Consultancy Meeting on Review of Member States’ Comments after 120-day Review of DS496
Advisory Material for the IAEA Regulations for the Safe Transport of Radioactive Material (20xx Edition)
J1-CS-1702607

29 January to 2 February 2018 at the IAEA Headquarters in Vienna, Austria

Second Consultancy Service Meeting on the Revision of the Advisory Material for the IAEA Regulations for the Safe Transport of Radioactive Material (SSG-26) and the Technical Basis Document (TBD)
J1-CS-1800819

19 to 23 March 2018 at the IAEA Headquarters in Vienna, Austria

Meeting Report
Drafted by Frank Koch, 3 April 2018

List of Participants:
Marianne Moutarde, France
Florence Gauthier, France 29 January to 2 February
Thierry Chrupek, France
Ingo Reiche, Germany
Steffen Komann, Germany 29 January to 2 February
Makoto Hirose, Japan
Akiko Konnai, Japan recording changes to DS496
Takuji Fukuda, Japan
Daiichiro Ito, Japan 29 January to 2 February
Frank Koch, Switzerland chair (for most of the time)
David Pstrak, USA recording decisions made on comments (Table of comments)
Anthony Patko, USA
Pierre Malesys, WNTI
Rainer Nöring, WNTI
Nancy Capadona, IAEA
Stephen Whittingham, IAEA partially attendant
Background

The *Regulations for the Safe Transport of Radioactive Material, 2018 Edition* (IAEA Safety Standards Series No. SSR-6, Rev. 1) (hereafter referred to as the “Transport Regulations”), have been approved by the Commission on Safety Standards. Following a new edition of Transport Regulations, the companion guide SSG-26, the Advisory Material for the IAEA Regulations for the Safe Transport of Radioactive Material, has to be revised accordingly. In June 2017, TRANSSC approved the draft text for the new edition of SSG-26 (DS-496), and Member States were requested to review the draft and submit their comments to the Secretariat.

These comments have been collected and consolidated by the IAEA Secretariat, and they will be discussed and either accepted or rejected for inclusion in the final draft of the new edition of the SSG-26, that will be submitted for approval to TRANSSC in November 2018.

TRANSSC has developed the Technical Basis Document (TBD) to record the history and the background of changes in the Transport Regulations since the first publication in 1961. The current version of the TBD provides some interfaces with the SSG-26.

Work to be done and requested outputs due to ToR

The comments received from Member States will be discussed in order to decide whether they are accepted, modified or rejected for the revision of SSG-26. Due justifications will be made in case of partial or total rejection. Recommendations to clarify the interface between the SSG-26 and the TBD will be provided. The requested outputs of the meeting were:

- the Resolution Table of Comments received by the IAEA Secretariat during the 120-day period,
- the final draft of the new edition of the Advisory Material (SSG-26, 2018 Edition), to be submitted for approval according to the IAEA Safety Standards publication process, and
- the proposal for updating/upgrading the TBD.

Meeting report and results with respect to SSG-26

The consultants have reviewed and intensively discussed the 462 Member States comments. The consultants have accepted 184 comments, modified 209 and rejected 69. Based on Member States comments, the consultants have provided additional amendments to SSG-26 draft mainly

- to improve clarity,
- to consolidate multiple comments for the same para.

All decisions have been made, based on a broad consensus of the attendant consultants and supported by the secretariat to ensure follow-up of TRANSSC decisions. Thanks to the provided comments of Member States, the consultants are committed to improve the guidance material to give reasonable advice for the implementation of the Transport Regulations in the Member States.

As the main results of the two consultancy service meetings, the resolution table of comments and the updated SSG-26 draft have been provided to support further TRANSSC considerations.

In addition, the consultants would like to bring the following issues to the attention of TRANSSC:

In this revision cycle,
1. Japanese comment J/03 propose to move the history section in SSG-26 (paras 103.8 to 103.16) to the TBD. The consultants accept to move most of this input to the TBD, but only the changes related to the current SSR-6 should remain in SSG-26. During the meeting, a consultant from Japan has provided an introductory section for the TBD including the other proposals related to the mentioned paras for SSG-26. The consultants recommend to TRANSSC to accept the move of paras 103.8 to 103.16 from SSG-26 to TBD.

2. The consultants have addressed proposal CDN/5 and other ones related to SCO-III to conclude inclusion of fixed contamination on the external surface to the calculation example in Appendix VII to support para 413.11. The consultants recommend that the SCO-III guidance material should be carefully reviewed by TRANSSC before final approval of SSG-26 draft.

3. The consultants have discussed comments related to the 20% increase in NCT such as F/32, F/36, F/40, and F/46. The consultants recommend text based on these comments, which should be reviewed by TRANSSC to be retained in SSG-26 or not, since they are new proposals discussed in dose rate 20% increase WG of TRANSSC35. France has indicated to formally address a note to TRANSSC including the CS results.

4. The comments J/44, J/45, and J/46 seek for completion of data for the newly added nuclides in the relevant tables. The consultants would like to bring this issue to the attention of TRANSSC and the A1/A2 working group to be added to the Appendices I and II.

5. The comment USA/158 proposes modifications of the definitions in Appendix IV (retention and tie-down). The consultants have reviewed and amended the definitions to improve clarity. TRANSSC should be aware of the amended definitions and the consistent use in the Appendix.

For further consideration in future review/revision cycles,

6. Following the IAEA editing policy, the consultants have rejected the comment USA/29 and related ones, which would like to include the sentence “Throughout this publication, reference to these modal regulatory documents always refers to the latest edition”. The consultants recommend that TRANSSC should consider the adoption of this concept in the next review/revision cycle of SSR-6.

7. The consultants have modified the comment CH/06, but they recommend to consider adopting the definition of the surface area for the contamination measurement to be included in para 505 during the next review/revision cycle of SSR-6.

8. The consultants made a recommendation for the resolution of CH/09 and related ones such as D/20, which address the application of the multiplication factor. The consultants would like to forward the issue to TRANSSC (or the future TRANSSC Technical Expert Group (TTEG)) for addressing these details and, if necessary, consider amendments to SSR-6 in the next review/revision cycle.

9. With respect to the rejected comment UK/13 (clarification of temperature range applied to testing of Type A packages), the consultants recommend to forward the issue for consideration by TRANSSC or the future TTEG for package performance.

10. The consultants have rejected the comment RUS/4, which seeks for clarification of not considering in-leakage for testing. The consultants recommend the issue to be considered by TRANSSC or the future Technical Expert Group for criticality.
11. With respect to the comment F/51, the consultants have discussed the consideration of collision for NCT testing. The consultants have not accepted the comment in this respect but they would like to forward the issue to TRANSSC or the future Technical Expert Group for package performance.

The chair would like to thank all the participants for their valuable contributions, and in particular Akiko Konnai for recording changes to DS496, David Pstrak for recording decisions made on comments and Nancy Capadona for ensuring follow-up of TRANSSC decisions and for providing IAEA editorial requirements for document preparation.

**Meeting report and results with respect to TBD**

The consultants have briefly discussed the relationship of the SSG-26 and the TBD. The main comments of the attendant consultants are summarised below:

- The incentive to compile TBD was to preserve background knowledge which was quickly disappearing due to loss of reference documents and retirement of experts in order to assist MS in future review and revision the Transport Regulations with deeper understanding of the technical background of provisions in the Regulations.
- Though the most of numerical values specified in the Regulations may be of arbitrary, engineering judges made by precursors have been proven to be excellent through the brilliant safety history in transport.
- Thanks to the works since 2010, exploring technical basis established in the past seem to have been completed. It is time to close such work and save the fruit as TBD Part 1.
- To assist MS deliberation in review/revision cycles of the Regulations, it will be helpful to provide compilation data such as, what was proposed, how discussed and why accepted, amended or rejected in the previous cycles in the Regulation paragraph-wise, as TBD Part 2.
- Thematic areas of the Regulations could be assigned to the specific TTEG.
- SSG-26 should be maintained in the current form (how + why), since it is IAEA official document approved by the related Safety Committees under the SPESS process.
- TBD would be an un-official, electronic document out of the SPESS process, but should be reviewed by TRANSSC, e.g., every updated content should be reported to TRANSSC meeting and consented.
- A consultancy meeting to prepare TBD Part 2 preparation process may be convened in coming September.

As an additional contribution, a discussion paper has been provided by Steve Whittingham as the head of the Transport Safety Unit (see attachment).

**Attachments to the meeting report**

- Resolution table of comments
- Updated SSG-26 draft
- Discussion paper to record technical basis of SSR-6