.1) and would be discussed by the RID/ADR/ADN Joint Meeting at its autumn session (19-29 September 2017). The Joint Meeting was expected to finalize the set of common amendments to ADR, RID and ADN that should enter into force on 1 January 2019 at this session, although the UNECE Working Party on the Transport of Dangerous Goods, the RID Safety Committee and the ADN Safety and Administrative Committees would still have to finalize amendments specific to each mode of transport (road, rail and inland waterways) at their respective sessions in November 2017 and January 2018. Thereafter, only last minute adjustments could be made before end of May 2018 for the 2019 versions of ADR, ADN and RID.

Documents submitted to the Joint Meeting are available at http://www.unece.org/trans/main/dgdb/ac1/ac12017.html

For future work, the ECOSOC Sub-Committee of Experts on the Transport of Dangerous Goods had started a new (2017-2018) biennium, with a first session (51st)
from 3-7 July 2017. If IAEA decided to publish a 2017 version of SSR-6, proposals for corresponding amendments to the Orange Book should be submitted to the ECOSOC Sub-Committee for consideration at its July 2018 session and final adoption in December 2018. They would then be reflected in the 21st revised edition of the Orange Book to be published in 2019, and thereafter in the 2021 versions of ADR, RID, ADN, IMDG Code, and ICAO TI for effective application to the various modes concerned.

3.6.2 ICAO (Contribution from Ms Rooney)

ICA (Rooney) Reported as follows;

Two Working Group meetings of the Dangerous Goods Panel (DGP) will take place in October 2017.

*Ad-Hoc working group with WNTI on pressure differential;*

WNTI (Desnoyers) provided the findings from the Ad-Hoc WNTI/ICAO DGP meeting. The report of the working group and associated documents were posted on the TRANSSC 34 webpage as INF Papers 15, 15a, 15b and 15c.

The challenge is to ISO freight containers IP2 or IP3, transported as SCO. The requirements used to apply only to liquid, but the 1996 change to 95 KPa + MNOP and applied to all radioactive materials.

It was agreed that Para 621 could be met provided that there was no loss of material from the package.

Guidance text was drafted and this would be provided on the ICAO website. This proposed guidance is provided as an Annex to the posted report.

Supplementary guidance material is also provided and would be posted to the ICAO website. This was submitted to the ICAO DGP WG that met the following week.

The question is if there is no objection from TRANSSC that the next ICAO DGP would determine the best location for this text as guidance material.

TRANSSC had no objection.

The Supplement to the TI’s would include the guidance, the decision is on whether it should be placed on the PUBLIC website.

The second issue brought to TRANSSC related to freight containers. Comments and guidance were provided. In the case of a freight container used as a packaging (IP 2)
the question to TRANSSC is “does Table 7 apply or not?” Para 543 on placarding is required; does this apply or does the labelling requirement for packaging apply.

For freight containers is the TI limited to 10 if it is used as a packaging? If it is over 10 it must be shipped as exclusive use. There appears to be contradictory information. DGP could not resolve this so it is brought to TRANSSC for comment.

France (Ferran) offered their interpretation for freight container as package, stating that you have to meet both requirements and Table 7 does apply.

US (Mr Boyle) commented that we should not to resolve this in the limited time of this meeting and he would need further time to consider offering support to the French position being forwarded as TRANSSC position.

ICAO replied that they would like an answer by the beginning of October would be helpful.

**TRANSSC Action 34-2: TRANSSC was invited to consider the information and provide any responses to the Secretariat as appropriate, by the end of September.**

The Secretariat suggested that a working group (correspondence) might be convened to clarify if there were differences in opinion.

The DGP brought up the issue of transport of materials under exclusive use which lead to inadequate consideration of the requirements. A statement on the DG transport document states it is exclusive use. The regulations do not state this explicitly and this is where there is a cause for concern.

An example was offered of a container with a TI greater than 50 where handling staff did not receive appropriate instructions and this lead ICAO to raise the question of a possible need for additional regulatory text/guidance to provide clarity.

IATA had raised before TRANSSC the question of Krypton 85 ignition exciters. The Spark gaps on these igniters contain Kr 85. The issue is when the engine is classified as UN 2938, or if it is de-fuelled it is shipped without any requirements placed on it.

Is it covered by Para 107 (e) on consumer goods?

SP 363 F covers this also, not subject to any additional requirement.

The Secretariat suggested that this too would be put to TRANSSC members for comment, and replies will be collated and the view of TRANSSC would be provided. ICAO offered that a decision sooner rather than later would be preferred, so they could make a finding at the next DGP.
TRANSSC Action 34-3: TRANSSC was invited to consider the information on the Krypton 85 Ignition Exciters and provide any responses to the Secretariat as appropriate.

ICAO (Rooney) thanked WNTI for their collaborative effort to resolve the pressure differential issue.

3.6.3 IMO (Contribution from Mr Bingbing Song)

IMO (Song) reported as follows;

The IMO Editorial and Technical Group held its 27th session from 8 to 12 May 2017. During the meeting, there were discussions on TI limits and CSI limits (paragraphs 2.5 and 2.6 of the report) (See Information Paper INF-18).

INF 18 outlines the outcome of the E&T Group discussions and contains the issues for what they are attempting to obtain a decision from TRANSSC on the application of TI to flat racks. Para 2.5 and 2.6 of the report covers these issues.

TRANSSC Action 34-4: TRANSSC was invited to consider the information and provide any responses to the Secretariat as appropriate.

Germany (Reiche) explained that the criticality WG had discussed this issue. The outcome was that they could not see a difference from closed and open containers, but cannot, at this stage, confirm the values. Work needs to be done to confirm the values in the table. Regarding the TI, Germany has the feeling that the higher TI values for large freight containers define a certain distance between packages, and closed character is not the point. The point is having distance between the packages. The limit is quite high and investigation will be necessary to answer the question.

TRANSSC Action 34-5: A working group will convene before TRANSSC35 and report to plenary

3.7 Feedback on CSM Transport Safety and Security Interface

A brief update on the CSM was provided by the Secretariat. The CSM (May 2017) featured experts in transport safety and security, and was chaired by Mr Ron Pope (USA) and further revised a draft document (TECDOC) on the safety/security interface and drafted a working agenda for a workshop to aid Member States with the safety/security interface for transport. A DPP has been prepared and this will be finalized and brought forward to the coordination committee and eventually provided at a future TRANSSC. An additional consultancy is planned for August 2017. A report
on the CSM will be made available. At the beginning of 2018 a document can go forward for approval.

3.8 Update on Transport Safety eLearning Platform

Secretariat (Ospina) provided a brief overview the Transport Safety eLearning course currently under development by the Secretariat. The platform will be available for a trial period from end of September and the official launch date will be January 2018.

3.9 Update on Revision of Training Course Series 1

Secretariat (Bajwa) provided a brief description of the work currently ongoing on the revision of the 2006 version of the Radioactive Material Transport Safety training course manual. He also mentioned that this work was being in conjunction with the development of an eLearning course for transport safety. The revised document will be made available on the eLearning platform.

Iran (Eshragi) asked about targeted training, referring to discussions in previous TRANSSC meetings. Secretariat (Whittingham) explained that it was the intention of the Secretariat to provide targeted training and that this would be developed at a later date.

3.10 Update on Technical Basis Document

Mr Bajwa (IAEA) provided a brief update on the status of Technical Basis Document. Work on the TBD is ongoing, and the document will need additional work to be completed. Mr Ron Pope, a former Unit Head of the TSU, is the expert currently working on the document. Plans to make the document available to the wider transport community will be implemented in 2017.

3.11 Update on Revision of ISO7195

ISO (Malesys) provided a presentation on the ISO process of consensus standards and an update on the work to revise the ISO 7195 standard on UF6 cylinders, as well as other ISO standards related to transport. The current draft of the document will go for balloting soon, and then only editorial changes will be made before the document is finally published.

Germany (Wille) raised the point that there is a strong link between SSR-6 and the ISO 7195 standard. He further pointed out that there was no consensus on every point in
the development of the ISO standard. The FDIS has two discrepancies with the ADR and that ISO will be formally informed of these discrepancies when the new draft is published. The European Association of Competent Authorities (EACA) met in May to discuss these points and France will prepare the letter to ISO generally describing the discrepancies between the ADR and the Standards. This is supported by Sweden, Belgium, Netherlands and France. This discussion was to provide notice to TRANSSC.

ISO (Malyses) responded that the ISO standard is a world-wide standard and does not just take into account European regulations.

Brazil (Bruno) is there a grandfathering clause in the ISO 7195 standard? ISO (Malyses) responded that in ISO 7195 there is a provision on transitional arrangements.

On other matters relating to criticality safety, Sweden (Mennerdahl) commented that there is a draft DIS standard for the general ISO 1709 which will be expanded to cover transport.

4.0 PROPOSED WORK PROGRAMME FOR TRANSSC

4.1 TRANSSC workplan

The Chair presented the Work Plan, and briefly went through some of the items on the plan. With regards to the plan for the further development of TS-G-1.3, TS-G-1.4 and TS-G-1.5 he stated that a detailed Work Plan was contained in Information paper Inf-14 which was presented by the Secretariat under Agenda Item 4.3.

4.2 Working Groups 1, 2, 3, and 4

Owing to the reconsideration of priorities during the meeting, Working Groups 1 – 4 did not meet (Agenda items 4.2.1 – 4.2.4).

4.2.5 Transportable Nuclear Reactors

Secretariat (Whittingham) introduced the topic of transportable nuclear reactors, and provided a brief discussion of a white paper that was written by the TSU and which was shared with the IMO some months earlier. A discussion of the issue ensued. The following is a summary of TRANSSC Members comments:

A Member State which would likely be a transit country posed a question relating to how this type of “shipment” would be characterized. Questions were also raised regarding the safety of this type of ship.
The Secretariat noted that there was an upcoming technical meeting on the “Nuclear Safety” of modular reactors and his understanding was this would include transportable reactors. Emergency response, Security and Safeguards have been made aware and have been asked to have discussions on this topic.

Another Member State commented it would be affected by these transports as early as 2018 adding they have very good bi-lateral communication with Russia. Communication, discussion and agreement are key component and they questioned ‘How does it fit in international regulatory guidelines?, is it covered by CNPPM and how does IMO and IAEA see this reactor when it is not a nuclear powered ship’; they commented in their opinion it is necessary to further examine this matter and they look forward to the TM on Safety and further discussion on how this will fit into the exiting framework.

Norway thanked the Secretariat for the paper and for the information which was presented in a clear way. The General Director of the Member State received the paper and moved to raise this issue in some of the other safety committees, and this generated a great deal of interest in these committees. They recommended the IAEA keep the channels of communication open with the IMO on this topic and this would help keep collaboration.

Russia stated that radioactive material transport legislation should not apply to radioactive material that is an integral means of transport. The Chair stated that this was an important issue for the Regulations as the owning state could simply use the on-board power reactor to power the vessel during transport and then claim exemption from the Regulations.

A question was raised concerning a risk assessment and source term calculation for any TNPP design as was the question of the site where the reactor is located: is a site characterization needed for anywhere that this TNPP might be located?

Secretariat (Whittingham): Stated that all current regulations address land based facilities, and may not directly apply to a Transportable Nuclear Power Plant (TNPP) and this raises the question of how to address this situation. Transport safety is well defined and the movement of radioactive material anywhere in the world is within a regulatory safety framework. He expressed his opinion that this technology will need to be assessed to establish where it fits in the nuclear safety framework.

A Member State appreciated what the Secretariat said, and appreciates the opening up of the discussion by the Secretariat, and stated that the safety of transport in the case of these TNPPs should be covered.
IMO thanked the Secretariat for bringing this issue up for discussion adding this is a relatively new issue and there are still a lot of fundamental questions that need to be answered. Any regulatory gaps need to be identified. Under IMO regulatory frameworks safety issues are covered for dangerous goods and for Class 7. In order for this “new technology” to be considered, IMO Member States must raise this issue for further consideration in the IMO context.

Secretariat (Whittingham) We are introducing the topic to have a reasonable safety consideration as a responsible way of addressing this new technology. By leading the way in what is a new sector, new questions and some uncertainties will inevitably be faced on the road to determining if the existing regulatory safety framework is sufficient, and if not, how it can be developed by the existing framework to introduce appropriate new or revised requirements. Starting off in the right way, getting together and moving forward on this topic is important.

He encouraged TRANSSC members to provide written comments to the Secretariat which would then be considered and included as TRANSSC comments in a letter to the IMO in the future.

**TRANSSC ACTION 34-6: TRANSSC Members to send comments to the Secretariat on Transportable Reactors, noting the Secretariat will write to the IMO in late September.**

### 4.3 TRANSSC Decisions on Safety Guides and Priorities

Secretariat (Whittingham) provided an overview of a newly developed color-coded schedule of documents related to transport that will be produced by the Secretariat (via the TRANSSC and other committees) through to 2023, providing insight as to how the Secretariat proposes to conduct the revision of the safety guides (TS-G-1.3, 1.4 and 1.5). Secretariat inquired of TRANSSC which document they felt should begin revision first.

Brazil (Bruno) indicated Compliance Assurance and Management Systems (TS-G-1.4 and TS-G-1.5). They run together and Industry and Competent Authorities use them as guidance for their programs.

Spain (Mr Zamora) indicated their opinion for 1.4 (Management Systems) to be revised first.

Secretariat (Mr Whittingham) put it to TRANSSC that TS-G-1.4 and TS-G-1.5 would be looked to first and TS-G-1.3 would be delayed.
Also on the chart is the criticality, A1/A2, and NORM. The Secretariat enquired as to what were the intents of these groups, in terms of continuing to meet or to produce a document that captures the work of these groups. It was suggested that at the next TRANSSC it would be helpful to have an indication of what these groups wish to do.

TRANSSC concluded that TSG 1.4 and 1.5 will be addressed first.

USA (Boyle) enquired regarding the “Quality Plan” review cycle plan for SSR-6 and SSG-26 and would like to see those for 2020 and beyond.

Secretariat (Mr Whittingham) stated that the TSU would look into the next revision of SSR-6/SSG-26/SSG-33 and how that might be captured in the table that was presented.

TRANSSC ACTION 34-7: Secretariat to include working groups on TS-G-1.4 and TS-G-1.5 in TRANSSC 35 agenda

4.4 Feedback from A1, A2 WG

UK (Cabianca) reported on the 8th meeting of the group, 2nd meeting in the current form. A summary of the work done by the group was provided. The group expects to have completed all the work on Qa and Qb by the next TRANSSC. The group has documented all the work that has been done. The presentation given on the work completed will be available on the TRANSSC 34 website.

USA (Boyle) thanked the members of the WG for an excellent job and proposed the creation of a standing committee on radiation protection which could serve many different functions. The members of the standing committee the be those currently serving on the A1,A2 WG.

The USA proposal was agreed to by TRANSSC. The US requested that the request for a Standing Committee on Radiation Protection be added as an Action Item.

TRANSSC ACTION 34-8: Secretariat to add to the List of Actions for TRANSSC 34 the formation of a Standing Committee on Radiation Protection.

4.5 Feedback from Criticality Working Group

Germany (Reiche) provided a summary of the decisions taken by the group. They could not agree on all issues, therefore some will continue to need to be discussed. INF 23, 24, and 25 include additional information on the issues discussed in the group.
The presentation given on the work completed will be available on the TRANSSC 34 website.

4.6 Feedback from NORM WG

TRANSSC Chair (Hinrichsen) provided feedback on the work of the NORM working group. The WG proposed to continue its deliberations by correspondence and report to TRANSSC 35. The WG Report will be available on the TRANSSC 34 website.

4.7 Feedback from CSM (DS493) – PDSR Safety Guide

France (Lizot) provided a summary of the work completed by the CSM on the DS 493. The document is on SPESS Step 8. The CSM received numerous comments on the document and were not able to resolve all the comments in the time allotted for the CSM; highlights of the changes that were made during the CSM were provided.

Germany (Reiche) commented the EACA would want to know how the guide will be updated, commenting if changes to regulations are made, the guide will be misleading if not updated at the same time.

Secretariat (Mr Whittingham) it is one of the companion guides (along with SSG-26 and SSG-33) that would need to revised along with the regulations. It should not be that challenging to update this document with regulatory changes.

Secretariat (Capadona) thanked the member of the CSM for their hard work and long hours this week.

4.8 Feedback from ICAO-WNTI WG on Pressure Differential During Air Transport

This was presented under Agenda Item 3.6.2.

4.9 Deliverables for TRANSSC 35

See Action Items below.

4.10 TRANSSC 35 and 36 Dates
The dates for the TRANSSC 35 and TRANSSC 36 Meetings, respectively, were 11-15 December, 2017 and 4-8 June, 2018

**TRANSSC ACTION 34-9:** Member States should submit the guidance on SCO III for SSG-26 during the upcoming 120 day Member State comment period for the document.

5.0 INTERACTIONS WITH IAG, IAEA Safety Committees and Secretariat.

5.1 **IAG Meeting (10 July 2017)**

Secretariat (Bajwa) provided a brief update on the discussions that occurred at the IAG meeting that was held 10 July 2017. Many of the issues that were discussed at the IAG meeting were already covered in the presentations of the Modal bodies (ICAO, IMO, and UNECE). A summary of the discussion that occurred with the Transport Facilitation Working Group (TFWG) was also provided. The minutes of the IAG meeting will be finalized and should be posted on the TRANSSC 34 website.

5.2 **TRANSSC Self-Assessment**

Secretariat (Delattre) provided an overview of the “Self-Assessment” process for Safety Standards Committees based on the harmonized terms of reference for the Committees.

**TRANSSC ACTION 34-10:** Secretariat to forward the Self-Assessment Form to TRANSSC Members.

**TRANSSC ACTION 34-11:** TRANSSC Members requested to complete the Self-Assessment Form and to forward to TRANSSC Chair by end of October.

5.3 **TRANSSC End of Term Report**

This item was not discussed during TRANSSC 34.

6.0 **REVIEW OF DRAFT MEETING REPORT**

The Draft Report of TRANSSC 34 would be posted following the conclusion of the Meeting.

7.0 **AGENDA FOR TRANSSC 35**
7.1 Items of Interest to TRANSSC 35

8.0 CLOSE OF MEETING

Pierre Malyses (ISO) and Marie Therese Lizot (France) were recognized and thanked for their invaluable contributions to TRANSSC as this was their last TRANSSC meeting.

Recognition of the service of Mr Bajwa (Secretariat) was provided by the Scientific Secretary and Chair of TRANSSC with the good wishes from TRANSSC for his future endeavours when he returns to NRC in August 2017.

8.0.1 Closing remarks by Mr Steve Whittingham Head Transport Safety Unit

Closing remarks from the Chair were provided.
Consideration should also be taken where there is a possible conflict of safety and security measures during transport, such as placarding and labelling, route and mode selection; and information management. For example, if a State were to determine, based on an analysis of the threat and on an exceptional basis, to remove external hazard communication, compensatory measures should be applied such as escorting personnel who can provide information on the nature and hazards of the material to emergency response. Solutions to potential conflicts such as these should be assessed and approved by the regulatory bodies responsible for transport safety and security.

The State may consider identifying materials and objects that it deems to be sufficiently unsuitable for use in a malicious act that they can be assigned to the basic transport security level when transported within the State. Further, understanding the wide range of radioactive materials which may be included in the basic security level, the State may wish to consider, for domestic transport, defining subcategories within the basic security level with regard to material activity and attractiveness to potential adversaries (discussed in Section 3.X) and assigning appropriate security measures to these subcategories based on a graded approach.
### Resolution Table of Member States Comments

<table>
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<tr>
<th>Comment No.</th>
<th>Para/Line No.</th>
<th>Proposed new text</th>
<th>Reason</th>
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<th>Accepted, but modified as follows</th>
<th>Rejected</th>
<th>Reason for modification / rejection</th>
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<tr>
<td>J/S11/01</td>
<td>All</td>
<td>When texts are revised by the Technical Editors, the revised version should be reviewed by TRANSSC.</td>
<td>To confirm the meaning of the contents is not altered.</td>
<td></td>
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<td>X</td>
<td>The SPESS procedure requires a Technical Editorial review to ensure (amongst other things) clarity, consistency and adherence to the IAEA style, glossary etc.</td>
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<tr>
<td>CDN/1</td>
<td>Table of Contents</td>
<td>Revert to existing format of Table of Contents</td>
<td>It is not clear why the format of the Table of Content was modified following the January 2017 meeting. For example, all existing titles that have been kept from the 2012 Edition are now all in capitalized letters and the associated paragraph numbers have been deleted. A number of new sub-titles have been added such as Low specific activity material without specific request for changing the current format of the Table of Contents. Similarly, existing titles from the 2012 Edition have been removed such as Classification of Packages, Categories, Approval of Special Form Radioactive Material and Low Dispersible Radioactive Material, Notification and</td>
<td>X</td>
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<tr>
<td>Page</td>
<td>Table of Contents</td>
<td>Editorial, formatting</td>
<td>Registration of Serial Numbers although those sections are still in existence within the document.</td>
<td>The Table of content should be reformatted for ease of reading.</td>
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<td>CDN/2</td>
<td>Table of Contents</td>
<td>ANNEX I: SUMMARY OF APPROVAL AND PRIOR NOTIFICATION REQUIREMENTS (Part 4)</td>
<td>REFERENCES TO ANNEX I</td>
<td>The Text from the Table of Contents should be deleted as it is a duplicate of the Title of Annex I.</td>
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</table>
| CDN/3 | Table of Contents | Table of Contents | Editorial: Table of Contents requires reformatting. Propose that the IAEA editors revert to existing format. 
Do not support the use of secondary subtitles (see list that appears under “Classification of Material”). If IAEA process requires this level of detail, please revise Table of Contents completely. | Table of Contents was not prepared in accordance with precedence or in accordance with our understanding of IAEA code of construction. 
Table of Contents is not as approved by TRANSSC in January 2017. | X |
<p>| USA/1 | Table of Contents | Consignors and carriers shall establish, in advance, arrangements for preparedness and response in accordance with the national requirements and in a consistent and coordinated manner with the national emergency arrangements and emergency management system. | Consistency with wording approved during the January 2017 meeting. | Consistency with wording approved during the January 2017 meeting. | X |
| CDN/4 | Para 304 | In the event of a nuclear or | The text proposed is different from the | Either comments to be rejected or in the wording from the TM ‘in accordance’ to be changed with ‘in a consistent and coordinate manner’ for consistency with GSR Part 7, | X |
| J/S11/02 | Para. 304 | | | | |
| USA/2 | Para 304 | Consignors and carriers shall establish, in advance, arrangements for preparedness and response in accordance with the national requirements and in a consistent and coordinated manner with the national emergency arrangements and emergency management system. | Consistency with text approved by TRANSSC in January 2017. | | | comments to be rejected or in the wording from the TM ‘in accordance’ to be changed with ‘in a consistent and coordinate manner’ for consistency with GSR Part 7. As only the term management system is defined in the glossary (and not emergency management system), management system can remain in italic. | X |</p>
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<th>Paragraph</th>
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<td>WNTI/1</td>
<td>304</td>
<td>In the event of a nuclear or radiological emergency during the transport of radioactive material, provisions established by relevant national and/or international organizations shall be observed to protect human life and health, property and the environment. Consignors and carriers shall establish, in advance, arrangements for preparedness and response in accordance with the national requirements and in a consistent and coordinated manner with the national emergency arrangements and emergency management system. The text in red was not agreed as per the final resolutions approved in Technical Meeting (TM) in January. The text approved in January by the TM should be used. The addition is beyond the editorial change and no justification is provided.</td>
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<td>… between the contents of a consignment and the environment in the event of an emergency accident. Consistency with wording approved during the January 2017 meeting.</td>
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<td>Para 305</td>
<td>Refs [6, 11, 12, 13, 14]. New references were added to the text following the meeting from January 2017. Have those references been validated by TRANSSC? References were checked by EPReSC</td>
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<td>USA/4</td>
<td>Para 305</td>
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<td>Identify the process used by IAEA to verify and add references to those approved by TRANSSC. Refs [6, 11, 12, 13, 14] should revert to those approved by TRANSSC in January if no process is identified. Consistency with text approved by TRANSSC in January 2017. Consistency with IAEA regulatory development process. No change proposed. References were checked.</td>
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<td>WNTI/2</td>
<td>305</td>
<td></td>
<td>The arrangements shall be based on the graded approach and take into consideration the hazards identified and their potential consequences, including the formation of other dangerous substances that may result from the reaction between the contents of a consignment and the environment in the event of an emergency accident. Guidance for the establishment of such arrangements is contained in Refs [6, 11, 12, 13, 14]. References deleted in red were not mentioned as per the final resolutions approved by the Technical Meeting (TM) in January. The text approved in January by the TM should be used. In the sentence the word “accident” is more relevant than “emergency”. To be rejected with clarity provided that emergency may arise also from a malicious act and the requirement should still be valid.</td>
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Table 1

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Names and description will be readable and so as the footnotes are on the same page as the table itself.

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**Footnotes:**

**Table 2** footnote (a) **Am-242m** **Am-242, Np-238**

**Table 2** footnote (b) Insert line breaks before Th-229. Delete space between Tl-208 and (0.36). Delete period and space after Po-212 and insert "(". Delete space between Pb-214 and Bi-214. Insert space between Am-242m and Am-242
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<td>- Th (natural) (a)</td>
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<td>- U (natural) (a)</td>
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<td>To add the following sentence at the end of footnote (a):</td>
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<tr>
<td></td>
<td>A₁ and A₂ values for Th (natural) and for U (natural) include contribution from their progeny at secular equilibrium.</td>
<td></td>
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<tr>
<td></td>
<td>A footnote should be assigned to U (natural) and Th(natural) to reflect TRANSSC decision regarding comment No USA/2015/10.</td>
<td></td>
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<tr>
<td></td>
<td>X</td>
<td>More detailed discussion and a conclusion in A1/A2 Working Group of experts is needed before changing current status of Table 2.</td>
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<table>
<thead>
<tr>
<th>WNTI/9</th>
<th>Footnote (a) under Table 2</th>
<th>Editorial</th>
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<tbody>
<tr>
<td></td>
<td>A₁ and A₂ to be changed in A₁ and A₂.</td>
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<th>WNTI/10</th>
<th>Footnote (b) under Table 2</th>
<th>Editorial</th>
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<tr>
<td></td>
<td>The list shall be reformatted (Th-238 and Th-239 on the same line, tabulations, …)</td>
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<tr>
<th>J/S11/06</th>
<th>P.36 TABLE 3</th>
<th>Editorial</th>
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<td>The height of title column should be adjusted to show full text.</td>
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<th>Table 3</th>
<th>Editorial</th>
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<td>The units are not readable: the table shall be reformatted.</td>
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<table>
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<tr>
<th>CDN/8</th>
<th>Para 413(c)(iii)</th>
<th>&quot;accessible surfaces&quot; should be &quot;external surfaces&quot;</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Following a detailed analysis, Canada does not support this change which was made following the January 2017 meeting.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>According to Appendix VII of SSG-26 guidance for large objects (VII.19), and confirmed by the</td>
<td>X</td>
</tr>
</tbody>
</table>
| USA/6 | Para 413(c)(iii) | “accessible surfaces” should be “external surfaces”  
(TRANSSC is strongly encouraged to revisit and revise the decision made in January 2017) | US supports comments made by Canada at January 2017 TRANSSC meeting and supports the recommendations made by original working group.  
US believes this is a real world, proven safety risk and does not believe this to be a potential or theoretical safety issue.  
US experience demonstrates that inaccessible surface areas do retain significant contamination due to their large surface area. This was demonstrated when a narrow gap between manway covers (weighing 800 pounds) and a steam generator were not properly prepared and led to contamination of the rail car carrying the generator. | X |
| CDN/9 | Para 413(c)(iv) | This bullet should be removed. | Following a detailed analysis, we do not support this change which was made following the January 2017 meeting. Any provisions for fixed contamination on the external surfaces of an SCO-III were purposefully not defined by the original working group for SCO-III.  
Fixed contamination would often be difficult if not impossible to determine. For SCO-III, no specific | X |
limits for the levels of fixed contamination on the external surfaces are required, since similar to packages, the external radiation resulting therefrom will combine with the penetrating radiation from the contents, and the net radiation levels are controlled by other specific requirements (para 573). The limit on the external non-fixed contamination is conservatively set to that for packages which, combined with the controls on radiation levels will ensure that the risk from fixed contamination is low. The major percentage of the component’s activity (A2 quantity) should be due to surface contamination on interior surfaces, rather than on exterior surfaces or resulting from neutron activation of the component.

| USA/7 | Para 413(c)(iv) | 413(c)(iv) should be deleted  
TRANSSC is strongly encouraged to revisit and revise the decision made in January 2017) | US supports comments made by Canada at January 2017 TRANSSC meeting and supports the recommendations, which specifically and intentionally omitted fixed contamination limits for SCO-III, submitted by the original working group.  
US concurs with Canada comment that was submitted on this issue and is repeated below (italics added).  
Any provisions for fixed contamination on the external surfaces of an SCO-III were purposefully not defined by the original working group for SCO-III.  
Fixed contamination would often be difficult if not impossible to determine. For SCO-III, no specific limits for the levels of fixed contamination on the external surfaces are required, since similar to packages, the external radiation resulting | X |
therefrom will combine with the penetrating radiation from the contents, and the net radiation levels are controlled by other specific requirements (para 573). The limit on the external non-fixed contamination is conservatively set to that for packages which, combined with the controls on radiation levels will ensure that the risk from fixed contamination is low. The major percentage of the component’s activity (A2 quantity) should be due to surface contamination on interior surfaces, rather than on exterior surfaces or resulting from neutron activation of the component.

<table>
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<th>Reference</th>
<th>Page</th>
<th>Issue</th>
<th>Details</th>
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<tr>
<td>J/S11/07</td>
<td>P.39-40</td>
<td>Whole table should be contained in the same page.</td>
<td>Editorial</td>
</tr>
<tr>
<td>WNTI/12</td>
<td>Table 4</td>
<td>Should be gathered on one page instead of being cut in two parts.</td>
<td>Editorial</td>
</tr>
<tr>
<td>CDN/10</td>
<td>Para 427</td>
<td>(e) If the <strong>packaging</strong> has contained <strong>fissile material</strong>, one of the provisions of subparagraphs (a)–(f) of para. 417 or one of the provisions for exclusion in para. 223 shall apply.</td>
<td>Words “packaging” and “fissile material” should be in italic.</td>
</tr>
<tr>
<td>USA/8</td>
<td>Para 427</td>
<td>Editorial (italics missing): (e) If the <strong>packaging</strong> has contained <strong>fissile material</strong>, one of the provisions of subparagraphs (a)–(f) of para. 417 or one of the provisions for exclusion in para. 223 shall apply.</td>
<td>Consistency with IAEA regulatory development rules.</td>
</tr>
<tr>
<td>CDN/11</td>
<td>Table 6</td>
<td>Missing line for LSA-I material</td>
<td>The line related to LSA-I is missing from the Table</td>
</tr>
<tr>
<td>J/S11/08</td>
<td>P.47</td>
<td>TABLE 6</td>
<td>The height of lower column should be adjusted to show full text. Insert a line after the footnote.</td>
</tr>
<tr>
<td>USA/9</td>
<td>Table 6</td>
<td>Editorial: Data appears to be missing or illegible</td>
<td>Correctness and Consistency with IAEA regulatory development rules.</td>
</tr>
<tr>
<td>WNTI/13</td>
<td>Table 6</td>
<td>Editorial</td>
<td>The table is not readable and shall be reformatted.</td>
</tr>
<tr>
<td>WNTI/14</td>
<td>Table 7</td>
<td>TABLE 7. MULTIPLICATION FACTORS FOR TANKS, FREIGHT CONTAINERS AND UNPACKAGED LSA-I, AND SCO-I AND SCO-III</td>
<td>Editorial</td>
</tr>
<tr>
<td>CDN/12</td>
<td>Para 520(e)(iii)</td>
<td>Remove the words; “to obtain an overall level of safety at least equivalent to that which would be provided if the requirements of para 648 (only for the test specified in para 724, preceded by the test specified in paras 720 and 721) had been met,” Following a detailed analysis, Canada does not support this change which was made following the January 2017 meeting. According to Appendix VII of SSR-6 guidance for large objects (VII.27), and confirmed by the original working group for SCO-III, the test requirements for IP-2 packages are sufficient for a large object and are already specified in 520(e)(iv). The likelihood of a large object failing these added tests (water spray and penetration) is extremely remote and therefore the tests are unnecessary. Any concern about water ingress to the package</td>
<td>The modification is that the text will be removed as proposed, but then the first sentence of 520(e)(iii) will be followed by a second sentence: “The transport plan shall demonstrate that the overall level of safety in transport is...”</td>
</tr>
<tr>
<td>USA/10</td>
<td>Para 520(e)(iii)</td>
<td>Remove the words; &quot;to obtain an overall level of safety at least equivalent to that which would be provided if the requirements of para 648 (only for the test specified in para 724, preceded by the test specified in paras 720 and 721) had been met,&quot; (TRANSSC is strongly encouraged to revisit and revise the decision made in January 2017)</td>
<td>US concurs with Appendix VII of SSR-6 guidance for large objects (VII.27) which was confirmed by the original working group for SCO-III and believes the test requirements for IP-2 packages are sufficient for a large object and are already specified in 520(e)(iv). US experience in transport of large objects shows no likelihood of a large object failing these added tests (water spray and penetration).</td>
</tr>
<tr>
<td>J/S11/09</td>
<td>P.49 TABLE 9</td>
<td>The height of column for <em>Excepted package</em> should be adjusted to show full text.</td>
<td>Editorial</td>
</tr>
<tr>
<td>CDN/13</td>
<td>Para 535</td>
<td>535. Each <em>package</em> that conforms to: (a) (b) (c)</td>
<td>Typos.</td>
</tr>
<tr>
<td>J/S11/10</td>
<td>P.49 Para. 535</td>
<td>Subparagraph numbers (f), (g) and (h) should be read as (a), (b) and (c).</td>
<td>Editorial</td>
</tr>
<tr>
<td>CDN/14</td>
<td>Para 542</td>
<td>542. Each label conforming to the applicable models in Figs 2–4 shall be completed with the following information: (a) ..... (i) ..... (ii) ..... (b) (c) ..... (b) (d) .....</td>
<td>Typos.</td>
</tr>
<tr>
<td>J/S11/11</td>
<td>P.50-53 Para. 542</td>
<td>Subparagraph numbers (a), (b), (b) and (c) should be read as (a), (b), (c) and (d).</td>
<td>Editorial</td>
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<td>------------------------------------------------------------------</td>
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</tr>
<tr>
<td>WNTI/15</td>
<td>542</td>
<td>(b) should be (c) and (c) should be (d)</td>
<td>Editorial</td>
</tr>
<tr>
<td>WNTI/3</td>
<td>542 (a) (i)</td>
<td>Except for LSA-I material, the name(s) of the radionuclide(s) as taken from Table 2, using the symbols prescribed therein. For mixtures of radionuclides, the most restrictive nuclides must be listed to the extent the space on the line permits. The group of LSA or SCO shall be shown following the name(s) of the radionuclide(s). The terms &quot;LSA-II&quot;, &quot;LSA-III&quot;, &quot;SCO-I&quot;, &quot;SCOII&quot; and &quot;SCO-III&quot; shall be used for this purpose.</td>
<td>In accordance with the decision taken about the French proposal reference F/2016/17 during the Technical Meeting in January, no &quot;category&quot; is assigned to unpackaged SCO-III (see para. 530), and no label is required to be affixed on unpackaged SCO-III (see para. 540). Consequently “SCO-III” shall be removed from the requirement in para 542 (a) (i).</td>
</tr>
<tr>
<td>CDN/15</td>
<td>Para 549</td>
<td>549. The consignor shall include in the transport documents a certification or declaration in the following terms:</td>
<td>Consistency with wording approved during the January 2017 meeting. Proposal related to this change was accepted.</td>
</tr>
</tbody>
</table>

"I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name and are classified, packaged, marked and labelled/placarded, and are in all respects in proper condition for transport in accordance with applicable international and national..."
| J/S11/12 | P.55-56 Para.549 | "I hereby declare that the contents of this **consignment** are fully and accurately described above by the proper shipping name and are classified, packaged, marked and labelled/placarded, and are in all respects in proper condition for transport **according to** in accordance with applicable international and national governmental regulations." | TRANSSC31 agreed to use "according to" instead of "in accordance with" to be consistent with the modal regulations such as UNOB, IMDG Code or ICAO-TI. As the text in "" is a model text of consignor’s declaration, the term "consignment" should not be italicized. | X |
| USA/11 | Para 549 | 549. The **consignor** shall include in the transport documents a certification or declaration in the following terms:

"I hereby declare that the contents of this **consignment** are fully and accurately described above by the proper shipping name and are classified, packaged, marked and labelled/placarded, and are in all respects in proper condition for transport **in accordance with according to** applicable international and national governmental regulations." | Consistency with text approved by TRANSSC in January 2017. | X |
<p>| WNTI/4 | 549 | &quot;I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name and are classified, packaged, marked and labelled/placarded, and are in all respects in proper condition for transport <strong>in accordance with according to</strong> applicable international and national governmental regulations.&quot; | The text approved in TRANSSC31 should be used to be consistent with the modal regulations. | X |
| J/S11/13 | P.59-60 Table 11 | Whole table should be contained in the same page. | Editorial | X |
| WNTI/16 | Table 11 | The table should appear on a sole page with its footnotes. | Editorial | X |
| CDN/16 | Para 622 | 622. An <em>excepted package</em> shall be designed to meet the requirements specified in paras 606–618 and, in addition, the requirements of para. 636 if it contains *fissile material allowed by one of the provisions of subparagraphs (a)–(f) of per para. 417, and the requirements of paras 619–621 if carried by air. | Consistency with wording approved during the January 2017 meeting. | X | Original wording not grammatically correct. This suggested rewording reflects the wording used previously in 423. |
| USA/12 | Para 622 | 622. An <em>excepted package</em> shall be designed to meet the requirements specified in paras 606–618 and, in addition, the requirements of para. 636 if it contains *fissile material allowed by one of the provisions of subparagraphs (a)–(f) of per para. 417, and the requirements of paras 619–621 if carried by air. | Consistency with text approved by TRANSSC in January 2017. | X | Original wording not grammatically correct. This suggested rewording reflects the wording used previously in 423. |
| CDN/17 | Para 683 (b) | 683. For <em>packages</em> to be transported by air: (a)…. | Consistency with wording approved during the January 2017 meeting. | X | 733 specifies a “Water leakage test” – no need to use “in-leakage.” |</p>
<table>
<thead>
<tr>
<th>Country</th>
<th>Para</th>
<th>Consistency</th>
<th>Note</th>
</tr>
</thead>
</table>
| USA/13 | Para 683 (b) | \(683.\) For packages to be transported by air: 
\(\begin{align*}
(a) & \ldots \\
(b) & \text{In the assessment of para. 682, use of special features as specified in para. 680 is allowed provided that leakage of water into or out of the void spaces is prevented when the package is submitted to the Type C package tests specified in para. 734 followed by the water in-leakage test specified in para. 733.}
\end{align*}\) | Consistency with text approved by TRANSSC in January 2017. | X | 733 specifies a “Water leakage test” – no need to use “in-leakage”. |
| CDN/18 | Para 809(f) | \(809.\) An application for approval shall include: 
\(\begin{align*}
\ldots \\
(f) & \text{If the package is to be used for shipment after storage, the applicant shall state and justify the consideration of ageing mechanisms on how ageing mechanisms have been considered in the safety analysis and justify these.}
\end{align*}\) | Consistency with wording approved during the January 2017 meeting. | See J/S11/14 Rev.1 |
| J/S11/14 | P.83 Para. 809(f) | (f) If the *package* is to be used for *shipment* after storage, the applicant shall state **how ageing mechanisms have been considered in the safety analysis** and justify **the these considerations and take account of the findings of these considerations of ageing mechanism on the safety analysis and within the proposed operating and maintenance instructions.** |
| J/S11/14 Rev.1 | P.83 Para. 809(f) | (f) If the *package* is to be used for *shipment* after storage, **the applicant shall state how ageing mechanisms have been considered in the safety analysis and justify these a justification of considerations and take account of the findings of these considerations to ageing mechanism in the safety analysis and within the proposed operating and maintenance instructions.** |
| USA/14 | Para 809(f) | 809. An application for *approval* shall include:

*……*

(f) If the *package* is to be used for *shipment* after storage, the applicant shall state and justify the **consideration of ageing mechanisms on how ageing mechanisms have been considered in the safety analysis and justify these considerations and take account of** |

---

**The text is different from the consensus of TM-55113, and changed text does not seem to be improved. Recover the agreed text.**

See J/S11/14 Rev.1

**As para. 809 starts with “An application for approval shall include”, subparagraphs should specify concrete name, kind or nature of documents.**

X

Consistency with text approved by TRANSSC in January 2017.

See J/S11/14 Rev.1
<table>
<thead>
<tr>
<th>Reference</th>
<th>Page</th>
<th>Text</th>
<th>Notes</th>
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<tr>
<td>WNTI/5 809 (f)</td>
<td></td>
<td></td>
<td>Consistency with wording approved during the January 2017 meeting.</td>
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<tr>
<td>CDN/19 Para 809(k)</td>
<td>809. An application for approval shall include:</td>
<td></td>
<td>Consistency with wording approved during the January 2017 meeting.</td>
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<tr>
<td>CDN/19 Para 809(k)</td>
<td></td>
<td></td>
<td>The text is different from the consensus of TM-55113. As the term “gap analysis programme” is common and important to the concept of shipment after storage, and is explained in DS496 (SSG-26_20xx Edition), it should be maintained.</td>
</tr>
<tr>
<td>J/S11/15 P.84 Para. 809(k)</td>
<td></td>
<td></td>
<td>Consistency with wording approved during the January 2017 meeting.</td>
</tr>
<tr>
<td>J/S11/15 Rev.1</td>
<td>P.84 Para. 809(k)</td>
<td>(k) For packages which are to be used for shipment after storage, a gap analysis programme describing a systematic procedure shall be established for a periodic evaluation of changes of regulations, changes in technical knowledge and changes of the state of the package design during storage.</td>
<td>As para. 809 starts with “An application for approval shall include”, subparagraphs should specify concrete name, kind or nature of documents.</td>
</tr>
<tr>
<td>USA/15</td>
<td>Para 809(k)</td>
<td>809. An application for approval shall include: (k) For packages which are to be used for shipment after storage, a systematic procedure shall be established for a gap analysis programme shall be provided. The gap analysis programme shall describe a systematic procedure for a periodic evaluation of changes of regulations, changes in technical knowledge and changes of the state of the package design during storage.</td>
<td>Consistency with text approved by TRANSSC in January 2017.</td>
</tr>
<tr>
<td>CDN/20</td>
<td>Para 829(e)</td>
<td>Remove the words; “and the requirements of paras. 413(c)(iv) and 522, if applicable,”</td>
<td>These paragraphs referenced requirements to allow the respective regulatory limits to be exceeded provided it could be demonstrated that, following a transport accident, the activity intake by a person in the vicinity of the accident does not exceed $10^{-6}A_2$ or a corresponding inhalation dose of 50 mSv. This option was removed in both these paragraphs, so the references are no longer applicable.</td>
</tr>
<tr>
<td>USA/16</td>
<td>Para 829(e)</td>
<td>Remove the words; “and the requirements of paras. 413(c)(iv) and 522, if applicable,”</td>
<td>These paragraphs referenced requirements to allow the respective regulatory limits to be exceeded provided it could be demonstrated that, following a transport accident, the activity intake by a person in the vicinity of the accident does not exceed 10^{-6}A_2 or a corresponding inhalation dose of 50 mSv. This option was removed in both these paragraphs, so the references are no longer applicable.</td>
</tr>
<tr>
<td>CDN/21</td>
<td>Para 838</td>
<td>838. Each certificate of approval issued by a competent authority for a special arrangement shall include the following information: (k) Additionally, for packages containing fissile material: (b) (i) A detailed description of the authorized radioactive contents;</td>
<td>Typos</td>
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### References

<table>
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<tr>
<th>CDN/22</th>
<th>References</th>
<th>N/A</th>
<th>It is not clear as to why new references were added (GSG-2, GSG-2.1) and other removed (NSS-13 and NSS-14) following the January 2017 meeting</th>
<th>No change proposed. References have been checked by NSGC and EPReSC.</th>
</tr>
</thead>
<tbody>
<tr>
<td>USA/17</td>
<td>References</td>
<td>Identify the process used by IAEA to verify and add references to those approved by TRANSSC. References should be removed if no verification and addition process is defined.</td>
<td>Consistency with text approved by TRANSSC in January 2017. Consistency with IAEA regulatory development process.</td>
<td>No change proposed. References were checked by NSGC and EPReSC.</td>
</tr>
</tbody>
</table>