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SAFE AND SECURE AT THE SOURCE



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Trip Report for TRANSSC 32 / RASSC 40 / WASSC 41 / 9th NSGC

TRANSSC-32 - June 14-15

TRANSSC-32 was a short meeting that spanned two days but warranted more time. It is unclear as to why the Secretariat made the decision to abbreviate the meeting and post-pone needed work until TRANSSC-33 this November. The following are highlights from the meeting:

French Proposal on Orange-Colored Plate:

France recently submitted a proposal to revise when the orange-colored plate displaying the UN number was required in the ADR/ADN/RID regulations. The French proposal was to require that the UN number be displayed except when it isn't meaningful or convenient (for example, if radioactive materials corresponding to several UN numbers are simultaneously carried). However, the participants to the latest ADR/ADN/RID joint meeting weren't ready to adopt this amendment without this subject being previously discussed in the context of TRANSSC. The proposed amendments would only affect surface shipments in the countries participating to ADR, ADN and/or RID. TRANSSC did not accept the French proposal to revise SSR-6 paragraph 572 to support the French proposal. It is unclear if this will affect the proposal to ADR/AND/RID.

Update on the status of A1/A2 values:

During AGM 2016 I provided a partial list of isotopes and the draft change to the A1 and A2 values that were presented during TRANSSC-31. Several isotopes had a significant reduction in the A1 and A2 values that would have mostly affected the radiography industry pushing some devices that contain sources in the Type A quantity into Type B quantities. This would be problematic if the devices were not qualified as Type B packages. The original goal of the A1/A2 working group was to have new values for the revision of SSR-6. This goal will not be achieved.



Work reassessing the A1/A2 values will continue, but the working group activities will be restructured as an IAEA CRP (Coordinated Research Project). This will delay any change to the current A1/A2 values. In addition, two different irradiation geometries considered: isotropic (ISO) or rotational (ROT). Anterior-posterior geometry no longer considered. ISO calculations closer to current Q_A values. ROT calculations generally <30% higher. A-values may not be affected. Consensus in the working group has not been reached on which geometry (ISO or ROT) to use. Actual effect on A-values will be determined, it is believed now that many of the A1/A2 values will not change.

There are new isotopes that have been added to the list of A1 and A2 values that are included in the SSR-6 revision, these are:

Radionuclide	A ₁ (TBq)	A ₂ (TBq)
Ni-57	0.6	0.6
Ge-69	1	1
Sr-83	1	1
Ba-135m	20	0.6
Ir-193m	40	3

SSR-6 Para 304 and 305:

The current text of paragraphs 304 and 305 are provided below:

304. In the event of accidents or incidents during the transport of *radioactive material*, emergency provisions, as established by relevant national and/or international organizations, shall be observed to protect persons, property and the environment. Appropriate guidelines for such provisions are contained in Ref. [4].

305. Emergency procedures shall take into account the formation of other dangerous substances that may result from the reaction between the contents of a *consignment* and the environment in the event of an accident.



Both paragraphs have been revised as part of the revision to SSR-6. During committee review EPRESC (Emergency Preparedness and Response Standards Committee) provided suggested revisions to both paragraphs that had been previously revised by TRANSSC. The revision to Para 304 was partially accepted while the revision to Para 305 was rejected. The revised paragraphs in SSR-6 that will go out to member states for 120 day review are as follows:

304. In the event of ~~of~~ a nuclear or radiological emergency during the transport of *radioactive material*, provisions established by relevant national and/or international organizations shall be observed to protect human life, health, property and the environment. *Consignors* and *carriers* shall establish in advance arrangements for preparedness and response for emergencies that may occur during transport in accordance with the **national emergency arrangements and emergency management system**. **Guidance** for the establishment of such **arrangements** are contained in Ref. [4, 14].

305. Emergency ~~procedures~~ **arrangements** shall take into account **all postulated emergencies and their consequences, and shall consider** the formation of other dangerous substances that may result from the reaction between the contents of a *consignment* and the environment in the event of an accident. **Guidance for the establishment of such provisions are contained in Ref. [4, 14].**

I see some compliance challenges with these paragraphs depending on how they are interpreted. It is not clear if there is an expectation for coordination between the consignor and carriers. The phrase “all postulated emergencies” is extremely broad and developing emergency arrangements to cover this aspect would be burdensome. ISSPA may want to comment directly or through member company competent authorities on these paragraphs during the 120 day review period.

Status of SSR-6:

SSR-6 approved by TRANSSC to go out for 120 MS review. Approval from other safety standard committees expected in the coming weeks. Target publication 2018.

Status of SSG-26:



SSG-26 approved by TRANSSC for CSS review. Approval from other safety standard committees expected in the coming weeks. Target publication 2019.

Status of SSG-2X (new document):

The Structure and Information to be Included in a Package Design Safety Report (PDSR) for the Transport of Radioactive Material. PDSR approved by TRANSSC to go out for 120 MS review. Approval from other safety standard committees expected in the coming weeks. Target publication 2018.

DS469 Revision to TS-G-1.2:

TS-G-1.2, Planning and Preparing for Emergency Response to Transport Accidents Involving Radioactive Material was published in 2002 and is due for revision. A new SSG will be developed, with proposed title Preparedness and Response for an Emergency during the Transport of Radioactive Material. Status to obtain approval to submit DPP to the CSS for approval. DPP will be presented to RASSC, WASSC and NSGC this week to move the DPP forward. Target publication date of 2020.

41st WASSC – June 20

The WASSC only meeting was held on June 20th from 14:00 to 17:30. This was a short meeting that covered topics only pertinent to WASSC, specifically the status of WASSC work and waste section safety standards. Of the Standards that are currently under revision or recently published that may have the most effect on ISSPA members is WS-G-2.5, Predisposal Management of Low and Intermediate Radioactive Waste, which has a section on disused sources and conditioning disused sources prior to disposal. This safety standard is in the publication process and is expected to be published in 2016.

41st WASSC/40th RASSC Joint Meeting – June 21-22

The joint WASSC/RASSC meeting was held June 21st and 22nd and covered topics applicable to both safety standard committees. I participated in the meeting June 21st. The meeting conducted on June 22nd was a topical meeting on NORM and was not relevant to ISSPA.



Status of Supplemental Guidance to the Code of Conduct:

The most significant topic discussed during the joint WASSC/RASSC meeting was the status report for the Code of Conduct Supplementary Guidance on the Management of Disused Radioactive Sources. There will be a technical meeting the week of June 27th which Paul Gray will attend to address Member State comments to the supplementary guidance. Approval from policy making organizations expected late summer/early fall of 2016.

Revision of RS-G-1.7 Application of the Concepts of Exclusion, Exemption and Clearance:

The second most important topic to ISSPA members is the proposed revision to RS-G-1.7. The current Safety Guide, published in 2004 based on the 1996 version of the BSS. Basic information from RS-G-1.7 has been incorporated into the new BSS and now much of RS-G-1.7 is redundant. No guidance exists on new concepts and definitions that have been introduced into the new BSS. The preferred option to revise RS-G-1.7 is to divide it into two new safety guides. One guide focused on the clearance of materials (waste) and the other on the exemption of commodities. This process is in the very early stage of development, DPPs not yet drafted and target publication dates of 2022.

9th Meeting of the NSGC – June 20-23

The 9th meeting of the NSGC was held from June 20th - June 23rd. Like all previous NSGC meetings Observers are restricted from a portion of the meeting, in this case Observers were allowed to attend the NSGC beginning in the afternoon session (2 PM) on the first day. I did not attend this session as I attended the WASSC meeting on the 20th. On the 21st I attended the joint WASSC/RASSC meeting. I did attend the NSGC meeting on June 22nd because the WASSC/RASSC meeting on NORM was held on the 22nd. I don't believe we missed much information as many of the agenda topics in WASSC/RASSC and the NSGC meeting were redundant as a good portion of the agendas were updates on the status of



DPPs and requests to the committee to move a DPP to the next step in the SPESS (Strategies and Processes for the Establishment of IAEA Safety Standards).

Status of Supplemental Guidance to the Code of Conduct:

The same presentation provided to WASSC/RASSC was provided to the NSGC. No additional information to report.

NST011 Preventative measures for nuclear and other radioactive material out of regulatory control:

The NSGC approved the document to go to Member States for 120 day review. The US had strong reservations with the document as they didn't believe there was any utility in the document as much of the material contained in the document is redundant with other documents. The US did not block the document from going out for 120 day review but I would expect that there will be significant comments to the document.

Computer Security Guidance:

Currently two guidance documents undergoing development, NST045 Computer Security for Nuclear Security and NST047 Computer Security Methods for Nuclear Facilities. These DPPs are planned to be presented at the 10th NSGC meeting in November for approval to proceed to 120 day Member State review. Once approved these documents will replace NSS 17, Computer Security at Nuclear Facilities. The scope of these documents is limited to nuclear facilities and there has not been any discussion to expand the scope or develop similar documents for radiological facilities. It will be interesting to see the member state comments after the 120 day review to see if there is a desire to expand computer security to radiological facilities. You may recall the NRC had distributed a computer security questionnaire to licensees earlier this year and NEI submitted a letter to the NRC urging that computer security regulations are not developed and that computer security guidance could be provided to licensees.

40th RASSC – June 23



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The RASSC only meeting was held on June 23th from 09:00 to 15:30. A good portion of the morning session was devoted to further discussion on Radon pertaining to revisions to dose coefficients for radon exposure. The new dose coefficients vary depending on the persons smoking habits. There are no radon dose coefficients in the BSS but they are expected to include these in the future.

DPPs discussed in earlier meetings also included in the RASSC only meeting.

The following RASSC lead DPPs that may affect ISSPA members are listed below.

DS419 - Radiation Safety in Well Logging:

Safety guide with planned target publication date of 2010 continues to be delayed in technical editing.

DS420 - Radiation Safety for Nuclear Gauges:

Safety guide with planned target publication date of 2010 continues to be delayed in technical editing.

A handwritten signature in blue ink, appearing to read "John J. Miller", with a long, sweeping horizontal line extending to the right.

John J. Miller