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COMMITTEE OF EXPERTS ON THE TRANSPORT OF DANGEROUS GOODS AND ON THE GLOBALLY HARMONIZED SYSTEM OF CLASSIFICATION AND LABELLING OF CHEMICALS

Sub-Committee of Experts on the
Transport of Dangerous Goods

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Comments on Working Paper ST/SG/AC.10/C.3/2006/67 ICAO Proposal on para 1.1.2.2.5 of UN Model Regulations

Transmitted by the IAEA

The International Civil Aviation Association/ICAO submitted to the 29th Session of the UN Sub-Committee of Expert on Transport of Dangerous Goods a proposal to add the following note to the para. 1.1.2.2.5 of UN Model Regulations:

For occupational exposures arising from transport activities, where it is assessed that the effective dose is most unlikely to exceed 1mSv in a year, no special work patterns, detailed monitoring, dose assessment programmes or individual record keeping need be required.”

ICAO considers the note would be beneficial, especially in light of current difficulties being faced in the transport of radioactive materials. In the following lines, detailed information of this issue is presented as well as the IAEA's view.

Background

For the Review Revision Cycle that produced the 2003 version of the IAEA Transport Regulations, a proposal was submitted by United Kingdom dealing with para 305 (a, b and c) of the Regulations (pls, see attached UK/02/14). According to this proposal, it is generally wrong to specify what the regulations don't require you to do in a regulation. Therefore, it would be more appropriate simply not to require. By deletion of para (a) the items which are not required in it continue not to be required. In this way the mismatch between (a) – most unlikely to exceed 1 mSv and (b) – likely to exceed 1 mSv (there is a gap here) is taken care of.

Para. 305 (a) was deleted from the 2003 revision because requiring dose assessment only under the conditions specified in (b) and (c) would imply that there was no need for dose assessment under the condition specified in (a). That is 305 (a) was a "no requirement" statement. By deleting it nothing would be lost.

With the current provisions in the 2005 revision of the Regulations, it is clear that unless the annual effective dose exceeded 1 mSv, dose assessment shall not be required. That is, even after deleting the old 305 (a), the same intent has been achieved. Therefore the ICAO proposal is intended to explain, by a note, what the situation is when the effective dose is likely to be less than or equal to 1 mSv in a year.

Comments from TRANSSC

As requested by the Secretariat, comments on this proposal were provided by some TRANSSC Members. In general, it can be drawn from comments that there is no objection on adding the proposed note to UN Model Regulations. Comments provided by TRANSSC are summarized in the following lines.

(comment) On evaluating ICAO proposal, the following should be taken into account:

- i. the context of paragraph 303.2 (305.2) of Advisory Material (TS-G-1.1), since the note *de facto* replaces “missing” paragraph 1.1.2.2.5 (a) of the MRTDG (Thirteenth revised edition) = 305(a) of the TS-R-1 (1996 Edition);
- ii. in the text of 2005 draft Edition of the TS-G-1.1, the paragraphs 303.2 (second sentence) and 303.3 (first sentence) have the same sense as the note;
- iii. it is not unusual, in the UN Model Regulations, to provide explanations through notes;

(Comment) A note should be added at the end of item 1.1.2.2.5 of UN Model Regulations saying:

“For further explanation see IAEA Advisory Material TS-G-1.1, “Advisory Material for the IAEA Regulations for the Safe Transport of Radioactive Material, Safety Guide No. TS-G-1.1 (ST-2), IAEA, 2002”

(Comment) Paragraph 305.2 of TS-G-1.1 says; “*Three categories for monitoring and assessing radiation doses result from para. 305. The first category (below the level specified in 305 (a)) establishes a dose range where little action needs to be taken for evaluating and controlling doses. The upper value of this range is 1 mSv in a year, which was chosen to coincide with the dose limit for a member of the public. The second category has an upper value of 6 mSv in a year, which is 3/10 of the limit on effective dose for workers (averaged over 5 years)*”.

This level represents a reasonable dividing line between conditions where dose limits are unlikely to be approached and conditions where dose limits could be approached. The third category is for any situation where the occupational exposure is expected to exceed the 6 mSv per year upper value in the second category.

Conclusion

IAEA has no objection on adding the proposed note to the paragraph 1.1.2.2.5 of UN Model Regulations.
