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PROPOSALS OF AMENDMENTS TO RID/ADR/ADN

Carriage of radioactive material

Note by the secretariat

Some problems of interpretation of the new provisions for the carriage of radioactive material, as laid down in the 2001 and 2003 versions of RID/ADR, have been brought to the attention of the secretariat, and the following solutions are suggested.

Table of paragraph 1.1.3.6.3

The last part of the list of substances or articles assigned to transport category 0 reads as follows:

"... and empty uncleaned packagings having contained substances classified in this transport category".

This would imply that empty uncleaned packagings having contained radioactive material classified under one of UN Nos 2912 to 2919, 2977, 2978 or 3321 to 3333 would have to be assigned to transport category 0.

*/ Circulated by the Central Office for International Carriage by Rail (OCTI) under the symbol OCTI/RID/GT-III/2003/35.

In fact, when these empty packagings meet the conditions of 2.2.7.9.6, they may be carried as excepted packages (UN No.2908 RADIOACTIVE MATERIAL, EXCEPTED PACKAGE – EMPTY PACKAGING), and UN No. 2908 is assigned to transport category 4.

To eliminate this contradiction, the secretariat proposes to amend the last part of the text in column (2) for transport category 0 to read as follows:

"... and empty uncleaned packagings, except those classified under UN No. 2908, having contained substances classified in this transport category."

Transport document

Both sub-sections 5.4.1.1 and 5.4.1.2.5 apply to the carriage of radioactive material, but the fact that the same requirements are repeated (5.4.1.1 (a) and (b) and 5.4.1.2.5.1 (a) and (b)) and that the second indent of 5.4.1.1.1 (c) refers to 5.4.1.2.5 is misleading. Users do not know whether the UN No and the proper shipping name have to be repeated twice in the transport document, and whether 5.4.1.1.1 (d) to (i) are applicable to radioactive material. Furthermore, the order prescribed in 5.4.1.2.5.1 is not consistent with paragraph 549 of the IAEA Regulations for letters (a), (b) and (c), and there is a contradiction between the order prescribed for these letters (a), (b) and (c) and the alternatives allowed according to 5.4.1.1.1.

In order to solve this problem, the secretariat suggests to amend 5.4.1.2.5 by listing only those elements of information which supplement the general requirements (as in 5.4.1.5.7.1 of the UN Model Regulations on the Transport of Dangerous Goods).

Proposal

5.4.1.1.1 (c), second indent: Amend to read:

"- for radioactive material of class 7: the Class number "7".

5.4.1.1.1 (d) Add the following "NOTE":

"NOTE: For radioactive material of Class 7 with subsidiary risks, see special provision 172".

5.4.1.2.5: Amend to read: "Additional provisions for Class 7".

5.4.1.2.5.1 Amend to read:

"The following information shall be inserted in the transport document for each consignment of Class 7 material, as applicable, in the order given and immediately after the information required under 5.4.1.1.1 (a) to (c):

- (a) ... (Existing text of (d) to
to
(i) ... (m)".

Consequential amendments:

2.2.7.9.1 (a): Replace "5.4.1.2.5.1 (a)" with "5.4.1.1.1 (a)".

For "(special provisions 172 or 290)" read "(special provision 290, if relevant).

2.2.7.9.7 In the list of non-applicable paragraphs, insert "5.4.1.1.1, except (a) [and (e) to (i)] */".

After "5.4.1.2.5.1", delete "except for (a)".

3.3.1 Special provision 172: Replace the reference to 5.4.1.2.5.1 (e) by a reference to 5.4.1.2.5.1 (b).

Special provision 290: At the end, delete "and 5.4.1.2.5.1 (a)".

Other issues to be considered

Language to be used for labels

There is presently a discrepancy between the French text of the IAEA Regulations on the Safe Transport of Radioactive Material and RID/ADR. According to the French text of the IAEA Regulations, the language to be used on labels should be English, and not French (This was decided on the basis of a proposal by the Government of France).

Therefore the secretariat proposes that the section of 5.2.2.2 concerning Class 7 hazard labels be amended to reflect the same labels as in the English text (Models Nos 7A, 7B, 7C and 7E).

Similarly, wherever they appear, the acronyms IT (Indice de transport) and ISC (Indice de sûreté-criticité) should be replaced by TI and CSI, with footnotes in 2.2.7.6 indicating "L'acronyme "TI" correspond au terme anglais "Transport Index" and "L'acronyme "CSI" correspond au terme anglais "Criticality Safety Index".

*/ It is unclear from the IAEA Regulations and the UN Model Regulations whether 5.4.1.1.1 (e) to (i) of RID/ADR should apply to excepted packages.

Hazard Identification numbers

According to the 1999 version of RID/ADR, the hazard identification number to be used on the orange plate for the carriage of radioactive material could be 70, 72, 723, 73, 74, 75, 76 or 78, depending on the subsidiary hazard presented by the radioactive material (Refer to Appendix V/B5).

In the process of restructuring RID/ADR, it was decided to use only hazard identification number 70, which is indicated systematically for all class 7 entries in column (20) of RID, and for class 7 material which may be carried in tanks in ADR (UN Nos 2912, 3321, 3322).

However, numbers 72, 723, 73, 74, 75, 76 and 78 are still mentioned in 5.3.2.3.2. Therefore the secretariat proposes to delete these numbers.

UN number

The requirements of ADR concerning the marking of the UN number on the orange plate are not consistent with those of the IAEA Regulations.

According to 5.3.2.1.2 and 5.3.2.1.4, the marking of the UN number is required only when number "70" is indicated in column 20 of Table A of Chapter 3.2, i.e. for UN Nos 2912, 3321, 3322 (L.S.A material, non-fissile or fissile excepted) (in tanks on in solid form in bulk).

According to the IAEA Regulations and the UN Model Regulations (see 5.3.2.1.1), the display of the UN number should be required for:

- radioactive material in tanks;
- unpackaged LSA-1 or SCO-1 material of class 7, in or on a vehicle, or in a freight container, or in a tank;
- packaged radioactive material with a single UN number under exclusive use in or on a vehicle or in a freight container.

when a placard is required.

Therefore the secretariat proposes the following changes:

- (a) In table A of Chapter 3.2 of ADR, column 20, add "70" for UN Nos 2913, 2915, 2916, 2917, 2919, 2977, 2978, 3321, 3323, 3324, 3325, 3326, 3327, 3328, 3329, 3330, 3331, 3332 and 3333.
- (b) In table A of Chapter 3.2 of RID, column 20, delete "70" for UN Nos 2908, 2909, 2910, 2911.
- (c) In 5.3.2.1.4 of ADR, first sentence, after "dangerous solid substances in bulk" insert "or packaged radioactive material with a single UN number

under exclusive use and no other dangerous goods". At the end of the last sentence, add "or for the packaged radioactive material carried under exclusive use in the transport unit or in the container".

(d) In 5.3.2.1.1 of RID, add a new indent to read:

"- wagons and containers carrying packaged radioactive material with a single UN number under exclusive use and no other dangerous goods".
