Combined Resolution Table – DS515 – Compliance Assurance for the Safe Transport of Radioactive Material

COMMENTS BY REVIEWER Country/Organization: Canada, China, France, India, Israel, Japan, Morocco, Pakistan, Ukraine, WNTI				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
WNTI-1	<u>General comment</u> The document provides interesting information about expectations from the competent authorities, and – in a certain way – potential interpretations of the Transport Regulations. Consequently, though the targeted audience of the guide is the competent authorities, the guide provides valuable information for the Industry as stated in para. 1.7.			X			
PAK-1	1.8.	This Safety Guide addresses compliance assurance for the **safe** transport of radioactive material, based on the same scope as described in para 106–110 of the Transport Regulations.	The term "safe" is in line with the title of the document and provides more clarity about the scope.	X			
IND-1	4/2.5/	Point 16 and 17 should be included	Point number 16 and 17 are missing			X	Points number 16 and 17 have not been included because they do not apply to transport.
PAK-2	2.12 (last para)	~~GSG-12 [3] also provides recommendations on the use of external expert support, generic processes of the integrated management system, the basic elements of a competent authority training programme, and the structure of information in the integrated management system.~~	May be deleted. The information seems repetitive. The same is covered in para 2.16 more effectively.	X			

RUS-2	Para 2.14 in line 3 to add after [6]; …para. 2.12 above	In para 2.14, line 3: to add after [6]; …and para. 2.12 …	Title of part "Resources available to the CA" evidently means all resources, but listed ones concern only technical expertise matters and does not include some functions of CA listed e.g. in para. 2.12 c)	X	The title of this subsection is proposed to be changed to: EXPERTISE AVAILABLE TO THE COMPETENT AUTHORITY It is proposed that the text of para. 2.14 be revised as indicated in the document.		
UKR-1	2.14	"To carry out these duties, the competent authority will need to have access to expertise in many different fields, which could include the following...". We propose also to consider "Design solutions on safe handling operations in loading/unloading of packages" in the list.	The consideration of these design solutions is important for preventing accident situations during handling operations (in particular, with dropping of package). These issues are considered in practices in Ukraine within the framework of the state regulatory review.			X	The suggested topic is already covered by 'Materials science and mechanical/structural engineering' and 'Packaging and transport operations'.

UKR-2	2.14	Replacement. "To carry out these duties, the competent authority will need to have access to expertise in many different fields, which could include the following… - Packaging manufacturing; …." to be replaced with "To carry out these duties, the competent authority will need to have access to expertise in many different fields, which could include the following… - Packaging manufacturing and testing; …."	Testing is an important step in confirming that the packages meet the established requirements.	X	It is proposed that "Package testing" be added as a separate item.		
UK-1	2.15		This would be an appropriate place to identify IAEA databases which may contain useful information for competent authorities – INES, ITDB or similar.			X	The focus of the subsection that includes para. 2.15 is expertise available to the competent authority; therefore, the proposed references are not appropriate.
France-1	2.17	(…). (k) Agencies with responsibilities for emergency preparedness and response.	According to the introductory paragraph of 2.17, organizations that "may have roles and responsibilities concerning the safe transport of radioactive material" should be listed. "Agencies with responsibilities for emergency preparedness			X	"Agencies with responsibilities for emergency preparedness and response" are already listed in Para. 2.17(e).

			and response" are part of these organizations.				
MOR-2	2.17	Add Agencies with responsibilities for nuclear security event	These agencies plays an important role in case of nuclear security event			X	The list in para. 2.17 concerns organizations that may be involved with the *safe* transport of radioactive material. Agencies that deal with nuclear security are appropriately listed in para. 2.19, which lists agencies that are responsible for regulations that have an interface with the Transport Regulations.

J-03	P.7/L.7 2.17	Add the following text after (j): "If agencies responsible for storage and transport are different, liaison and cooperation between them are extremely important in the licensing, operation and inspection of packages intended to be used for shipment after storage."	Interface between storage and transport in case for the shipment after storage should be stated.	X	It is proposed that the text in item 2.19(a) be changed as follows: 'Agencies that serve as the regulatory body for nuclear safety, radiation safety, and radioactive waste safety, which includes the use and storage of radioactive material. ~~Other technical regulatory bodies;~~' and that the former 2.19(a) be moved to a new 2.19(k).		

Israel-1	2.17, 2.19 4.10-4.12(i) 4.19, 4.79 (l) 5.1 – 5.3 and 6.3	We would like to suggest to consider enhancing, even more, the usefulness and clarity of this Safety Guide by some more deliberation regarding the issue (scenarios) of *more than one competent authority may be responsible for the regulatory control of the transport of radioactive material*. Our comment refers to both possible cases: (a) Having more than one involved competent authority (**CA**) in one state with the transport of radioactive material being within the boundaries of that one country, and (b) The transport being done between different states with possible transit (and interim storage?) via additional countries (of course necessitating the involvement of additional CA's). Even though that these issues are described in the present Guide, we think that they need clearer **guiding summaries** for the user regarding at least the following main points (<u>relevant paragraphs # in parentheses</u>): **1.1** If more than one CA is responsible, (2.17) it should be clear how is it decided which one is the leading CA for a given transport in that country - "*the appropriate CA*" (2.19) **1.2** If the transport route includes several countries, with	Completeness And Usefulness	X X	(a) It is proposed to replace para. 2.9 with text from para. 207.1 of SSG-26 (Rev. 1), which provides details about situations in which there are multiple competent authorities in one State. (b) It is proposed that para. 5.1 be revised as indicated in the document to provide more details about the multilateral approval process and to clarify the role of the consignor in this process.		

		relevant responsibilities of the CA's of all countries involved, it is needed for one CA to take responsibility for overseeing the whole transport and liaison with CA's of all other countries (for unilateral and multilateral cases). **1.3** The guiding summary to point 1.2 here above, could be extracted from 4.10 (the prime responsibility of the consignor indicating the role of the CA of the country of origin for unilateral approvals (4.11) and for multilateral approvals (4.12(i)), from 4.19 role of "original CA", and definitely from 4.79(l) using the term *responsible competent authority*, as well as partly from paragraphs 5.1-5.3 and 6.3.					
UKR-3	2.18	Replacement. “The competent authority should arrange regular meetings for the parties …” to be replaced with “The competent authority should arrange regular close cooperation between the parties …”	Various forms of interaction are possible for the purpose of coordination.	X	The following changes to the text in para. 2.18 are proposed: “The competent authority should facilitate~~arrange~~ regular cooperation between~~meetings for~~ the parties …”		

UKR-4	2.21	Replacement. “In addition to the meetings described in 2.18…” to be replaced with “In addition to the cooperation described in 2.18…”	See para 3.	X			

MOR-3	2.22	The competent authority should liaise very closely with agencies involved in emergency preparedness and response and agencies involved in nulcear security event	idem Because they have a responsibilities to manage the radiological crime scene	X	The following new text is proposed to be included in para. 2.22: 'Further recommendations on planning and preparing for response to an emergency involving radioactive material in transport including situations in which a nuclear security event is confirmed to be the initiating event are provided in IAEA Safety Standards Series No. DS469, Preparedness and Response for an Emergency during the Transport of Radioactive Material [10].'		

MOR-1	2.23-2.27	The document does not adress deeply safety and security interfaces, related to compliance assurance it, only, gives reference to NSS 9-G(rev) and NSS 26-G		X	It is proposed that a new para. 2.28 will be added that provides recommendations for meeting Requirement 12 of GSR Part 1. See document file for this text.		
WNTI-3	2.25	2.25. Information about international agreements and guidance on nuclear security can be found in the Convention on the Physical Protection of Nuclear Material and the Amendment thereto [11] provides for the protection of nuclear material in transport against sabotage and theft.	Editorial. Typo.	X	Para. 2.25 has been reworded as indicated in the document file.		
J-04	P.8/L.25 2.25	2.25. ~~Information about~~ ~~i~~International agreements ~~and guidance~~ on nuclear security can be found in the Convention on the Physical Protection of Nuclear Material and the Amendment therto [11] provides for the protection of nuclear material in transport against sabotage and theft.	The Convention on the Physical Protection specifies obligations of parties, not guidance.	X			
J-05	P.8/L31 2.26	2.26. Security provisions for the transport of radioactive material are provided in the United Nations model regulations [13], and in modal regulations [14~~]~~, ~~[~~15].	Editorial (IAEA style).	X			

WNTI-4	2.27	**Recommendations for the physical protection of radioactive material, are provided in IAEA Nuclear Security Series No. 13, Nuclear Security Recommendations on Physical Protection of Nuclear Material and Nuclear Facilities (INFCIRC/225/Revision 5) [11bis]. and recommendations for the security of radioactive material, are provided in IAEA Nuclear Security Series No. 14, Nuclear Security Recommendations on Radioactive Material and Associated Facilities [11ter]. Furthermore,** guidance for the security for transport of radioactive material is provided in the IAEA Nuclear Security Series ~~Nos 9, Security in the Transport of Radioactive Material~~ **No. 9-G (Rev. 1) Security of Radioactive Material in Transport** [16], and **No.** 26-G, Security of Nuclear Material in Transport [17].	INFCIRC/225/Rev. 5 and NSS No. 14 should be mentioned and their implementation guides (No. 9-G and 26-G) should also be mentioned appropriately. The relevant references should be added. The document NSS No.9 has been revised in 2020 and is now NSS No. 9-G.	X			

J-06	P.8/L32 2.27	2.27. Recommendations for Physical Protection of Nuclear Material and Nuclear Facilities including transport are provided in INFCIRC/225/Rev.5 [11bis] and recommendations for security of radioactive material including transport are provided in IAEA Nuclear Security Series No.14 [11ter]. Furthermore, g~~G~~uidance for the security for transport of radioactive material is provided in the IAEA Nuclear Security Series ~~No. 9, Security in the Transport of Radioactive Material~~ No. 9-G (Rev. 1) Security of Radioactive Material in Transport [16], and 26-G, Security of Nuclear Material in Transport [17].	Recommendations documents (INFCIRC/225/Rev.5 and N.S.S. No.14) which are based on the implementation guides (No. 9-G and 26-G) should be mentioned. See J-21 and J-22 for references [11bis] and [11ter]. This document (NSS No.9) has been revised in 2020.	X			
J-07	P.9/L10 3.3	3.3. International bodies have issued many general and modal regulations and recommendations on the safe transport of dangerous goods including radioactive material (Class 7) as follows ; ~~With regard to the transport of radioactive material, these regulations and recommendations are based on the Transport Regulations. International regulations and recommendations have been issued by the United Nations [13], the International Civil Aviation Organization [14], the International Maritime Organization [15] and the Universal Postal Union [18]~~.	The names of international regulations should be listed specifically to be consistent to the following para. 3.4.	X	See proposed text in the revised para. 3.3.		

		(a) Recommendations on the Transport of Dangerous Goods, Model Regulations (UN Model Regulations) [13] (b) Technical Instructions for the Safe Transport of Dangerous Goods by Air,(ICAO-TI). [14] (c) International Maritime Dangerous Goods Code (IMDG Code) [15] (d) Universal Postal Convention [18] The Transport Regulations is incorporated to UN Model Regulations and ICAO-TI and IMDG Codes based on it are mandatory to be applied nationally and internationally through the conventions. These regulations and recommendations are updated every two years ~~periodically~~.	The status of these international regulation and the period of the revision should be clarified.				
WNTI-5	3.4	There are also regional agreements, conventions and regulations concerning the safe transport of **dangerous goods, including** radioactive material**, which may be mandatory for states that are party of these agreements, conventions and regulations**, for example:	The status of these regional regulations should be clarified.	X			
J-08	P.9/L.17 3.4	There are also regional agreements, conventions and regulations concerning the safe transport of dangerous goods including radioactive material and some of	The status of these regional regulation should be clarified.	X	The following changes to the text are proposed:		

		them are also mandatory for member states of the multilateral conventions and agreements, for example:			‘There are also regional agreements, conventions and regulations concerning the safe transport of dangerous goods, including radioactive material, which may be mandatory for states that are party to these agreements, conventions and regulations.’		

China-2	3.5/ Line No.2	3.5 In the interests of international harmonization and safety, individual States should follow and fully implement the provisions of the Transport Regulations. However, due to specific national circumstances, a State may need to deviate from, or add to, the provisions of the Transport Regulations or of other international regulations and guidelines. In such cases, these specific provisions should be included in relevant national regulations and guides and, if applicable, in international or regional regulations, and the competent authority should communicate such differences to the transport industry for the transport of radioactive material, to other competent authorities as appropriate, to the international modal organizations and to the IAEA. Such communications should be used to assist in the efficient movement of radioactive material between countries and to minimize any delays or misunderstandings.	When a State may need to deviate from, or add to, the provisions of the Transport Regulations or of other international regulations and guidelines. It needs communicate other countries to assist in the efficient movement of radioactive material between countries and to minimize any delays or misunderstandings.	X	The last sentence in para. 3.5 is proposed to be changed as indicated: '… in international or regional regulations (e.g. under "State Variations" in the ICAO-TI **Error! Reference source not found.**~~).~~); if practicable, the competent authority should communicate such differences to relevant transport organizations, to other competent authorities as appropriate, and to the international modal organizations.'		
J-09	P.9/L.30 3.5	In the interests of international harmonization and safety, individual States should participate the international or regional conventions and agreements mentioned in paras 3.3 and 3.4 to follow and fully	To participate the international conventions (e.g. SOLAS, Chicago Conventions) is better for safe transport of dangerous goods	X	References to SOLAS and the Chicago Convention are proposed to be added to para. 3.3.		

		implement the provisions of the Transport Regulations.	including radioactive material.				
PAK-3	3.7 (b)	Topics that should be addressed in regulations and guides, for example the authorization process, documentation to be submitted to the competent **authority**, and enforcement policy;	The word "authority" is missing.	X			
UKR-5	4.2	"Compliance with the Transport Regulations can be assured by the competent authority in various ways and may include the following activities...". We propose also to consider "Radiation protection" activities.	Assessment of radiation protection is an important step in confirming that the packages meet the established requirements.			X	Radiation protection activities are included and must be considered in most of the listed activities.
UKR-6	4.2, Annex III	We propose to consider inspection of the accounting system for packages and radioactive materials that were transported (in particular, take this into account in para 4.2 and Annex III).	Accounting for radioactive materials is a necessary component of the licensee's activities in the field of radioactive material transport.			X	The accounting system for radioactive materials is not explicitly within the scope of the Transport Regulations, but subject to other regulatory requirements. As far as possible this aspect can be considered to be included under 4.2 (g) and 4.3.
China-3	4.2/(c)	(c) Inspections and approvals of the management systems of users of the Transport Regulations;	The management systems of users of the Transport Regulations need to approvals too.			X	Not all management systems are subject to approval.

WNTI-7	4.7	4.7. A more complex compliance assurance programme will be needed for a State ~~that performs~~ **where** a large number of shipments **are performed within, through, from or into**, including many types and large quantities of radioactive material, and which designs and manufactures packagings.	The State does not "perform" shipments.	X	It is proposed that the text of the sentence be revised as follows: 'A more complex compliance assurance programme will be needed for a State ~~that performs~~ where a large number of shipments are performed within, through~~, from~~ or into, or from, its territory, including shipments of many types and large quantities of radioactive material~~,~~ and where packages are designed and manufactured~~ich designs and manufactures packagings~~.'		
France-2	4.7	4.7. A more complex compliance assurance programme will be needed for a State ~~that performs~~ **where** a large number of shipments **are performed within, through, from or into**, including many types and	The State does not "perform" shipments.	X	See WNTI-7		

		large quantities of radioactive material, and which designs and manufactures packagings.					
WNTI-8	4.9	4.9. The compliance assurance programme**, and particularly the associated guidance and checklists,** should be updated in a timely fashion when there are changes to the Transport Regulations, and should also be reviewed periodically to ensure that it continues to achieve the goals that it was designed to achieve. (…).	In most instances the changes in the Transport Regulations are now rather minor. They have more influence on the guidance and checklists for inspection than on the other parts of the compliance assurance programme.			X	It is not appropriate to mention "guidance and checklists" explicitly because they are only two subjects among many others of equal or even higher importance which belong to a compliance assurance programme (see Fig. 1.)
WNTI-9	4.14	~~4.14. Many applicants make their first submission to the competent authority for a specific need, which can be rather narrow in scope, and later make several requests for amendments to the approval certificate, to expand its scope in order to be able to use the packaging for other types of material and/or shipment. Whenever possible, applicants should be encouraged to first submit an application for a comprehensive approval certificate that anticipates and covers their future needs.~~	A first application for a specific need is a common practice and is beneficial for both the applicants and the competent authorities, because the discussions and issues can be focused, and the approval process can be shortened. If all possibilities are required in the first submission, ambiguous specifications or parameters with uncertainties may be included. The general aspect of the application	X			See J-10 for reason (first sentence)

			can also the assessment more difficult. It can be time consuming for both sides.				
J-10	P.14/L.42 4.14	~~4.14. Many applicants make their first submission to the competent authority for a specific need, which can be rather narrow in scope, and later make several requests for amendments to the approval certificate, to expand its scope in order to be able to use the packaging for other types of material and/or shipment. Whenever possible, applicants should be encouraged to first submit an application for a comprehensive approval certificate that anticipates and covers their future needs.~~	Para.4.14 is outside of the scope of the objective of this Safety Guide. Further, such practice is common and beneficial for both applicants and the competent authorities because the discussions and issues can be focused and the approval processes can be shorten.	X			
J-11	P.16/L.5 4.21	4.21. As stated in para. 306 of the Transport Regulations, …, and also by inspecting the implementation of arrangements in practice (see para. 4.24). The management system is developed and applied using a graded approach based on Requirement 7 of GSR Part 2 [5]. An example of the types of information ….	The application of the graded approach to the management based on the requirement of GSR Part 2 may be better to be mentioned.			X	Already included under 4.20
WNTI-10	4.24	4.24. In verifying the effectiveness of the arrangements within the management system of a user, the competent authority should inspect	Paras 4.20 to 4.24 are rather general. Then, the more specific information in (a), (b), (c) and (d)			X	Para.4.24. complements the more general paras 4.20-4.23 by

		procedures, records and facilities, especially facilities in which designers and manufacturers perform their operations. The competent authority should verify **that** ~~the following, as appropriate:~~ ~~(a) The design of a package is accurately described by engineering drawings, material specifications and records of the methods of construction (for package designs requiring approval by the competent authority, this information is a required part of the application for the approval certificate (Section VIII of the Transport Regulations). For package designs that do not require approval by the competent authority, the information should be provided to the competent authority upon request).~~ ~~(b) The packagings are manufactured in accordance with the design (for package designs that require approval by the competent authority, changes or modifications in the construction methods for the packaging, the materials of construction, are required to be approved by the competent authority before use of the package: see Para. 503 of the Transport Regulations. For package designs that do not require approval by the competent authority, such changes should be documented and made available to	should be better located in the sections about "Design assessments" (new proposed paragraph 4.30bis), "Inspection of manufacturing" (paragraph 4.68 and new proposed paragraph 4.69bis), and "Inspection of consignors" (new proposed paragraph 4.78bis). In (b), it should be noted also that the reference to para. 503 of the Transport Regulations does not seem appropriate. It is not clear where, in para. 503 of the Transport Regulations, it is required that "changes or modifications in the construction methods for the packaging, the materials of construction, are required to be approved by the competent authority before use of the package".	X	For clarification, reference to "para. 503" will be replaced by reference to "para. 503, first sentence,".		providing transport specific information on important areas that should be addressed within the management system and verified by the competent authority (e.g., design, manufacture, quality control, use, maintenance, non-compliances). This overview here at one point provides useful information about these areas of the management system in support of compliance assurance (see heading of this section) and a good basis for the more specific information about "Design assessments", "Inspection of manufacturing" and "Inspection of consignors" following later on from a different perspective.

		~~the competent authority upon request. This applies equally to new package designs and to packagings in use).~~ ~~(c) Equipment used for inspection, measurement, testing and manufacturing is suitable for its purposes, and is properly controlled, calibrated, used and maintained in accordance with procedures and schedules. All results from inspections, measurements and testing and all products of manufacturing should be fully documented.~~ ~~(d) The packages are correctly prepared, packed and transported. This includes all necessary maintenance and other administrative procedures, as well as appropriate measures for radiation protection.~~ (e) All non-conformances are correctly documented and reviewed, and accepted or rejected, and notified to the competent authority as appropriate.					
France-3	4.24	4.24. In verifying the effectiveness of the arrangements within the management system of a user, the competent authority should inspect procedures, records and facilities, especially facilities in which designers and manufacturers perform their operations. The	Paras 4.20 to 4.24 are rather general. Then, the more specific information in (a), (b), (c) and (d) should be better located in the sections about "Design assessments" (new proposed paragraph			X	See WNTI-10

		competent authority should verify **that** ~~the following, as appropriate:~~ ~~(a) The design of a package is accurately described by engineering drawings, material specifications and records of the methods of construction (for package designs requiring approval by the competent authority, this information is a required part of the application for the approval certificate (Section VIII of the Transport Regulations). For package designs that do not require approval by the competent authority, the information should be provided to the competent authority upon request).~~ ~~(b) The packagings are manufactured in accordance with the design (for package designs that require approval by the competent authority, changes or modifications in the construction methods for the packaging, the materials of construction, are required to be approved by the competent authority before use of the package: see Para. 503 of the Transport Regulations. For package designs that do not require approval by the competent authority, such changes should be documented and made available to the competent authority upon request. This applies equally to new package designs and to packagings in use).~~	4.30bis), "Inspection of manufacturing" (paragraph 4.68 and new proposed paragraph 4.69bis), and "Inspection of consignors" (new proposed paragraph 4.78bis).				

		~~(c) Equipment used for inspection, measurement, testing and manufacturing is suitable for its purposes, and is properly controlled, calibrated, used and maintained in accordance with procedures and schedules. All results from inspections, measurements and testing and all products of manufacturing should be fully documented.~~ ~~(d) The packages are correctly prepared, packed and transported. This includes all necessary maintenance and other administrative procedures, as well as appropriate measures for radiation protection.~~ (e) All non-conformances are correctly documented and reviewed, and accepted or rejected, and notified to the competent authority as appropriate.					
WNTI-11	4.26	4.26. ~~In some States, the holders of certain posts within the competent authority and the organizations of the consignor, the carrier and/or the consignee have to be authorized or certified before they are allowed to perform their duties. In such cases,~~ ~~e~~E ach organization should maintain adequate records of the training provided, the performance of individual trainees and the authorizations or certificates issued.	The need for maintaining records of the training provided is general (para. 314 of the Transport Regulations). It should appear first in this para. 4.26. The requirements that are specific to some States should appear at the end of the paragraph.	X			

		Also, records should be maintained in accordance with the management system, and these should be inspected periodically by the competent authority. The main purposes of such records are: (a) To provide evidence of the appropriate qualification of persons whose duties have a bearing on safety, and with evidence of the required authorizations or certificates; (b) To provide evidence of the basis for these authorizations or certificates; (c) To provide documentation that can be used in reviews of the training programme to enable any necessary corrective actions to be taken. **In some States, the holders of certain posts within the competent authority and the organizations of the consignor, the carrier and/or the consignee have to be authorized or certified before they are allowed to perform their duties.**					
France-4	4.26	4.26. ~~In some States, the holders of certain posts within the competent authority and the organizations of the consignor, the carrier and/or the consignee have to be authorized or certified before they are allowed to perform their duties. In such cases,~~ e**E**ach organization should maintain	The need for maintaining records of the training provided is general (para; 314 of the Transport Regulations). It should appear first in this para. 4.26. The requirements that are specific to some	X			

		adequate records of the training provided, the performance of individual trainees and the authorizations or certificates issued. Also, records should be maintained in accordance with the management system, and these should be inspected periodically by the competent authority. The main purposes of such records are: (a) To provide evidence of the appropriate qualification of persons whose duties have a bearing on safety, and with evidence of the required authorizations or certificates; (b) To provide evidence of the basis for these authorizations or certificates; (c) To provide documentation that can be used in reviews of the training programme to enable any necessary corrective actions to be taken. **In some States, the holders of certain posts within the competent authority and the organizations of the consignor, the carrier and/or the consignee have to be authorized or certified before they are allowed to perform their duties.**	States should appear at the end of the paragraph.				
WNTI-12	4.30bis	**4.30bis. The competent authority should verify that the design is accurately described by engineering drawings, material**	The information in para. 4.24 (a) is specific to the design assessment. Therefore, it should be			X	See WNTI-10

		specifications and records of the methods of construction. For package designs requiring approval by the competent authority, this information is a required part of the application for the approval certificate (Section VIII of the Transport Regulations). For package designs that do not require approval by the competent authority, the information should be provided to the competent authority upon request.	better located in this new paragraph 4.30bis in the section about "Design assessments".				
France-5	4.30bis	**4.30bis. The competent authority should verify that the design is accurately described by engineering drawings, material specifications and records of the methods of construction. For package designs requiring approval by the competent authority, this information is a required part of the application for the approval certificate (Section VIII of the Transport Regulations). For package designs that do not require approval by the competent authority, the information should be provided to the competent authority upon request.**	The information in para. 4.24 (a) is specific to the design assessment. Therefore, it should be better located in this new paragraph 4.30bis in the section about "Design assessments".			X	See WNTI-10

UK-2	4.32(bis)		As the new issue of SSR-6 has enhanced the requirements for shipment after storage and ageing management consideration of including this here. Noting that references are made later in the document (4.51 (f) and 4.76) but these are relating to specific aspects of the process and this should be considered as a generic aspect applicable to the whole design assessment process.	X	The following new text is proposed: The assessment of the designs of packages intended to be used for shipment after storage should consider the effects of aging mechanisms during an extended time period between loading of the package and its shipment after storage to ensure that the package design meets all applicable requirements of the relevant provisions of the Transport Regulations at the time when the first shipment after storage takes place (see paras. 503(e) and 613A of the Transport Regulations). This includes the		

					assessment of appropriate ageing management and a gap analysis programme (see paras 809(f) and 809(k) of the Transport Regulations). More guidance is provided in SSG-26 (Rev. 1) [2], paras 503.3, 613A.1-613A.6 and 809.3-809.4.		
UKR-7	4.33	Replacement. "It may be necessary to test packages and scale models or representative examples of package features and materials (including special form radioactive material) to demonstrate compliance of the design with the requirements…" to be replaced with "Packages and scale models or representative examples of package features and materials (including special form radioactive material) should be tested to demonstrate compliance of the design with the requirements…".	The tests cover a wide range of checks for compliance of the package design with the requirements. The scope of tests is determined by the type and features of package. Tests are carried out in different scope but for all packages.			X	Current text is appropriate. Testing is not always necessary.

UKR-8	4.33 (a)	Replacement. "…It should cover not only the manufacture of the specimens to be tested but also all the relevant activities relating to management, preparation, measuring, testing, recording, analysing and reporting associated with the particular test or series of tests to be undertaken." to be replaced with "…It should cover not only the manufacture of the specimens to be tested but also all the relevant activities relating to management, preparation, measuring, testing, recording, analysing, elimination of disadvantages (if detected during testing) and reporting associated with the particular test or series of tests to be undertaken."	The tests are considered to be successfully completed after the disadvantages (if detected during testing) have been eliminated.	X	Text should be modified as follows: add after "analysing" in brackets: "(including corrective measures, if necessary)		
UKR-9	4.33 (b)	Replacement. "The test programme should satisfy the approving body… When drop tests are concerned, drop sequences and drop attitudes should be agreed with the approving body…" to be replaced with "The test programme should be agreed with the approving body… When drop tests are concerned, drop sequences and drop altitudes	We propose to use in both cases the expression "should be agreed with the approving body" (or in both cases "should satisfy the approving body").			X	Depending on the package type, the test programme may be very different (from simple to very complex). The two different expressions indicate that in any case the whole test programme should satisfy the competent authority without specifying

		should be agreed with the approving body…".					the kind of interactions with the competent authority; however, in the case of drop testing, where specific and detailed drop sequences and drop attitudes may apply, 'agreement' is recommended.
UKR-10	4.33 (b)	Replacement. "The number of tests and specimens, the test sequences, and the measurement techniques and methods of analysis should be clearly established." to be replaced with "The number of tests and specimens, the conditions of tests, the test sequences, and the measurement techniques and methods of analysis should be clearly established."	Test conditions are one of the important factors.	X	"test conditions" should be used instead of "conditions of tests"		
UKR-11	4.33(a)-(g)	We propose to add one more subpara "The acceptance criteria for each specific test should be clearly established."	The test acceptance criteria are a mandatory component of the test programme.	X	In 4.33(b), which deals with the testing programme, it is proposed to add "and the acceptance criteria" in the second sentence after "analysis". Together with the		

					change according to UKR-10 the second sentence should read as follows: "The number of tests and specimens, test conditions, test sequences, ~~and the~~ measurement techniques, ~~and~~ methods of analysis and the acceptance criteria should be clearly established."		
UKR-12	4.33 (g)	Replacement. "All test results, including any instances of damage, should be considered as part of the competent authority's assessment of the final package design." to be replaced with "All test results, including any instances of damage or disadvantages of design (if detected during testing) and elimination of these disadvantages, should be considered as part of the competent authority's assessment of the final package design."	The tests are considered to be successfully completed after the disadvantages (if detected during testing) have been eliminated.			X	Already covered by resolution of UKR-8
Israel-2	4.33(b), 4.36, 4.43, and 4.46	In these paragraphs dealing with testing of materials and packages for transport, the **drop tests** in particular are mentioned quite	Completeness			X	The drop tests in their various forms apply to all package types which are

		frequently. It may seem that drop tests "enjoy some kind of priority" compared to the other required tests specified in the Transport Regulations (SSR-6), such as water spray tests, stacking tests and thermal tests, for example. We would like to suggest to change phrasing so as to prevent drop tests being given "extra importance".					subject to testing, which is not the case for the other tests; therefore, it is appropriate that it is mentioned more often. Another reason is that a "drop test" is mentioned additionally in conjunction with the "target", because it must meet the specific requirement of para. 717 of the Transport Regulations.
WNTI-13	4.33bis	**4.33bis. When scale modelling is used in testing to support an application for approval, the assessor should confirm that all scaling factors have been taken into account, with all pertinent features of the package design being accurately represented.**	The information in para. 4.51 (l) is specific to testing. Therefore, it should be better located in this new paragraph 4.33bis in the section about "Testing of packages and materials".	X	It is proposed that the following text be entered as a new para. 4.33(bis): 4.33(bis) When a scale model is used in testing to support an application for approval, the competent authority should confirm that all scaling factors have been taken into account, with		

					all pertinent features of the package design being accurately represented.		
France-6	4.33bis	**4.33bis. When scale modelling is used in testing to support an application for approval, the assessor should confirm that all scaling factors have been taken into account, with all pertinent features of the package design being accurately represented.**	The information in para. 4.33 (l) is specific to testing. Therefore, it should be better located in this new paragraph 4.33bis in the section about "Testing of packages and materials".	X	See WNTI-13		
China-4	4.36/ Line No.4	4.36 Before the commencement of tests by the applicant, the competent authority should consider inspecting the test facilities and arrangements, especially the specimens, the target for drop tests, and the measuring and recording systems. The competent authority may also perform inspections that include direct observation of the tests. The applicant should inform the competent authority of any deviation from the test plan and should present the results of testing — for example, evidence of leakage, distortion or other damage — to the competent authority.	The competent authority needs to know any deviation from the test plan and should present the results of testing.	X	It is proposed that the last sentence be modified as follows: "The competent authority should require that it be informed by the applicant about any deviation from the test plan and resulting consequences for the results, as applicable."		
WNTI-14	4.40	4.40. It is the responsibility of the competent authority to ensure that the designs of packages are assessed against all the relevant parts of the Transport Regulations. Therefore, the competent authority should not	Package designs that do not require approval by the competent authority have a wide variety of potential hazards and the graded approach is			X	This para is based on para. 801 to the Transport Regulations, which implies that assessments of

		only conduct assessments of designs specified in para. 802(a) of the Transport Regulations, but should also ensure**, based on a graded approach**, that similar assessments of package designs that do not require approval by the competent authority (such as Type A packages or industrial packages) are performed by appropriate organizations and that the necessary documentary evidence of such assessments is made available to the competent authority, if requested (see paras 801.1 – 801.3 of SSG-26 [2] ~~and Annex I of this Safety Guide for guidance on documentary evidence for packages that do not require competent authority approval~~). Information about the structure and contents of a package design safety report, which applies to all types of packages and is intended to demonstrate compliance of the design of a package with the Transport Regulations is provided in IAEA Safety Standards Series No DS493, Format and Content of the Package Design Safety Report for the Transport of Radioactive Material [29].	important for assessments by the competent authorities. There is no information on this topic in Annex I (the first part of Annex I is about "Information to be included in applications for approval of design of packages"). If deemed really necessary, a direct reference could be made to the PDSR Guide (Ref. [29] in the draft DS515).	X	Text modified as follows: (see paras 801.1-801.3 of SSG-26 (Rev. 1) [2], Annex I, para. I-3 of this Safety Guide and Ref. [29] for …)		package designs that do not require competent authority approval should be performed by appropriate persons or organizations to confirm by documentary evidence that all applicable requirements are met. This requirement is independent of a "wide variety of potential hazards". See WNTI-15.
J-12	P.20/L.21, L,23 4.40	4.40. It is the responsibility …of the competent authority … Therefore, the competent authority should not only conduct assessments of designs specified in para. 802(a) of the	The package designs that do not require approval by the competent authority have wide variety of potential hazards and the			X	See WNTI-14 and WNTI-15.

		Transport Regulations, but should also ensure that similar assessments of package designs that do not require approval by the competent authority (such as Type A packages or industrial packages) are performed by appropriate organizations based on the graded approach, and that the necessary documentary evidence of such assessments is made available to the competent authority, if requested (see paras 801.1 – 801.3 of SSG-26 [2] ~~and Annex I of this Safety Guide for guidance on documentary evidence for packages that do not require competent authority approval~~). Information about the structure and contents of a package design safety report, …	graded approach is important for assessments by the competent authorities. There is no information on this topic in the Annex I.	X	See WNTI-14		
WNTI-15	4.41	The compliance assurance programme of the competent authority should also cover the design, manufacture and use of packages, and the maintenance of packagings, that do not require approval by the competent authority, **as appropriate**.	It seems impractical to know all information on packages that do not require the approval.	X	This para refers to the scope of the compliance assurance programme without referring to the amount or details of required information. Instead of "as appropriate" it is proposed to add at the end of this sentence: "based on a graded approach".		

WNTI-16	4.43	4.43. The competent authority may discuss the development and the proposed testing of a package with the applicant **based** on ~~the basis of~~ the preliminary information provided. ~~The possible content of this preliminary information is described in DS493 [29] and may be based on the information in Annex I.~~ Specifically, (…).	Editorial It is not clear how DS493 and/or Annex I could be used to identify which preliminary information should be provided to the competent authority.	X	The second sentence of para. 4.43 is proposed to be modified as follows: "The format and content of this preliminary information should take into account the recommendations provided in DS493 [32]."		
UKR-13	4.43	Replacement. "The preliminary information might also cover the requirements of the management system for design and testing." to be replaced with "The preliminary information might also cover the requirements of the management system for design, manufacture and testing."		X			
WNTI-17	4.46	4.46. Before the commencement of tests by the applicant, the competent authority should consider ~~verifying~~ **inspecting** the test **facilities and arrangements**, especially the specimen, the target for drop tests, and the measuring and recording systems. (…).	Same scope and wording as in para. 4.36.	X			
WNTI-18	4.47	4.47. **Information about the structure and contents of a package design safety report, which is intended to demonstrate compliance of the design of a**	A general introduction of DS493 is necessary.	X	Instead of the new sentence at the beginning, it is proposed that the current be		

		package with the Transport Regulations is provided in DS493 [29]. (…).			modified as follows: "4.47 In conjunction with the information in Annex I and in DS493 **Error! Reference source not found.** about the structure and contents of a package design safety report, the application …"		
WNTI-19	4.51 (b)	4.51. (…) The following aspects should be considered: (a) (…). (b) Before commencing the design assessment, the assessor should be satisfied that a management system at an appropriate level has been applied throughout the design process; appropriate evidence of this should**, upon request,** be made available to the assessor **for inspection**. (…).	(b) is not strictly part of the design assessment, as stated at the beginning of (b) ("Before commencing the design assessment, …"). Therefore, the "evidence" that are requested in (b) are not part of the package design safety report that supports the application for approval. Consequently, if the management system is to be examined before commencing the assessment of the application, the assessor should request the necessary evidence (as they are not part of the			X	Para 4.51. deals with reviews and assessments by competent authorities of applications for approval and consequently (b) is part of this review process and an important aspect before assessing the design aspects in detail. According to para 809 (j) of the Transport Regulations, the applicant is required to submit appropriate documentation of

			application). A wording similar to the one that is used in para. 801 of the Transport Regulations is proposed. Alternatively, if the purpose is to base the actions in (b) on the information included in the package design safety report (as required in para 809 (j) of the Transport Regulations), (b) should be simplified as follows: (b) ~~Before commencing the design assessment t~~**T**he assessor should be satisfied that a management system at an appropriate level has been applied throughout the design process; appropriate evidence of this should be made available to the assessor **(para. 809 (j) of the Transport Regulations).** (…).				the management system as part of the application.

UKR-14	4.51	We propose to add subpara "The assessor should examine that design has been carried out in compliance with standards, using engineering technical practices. The assessor should examine the specific design solutions, sufficiency and completeness of design documents. The assessor should examine that the packagings are manufactured according to specific quality plans, with the appropriate tests required (including acceptance tests)."	These issues directly affect the performance of safety functions by package and its quality. These issues are considered in practices in Ukraine within the framework of expert review.	X	The following additional sentence is proposed to be included at the end of 4.51(b): "Before initiating a detailed review of an application, the completeness of the design description and specification should be confirmed including information regarding the intended use of the package design (e.g. mode of transport, handling during transport or transport after storage)."		Manufacturing is covered under 4.66-4.73.
UKR-15	4.51	We propose to add subpara "The assessor should examine the type and specific purpose of package, and assess the classification, volumes and characteristics of transported radioactive materials.	The requirements of the Rules are different for different radioactive materials and types of packages. All design solutions for justifying the safety functions performed by packages are directly related to the radioactive			X	Volumes of transported radioactive material in terms of the numbers of shipments are not part of the package design approval. The other aspects are included in the

			material that is planned to be transported and to the type of package.				proposed resolution for UKR-14.
UKR-16	4.51	We propose to add subpara "The assessor should examine the grades and properties of the materials used in the design, in particular from engineering technical practices."	These are important factors on which the package specific functions depend on, and so are its reliability and durability.			X	Already included under 4.51.(c)-(j)
WNTI-20	4.51 (d)	(d) The assessor should examine all relevant ~~physical and~~ mechanical aspects of the design in order to confirm that the package will be physically able to safely carry the specified radioactive material under ~~both~~ **routine,** normal and accident conditions of transport (this includes, for example, **for routine conditions of transport,** tie-down points and trunnions).	Clarification. The meaning of "physical" in this sentence is unclear, and "physical" does not seem to add significant value to the sentence. Clarification about the conditions of transport to be considered.	X X		X	Tie-down points and trunnions are part of the design and must be designed to meet the applicable conditions of transport; para. 638 of the Transport Regulations requires that any tie-down attachments on the package shall not impair the ability of the package to meet the requirements of the Transport Regulations under normal and accident

							conditions of transport.
France-7	4.51 (d)	(d) The assessor should examine all relevant ~~physical and~~ mechanical aspects of the design in order to confirm that the package will be physically able to safely carry the specified radioactive material under ~~both~~ **routine,** normal and accident conditions of transport (this includes, for example, **for routine conditions of transport,** tie-down points and trunnions).	Clarification. The meaning of "physical" in this sentence is unclear, and "physical" does seem to add significant value to the sentence. Clarification about the conditions of transport to be considered.	X X		X	See WNTI-20
WNTI-21	4.51 (g)	(g) The assessor should examine in detail the shielding features and radiation safety aspects of the design; the assessor should confirm that, with regard to the maximum proposed radioactive contents, the design of the ~~finished~~ package ~~will~~ provide**s** sufficient radiological shielding in all directions to comply with the Transport Regulations and the principle of optimization of protection.	Clarification. The meaning of "finished" in this sentence is unclear and "finished" does not seem to add significant value to the sentence. Editorial.	X			
France-8	4.51 (g)	(g) The assessor should examine in detail the shielding features and radiation safety aspects of the design; the assessor should confirm that, with regard to the maximum proposed radioactive contents, the design of the ~~finished~~ package will provide sufficient radiological shielding in all directions to comply with the Transport Regulations and	Clarification. The meaning of "finished" in this sentence is unclear and "finished" does not seem to add significant value to the sentence.	X			

		the principle of optimization of protection.					
WNTI-22	4.51 (g)	(g) (…) the assessor should confirm that, with regard to the maximum proposed radioactive contents, the design of the finished package ~~will~~ provide**s** sufficient radiological shielding in all directions to comply with the Transport Regulations ~~and the principle of optimization of protection~~. (…).	Optimization of protection is one of the principles of the Transport Regulations, as stated in para. 301 of the Transport Regulations. That said, the principle of optimization of protection is not an item to be included in an application for a package design (for instance, this is not listed in para. 809 of the Transport Regulations). Therefore, the review of the implementation of the principle of optimization of protection is beyond the requirements of the Transport Regulations. In addition, the optimization of protection is a global approach that encompasses all activities related to a given shipment, including the choice of the package design, the preparation of the package, its movement, etc. It is not appropriate to evaluate the correct			X	Optimization of protection and safety is one of the principles of the Transport Regulations (see para 301 of the Transport Regulations and GSR Part 3). This includes the appropriate designs of packages, in particular regarding shielding. Although this optimization is not listed as an item in para 809 it is a principle any designer and assessor should apply. Furthermore, the principle of optimization of protection should be considered by the assessor because the design assessment includes the loading, handling and carriage of the package and the radiation exposures

			implementation of the principle of optimization by looking at a single stage of the shipment.				of workers in these contexts.
France-9	4.51 (g)	(g) (…) the assessor should confirm that, with regard to the maximum proposed radioactive contents, the design of the finished package will provide sufficient radiological shielding in all directions to comply with the Transport Regulations ~~and the principle of optimization of protection~~. (…).	Optimization of protection is one of the principles of the Transport Regulations, as stated in para. 301 of the Transport Regulations. That said, the principle of optimization of protection is not an item to be included in an application for a package design (for instance, this is not listed in para. 809 of the Transport Regulations). Therefore, the review of the implementation of the principle of optimization of protection is beyond the requirements of the Transport Regulations. In addition, the optimization of protection is a global approach that encompasses all activities related to a given shipment, including the choice of the package design, the preparation of the package, its movement, etc. It is not			X	See WNTI-22

			appropriate to evaluate the correct implementation of the principle of optimization by looking at a single stage of the shipment.				
WNTI-23	4.51 (g)	(g) The absence of any radiation 'shine paths' through package closures and ports used for package testing should be verified. **(g bis)** The need to decontaminate the packagings in use should also be considered~~;~~. ~~t~~**T**he assessor should confirm the absence of features that might retain contamination, and that materials that are difficult to decontaminate are not used. (h) The assessor should thoroughly examine all aspects of containment provided by the package. (…)	Decontamination is an issue different from shielding. It should be considered in a different item (new item (g bis)).	X			
France-10	4.51 (g)	(g) The absence of any radiation 'shine paths' through package closures and ports used for package testing should be verified.~~;~~ **(g bis)** The need to decontaminate the packagings in use should also be considered. ~~t~~**T**he assessor should confirm the absence of features that might retain contamination, and that materials that are difficult to decontaminate are not used.	Decontamination is an issue different from shielding. It should be considered in a different item (new item (g bis)).	X			

		(h) The assessor should thoroughly examine all aspects of containment provided by the package. (…)					
WNTI-24	4.51 (h)	(…).The assessor should also consider the features of the design that provide for containment and should determine how they might be adversely affected by routine and normal **conditions of** transport ~~operations~~, by the prescribed maintenance periods and instructions, and by the effects of accident conditions of transport and related testing.	Editorial.	X			
France-11	4.51 (h)	(…).The assessor should also consider the features of the design that provide for containment and should determine how they might be adversely affected by routine and normal **conditions of** transport ~~operations~~, by the prescribed maintenance periods and instructions, and by the effects of accident conditions of transport and related testing.	Editorial.	X			
WNTI-25	4.51 (i)	~~(i) The assessor should thoroughly examine the design to ensure that all factors affecting radiation safety in respect of the design have been identified and addressed.~~	(i) is already covered by (g), in particular by the first sentence.	X			
France-12	4.51 (i)	~~(i) The assessor should thoroughly examine the design to ensure that all factors affecting radiation safety in respect of the design have been identified and addressed.~~	(i) is already covered by (g), in particular by the first sentence.	X			

WNTI-26	4.51 (k)	(…). The assessor should also consider that such package instructions may have to be followed by **carriers and** consignees that are unfamiliar with the package and its design principles.	Carriers are also organizations that, potentially, are not familiar with the design principles of the package. .	X			
J-13	P.23/L.19 4.51 (k)	(k) The assessor should also consider that such package instructions may have to be followed by ~~consignees~~ drivers or forwarders that are unfamiliar with the package and its design principles.	Consignees should know the details of the packages very well for safety because they open them by training and drills in advance.	X	Text modified as as suggested in WNTI-26		
WNTI-27	4.51 (l)	~~(l) When scale modelling is used in testing to support an application for approval, the assessor should confirm that all scaling factors have been taken into account, with all pertinent features of the package design being accurately represented.~~	(l) is related to testing. Therefore, it should be better located in a new paragraph 4.33 bis, in the section about "Testing of packages and materials".	X	See WNTI-13		
France-13	4.51 (l)	~~(l) When scale modelling is used in testing to support an application for approval, the assessor should confirm that all scaling factors have been taken into account, with all pertinent features of the package design being accurately represented.~~	(l) is related to testing. Therefore, it should be better located in a new paragraph 4.33 bis, in the section about "Testing of packages and materials".	X	See WNTI-13		
WNTI-28	4.53	4.53. The serial number on the packaging is required to uniquely identify each packaging manufactured **to a package design approved by the competent authority under one or more of paras 807-816 and 820 of the Transport Regulations**: see para.	Clarification. All packagings do not need a serial number in accordance with the introductory sentence in para. 535.	X	It is proposed that the text is modified as follows: "4.53. The serial number on the packaging is required to uniquely identify		

		535~~(b)~~ of the Transport Regulations.(…).			each packaging manufactured~~: see para. 535(b) of the Transport Regulations~~ to a package design approved by the competent authority (see para. 535(b) of the Transport Regulations)~~.~~."		
WNTI-29	4.56	(…). The competent authority ~~shou ld~~ **should** give consideration to the reasons why the shipment cannot be made in full compliance with applicable requirements.	Editorial. Typo.	X			
IND-2	25/4.59/d	The user should have all the documentation required by the Transport Regulations, including the relevant approval certificates of the competent authority and any associated instructions for handling, loading, stowage, emergency arrangement and use of packages, and for the maintenance of packagings. These instructions are usually in the form of an instruction manual.	Arrangements for emergency is an important aspect to be verified during inspection	X	It is proposed that the text should be modified as follows: "4.59(d) The user should have all the documentation … and any associated instructions for emergency arrangements, for handling, loading …"		
WNTI-30	INSPECTION OF TRANSPORT OPERATIONS		This section (paras 4.57 to 4.62) appears to be general and to be applicable to the items	X	Para 4.59 provides an overview/summary of the main		

	Paras 4.57 to 4.62		"Radiation protection", "Inspection of manufacturing", "Inspection of maintenance arrangements", "Inspection of consignors" and "Inspection of carriers". An introductory paragraph, after the heading "INSPECTION OF TRANSPORT OPERATIONS" and before para. 4.57 should explain that (i.e. should explain how to "use" the paras 4.57 to 4.62). *We are not able to make a proposal or to provide additional text for that purpose.*		aspects and procedures in connection with transport operations which should be subject to inspection by the competent authority. To have this at one point is very useful for the reader and provides a good basis for all the detailed information following later. The following modified text is recommended to reflect this better: 1) replace the text under 4.59.(c) as follows: "Proper packagings for the contents of the packages should be used." and 2) add the following text at the end of 4.59: "More detailed guidance on the corresponding inspection activities of the		

					competent authority are provided in paras 4.66-4.81.		
WNTI-31	4.59	(…). ~~(c) The consignor should use the proper packaging for the contents of packages.~~ (d) The user should have all the documentation required by the Transport Regulations, including the relevant approval certificates of the competent authority and any associated instructions for handling, loading, stowage and use of packages, and for the maintenance of packagings. These instructions are usually in the form of an instruction manual. (e) The user should follow established procedures for the preparation and use of the packages, in accordance with the approval certificate, the instruction manual and related documents. ~~(f) Procedures should be established and followed to properly mark and label packages in accordance with the Transport Regulations. This should include the proper determination and application of the correct transport index.~~ ~~(g) Procedures should be established and followed, and appropriate and properly calibrated instruments~~	(c) is specific to inspection of consignors and is already covered by 4.79 (d). (f) is specific to inspection of consignors and is already covered by 4.79 (g). (g) is specific to inspection of consignors and is already covered by 4.79 (i), (k) and (l).			X	See resolution for WNTI-30

		~~should be provided to monitor dose rates and contamination levels.~~ ~~(h) Procedures for the preparation and control of transport documents, for the placarding of vehicles, for the provision of documentation for carriers, and for notification of competent authorities, should be established and followed.~~ ~~(i) During transport, carriers should be performing the required actions for placarding, and for the stowage and separation of packages. Carriers should also undertake any administrative controls relating to exclusive use shipments, or supplementary operational controls specified in the certificate of approval of the competent authority.~~ (j) (…)	(i) is specific to inspection of carriers and is already covered by 4.80 (c) and (e).				
France-14	4.59	(…). ~~(c) The consignor should use the proper packaging for the contents of packages.~~ (d) The user should have all the documentation required by the Transport Regulations, including the relevant approval certificates of the competent authority and any associated instructions for handling, loading, stowage and use of packages, and for the maintenance of packagings. These instructions are usually in the form of an instruction manual.	(c) is specific to inspection of consignors and is already covered by 4.79 (d).			X	See resolution for WNTI-30

		(e) The user should follow established procedures for the preparation and use of the packages, in accordance with the approval certificate, the instruction manual and related documents. ~~(f) Procedures should be established and followed to properly mark and label packages in accordance with the Transport Regulations. This should include the proper determination and application of the correct transport index.~~ ~~(g) Procedures should be established and followed, and appropriate and properly calibrated instruments should be provided to monitor dose rates and contamination levels.~~ ~~(h) Procedures for the preparation and control of transport documents, for the placarding of vehicles, for the provision of documentation for carriers, and for notification of competent authorities, should be established and followed.~~ ~~(i) During transport, carriers should be performing the required actions for placarding, and for the stowage and separation of packages. Carriers should also undertake any administrative controls relating to exclusive use shipments, or supplementary operational controls specified in the certificate of approval of the competent authority.~~ (j) (…)	(f) is specific to inspection of consignors and is already covered by 4.79 (g). (g) is specific to inspection of consignors and is already covered by 4.79 (i), (k) and (l). (i) is specific to inspection of carriers and is already covered by 4.80 (c) and (e).				

China-5	4.59/(c)	(c) The consignor should use the proper packaging for the specific contents of packages. The packages being prepared for shipment should be examined by the competent authority, where practicable.	The competent authority needs to know the packages whether prepared.			X	See resolution for WNTI-30
China-6	4.66-4.73/ INSPECTION OF MANUFACTURING	Following the manufacturer's verification of compliance, the responsible organization should legibly and durably mark the packaging. For packages approved by the competent authority, the competent authority is required to be informed of the serial number of each accepted packaging, in accordance with para.	According to the requirements of identification of packages and serial numbers of packages 4.5.2 and 4.5.3, the insertion of manufacturing shall be added with implementation of marking requirements			X	Already sufficiently covered by paras 4.52 and 4.53 and reference to Annex VII in para 4.68
J-14	P.26/L.38 4.67	4.67. The competent authority should give particular consideration to how the management system is applied before the manufacture of packagings begins, such as during the development of manufacturing processes and procedures. The inspection programme for the manufacture of a single ~~package~~ packaging may be different from that for the continuous manufacture of ~~packages~~ packagings.	Radioactive contents are not included.	X			
France-15	4.68	4.68. Packagings should be manufactured in accordance with the design specifications through a process that is subject to the management system. To confirm this, the competent authority should perform inspections of the manufacturing process, including the	The information in para. 4.24 (b) is specific to manufacturing. Therefore, it should be better located in para. 4.68 in the section about "Inspection of manufacturing".	X	Due to the proposed resolution for France-3 regarding para. 4.24, it is proposed not to include the whole		

		actual implementation and effectiveness of the management system. The management system may be inspected by the competent authority before the commencement of manufacturing of a packaging and periodically thereafter. **The competent authority should verify that the packagings are manufactured in accordance with the design. For package designs that require approval by the competent authority, changes or modifications in the construction methods for the packaging, the materials of construction, are required to be approved by the competent authority before use of the package: see Para. 503 of the Transport Regulations. For package designs that do not require approval by the competent authority, such changes should be documented and made available to the competent authority upon request. This applies equally to new package designs and to packagings in use.** An example checklist for inspections of the manufacturing of packagings is provided in Annex VII.			text of para. 4.24(b) here but to include reference to para. 4.24.(b) and also 4.24.(c) at the end of the third sentence as follows: "The management system may be inspected……and periodically thereafter (see also para. 4.24 (b) and (c))." In addition, much more detailed information about these aspects is provided in Annex VIII, as referred to in the last sentence of para. 4.68.		
WNTI-33	4.69bis	**4.69bis. The competent authority should verify that the equipment used for inspection, measurement, testing and manufacturing is suitable for its purposes, and is**	The information in para. 4.24 (c) is specific to the manufacturing. Therefore, it should be better located in this new	X	See resolution for France-15		

		properly controlled, calibrated, used and maintained in accordance with procedures and schedules. All results from inspections, measurements and testing and all products of manufacturing should be fully documented.	paragraph 4.69bis in the section about "Inspection of manufacturing".				
France-16	4.69bis	**4.69bis. The competent authority should verify that the equipment used for inspection, measurement, testing and manufacturing is suitable for its purposes, and is properly controlled, calibrated, used and maintained in accordance with procedures and schedules. All results from inspections, measurements and testing and all products of manufacturing should be fully documented.**	The information in para. 4.24 (c) is specific to the manufacturing. Therefore, it should be better located in this new paragraph 4.69bis in the section about "Inspection of manufacturing".	X	See resolution for France-15		
WNTI-34	4.78bis	**4.78bis. The competent authority should verify that the packages are correctly prepared, packed and transported. This includes all necessary maintenance and other administrative procedures, as well as appropriate measures for radiation protection.**	The information in para. 4.24 (d) is specific to the preparation of transport. Therefore, it should be better located in this new paragraph 4.78bis in the section about "Inspection of consignors".	X	Due to the proposed resolution for France-3 regarding para. 4.24, it is proposed not to include the whole text of para. 4.24(b) here but to include a reference to para. 4.24.(d) in brackets at the end of the first		

					sentence of para. 4.79. as follows: "4.79. The competent authority should assure that the consignor's responsibilities, as defined in paras 545-561 of the Transport Regulations, are followed (see also para. 4.24.(d)). In addition, the information provided by para. 4.24.(d) is covered in much more detail by Annex VI as referred to in the second sentence of para. 4.79. and in some of the following sub-paragraphs under para. 4.79.		
France-17	4.78bis	**4.78bis. The competent authority should verify that the packages are correctly prepared, packed and transported. This includes all necessary maintenance and other administrative procedures, as well as appropriate measures for radiation protection.**	The information in para. 4.24 (d) is specific to the preparation of transport. Therefore, it should be better located in this new paragraph 4.78bis in the section about "Inspection of consignors".	X	See resolution for WNTI-34		

WNTI-35	4.79 (f)	(f) The consignor should ensure that the package used for transport conforms to ~~the~~ **its** specifications**, including those** indicated on the approval certificate **for package design that require competent authority approval,** and the packaging is in an acceptable condition based on written procedures. For packagings, the consignor should have evidence, such as certificates of conformity or inspection reports, that the packagings conform to ~~the~~ **its** specifications**, including those** quoted on the approval certificate **for package design that require competent authority approval**. (…).	Some package designs do not require approval by the competent authority, but still need to be included in this paragraph.	X			
J-15	P.29/L.3 4.79 (f)	The consignor should ensure that the package used for transport conforms to the specifications indicated on the approval certificate or package specifications and the packaging is in an acceptable condition based on written procedures.	Some kinds of packages are not required approval by the CA.	X	See resolution for WNTI-35		

CAN-1	4.79(h)	The consignor should have appropriate and calibrated monitoring instruments to conduct the necessary measurements of dose rates and radioactive contamination, associated with the transport of radioactive material. For example, the consignor should be able to satisfy the competent authority that it is knowledgeable on the operation of the monitoring instruments, and is capable of conducting correct measurements of dose rate and radioactive contamination, to ensure radiation protection and transport safety.	Reworded 4.7.9 (h) in order to be grammatically correct and clearer on expectations which align with 4.59 (g), 4.79 (g), as examples. It is assumed that "appropriate" not only applies to knowledge, but also to the monitoring instruments as well. Carrying out "calibrated" measurements can only be done if the instrument is calibrated. Therefore, the provision for the instrument to be "calibrated" was included in the first sentence. Note that it is also suggested to replace "carrying out" with "conduct/conducting", and "valid" with "correct".	X	See the file for the revised, proposed text.		
WNTI-36	4.79 (i)	(i) ~~The consignor should have the necessary licences or other permissions, granted by the competent authority or by other governmental bodies, to function as a consignor of radioactive material. Also, the competent authority should be satisfied that the consignor has the~~	The consignor approval system is subject to significant variations from one state to another one. These sentences are too specific.	X	The second sentence cannot be deleted but should be clarified as well as the first one as follows:		

		~~applicable approval(s) required for the transport of radioactive material.~~ (…).			"Subject to national legislations, ~~T~~the~~The~~ consignor should have the necessary licenses or other permissions, granted by the competent authority or by other governmental bodies, to function as a consignor of radioactive material. Also, the competent authority should be satisfied that the consignor has the applicable approval(s) required for the transport of radioactive material (e.g. shipment approval, special form approval)."		
J-16	P.29/L.25 4.79 (i)	~~(i) The consignor should have the necessary licences or other permissions, granted by the competent authority or by other~~	The approval system for consignors to transport radioactive material does	X	See resolution for WNTI-36		

		~~governmental bodies, to function as a consignor of radioactive material. Also, the competent authority should be satisfied that the consignor has the applicable approval(s) required for the transport of radioactive material.~~	not seem common globally.				
Israel-3	4.79(j)	We are aware that the requirement from the consignor *to retain a copy of each transport document for a minimum period of three months* stems from the Transport Regulations SSR-6. Nevertheless, we would like to suggest to consider significant prolongation of this retention period (to 6-12 months for example) considering possible scenarios of delayed shipments, cases of extended interim storages, and other delays which in rare cases may necessitate further inquiries related to the transport.	Usefulness			X	Suggestion is outside the scope of DS515
WNTI-37	4.79 (m)	(m) The consignor is required, before each shipment of any package, to ensure that the requirements **specified in the relevant provisions** of the Transport Regulations and **in** the applicable certificates of approval have been fulfilled: see para. 503 of the Transport Regulations. During the lifetime of a packaging, the consignor should maintain records demonstrat~~e~~**ing** that the requirements of para. 503 of	To use a wording similar to that in para. 503 of the Transport Regulations (the wording "relevant provisions" is important: the consignor is not required to ensure that all the requirements of the Transport Regulations are fulfilled). Editorial.	X			

		the Transport Regulations have been met. (…).					
France-18	4.79 (m)	(m) The consignor is required, before each shipment of any package, to ensure that the requirements **specified in the relevant provisions** of the Transport Regulations and **in** the applicable certificates of approval have been fulfilled: see para. 503 of the Transport Regulations. During the lifetime of a packaging, the consignor should maintain records demonstrat~~e~~**ing** that the requirements of para. 503 of the Transport Regulations have been met. (…).	To use a wording similar to that in para. 503 of the Transport Regulations (the wording "relevant provisions" is important: the consignor is not required to ensure that all the requirements of the Transport Regulations are fulfilled). Editorial.	X			
WNTI-38	4.80	(a) to (h) The carrier ~~has~~ **should have** (…).	Editorial. It is preferable to use the same style as in para. 4.79.	X			
Israel-4	4.81	Following our comment no. 1 above, and by similarity to the use of the term *responsible competent authority* in paragraph **4.79(l)** of this Safety Guide, we suggest to add the word "responsible" as follows: *During inspection of the transport operations of the consignee, the* responsible *competent authority should consider verifying the following…*	Clarity	X			
WNTI-39	4.81	(a) to (d) **The consignee should have** (…).	Editorial. The style (including the grammatical style) of the introductory sentence of	X			

			para. 4.81 and its items (a) to (d) should be the same as the style in paras 4.79 and 4.80.				
WNTI-40	4.83	4.83. Activities related to emergency preparedness and response are one of the fundamental activities of the competent authority~~.~~ (see para. 4.4)**.** (…). The competent authority has several relevant roles and responsibilities with regard to emergency preparedness and response including: reviewing the arrangements for emergency preparedness and response of users during inspections (~~S~~**s**ee para. 4.80(f) and Annexes III, V, and VI) and **during** the review of applications for **approvals,** ~~and the~~ issuance of approvals (Annex I), establishing roles and responsibilities and liaising with other relevant governmental agencies (see paras 2.17, 2.18**, 2.19** and 2.22), participating in exercises, participating in training, and maintaining appropriate expertise (see para 2.16). (…).	Editorial. Editorial. Clarification. Completeness of the list of paragraphs to be considered.	X			

France-19	4.83	4.83. Activities related to emergency preparedness and response are one of the fundamental activities of the competent authority~~.~~ (see para. 4.4)**.** (…). The competent authority has several relevant roles and responsibilities with regard to emergency preparedness and response including: reviewing the arrangements for emergency preparedness and response of users during inspections (~~S~~**s**ee para. 4.80(f) and Annexes III, V, and VI) and **during** the review of applications for **approvals,** ~~and the~~ issuance of approvals (Annex I), establishing roles and responsibilities and liaising with other relevant governmental agencies (see paras 2.17, 2.18**, 2.19** and 2.22), participating in exercises, participating in training, and maintaining appropriate expertise (see para 2.16). (…).	Editorial. Editorial. Clarification. Completeness of the list of paragraphs to be considered.	X			
J-17	P.32/L.9 4.83	4.83. Activities related to emergency preparedness and response are one of the fundamental activities of the competent authority~~.~~ (see para. 4.4).	Editorial (move period).	X			
J-18	P.32/L.20 4.84	4.84. International cooperation may be necessary when States ~~are affected~~ needs any assistance to respond to accidents that occur during the transport of radioactive material. Certain types of transport accidents are covered by the Convention on Early Notification of	"affected" seems vague.			X	Cooperation does not only apply when states need assistance to respond

		a Nuclear Accident and Convention on Assistance in the Case of a Nuclear Accident or Radiological Emergency [33].					
UK-3	4.92 (bis)	Recognising the international aspect to transport, incident investigation and enforcement may require international co-operation between States.	Expectation for interfaces between National competent authorities with respect to international movements where enforcement or investigations are proposed. This aspect is not discussed.	X			
China-7	5. /MULTILATERIAL APPROVALS	It is suggested to add what situations requiring multilateral approval by competent authorities.	To provide reference for multilateral approval application			X	The situations requiring multilateral approval by competent authorities are already listed in para. 4.12, which is referred to in para. 5.1.
China-8	6 /INTERNATIONAL COOPERATION RELATING TO COMPLIANCE ASSURANCE	It is suggested to add the following contents : National competent authorities meet regularly under the auspices of the IAEA in order to further develop the Transport Regulations and their associated advisory and explanatory Safety Guides for the safe transport of radioactive material. The common aim of such meetings is related to the uniformity of the application of the Transport Regulations in all Member States.	International cooperation in the field of compliance assurance is clearly a powerful tool that can help to achieve that aim.	X	Para. 6.2bis is proposed to be added with the following text: 'National competent authorities should cooperate to further develop the Transport Regulations and its associated		

					advisory and explanatory Safety Guides for the safe transport of radioactive material **Error! Reference source not found.**, **Error! Reference source not found.**, **Error! Reference source not found.**, **Error! Reference source not found.**, **Error! Reference source not found.**, **Error! Reference source not found.**. One objective of such cooperation is the uniform application of the requirements of the Transport Regulations in all Member States.'		
WNTI-41	6.1	The national competent authority is responsible for compliance assurance within its territory. However, many shipments of	To facilitate international transport is also important.	X	See text that has been proposed to be added to para. 3.5 in response to		

		radioactive material involve packages of foreign origin. Each such instance of transport should also comply with national regulatory requirements. **In addition, the consistency of the national regulatory requirements between the states should be promoted to facilitate international transport. If a state imposes any additional requirements or suggestions, they should be clearly disclosed to avoid the interruption or the denial of the shipment.**			China-2 and J-09, and para. 3.8. A reference to paras 3.5 and 3.8 is proposed to be added to the last sentence in para. 6.1.		
J-19	P.34/L.36 6.1	6.1. The national competent authority is responsible for compliance assurance within its territory. However, many shipments of radioactive material involve packages of foreign origin. Each such instance of transport should also comply with national regulatory requirements. In addition, the consistency of the national regulatory requirements between the states should be taken into account to facilitate international transport. If a state imposes any additional requirements or suggestions, they should be clearly disseminated to avoid the interruption of the transport.	To facilitate international transport is also important.	X	See text that has been proposed to be added to para. 3.5 in response to China-2 and J-09, and para. 3.8.		
WNTI-42	REFERENCES [11]	[11] ~~INTERNATIONAL ATOMIC ENERGY AGENCY, Amendment to the Convention on the Physical Protection of Nuclear Material,~~	The Convention on the Physical Protection and its Amendment should be two different references,	X			

		~~INFCIRC/274/Rev.1/Mod.1, IAEA, Vienna (2016); The~~ Physical Protection of Nuclear Material and Nuclear Facilities, INFCIRC/~~225~~**274**/Rev.~~5~~ **1**, IAEA, Vienna (~~2011~~**1980**)~~.~~**; Amendment to the Convention on the Physical Protection of Nuclear Material, GOV/INF/2005/10-GC(49)INF/6, IAEA, Vienna (2005).**	and they should be correctly quoted. See also the related comments on para. 2.25.				
J-20	P.36/L.34 Ref. [11]	[11] ~~INTERNATIONAL ATOMIC ENERGY AGENCY, Amendment to the Convention on the Physical Protection of Nuclear Material, INFCIRC/274/Rev.1/Mod.1, IAEA, Vienna (2016); The Physical Protection of Nuclear Material and Nuclear Facilities, INFCIRC/225/Rev.5, IAEA, Vienna (2011).~~ Convention on the Physical Protection of Nuclear Material, INFCIRC/274/Rev.1, IAEA Vienna (1980); Amendment to the Convention on the Physical Protection of Nuclear Material, (GOV/INF/2005/10-GC(49)INF/6, IAEA, Vienna (2005)	INFCIRC/225 is different to the PP Convention.	X			
WNTI-43	REFERENCES [11bis] (new)	**INTERNATIONAL ATOMIC ENERGY AGENCY, Nuclear Security Recommendations on Physical Protection of Nuclear**	INFCIRC/225/Rev.5 should be listed in the references (see above comment on para.2.27).	X			

		Material and Nuclear Facilities (INFCIRC/225/Revision 5), IAEA Nuclear Security Series No. 13, IAEA, Vienna (2011).					
J-21	P.36/bottom Ref. [11bis]	[11bis] INTERNATIONAL ATOMIC ENERGY AGENCY, Nuclear Security Recommendations on Physical Protection of Nuclear Material and Nuclear Facilities (INFCIRC/225/Revision 5), IAEA Nuclear Security Series No. 13, IAEA, Vienna (2011).	INFCIRC/225/Rev.5 should be mentioned correctly.	X			
WNTI-44	REFERENCES [11ter] (new)	**INTERNATIONAL ATOMIC ENERGY AGENCY, Nuclear Security Recommendations on Radioactive Material and Associated Facilities, IAEA Nuclear Security Series No. 14, IAEA, Vienna (2011).**	NSS No. 14 should be listed in the references (see above comment on para.2.27).	X			
J-22	P.36/bottom Ref. [11ter]	[11ter] INTERNATIONAL ATOMIC ENERGY AGENCY, Nuclear Security Recommendations on Radioactive Material and Associated Facilities, IAEA Nuclear Security Series No. 14, IAEA, Vienna (2011).	NSS No.14 should be added.	X			
WNTI-45	REFERENCES	[2] INTERNATIONAL ATOMIC ENERGY AGENCY, Advisory Material for the IAEA Regulations for the Safe Transport of Radioactive Material (2018 **Edition**), IAEA	Editorial.	X			

		Safety Standards Series No. SSG-26 (Rev. 1), IAEA, Vienna (202X).					
WNTI-46	REFERENCES	[16] INTERNATIONAL ATOMIC ENERGY AGENCY, Security of Radioactive Material in Transport, IAEA Nuclear Security Series No. 9-G (Rev. 1), IAEA, Vienna (2020).	Editorial. Correctness of the reference.	X			
WNTI-47	REFERENCES		References [14], [15], [19], [21] and [22] should be updated to take into account their latest editions that will reflect the 2018 Edition of the Transport Regulations.	X			
France-20	REFERENCES		References [14], [15], [19], [21] and [22] should be updated to take into account their latest editions that will reflect the 2018 Edition of the Transport Regulations.				See WNTI-47
J-23	Annex I P.42/L.8 I-2	I–2. The applicant seeking approval needs to …paras 807(c), 809, 812 and 815 of IAEA Safety Standards Series No. SSR-6 (Rev.1), Regulations for the Safe Transport of Radioactive Material, 2018 Edition (the Transport Regulations) [I–1].	Editorial (in black letters, without underline).	X			

IND-3	44/11-12, Annex I, Information to be included in Applications for Approval of Design of Special Form Radioactive Material and Low Dispersible Radioactive Material	Administrative information Name, address, email id and telephone number of the applicant Name, address , email id and telephone number of the designer	Email ID may also be included for reliable communication	X			
MOR-4	Annex I, 'For approval of SCO-III shipments'	Transport plan	Detailed description for this transport plan	X	The following text is proposed to be added to the bullet point concerning the transport plan: A transport plan that describes various aspects of the shipment as required by para. 520(e)(iii) of the Transport Regulations [I-1].		
MOR-5	Annex I, Information to be included in Applications for Approval of Shipments under Special Arrangement	Compensatory measures (technical, operational and administrative)	Add some examples of these measures			X	As stated in para. 4.17, information about additional operational controls that might be employed for shipments under special arrangement are discussed in para. 830.1 of SSG-26.

France-21	ANNEX I INFORMATION ON MANAGEMENT SYSTEMS Third paragraph	Information on management systems that is included with applications for approval **of design of packages, of design of special form radioactive material and low dispersible radioactive material, of shipments, and of shipments under special arrangement** might include the following information in accordance with international, national or other standards acceptable to the competent authority:	Clarification. The applications for approval that are referred to here are those that are considered in the first part of this Annex I.	X	It is proposed that the second para. in the subsection on INFORMATION ON MANAGEMENT SYSTEMS be revised as indicated: Although ~~Althoug h t~~ this subsection focuses on information on management systems to be included in applications for approval of: the designs of packages, special form radioactive material and low dispersible radioactive material, and shipments and shipments under special arrangement~~anne x focuses on packagings used in transport of radioactive material~~, it provides		

					comprehensive information that can be adapted to any of the transport activities mentioned above.		
WNTI-48	ANNEX I INFORMATION ON MANAGEMENT SYSTEMS Third paragraph	Information on management systems that is included with applications for approval **of design of packages, of design of special form radioactive material and low dispersible radioactive material, of shipments, and of shipments under special arrangement** might include the following information in accordance with international, national or other standards acceptable to the competent authority:	Clarification. The applications for approval that are referred to here are those that are considered in the first part of this Annex I.	X	See France-21		
WNTI-49	ANNEX II CERTIFICATE OF APPROVAL FOR SHIPMENTS UNDER SPECIAL ARRANGEMENT 5 (c) (ii)	(ii) Physical and chemical form [including special form radioactive material, low dispersible radioactive material, or fissile material excepted under para. 417(f) of SSR-6 (Rev. 1), if applicable]	Editorial	X			
WNTI-50	ANNEX II CERTIFICATE OF APPROVAL FOR SHIPMENTS UNDER SPECIAL ARRANGEMENT 5 (d) (v)	(v) Criticality safety index**, if applicable**	In the framework of a special arrangement, it may happen that it is not possible to calculate the criticality safety index.			X	CSI is required. See para. 836(k)(ii) of the Transport Regulations.

WNTI-51	ANNEX II CERTIFICATE OF APPROVAL FOR SHIPMENTS UNDER SPECIAL ARRANGEMENT 5 (d) (vii)	(vii) Any allowance [based on para. 667(b) of SSR-6 (Rev. 1)] for a change in neutron multiplication assumed in the criticality assessment as a result of actual irradiation experience~~]~~	Editorial.	X	Also, the reference to para. 667(b) has been changed to 677(b).		
J-24	General Annex III and IV	(Comment only) Annex III and IV should be referred in TS-G-1.4 under revision.	To maintain consistency between the safety guides on compliance assurance and management system.	X			
WNTI-52	ANNEX IV TITLE	ANNEX IV: EXAMPLE OF A PROCEDURE AND CHECKLIST FOR INSPECTI~~O~~N**G** A MANAGEMENT SYSTEM	Editorial.	X			
WNTI-53	ANNEX IV	*3.5 should be 3.4 and the following numbers should be shifted accordingly*.	"3.4" is missing.	X			
J-25	Annex IV P.65	Item No. 3.5. to 3.12. should be read as No. 3.4. to 3.13.	Editorial (Item No. 3.4. is missing),	X			
J-26	Annex IV P.66/L.10 5.1.2.	5.1.2. The head of compliance selects … Team members other than observers have received ~~formal~~ training in appropriate inspection techniques.	Meaning of "formal" is unclear and it is redundant.	X			
J-27	Annex IV P.67/L.4 5.1.7.	5.1.7. The agreed date(s) for the inspection is (are) confirmed by means of correspondence with the organization being ~~audited~~ inspected; other interested parties are also notified. In all instances the	"Inspected" fits better than "audited".	X			

		notification includes the following points:					
J-28	Annex IV P.67/L.10 5.1.8.	(Insert a line) 5.1.8. Prior to the inspection …	Editorial (insert a line).	X			
J-29	Annex IV P.67/L.20 5.2.1. (e)	(e) The closing meeting ~~and attendance~~.	Redundant.	X			
J-30	Annex IV P.68/L.10 5.4.3.	5.4.3. The progress of corrective actions is monitored by the team leader~~, using a statement of inspection completion~~. If problems are encountered …	It seems not necessary.	X			
IND-4	69/5, Annex IV, Item 5 under Example of a Checklist for Inspecting a Management System – Management System and Strategic Planning	Does the management system fully cover the activities undertaken by the organization (these activities may include the design, manufacture, maintenance and repair of packagings, and the preparation, consigning, loading, carriage (including in-transit storage), *shipment* after storage, unloading and receipt at the final destination of loads of radioactive material and packages)?	To be in line with para 106 of SSR-6 (2018 Ed)	X			
J-31	Annex V P.71/L.10 39.	39. Are the interested parties ~~(stakeholders)~~ clearly identified?	Redundant.	X			
J-32	Annex V P.83/10th column	Are the different components of the packagings in good state?	Clarification needed.	X	The indicated change to the subject text is proposed:		

		What does "different components" mean?			'Are the ~~different~~ components of the packagings in good state?'		
IND-5	83/Annex V	Is the marking method of packages adequate? 531-537, 545, 547, 507	Para 507 gives the requirement of considering other dangerous property in additional to radioactive and fissile property.	X			
IND-6	84/Annex V	Add as separate point: Whether arrangements exist for assessment of leaking or damaged packages and its storage at interim location till it is reconditioned &decontaminated 510,511	Assessment of leaking or damaged packages should be checked during inspection.	X	This issue is most applicable to carriers; therefore, the following text is proposed to be included in the Annex VI Example of a Checklist for Inspecting Carriers: 'Have arrangements and procedures been established regarding packages that are damaged or leaking that include the: identification of, assessment of contamination		

					and dose rates associated with, and protective measures related to, such packages?' See also, IND-15.		
IND-7	85/ Annex V	EXAMPLE OF A CHECKLIST FOR INSPECTION consignors Are the dose records of the workers maintained?	For assessment, the dose records needs to be maintained	X	The following text is proposed to be added as an additional item in Annex V/Radiation protection requirements: 'Are records of individual monitoring of workers maintained, if required?'		
IND-8	85/Annex V	Does the Company know the applicable limits for ~~radiation levels~~ dose rates or contamination?	The terminology 'dose rate' is replaced with radiation level (ref. IAEA SSR-6, 2018 Ed.)	X			
J-33	Annex V P.85/bottom column	Does the ~~c~~Company know the applicable limits for ~~radiation levels~~ dose rates or contamination?	Terminology.	X			
J-34	Annex V P.86/2nd column	Is there a protocol in case of noncompliance with the above limits for ~~radiation levels~~ dose rates or contamination	Terminology.	X			

IND-9	86/Annex V	Is there a protocol in case of non-compliance with the above limits for ~~radiation levels~~ dose rates or contamination?	The terminology 'dose rate' is replaced with radiation level (ref. IAEA SSR-6, 2018 Ed.)	X			
J-35	Annex VI P.89/L.1	~~**Company details and organization**~~ **Activities performed by the carrier:**	Proper title.	X			
IND-10	89/Annex VI	EXAMPLE OF A CHECKLIST FOR INSPECTION CARRIERS Are the dose records of the workers maintained?	For assessment, the dose records needs to be maintained.	X			
J-36	Annex VI P.90/6th column	Does the ~~c~~Company know the applicable limits for ~~radiation levels~~ dose rates or contamination?	Terminology.	X			
IND-11	90/Annex VI	Does the Company know the applicable limits for ~~radiation levels~~ dose rates or contamination?	The terminology 'dose rate' is replaced with radiation level (ref. IAEA SSR-6, 2018 Ed.)	X			
J-37	Annex VI P.90/7th column	Is there a protocol in case of non-compliance with the above limits for ~~radiation levels~~ dose rates or contamination	Terminology.	X			
IND-12	90/Annex VI	Is there a protocol in case of non-compliance with the above limits for ~~radiation levels~~ dose rates or contamination?	The terminology 'dose rate' is replaced with radiation level (ref. IAEA SSR-6, 2018 Ed.)	X			
J-38	Annex VI P.90/10th column	Is shielding used on the ~~transport vehicle~~ conveyance?	Proper term to include conveyance other than vehicle.			X	The dose rate limits in para. 566 (the referenced para. of the Transport Regulations) apply to vehicles and not conveyances. See

							also, paras 573 and 575 of the Transport Regulations.
J-39	Annex VI P.91/6th column	Are accumulations of packages on conveyances monitored for ~~radiation levels~~ dose rates, TI and CSI?	Terminology.	X			
IND-13	91/Annex VI	Are accumulations of packages on conveyances monitored for ~~radiation levels~~ dose rates, TI and CSI?	The terminology 'dose rate' is replaced with radiation level (ref. IAEA SSR-6, 2018 Ed.)	X			
IND-14	90/Annex VI	Are contamination checks performed? Provision ,in SSR-6 (Rev.1), 2018 Edition para 505	Para 505 may be added which pertains to decontamination of freight containers, IBC, tanks and over packs, applicable to carriers.	X			
IND-15	90/Annex VI	Add as separate point: Are the radiological measures conducted on the packages according to regulations? 508, 509, 516, 523-524A, 526-529	This is applicable for carriers also.			X	Radiation measurements that are related to the paras of the Transport Regulations that are cited by the commenter are primarily the responsibility of the consignor. Most of the radiation measurements of packages that are performed by carriers would be for packages that are damaged or leaking and text is proposed to be added to the

							Driver/Company Requirements section of Annex VI that addresses this issue. See also IND-6.
IND-16	90/Annex VI	Add as separate point: Are there provisions to make arrangements for packages wherein average heat flux is more than 15 W/m^2 ref of para 565	This is applicable for carriers also.	X	The following text is proposed to be added as a new point under Placarding, Fire Extinguishers, Miscellaneous Equipment and Stowage: 'Have arrangements and procedures been established that take account of the requirements related to the surface heat flux of the package or overpack during carriage and stowage?'		
IND-17	91/Annex VI	Add as separate point Company's requirement Before accepting the consignment whether the compliance w.r.t marking and labelling is checked made ref to paras 530- 542,507	This is new point to be added as these activity is to be carried out before accepting any consignment by the company. As per 507, labelling for other			X	Ensuring that a package is properly prepared for transport is the responsibility of the consignor. See Consignor's Responsibilities in

			dangerous property also needs to be checked				paras 545-561 of the Transport Regulations.
IND-18	91/Annex VI	Add as separate point Company's requirement Is a procedure in place to meet the compensatory safety measures to be put in by the carrier for shipment under special arrangement? Para 310	The carrier may have to make some arrangement w.r.t to the shipment under special arrangement	X	The following text is proposed to be added as an additional point in the Driver/Company Requirements section of Annex VI: 'If a consignment has been transported under special arrangement, has the carrier implemented all relevant compensatory measures related to its carriage? Have arrangements been made concerning relevant compensatory measures for planned shipments under special arrangement?'		

IND-19	92/Annex VI	~~Vehicles~~ - Placarding, Fire Extinguishers, Miscellaneous Equipment and Stowage Are the large freight containers carrying unpackaged LSA-I material or SCO-I or packages other than excepted packages, and tanks placarded? Para 543-544	Placarding requirements are there for freight container and tank also apart from road rail vehicles.	X			
WNTI-56	CONTRIBUTORS TO DRAFTING AND REVIEW	(…) F~~e~~é~~r~~r~~é~~o~~n, F. Nuclear Safety Authority, France (…).	Typo.	X			