

# ONR Transport Competent Authority Newsletter

Dec 2021

#### 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 <u>website</u> 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 period we have noted the following issues:

- Emergency/contingency plans relying on the driver to instigate the plan. Duty-holders should put in place procedures to respond to incidents reported by any reporter as the driver may be incapacitated or unaware of the incident.
- Co-operation between duty-holders. We have been informed that in some cases duty-holders are not co-operating in the production of Radiation Risk Assessment (RRA) and/or emergency/contingency plans. We would like to remind all duty-holders that CDG09 (Schedule 2(1) Para 3(8)) and IRR17 (Reg

16) require duty-holders to co-operate and exchange information with each other.

### 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:

Package fallen from vehicle during carriage.

An incident occurred where an incorrectly secured package fell from a vehicle during carriage. The package was found by a member of the public who contacted the consignor. The consignor did not provide suitable guidance to the member of the public.

As a result of this incident the consignor was issued with an Improvement Notice and an Enforcement Letter, the carrier was issued with an Enforcement Letter.

ONR reminds all duty-holders that the RRAs, contingency and emergency plans are important (and legally required) documents that identify and determine your response to incidents.

Radiopharmaceutical vial seal failure

An incident occurred where the lid on a radiopharmaceutical vial was not correctly sealed prior to consignment. As a result of this on opening the lead pot containing the vial, the consignee found the vial to be empty. On investigation the lead pot and interior of the package were found to be contaminated. The root cause of the failure is currently under investigation.

Incidents should be reported using the process identified on the Notify ONR - Contact us page.

We are updating our incident recording system, as such we 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

We are in the process of reviewing our guidance on transport RRAs having taken account of feedback and observations during inspections. ONR's transport RRA expectations will be clarified in the revised guidance, specifically in regard to estimation of accident doses and the need for a clear conclusion as to whether a radiation emergency is possible. The guidance on emergency plans is also due for review in the next 12 months.

## Package approvals and expiry

The following package approvals/validations have been granted by us, and on behalf of the other regulatory authorities:

See Annex A

The following package approvals/validations have lapsed or are due to lapse:

See Annex B

#### 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.

In Nov 2021 we attended the 43<sup>rd</sup> meeting of the IAEA Transport Safety Standards Committee. This was run as a remote meeting using video conferencing, the details of what was discussed are available on the IAEA website - TRANSSC Members Area (iaea.org) the minutes will be published by the IAEA in due course.

The meeting agreed to start the review process for SSR-6 – the review comment process will be open until 14<sup>th</sup> Feb 2022 at which point any comments received by ONR will be submitted to the IAEA for consideration.

If you would like to submit comments please email <a href="mailto:linearing-nov.uk">lnternationalstandards@onr.gov.uk</a> with the subject heading "SSR-6 review" and we will provide you with the form to submit.

We publish formal revision consultations on our website - <u>ONR - International Atomic Energy Agency draft documents consultation</u> – 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 2021

Competent Authority ID	Issue Date	Expiry date
GB/3575A/AF-96 (Rev. 1)	12/01/2021	31/03/2022
GB/3575A/AF-96T (Rev. 1)	12/01/2021	31/03/2022
GB/3575B/AF-96 (Rev. 1)	12/01/2021	31/03/2022
GB/3575B/AF-96T (Rev. 1)	12/01/2021	31/03/2022
GB/3575C/AF-96T (Rev. 0)	12/01/2021	31/03/2022
GB/3575C/AF-96 (Rev. 0)	12/01/2021	31/03/2022
GB/5112/B(M)F-96 (Rev. 0)	25/03/2021	20/07/2025
GB/3575A/AF-96 (Rev. 2)	07/04/2021	31/03/2022
GB/3575A/AF-96T (Rev. 2)	07/04/2021	31/03/2022
GB/3575B/AF-96 (Rev. 2)	07/04/2021	31/03/2022
GB/3575B/AF-96T (Rev. 2)	07/04/2021	31/03/2022
GB/3575C/AF-96T (Rev. 1)	07/04/2021	31/03/2022
GB/3575C/AF-96 (Rev. 1)	07/04/2021	31/03/2022
GB/5129/B(U)F-96 (Rev. 1)	15/04/2021	31/12/2021
GB/2773A/B(U)-96 (Rev. 9)	19/04/2021	30/06/2025
GB/5124/AF-96 (Rev. 0)	08/06/2021	31/03/2025
GB/2799E/B(U)-96 (Rev. 7) – Modification CN 070	08/06/2021	10/02/2020
USA/9296/B(U)-96 (Rev. 12)	15/06/2021	31/05/2026
GB/5128/B(U)F-96 (Rev. 0)	16/06/2021	30/11/2023
USA/9357/B(U)-96 (Rev. 6)	17/06/2021	31/05/2026
GB/2773D/B(U)-96 (Rev. 0)	23/07/2021	31/07/2026
GB/2773D/B(U)-96 (Rev. 1)	04/08/2021	31/07/2026
CDN/2104/B(U)-96 (Rev. 0)	06/09/2021	31/05/2026
GB/2773A/B(U)-96 (Rev. 9) – Modification CN 072	09/11/2021	30/06/2025
GB/5130/AF (Rev. 0)	01/12/2021	04/03/2025

Annex B – Package certificates/validations expired or due to expire in 2021

Competent Authority ID	Expiry Date	Status
USA/9035/B(U)-96 (Rev. 20)	31/01/2021	No current UK approval
GB/3575A/AF-96 (Rev. 0)	31/03/2021	Replaced by Rev. 1 on 12/01/2021
GB/3575A/AF-96T (Rev. 0)	31/03/2021	Replaced by Rev. 1 on 12/01/2021
GB/3575B/AF-96 (Rev. 0)	31/03/2021	Replaced by Rev. 1 on 12/01/2021
GB/3575B/AF-96T (Rev. 0)	31/03/2021	Replaced by Rev. 1 on 12/01/2021
GB/3575A/AF-96 (Rev. 1)	31/03/2021	Rev. 2 issued on 07/04/2021
GB/3575A/AF-96T (Rev. 1)	31/03/2021	Rev. 2 issued on 07/04/2021
GB/3575B/AF-96 (Rev. 1)	31/03/2021	Rev. 2 issued on 07/04/2021
GB/3575B/AF-96T (Rev. 1)	31/03/2021	Rev. 2 issued on 07/04/2021
GB/3575C/AF-96 (Rev. 0)	31/03/2021	Rev. 1 issued on 07/04/2021
GB/3575C/AF-96T (Rev. 0)	31/03/2021	Rev. 1 issued on 07/04/2021
GB/292/S-96 (Rev. 4)	28/02/2021	No current UK approval
GB/2942A/B(M)F-96 (Rev. 3)	30/04/2021	No current UK approval
GB/2942A 01/B(M)F-96T (Rev. 5)	30/04/2021	No current UK approval
GB/2943A/B(M)F-96 (Rev. 3)	30/04/2021	No current UK approval
GB/2943A 01/B(M)F-96T (Rev. 5)	30/04/2021	No current UK approval
GB/3518A/AF-85 (Rev. 9)	31/05/2021	No current UK approval
GB/2773A/B(U)-96 (Rev. 8)	30/06/2021	Replaced by Rev. 9 on 19/04/2021
GB/3939A/B(U)-96 (Rev. 3)	30/06/2021	Validated for UK use under CDN/2104/B(U)-96 (Rev. 0) on 06/09/2021
USA/9296/B(U)-96 (Rev. 11)	30/06/2021	Replaced by Rev. 12 on 15/06/2021
USA/9357/B(U)-96 (Rev. 5)	30/07/2021	Replaced by Rev. 6 on 17/06/2021
GB/2835A/B(U)-96 (Rev. 3)	31/07/2021	No current UK approval
GB/3358W/B(M)F-96 (Rev. 1)	30/09/2021	No current UK approval
GB/3981A/B(U)-96 (Rev. 3)	31/10/2021	No current UK approval
GB/2917A/B(U)-96 (Rev. 0)	20/12/2021	Valid UK approval (application for renewal under assessment)
GB/2767B/B(U)-96 (Rev. 4)	31/12/2021	Valid UK approval (application for renewal under assessment)
GB/3516B/AF-96 (Rev. 0)	31/12/2021	Valid UK approval
GB/5108A/IF-96 (Rev. 4)	31/12/2021	Valid UK approval (application for renewal under assessment)
GB/5108A/AF-96 (Rev. 1)	31/12/2021	Valid UK approval (application for renewal under assessment)
F/381/AF-96 (1) (Rev. 6)	31/12/2021	Valid UK approval (application for renewal under assessment)