



REPORT OF WORKSHOP
AT
THE SOCIETY OF RADIOLOGICAL PROTECTION
MEETING
ON
THE TRANSPORT OF RADIOACTIVE MATERIALS

Produced by

The Non Nuclear Industry Sectorial Committee

Summary

This report is a record of the findings resulting from the workshop held at the SRP meeting on the Transport of Radioactive Materials. It includes the notes made at the time of the workshop and a summary of the areas to be explored by the Non Nuclear industry Sectorial Committee and the Department for Transport.

It does not attempt to resolve the issues, but to identify those raised that should be addressed in future planning by various interested organisations.

Report of the Society for Radiological Protection meeting on the Transport of Radioactive Material held on 1st November 2007

1. Introduction

Following a workshop organised by the Department for Transport the previous year, it was realised that the participants needed a forum in which to raise questions and discuss issues relating to transport. As a result the Non Nuclear Industry Sectorial Committee (NNISC) decided that they should organise a meeting on behalf of the Society for Radiological Protection on the Transport of Radioactive Materials. This meeting took place on 1st November 2007 at the Birmingham and Midlands Institute. The NNISC decided that an appropriate way forward was to divide the meeting into two parts, a morning of presentations from key personnel and a workshop comprising syndicate groups in the afternoon. The meeting programme is attached in Appendix A.

A full report of the meeting has been produced by Peter Cole, University of Liverpool and this will be published in the Society Journal of Radiological Protection.

2. Process

Participants were asked to select three sessions from the five that were offered and to rotate round these groups during the afternoon. The sessions offered were:

- Session A – Packaging
- Session B – Documentation
- Session C – Training
- Session D – QA/Monitoring
- Session E – Security

Each group had facilitators from the NNISC and Department for Transport (DfT). The NNISC were not offering answers to the questions raised, merely a forum in which to raise them.

Following the SRP meeting, the NNISC and DfT arranged a meeting to discuss the outcome of the workshops and summarise the points made. DfT expressed a desire to participate in order to gain information on the areas they may need to explore for producing future guidance and legislation. The HSE also attended in relation to one of the specific recommendations made by the workshop.

A summary in the form of bullet points giving the key areas of concern has been produced. This summary will be used by the NNISC and the Department for Transport to determine areas that need to be addressed in the future.

3. Summary of themes arising from the workshop

Syndicate session A - PACKAGING

- Application of Ionising Radiations Regulations 1999 to packages containing exempt material.
Users need to be reminded that although a package may be exempt from the transport regulations, other legislation such as the Ionising Radiations Regulations are still applicable.
- Re-use of packages including those packages classified as 'Non Reusable'.
Users wish to know if, for example, Type A packaging could be re-used for the transport of "Excepted" packages. This is an important environmental issue as regards recycling and reuse.
- Issues surrounding denials of shipment.
Users experienced problems with denial shipments, particularly at Ports and would appreciate it if this issue could be addressed. There was an indication that this was due to lack of understanding on the part of the Port Authorities.
- Issues surrounding the perceived volume of paperwork (too much?)
There is confusion regarding "Certificates of Conformity" and "Consignment notes", some do not appreciate that not all paperwork is required by the Department of Transport, but is required by other legislation such as Customs and Excise.
- Incident reporting and feedback.
Some accidents and incidents are not reported.. It was agreed that this is an area that needs to be addressed, particularly if any of these are notifiable events.

Syndicate Session B - DOCUMENTATION

- Document Retention Periods
Lack of awareness regarding retention periods for documentation. Inconsistencies between legislation.
- Repeat consignment notes (Transport Docs)
Validity period for consignment notes required.
- Tremcards – Emergency Instructions in Writing
- DFT (dangerous goods division) website and guidance:
www.dft.gov.uk/pgr/freight/dgt1
There was a view that derogations should be published on the DfT website. This should be investigated.
- Comparison (changes) between Old and New regulations.
Users wanted a document illustrating the variations between the old and the new regulations. There was also a call for a simplified guide to the ADRs.

Syndicate Session C - TRAINING

Issues not to be confined to Transport of (dangerous goods) Class 7

- Responsibilities and requirements (sector Specific)
It was clear from the suggestions made that responsibilities and requirements need to be identified for personnel such as Duty Holders, driver training and vocational training by employers. DfT are in discussion with the National Skills Academy regarding competences for Duty Holders under Class 7. Propose to have two sectors setting the level of training - nuclear and non nuclear.
- Flowchart (DfT Flowchart in preparation)
DfT are preparing a flowchart covering aspects of transport, including packaging, radiation, contamination, vehicle procedures, radiation protection requirements and emergency response.
- Refresher Training (frequency)
Users would like guidance on the frequency of refresher training as there is some confusion regarding frequency.
- Guidance
Guidance on the syllabus on what training is required.

Syndicate Session D - QA/MONITORING

- Quality Assurance programmes
Users want to know what is acceptable, is it appropriate to size and scope of operations, what is needed for small and large sources. Should it incorporate requirements of IRR99 and RSA93. What QA should go into the documentation.

QAPs – What is required for:

- Infrequent User,
 - frequent User,
 - Orphan sources,
 - Carriers?
- SRP – List of Carriers?
There was a suggestion that SRP should have a list of carriers on the website. This is not feasible and it would be more appropriate if DfT had a list of approved carriers on its website.
 - Re Use of Packages
Already addressed under packaging.
 - Monitoring
Users want to know what monitoring should they be carrying out. Do consigners monitor package went where it was destined to go? Is delivery out of hours causing difficulties?
 - SRP – Sector Guidance

It was suggested that SRP produce Sector specific guidance. This will be examined by the NNISC.

Syndicate Session E - SECURITY

- Transport - weak link
There were concerns that transport is the weak link as regards security of sources, in particular lorry theft. There is guidance on the DfT website:
 - *Transec <http://www.dft.gov.uk/pgr/security/>*
 - *FTA website www.fta.co.uk/*
 - *IAEA (low end)*

- Placarding
A number raised the question of whether to placard or not, raising the profile that they are transporting radioactive material. IAEA insist that vehicles are placarded. Loris Rossi informed some of the groups that the EC had examined this issue and concluded that the health and safety benefits of signage, particularly in accident situations, far outweighed any increased risks of theft.

- International Shipments regulated agents (Transec)

- Deliveries of medical radioactive materials(out of hours)
*There was suggestion that deliveries out of hours may still be causing difficulties, particularly in terms of security. HSE raised the issue in 2002/03 and the **British Nuclear Medicine Society (BNMS)**, **British Institute of Radiology (BIR)**, and the **Institute of Physics and Engineering in Medicine (IPEM)** subsequently issued joint guidance. It was felt that HSE should remind duty holders of the presence of the guidance.*

4. Conclusions

The meeting was well attended with in excess of 130 attendees, numbers being limited by the size of the venue and meeting rooms.

The feedback overall was good and all attendees were given an opportunity to raise questions and express their opinions.

The NNISC and DfT have a number of areas to explore to improve communications and training of users, such as shippers, carriers and customers.

5. Future Work

At the meeting following the SRP meeting it was agreed that the NNISC would explore the following areas:

- List of carriers
- Guidance and best practice in transport NNISC
- Direct links to regulators on SRP website.
- Identify single point of contact within SRP for DfT to feed update information to.

The Department for Transport would Department review training of duty holders which involves series of standards training syllabi. This will be carried out in conjunction with National Skills

Academy and Learning and Skills Council. HSE would republicise the guidance for security arrangements for delivery and collection of radioactive materials in medicine.

6. Acknowledgements

The Non Nuclear Industry Sectorial Committee wish to thank the presenters, the workshop facilitators, and the note takers for their contribution towards making it a very successful meeting. They also wish to thank Peter Cole for producing a full report of the meeting for the Journal and the Department for Transport for supporting the venture and for attending the follow-up meeting afterwards.

Sheila Liddle
Secretary NNISC
19th January 2008

Appendix A

PROGRAMME

Plenary Session: Lyttleton Lecture Theatre

- 09.30** **Chairman's Welcome & Presentation of SRP Awards**
Sheila Liddle, SRP President
- 10.00** **Transport Legislation**
Caroline Billingham, Department for Transport
- 10.30** **International Transport Security Arrangements**
Loris Rossi, Department for Transport
- 10.50** **International Transport Issues**
Charlie Carrington, GE Healthcare
- 11.10** Coffee & Exhibition (Dickens Room)
- 11.30** **Carriage by Air – What, When & Who**
Estelle Walker, Onephton Consultancy
- 11.50** **Transfrontier Shipment**
Bob Russ, Environment Agency
- 12.10** **Packaging – Excepted, Industrial and Type A**
Trevor Moseley, AURPO/Sheffield University
- 12.30** **Open Forum**
- 12.50** Lunch & Exhibition (Dickens Room)
- 13.50** **Introduction to Workshop Sessions**
Delegates will be able to attend 3 of the 5 workshops offered and they will begin at the following times:

14.00 Workshop 1
14.40 Workshop 2
15.20 Workshop 3

Workshop Choices & Location:

- A Packaging – Lyttleton Lecture Theatre
- B Documentation – Room 14
- C Training – Room 16
- D QA and Monitoring – Room 21
- E Security – Woodward Room

16.00 Concluding Remarks