### Advisory Material for the IAEA Regulations for the Safe Transport of Radioactive Material (DS496)

#### COMMENTS BY REVIEWER

<table>
<thead>
<tr>
<th>Comment No.</th>
<th>Para/Line No.</th>
<th>Proposed new text</th>
<th>Reason</th>
<th>Accepted</th>
<th>Accepted, but modified as follows</th>
<th>Rejected</th>
<th>Reason for modification/rejection</th>
</tr>
</thead>
<tbody>
<tr>
<td>B-1</td>
<td>103.16 (b)</td>
<td>(b) Concept of Dual Purpose Cask (DP&amp;C) is incorporated as “shipment after storage”.</td>
<td>Wrong abbreviation of Dual Purpose Cask</td>
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<td>B-2</td>
<td>409.16</td>
<td>No new text</td>
<td>Considering that small contaminated objects can be qualified as LSA-II without any more precise criteria (a.o. indication on the sizes) is not sufficient clear and precise, and can be misunderstood and/or not correctly used by the consignor.</td>
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<td>B-3</td>
<td>624.5</td>
<td>In case when the compliance to the requirement is demonstrated by measurement of dose rate using a package loaded with radioactive sources. The method of evaluation of the increase in maximum surface dose rate varies from one design to another. This could lead to discrepancies in evaluating a package’s ability to satisfy the requirements of para. 624(b). One way of overcoming this problem may be to define the maximum surface area of the package over which the surface dose rate is assessed. Thus, for example, individual measurements may be taken over areas not greater than 10% of the total surface area of the package. The package surface may be marked to define the subdivisions to be considered and tests conducted by means of a test source suitable for the package (i.e. Co-60 or Na24 for general package use or specific nuclides for a certain package design and appropriate activities which result the change of dose rate to be detectable). It</td>
<td>According to our experience, it’s very difficult to demonstrate by measurement the requirement of para 624 (b). The requirement is applicable at any external surface. It’s difficult to define a representative test source for LSA material especially for the geometry of the content and his movement during tests specified in para 722 and 723. The guidance could be misunderstood and lead to possible misuses by designer.</td>
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<td>may be necessary to consider the effect of increased localized dose rates when evaluating surface dose rate increases.</td>
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