



ONR Transport Competent Authority Newsletter

March 2022

Introduction

Welcome to the newsletter from our Transport Competent Authority (TCA).

The TCA is the competent authority, under the Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations 2009 (CDG), for the movement of Class 7 (Radioactive) material by road, rail and inland waterways within Great Britain.

The TCA also provides support to the other UK competent authorities with respect to transport by Sea and Air; and by land in Northern Ireland. ONR is also the enforcing authority for the Ionising Radiation Regulations 2017 with regards to transport.

This newsletter aims to provide a regular update to all duty-holders, with information relevant to the transport of radioactive material within the UK.

The TCA provides generic guidance and support on how duty-holders can comply with the legal requirements via our [website](#) and stakeholder events, this newsletter is part of that approach. For advice on specific transport activities, duty-holders should consult their Radiation Protection Advisor and/or Dangerous Goods Safety Advisor (DGSA).

Inspections and compliance activity

We undertake a programme of planned compliance inspections of duty-holders that have transport responsibilities. Inspections are undertaken physically at duty-holder's premises or remotely as appropriate. All our inspectors are tested for COVID-19 prior to a physical inspection and will follow any appropriate restrictions duty-holders may have in place.

During our inspections in the previous quarter we have noted the following issues:

- Radiation Risk Assessments are required to consider the total load potential load in a vehicle – not just a single package. The assessment should consider the number and type of packages in a consignment. Where a wide variety of loads are transported a bounding cases may be used to cover the range of activity carried, in these cases the bounding case(s) will need to be justified.

Incidents and operational experience

We are informed of transport incidents via our INF1 reporting process; these, along with previously reported incidents, are reviewed on a regular basis. The following incidents have been identified as significant:

- Radiopharmaceutical bottle damage/broken

We have been informed of a number of similar incidents over the last three months. The causes of these incidents are still under investigation, please continue to report broken vials to ONR if you come across them.

- Road Traffic Accidents

There have been a number of incidents involving minor road traffic accidents. Nobody was seriously hurt and no material released as a result of these incidents. It is understood that traffic incidents can be difficult to avoid but the response to an incident should be part of your contingency/emergency plans. We have come across incidents recently where the plans were not clear and/or individuals not trained in their use.

Incidents should be reported using the process identified on the [Notify ONR - Contact us](#) page.

We are updating our incident recording system and remind duty-holders that we require the details of consignor, carrier and consignee (where applicable) in incident reports. We also may ask for further details of any packages involved – e.g. UN number, radioisotope and activity.

Changes to regulations and ONR guidance

Radiation Risk Assessments:

The guidance on Radiation Risk Assessments has been updated. The guidance is in a new format and contains additional information to assist in the production of risk assessments. There has been no change in expectations and it is important that the IRR17 ACOP should be used in conjunction with the ONR guidance. The guidance can be found at:

<https://www.onr.org.uk/transport/td-tca-gd-003.pdf>

ONR Website:

The Transport section of the ONR website has been updated. The structure has been changed and some additional information and guidance provided. The website can be found at:

<https://www.onr.org.uk/transport/index.htm>

Type A Packaging inspection guidance:

ONR has issued guidance to its inspectors to use when assessing the compliance of Type A packaging. This guidance may be useful to duty-holders to benchmark their own arrangement against. Some of the guidance is applicable to other non-competent authority approved packages, although the guidance is aimed primarily at Type A.

https://www.onr.org.uk/operational/tech_insp_guides/ns-insp-gd-075.pdf

Package approvals and expiry

ONR has received a number of package certificate renewal applications without a Periodic Design Review Report (PDRR). The PDRR is a key aspect of the application, section 4 of the Applicants Guide - [Guidance for applications for UK Competent Authority Approval \(onr.org.uk\)](#). Without a PDRR the application for renewal will not be successful.

See Annex A for package approvals/validations that have been granted by us, and on behalf of the other regulatory authorities:

See Annex B for package approvals/validations that have lapsed or are due to lapse:

The details in Annexes A and B are provided for information only, it is the responsibility of the consignor to ensure that the package being consigned has a valid certificate of approval for all modes and countries required.

International

As part of our international role we manage the UK's responses to updates in International Atomic Energy Agency (IAEA) documentation relating to the transport of Class 7 dangerous goods.

There were no international meetings last quarter. In March 2022, ONR submitted, on behalf of the UK, a range of comments to the IAEA relating to the review of SSR-6.

We publish formal revision consultations on our website - [ONR - International Atomic Energy Agency draft documents consultation](#) – in addition to discussions with industry bodies.

Contact Us

Contact with the TCA should be through our contact email account below.

E-mail: contact@onr.gov.uk

Website: [ONR - Transporting radioactive material](#)

Annex A – package certificates/validations approved in 2022 to date

Competent Authority ID	Issue Date	Expiry date
GB/3518A/AF-85	13/01/2022	31/07/2025

Annex B – Package certificates/validations expired or due to expire in Q1 and Q2 of 2022

Competent Authority ID	Expiry Date	Status
GB/1648C/B(M)-96T	31/03/2022	In assessment re-issue due soon
GB/3575A/AF-96	31/03/2022	In assessment re-issue due soon
GB/3575A/AF-96T	31/03/2022	In assessment re-issue due soon
GB/3575B/AF-96	31/03/2022	In assessment re-issue due soon
GB/3575B/AF-96T	31/03/2022	In assessment re-issue due soon
GB/3575C/AF-96T	31/03/2022	In assessment re-issue due soon
GB/3575C/AF-96	31/03/2022	In assessment re-issue due soon
GB/3739A/B(U)F-96	31/03/2022	Six month extension granted In assessment.
GB/395/S-96	31/05/2022	Application received