

DS543 SSR-6 (Rev. 2) Step 7 Resolution Table

COMMENTS BY REVIEWER				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
IRN/ NUSSC-13	General	Used hyperlinked for addressing the paragraph in content of SSR6	It is necessary to easy use of SSR6	X			Draft safety standards are developed by a large number of different contributors and hyperlinks are problematic at the drafting stage. However, the Secretariat is considering whether this could be implemented in the final publication of SSR-6 (Rev. 2).
IRN/ NUSSC-15	General	Recommended that present flow diagram (Fig. 1) in SSG-33 be used to SSR6 publication	Adding the more description about evaluation of classification especially for uranium compound.			X	This is guidance and is more appropriately placed in SSG-33 (Rev. 1)
IRQ-03	General comment	Insert “nuclear” before referring to “safety” or “security” wherever required throughout the draft	Terms of the IAEA	X	There is no need to make this change for safety. The Glossary states that nuclear safety is “Often abbreviated to safety in IAEA publications on nuclear safety. Safety means nuclear safety unless otherwise stated”. However, the full term ‘nuclear security’ should be used, as this is only abbreviated to ‘security’ in publications on nuclear security.		

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PAK-20	General		For the following comments/proposals no record of TRANSSC proceedings is available; ✓ PPA F-46 ✓ PPA F-56 PPA JPN-01	X			The TTEG-PPA resolution table has been updated to reflect the acceptance of these proposals by TRANSSC.
CDN/ EPRSC-01	101 ; IAEA Safety Standards Series No. GSR Part 1 (Rev. 1), Governmental, Legal and Regulatory Framework for Safety [3]; and IAEA Safety Standards Series No. GSR Part 2, Leadership and Management for Safety [4] <u>and IAEA Safety Standards Series No. GSR PRT 7, Preparedness and Response for a Nuclear or Radiological Emergency [12].</u>	Completeness. As the document includes provision for emergency response, GSR Part 7 should be included in this list. This also improves consistency with IAEA SSG-65, which explicitly references GSR Part 7	X			
CHN-01	102	This Safety requirements Standard is supplemented by a hierarchy of Safety Guides,	This regulations has transferred from <i>IAEA SAFETY STANDARDS</i> to <i>SPECIFIC SAFETY REQUIREMENTS</i> . <i>And it is clearly referred to SSR-6</i>			X	Para. 102 accurately reflects the fact that SSR-6 is a Safety Standard that is supplemented by a hierarchy of Safety Guides.
PAK-01	102	SSG XX " Radiation Protection Programmes for the Transport of Radioactive Material"	The list of safety standards which are supplementing DS-543 are mentioned. In the referred para, IAEA guide TS-G-1.3 " Radiation Protection Programmes for the Transport of			X	The revision of TS-G-1.3 is already included in para. 102 as SSG-86.

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			Radioactive Material" (which is currently under issuance process) is missing. Please include the same. As mentioned in the last TRANSSC meeting, this has been in final stages of issuance and SSG-XX number has been allocated - same may be mentioned here.				
IRN/NUSSC-03	Background (par. 102) and preface section	<i>This safety standard is supported by SSG-66 which provides recommendation on preparation of a PDSR.....</i>	Use of SSG-66 as a new document should be reflected in background and preface section (Table titled changed paragraphs in the publication),			X	SSG-66 is already referenced in para. 102. If a similar Preface is included in the revised SSR-6, para. 102 will be included in the list of changed paragraphs.
USA/NSGC-01	Para 102	Add Footnote: See also publications issued in the IAEA Nuclear Security Series.	Given its place in the Nuclear Safety Series, the text of this document should refer to the Nuclear Security Series, as the previous draft version. The previous version (SSR 6 Rev 1) says right up front in footnote #1 "See also publications issued in the IAEA Nuclear Security Series." This doesn't exist in the current draft. Suggest inclusion of a similar statement in this draft.			X	The footnote referred to by the commenter is in the front matter of the publication, which is the same for all safety standards. This front matter will be added later in the development process for this publication, and it will likely include this footnote. NB: Various publications concerning nuclear security, including those of the IAEA Nuclear Security Series, are referenced in Annex I of the draft DS543.

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BGD/ NSGC-01	Para No.: 109, Line No.: 02	To ensure that control of radioactive material is not relinquished inappropriately.	To understand more clearly that this is radioactive material.	X			
IRQ-01	Para 109/ Line No. 2	Insert “a potential malicious act such as” before “unauthorized removal and sabotage”	To make the statement more clear			X	The beginning of the first sentence of para. 109 is: "Measures should be taken to ensure that radioactive material is kept secure in transport so as to prevent ...". Such measures would not be able to prevent “a potential malicious act”. Also, introduction of the word “malicious” would narrow the scope of this requirement and make it necessary to have knowledge of the state of mind of the individual/organization committing an act.
IRQ-2	Para 109/ Line No. 3	Insert “nuclear” before “safety measures”	Terms of the IAEA			X	See IRQ-03
PAK-02	109	The modified text may be reconsidered/deleted	A statement has been added in the scope of the draft regarding consideration of nuclear security measures in design along-with safety aspects. It may be mentioned draft document provides requirements in aspects of safety. However design requirements regarding			X	The second sentence in para. 109 was introduced following internal discussions to address the safety/security interface according to Requirement 12 of GSR Part 1 (Rev. 1).

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			security aspects are not given in the draft. Please clarify In addition the basis/justification for inclusion of the text, Whether it is based on some Member states feedback or was it based on judgment may also be included.				
USA/TRA NSSC-01	109	Measures should be taken to ensure that radioactive material is kept secure in transport so as to prevent damage , unauthorized removal and sabotage... (Would like to retain the word “damage” before using text suggested by NSNS)	The previous (2018) paragraph required RAM to be secured to prevent “theft or damage”. An IAEA NSNS proposal changes that to “unauthorized removal and sabotage”. NSNS’s proposed “unauthorized removal” adequately replaces “theft”; however, “sabotage” is not necessarily equivalent to “damage” in terms of transportation.	X	‘damage’ will be kept, but the order will be as follows: “unauthorized removal, sabotage or damage”		
IRN/ NUSSC-02	Section II. Definitions	The definition of the <i>Package Design Safety Report (PDSR)</i> should be added.	Based of acceptance of comment No. 1, this expression is used in the next version of SSR-6.			X	New proposal; The Review Cycle for SSR-6 (Rev. 1) was initiated with the issuance of a Note Verbale on 5 November 2021, which invited all Member States to submit proposals for

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							<p>changes to SSR-6 (Rev. 1). In response, over 300 proposals were submitted. At its meeting in November/December 2022, TRANSSC decided that, based on the proposals that were submitted, there is sufficient justification for revising SSR-6 (Rev. 1), and a Revision Cycle was initiated. In accordance with the 2021 Transport Regulations Revision Quality Plan, only proposals that were submitted in response to the 5 November 2021 Note Verbale before the deadline of 18 March 2022 would be considered during the Revision Cycle. Proposals submitted after this deadline may be considered in a future Review/Revision Cycle.</p> <p>NB: Furthermore, the term is not used in SSR-6.</p>
JPN(TRA NSSC)-02	205A, 217(b), Table						

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	10&11, 825(c)						
	1) Comments on WNTI-02-and 03(a)	1) All modified texts related to WNTI-02 and 03(a) should be removed from the draft SSR-6(Rev.2) until IMO can confirm the safety of ships.	1) IMO has not approved them by 9th October when TRANSCC46 decided as the deadline.	X			
	2) Comments on WNTI 05 and CDN-04	2) In Table 10 and 11, the deletion of TI and CSI limits for total vessel should be suspended.	2) <ul style="list-style-type: none"> - Japan thinks the regulation of defined deck area is unclear; whether more than one defined deck areas are allowed on a single deck. This is not clearly specified in the regulations and the same concerns were pointed out at CCC9 of the IMO meeting. - If multiple defined deck areas for radioactive material were defined on one deck and an accident happened, those fissile material could accumulate in one location and reach criticality. 			X	The deletion of the TI and CSI limits for the total vessel is not related to the concept of defined deck area. With regard to the deletion of the total vessel limits, as noted in a report by TTEG-C, <i>the limits that are applicable to hold, compartment or defined deck area, combined with the minimum distance of 6 m between groups of packages, are sufficient to provide an appropriate level of safety.</i> The deletion of the total vessel limit in Table 10 was accepted by TRANSSC. Additional guidance concerning defined deck areas should be included in SSG-26.

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			- Therefore, the current limits for total vessel should be retained until the requirements for defined deck area are clarified by IMO.				
USA/TRA NSSC-02	205A	Bay 205A. Bay shall mean a specially designed space in a containership to stow large freight containers that is delimited by bulkheads and equipped with cell guides.	IMO defines spaces on containerships. This is completely outside TRANSSEC responsibility or expertise.	X			
USA/TRA NSSC-03	217	Conveyance shall mean: (a) For transport by road or rail: any <i>vehicle</i> . (b) For transport by water: any <i>vessel</i> , or any hold, compartment, bay , or <i>defined deck area</i> of a <i>vessel</i> . For transport by air: any <i>aircraft</i> .	If comment to remove definition of “bay” is accepted, it should be removed throughout regulations.	X			
PAK-19	General	219 A	Para # is missing for definition of design (after para 219)	X			
IRN/ NUSSC-18	Definition	rigid and non- rigid over pack	In Par. 524 is provided information about rigid and non- rigid over pack but is not mentioned in Definition section			X	New proposal; See text concerning new proposals in IRN/NUSSC-02. NB: Some guidance is provided in paras 524A.1 of SSG-26 (Rev. 1).

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F-01	220	<u>220.</u> <i>Design</i> shall mean the description (...)	Editorial The paragraph number is missing.	X			
JPN/TRA NSSC-03	220	<u>220</u> <i>Design</i> shall mean the description;	Number of the provision is missing.	X			
UK-02	220	Remove “,by the designer,”	This text was introduced as part of the changes proposed to 801 – the proposed changes to 801 have been rejected so this text should be removed.	X			
USA/TRA NSSC-04	220	<i>Design</i> <i>Design</i> shall mean the description; by the designer , of fissile material excepted under para. 417(f), <i>special form radioactive material, low dispersible radioactive material, package or packaging</i> that enables such an item to be fully identified. The description may include specifications, engineering drawings, reports demonstrating compliance with regulatory requirements, and other relevant documentation.	“Designer” is undefined and causes confusion.	X			
WNTI-01	220	<i>Design</i> shall mean the description; by the designer , of fissile material excepted under para. 417(f), <i>special form radioactive material, low dispersible radioactive material, package or packaging</i> that enables such an item to be fully identified. The description may include	Delete “by the designer”. This is no longer required as there are no longer modifications in para. 801 and other paragraphs in Section VIII that use the term “designer”.	X			

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		specifications, engineering drawings, reports demonstrating compliance with regulatory requirements, and other relevant documentation.					
CDN/TRAN SSC-03	220 (low specific activity material)	220 6. Low specific activity (LSA) material shall mean...	Low specific activity material should be paragraph 226 (not 220).	X			
CDN/TRAN SSC-04	226 (low toxicity alpha emitters)	226 7. Low toxicity alpha emitters are:	Low toxicity alpha emitters should be paragraph 227 (not 226).	X			
F-02	226	220 - 226 . <i>Low specific activity (LSA) material</i> -shall mean (...)	Editorial The paragraph number is incorrect.	X			
JPN(TRAN SSC)-07	Para. 226	<i>Low specific activity material</i> 220 226 . <i>Low specific activity (LSA) material</i> shall mean ...	Typo	X			
USA/TRAN SSC-05	226	Editorial: paragraph number correction.	The definition of LSA should be paragraph 226, not 220. Low toxicity alpha emitter definition should then be paragraph 227, not 226.	X			
PAK-04	226 227. <i>Low toxicity alpha emitters are: <u>uranium enriched up to 20%, natural uranium</u></i>	In the draft word "unirradaited" has been inserted instead of the agreed text in the proposal/comment TTEG RP USA-02.	X			
F-03	227	226 - 227 . <i>Low toxicity alpha emitters</i> are (...)	Editorial The paragraph number is incorrect.	X			

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JPN(TRA NSSC)-08	Para. 227	<i>Low toxicity alpha emitters</i> 226 227 . <i>Low toxicity alpha emitters</i> are: ...	Typo	X			
PAK-03	229A, 229B	NATURALLY OCCURRING RADIOACTIVE MATERIAL (NORM) Radioactive material containing no significant amounts of radionuclides other than naturally occurring radionuclides.	In the referred para definition of NORM and naturally occurring radionuclide's have been added. It may be mentioned that the stated definitions are not in-line with IAEA Nuclear Safety and Security Glossary, 2022 (Interim) (Pg#131).	X			
CDN/TRAN SSC-05	229B	229B. Naturally occurring radionuclides shall mean radionuclides that occur naturally on Earth in significant quantities. The term is used to refer to the primordial radionuclides ⁴⁰K, ²³⁵U, ²³⁸U and ²³²Th potassium-40, uranium-235, uranium-238, and thorium-232 and their radioactive decay products. This includes U (natural) and Th (natural).	The writing of the radionuclides should be consistent with the format used in other definitions.	X			
WNTI-02	229A	229A. <i>Naturally occurring radioactive material (NORM)</i> shall mean <i>radioactive material</i> containing only no significant amounts of radionuclides other than <i>naturally occurring radionuclides</i> . Material in which the activity concentrations of the <i>naturally occurring radionuclides</i> have been changed by a process is included.	Consistency with the IAEA Nuclear Safety and Security Glossary – 2022 (Interim) Edition	X			

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F-04	240	(...) Note: The terms ‘activity concentration’ and <i>specific activity of a material</i> are synonymous for the purpose of these Regulations.	This note, while useful, is not totally correct.	X			
JPN/TRA NSSC-01	240.	<p><i>Specific activity</i></p> <p>240. <i>Specific activity</i> of a radionuclide shall mean the activity per unit mass of that nuclide. The <i>specific activity</i> of a material shall mean the activity per unit mass of the material in which the radionuclides are essentially uniformly distributed. Note: The terms ‘activity concentration’ and <i>specific activity of a material</i> are synonymous for the purpose of these Regulations.</p>	<p>This NOTE is not technically correct .</p> <p>“<i>Specific activity</i> of a material” is used in the same sense as “radioactivity concentration”, but “<i>specific activity</i> of a radionuclide” is not.</p> <p>Additional finding: In SSR-6, “<i>specific activity</i>” is defined along with whether it is of a nuclide or of a material; in UNOB, “<i>specific activity of a radionuclide</i>” is defined, but not “specific activity of a material”.</p>	X			
<p><i>Specific activity of a radionuclide</i> means the activity per unit mass of that nuclide. The specific activity of a material shall mean the activity per unit mass of the material in which the radionuclides are essentially uniformly distributed.</p> <p>NOTE: The terms "activity concentration" and "specific activity" are synonymous for the purpose of these Regulations.</p>							

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PAK-05	247	Natural uranium shall mean uranium	The proposed change (i.e. whether to keep the word "Uranium" italics needs to be discussed in TRANSSEC prior to its implementation.			X	Italicization is used in the text to denote words that are defined in Section II. 'Uranium' is not defined as a term in itself, only as part of other terms. Therefore, it should not be italicized when it appears alone in the text.
IRN/ NUSSC-14	247/ Line No. 7 SSR-6 edition 2018	It is defined by (enrichment of ²³⁴ U in natural uranium)×(enrichment percentage)	In the end of enrichment uranium, mentioned "a very small mass percentage of ²³⁴ U is present" and it is not quantitatively and cause to variety of descriptions. If replace with quantitative mount it is so better.			X	New proposal. See text concerning new proposals in IRN/NUSSC-02.
IRQ-05	Para 304/ line No.5	Packages must be kept separate from workplaces and public places and from other dangerous goods.	Emergency			X	New proposal. See text concerning new proposals in IRN/NUSSC-02. NB: Segregation during transport is addressed in paras 562 and 563.
PAK-06	304	...and emergency management system	Modifications made in the text have eliminated the requirement of emergency management system. Resultantly, the text does not remain in-line with GSR Part 7 and SSG-65. Please correct.			X	This change is proposed for alignment with the UNOB. Fundamental requirements for emergency response are located in GSR Part 7 and its supporting safety guides.
CDN/ EPreSC-02	305	The arrangements for preparedness and response shall be based on the graded approach and shall take into	Completeness. GSR part 7 should be listed as a			X	While GSR Part 7 is referred to in the IAEA Safety Standards in terms of

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		consideration the identified hazards and their potential consequences, including the formation of other dangerous substances that may result from the reaction between the contents of a consignment and the environment in the event of a nuclear or radiological emergency. <u>Requirements for the establishment of such arrangements are provided in Ref [12], with additional guidance for the establishment of such arrangements</u> is contained in Refs [6, 12 13–15].	requirement, rather than guidance.				“requirements”, it would be misleading to refer to it in SSR-6 in this way. The text of SSR-6 becomes binding when it is incorporated into modal regulations, adherence to which is required by international conventions and regional agreements. Therefore, in SSR-6 it would be appropriate to refer to GSR Part 7 as “guidance”.
IRQ-4	Para 305	Taking into account the strong partnership between all institutions and expertise, and providing the various resources necessary for confrontation that can be used optimally and effectively in the confrontation.	The arrangements for preparedness and response shall be based on the graded approach and shall take into consideration the identified hazards and their potential consequences, including the formation of other dangerous substances that may result from the reaction between the contents of a consignment and the environment in the event of a nuclear or radiological emergency. Guidance for the establishment of such arrangements is contained in Refs			X	New proposal. See text concerning new proposals in IRN/NUSSC-02. Guidance on this topic is provided the references cited in para. 305 and in SSG-65.
ISR-01	306	A <i>management system</i> based on international, national or other	The change proposed in para 220 incorporates the			X	See UK-02.

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		standards acceptable to the <i>competent authority</i> shall be established and implemented for all activities within the scope of the Regulations, as identified in para. 106, to ensure compliance with the relevant provisions of these Regulations. Certification that the <i>design</i> specification has been fully implemented shall be available to the <i>competent authority</i> . The designer , manufacturer, <i>consignor</i> or user shall be prepared:	concept of the designer in the definition of <i>design</i> . Therefore, the designer needs to be included in para 306 as one of the parties subject to inspection by the competent authority.				
IRN/ NUSSC-09	306	Periodic inspection and maintenance of packages should be done before use of package for shipment. Procedures and records of this activities shall be provided.	Due to existence of reusable packages in facilities			X	New proposal. See text concerning new proposals in IRN/NUSSC-02. NB: Most of these topics are already covered by paras 501 to 503.
PAK-07	306 A	Where <i>competent authority approval</i> is required, such <i>approval</i> shall take into account, and be contingent upon, the adequacy of the <i>management system including elements as described by of GSR part 2</i>	It is stated in para 101 that these regulations are based on IAEA Safety standard series No. GSR part 2. However, the elements of leadership and management for safety are not addressed in the document. These elements include safety culture, leadership for safety, etc Please include/reconsider.			X	New proposal. See text concerning new proposals in IRN/NUSSC-02.

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USA/EPre SC-01	315	“315. The training required in para. 313 shall be provided or verified upon employment in a position involving radioactive material transport and shall be periodically supplemented with retraining, simulation/exercises, and/or knowledge checks , as deemed appropriate by the competent authority.”	To expand and strengthen the list of opportunities for supplemental training.			X	New proposal. See text concerning new proposals in IRN/NUSSC-02. NB: The proposed text seems not to be consistent with the existing paragraph, which focuses on the need for retraining.
USA/NSG C-02	Para 315	“The training required in para. 313 shall be provided or verified upon employment in a position involving radioactive material transport and shall be periodically supplemented with retraining, simulations and exercises, or knowledge checks , as deemed appropriate by the competent authority.”	To expand and strengthen the list of opportunities for supplemental training.			X	See USA/EPreSC-01
USA/EPre SC-02	316	Expound on para 316 “HUMAN FACTORS” to provide more explanation for the requirement that “systematic consideration of human factors shall be included in the <i>design</i> of a <i>package</i> .”	This para lacks important details about what types of human factors shall be considered, why it applies only to the design of a package rather than more comprehensively, and how the results of this systematic consideration should be incorporated into regulations.			X	See JPN/TRANSSC-04, USA/TRANSSC-06, and WNTI-03.
IRN/TRANSSC-01	316	"Human factor" should be moved from para 316 to para 306A.	Mostly related to management system			X	See JPN/TRANSSC-04, USA/TRANSSC-06, and WNTI-03.
JPN/TRANSSC-04	316	HUMAN FACTORS	There are no specific requirements and no consensus to add the para. in TRANSSC.	X			

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		316. Systematic consideration of human factors shall be included in the design of a package.	This proposal will lead confusion for regulators and applicants because factors are not identified.				
USA/TRA NSSC-06	316	HUMAN FACTORS 316. Systematic consideration of human factors shall be included in the design of a package.	<p>Unclear what “human factors” need to be considered and applying them to everything (excepted packages) is overreach and unnecessary.</p> <p>As an administrative requirement, all designs will have to be re-evaluated and recertified to meet human factors requirements. Is it possible to retrofit these requirements into existing designs?</p> <p>If proposal is accepted, paragraph seems better suited under the GENERAL REQUIREMENTS FOR ALL PACKAGINGS AND PACKAGES as it is limited to design of packages.</p>	X			

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WNTI-03	316	<p>HUMAN FACTORS</p> <p>316. Systematic consideration of human factors shall be included in the design of a package.</p>	<p>Despite long discussions during the review process on this topic, the need for this requirement has not been clearly established.</p> <p>The wording is confusing.</p> <ul style="list-style-type: none"> - What is the meaning of “systematic” in the current context? - What is the meaning of “consideration (...) shall be included in the design of a package”, knowing that the design is defined (para. 220) as the description of the package? 	X			
USA/NSGC-03	Sentence 316	Recommend adding a reference to an IAEA publication that discusses considerations regarding human factors in package design.	This is the only place in the document where this is mentioned; No other references to human factors exist in this document. Also, this para lacks important details about what types of human factors shall be considered, why it applies only to the design of a package rather than more comprehensively, and how the results of this			X	See JPN/TRANSSC-04, USA/TRANSSC-06, and WNTI-03.

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			<p>systematic consideration should be incorporated into regulations.</p> <p>Recommend providing a reference to another IAEA document, as needed, for further information on how to consider human factors in package design. Otherwise, the sentence does not stand on its own.</p>				
IRN/NUSSC-16	Classification of materials	Sample of radioactive material	In this section, it is suggested to provide information about transportation of samples of radioactive material that are transported for the purpose of laboratory measurements. Information about weight, volume, activity limits and the other criteria can distinguish a sample from a consignment.			X	New proposal. See text concerning new proposals in IRN/NUSSC-02. NB: The requirements of SSR-6 do not focus on the intended use of radioactive material that is transported.
USA/TRA NSSC-07	401	401. <i>Radioactive material</i> shall be assigned one of the United Nations (UN) numbers specified in Table 1 in accordance with paras 408–434, unless otherwise specified by the United Nations Recommendations on the Transport of Dangerous Goods, Model Regulations [16].	<p>Do not understand the need for this and do not understand when this would occur.</p> <p>Addition raises a “what then” issue. If Orange Book uses different UN number, would shipper follow through with UN requirements or IAEA requirements?</p>	X			The proposed text gives the impression that the assignment of UN numbers to radioactive material could be different in SSR-6 and in the UNOB, which is not the case. This issue is already addressed by para. 507.

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ARG/RASSC-01	Table 2: Basic radionuclide values	<p>Provide an explanation of the changes of A₁ and A₂ values.</p> <p>To create a RASSC members small group to review the changes and discuss possible impacts on other values.</p>	<p>The draft present new values for A₁ and A₂, but there is no provision of the rationale of these changes or description of the new criteria used for calculating those values (new exposure scenarios, new dose coefficients, etc).</p> <p>Besides, an analysis of the possible impact of this change on other values agreed in GSR Part 3 such as exemption and clearance values should also be discussed</p>			X	<p>A full explanation for the proposed revision of the A₁/A₂ values is provided in Version 1.0 the report of the Working Group on A₁/A₂ that has been uploaded to the TRANSSC 47 web folder: Report of the Working Group on A₁/A₂. NB: A₁/A₂ values are stand-alone values in SSR-6 and have no corresponding values in other IAEA safety standards; therefore, a change in these values will not impact other values in GSR Part 3 such as exemption and clearance values.</p>
JPN/RASSC-01	TABLE 2. BASIC RADIONUCLIDE VALUES	<p>General Comment</p> <p>The reasons why the basic radionuclide values in Table 2 were changed should be carefully indicated. Without this explanation, it is impossible to determine whether the proposed values are scientifically</p>	<p>When RASSC approved the draft DPP DS543 in November 2022, Japan RASSC asked if the A₁ and A₂ values could be changed in view of concerns about the impact on and consistency with</p>			X	<p>See ARG/RASSC-01.</p>

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		<p>correct from the standpoint of radiation safety and provide a net regulatory benefit.</p> <p>This proposed change is more than just a change in one of the values in transport regulations (SSR-6); the next step should be to foster a common understanding among RASSC and beyond of the possible future impact on the key radiation protection values contained in GSR Part 3 and others.</p> <p>A careful explanation of the justification for changing only some of the basic radionuclide values at this time should be provided to all concerned.</p>	<p>other radiation protection values, and the technical officer responded that it would depend on the conclusion of the TRANSSC meeting to be held the following weeks. The meeting report is available at: https://www-ns.iaea.org/committees/files/RASSC/2272/JointRASSC-WASSCmeetingReport_12.04.2023_1.pdf</p> <p>Subsequently, without any explanation to RASSC, the draft was released at the end of August 2023. Japan RASSC found that the A1/A2 values have been changed, but cannot determine its validity because there is no description regarding how it was calculated.</p> <p>Table 2 of SSR-6 also shows exemption levels, but Japan RASSC confirmed that the exemption levels have not changed at this time.</p>				

COMMENTS BY REVIEWER				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
JPN/TRA NSSC-05	Table 2	Reject to change A1, A2 values in this process, and forward to the next cycle.	<p>The proposal does not seem matured.</p> <ul style="list-style-type: none"> - Values inconsistent within the A1A2 WG Interim Report and incorrect values are included in the proposed table. - Justification for the new 10-day rule is not understood, including change of the footnote (a). - Changes of text in the current SSR-6 and SSG-26 due to the change of A1/A2 values are not fully discussed. - Options to establish new Q system proposed by the WG have not been agreed or instructed by TRANSSC. <p>Meanwhile, due to the urgent needs, following changes may be incorporated in the current process.</p> <ul style="list-style-type: none"> - Clarification on U(natural) and U(natural)(purified). 			X	See ARG/RASSC-01.

COMMENTS BY REVIEWER				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
			- Addition of 24 new nuclides.				
PAK-18	Table 2	A1 and A2 values have been modified in table 2. However references/basis for these changes are not quoted.	There needs to be some justifications/calculation available for new radionuclide's for MS to review			X	See ARG/RASSC-01.
ISR-02	Table 2	Remaining with a threshold value of 40 TBq for A1 values in the following radionuclides: Be-10, Cs-135, Fe-55, Fe-60, Ge-71, H-3, Kr-81, Mo-93, Nb-93m, Ni-63, Np-237, Pt-193, Pu-242, Se-79, Sm-151, Tc-99, U-234, U-236 (medium and slow), and V-49	In the current version of SSR-6 the unlimited value for a certain radionuclide assigned to both A1 and A2 values simultaneously. The proposed change for the radionuclide mentioned in this line creates a new situation where A1 value is unlimited while the A2 value is limited.	X			NB: This issue has been addressed in Version 1.0 of the report of the Working Group on A ₁ /A ₂ that has been uploaded to the TRANSSEC 47 web folder: Report of the Working Group on A₁/A₂ .
ISR-03	Table 2	Setting a threshold value of 40 TBq for A1 value of I-129 and Ni-59	When A2 value is unlimited the material is classified as LSA-I, but there's no classification or specific requirements for materials with only A1 as unlimited. Therefore, the A1 value needs to remain or setup	X			See ISR-02.

COMMENTS BY REVIEWER				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
			to the upper threshold value of 40 TBq				
WNTI-04	Table 2	Entry: U (enriched to 10% or less) (all lung absorption types) (d)(e)(f)(i)	For clarification and consistency with other entries related to uranium isotopes in Table 2. The compounds of uranium that are relevant for the different lung absorption types should be described explicitly.	X			
WNTI-05	Table 2	Entries: U (enriched to 20% or less) (except slow fast and medium lung absorption) (d)(e) U (enriched to 20% or less) (all slow lung absorption types) (f)(i)	- For clarification and consistency with other entries related to uranium isotopes in Table 2. The compounds of uranium that are relevant for the different lung absorption types should be described explicitly. - The second line “all lung absorption types” is misleading as the first line “except slow lung absorption” includes already the fast and medium lung absorption cases.	X	To provide clarification as to which entry a given lung absorption rate applies, the text is proposed to be modified as follows: U (enriched to 20% or less) (except slow lung absorption) (i) U (enriched to 20% or less) (slow lung absorption) (i)		

COMMENTS BY REVIEWER				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
USA/TRA NSSC-08	TABLE 2	For discussion and not revision: How should member states implement alternate A1 and A2 values?	While modeling and calculations are correct and technically justified, the lower A2 values for high energy alpha emitters (Ac-225, At-211, Bi-212, etc.) requires a shift to Type B packages rather than Type A. This change significantly increases the manufacturers' cost of shipping targeted alpha therapies (TATs) and could hinder, if not halt, further advancement of TATs. In addition, a significant number of hospitals, researchers, and nuclear pharmacies do not have the experience or resources to accept Type B packages.	X			This matter should be addressed during the discussion on transitional arrangements.
JPN/TRA NSSC-06	Table 3	Reject to change values in this process, and forward to the next cycle.	Justification of the proposed values is not shown.			X	See ARG/RASSC-01.
F-05	Table 3	0.1 -> <u>1×10^{-1}</u> Etc.	Harmonization between all the values	X			

COMMENTS BY REVIEWER				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
PAK-08	414A, 414B	Paras may be shifted to section V	<p>In the said paras requirements for marking of mixed packing of Low specific activity (LSA) and surface contaminated objects are stated. These paras are inserted in section IV of the draft (Activity Limits and Classification) However, the requirement is more relevant to Section V (Requirements and Controls for Transport). Therefore, the appropriate Para number may be assigned in section V of the draft.</p> <p>Also please consider that transport of two types of radioactive material in a single package with bifurcation is not essentially a new type of radioactive material</p>	X	<p>Footnote b added to Table 9 to provide a link to Section V.</p> <p>In Table 9, entry in UN Marks column for Mixed packing of LSA material and SCO in a Type IP-1, Type IP-2 or Type IP-3 package is proposed to be changed for consistency with para 414A, as follows:</p> <p>UN number, preceded by the letters “UN” and followed by the proper shipping name for the each applicable UN numbers in the package (LSA material and SCO)^b</p> <p>^b See para. 414A.</p>		

COMMENTS BY REVIEWER				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
UK-03	414A/414B/430A 546A/546B		<p>Consideration of how this is implemented into UN model/modal regs – it is usually identified in Table A(9b) with specific provisions.</p> <p>546A/546B is different from examples in ADR e.g. 5.4.1.2.1 (b) for Class 1 mixed packing.</p> <p>Consistency with model/modal regs should be considered.</p>			X	The new paras for mixed packing in SSR-6 can be implemented in ADR, Table A, Column (9b) with appropriate references to new paras in ADR that will have the same text as paras 414A/414B/430A/546A/546B.
USA/TRANSSC-09	414B	414B. When <i>LSA material</i> and <i>SCO</i> are packed together in a <i>package</i> , each of the radioactive contents of the <i>package</i> and the total contents of the <i>package</i> shall be so restricted that the <i>dose rate</i> specified in para. 517 shall not be exceeded. The activity in the <i>package</i> shall also be so restricted that the activity limits for a <i>conveyance</i> specified in para. 522 shall not be exceeded.	Dose rate in paragraph 517 shall be applied to each LSA, SCO component individually and then to the entire package. This prevents high dose SCO being shielded by LSA and SCO being filled with high dose LSA.			X	The dose rate of 10 mSv/h applies to the cumulative dose rates of all contents of the package and not separately to the individual components. See USA/ TRANSSC-11 and BEL-05.

BEL-01	417(h)	<p>417. <i>Fissile material</i> and <i>packages</i> containing <i>fissile material</i> shall be classified under the relevant entry as “FISSILE” in accordance with Table 1 unless excepted by one of the provisions of subparagraphs (a)–(h) of this paragraph and transported subject to the requirements of para. 570. All provisions apply only to material in <i>packages</i> that meet the requirements of para. 636, unless unpackaged material is specifically allowed in the provision:</p> <p>(a)</p> <p>(h) Packaging containing 15 g or less of fissile nuclides, provided the package has at least 200 g of solid non-fissile material for every gram of fissile nuclides. Lead, beryllium, hydrogenous material enriched in deuterium, graphite and other allotropic forms of carbon may be present in the package but shall not be included in determining the required mass for solid non-fissile material, provided the package is transported subject to the consignment limit provided in para. 570(f).</p> <p>570. <i>Fissile material</i> meeting one of the provisions (a)–(gh) of para. 417 shall meet the following requirements:</p> <p>(a) Only one of the provisions (a)–(gh) of para. 417 is allowed per <i>consignment</i>.</p>	<p>The provision of a minimal mass of non-fissile material for the package brings very few compensation in terms of criticality safety during ACT (or even NCT), considering that there is no provision on the dilution/mixture of the fissile nuclides with the non-fissile material of the package.</p> <p>The safety case for such packages will be the same as the one for 417(d) or 417(e).</p> <p>Provisions and applicable requirements should thus be equivalent to the provisions and requirements applicable to 417(d) or 417(e).</p> <p>Such limitation will render the 417(h) useless (covered by 417(d) or 417(e)).</p> <p>Modification needed in case that para 417(h) is deleted (see comment BEL-01) – also for example for para 622.</p> <p>If para 417(h) is maintained as proposed in comment</p>			X	<p>TTEG-C (h) provides a new option with other criteria (higher masses of fissile nuclides as in (d)) and a consignment limit instead of a conveyance limit.</p> <p>Technical basis provided with proposed change demonstrated sufficient safety of this fissile exception under all conditions. Dilution of fissile mixture is provided by non-fissile material in the contents or in the packaging, and is sufficient in the presence of optimum moderation by water.</p> <p>Consignment limit of 45 grams fissile nuclides limits accumulation of packages, and of material that could be released under</p>
	570					X	

		<p>(b) Only one approved <i>fissile material</i> in <i>packages</i> classified in accordance with para. 417(f) is allowed per <i>consignment</i> unless multiple materials are authorized in the certificate of <i>approval</i>.</p> <p>(c) <i>Fissile material</i> in <i>packages</i> classified in accordance with para. 417(c) shall be transported in a <i>consignment</i> with no more than 45 g of <i>fissile nuclides</i>.</p> <p>(d) <i>Fissile material</i> in <i>packages</i> classified in accordance with para. 417(d) shall be transported in a <i>consignment</i> with no more than 15 g of <i>fissile nuclides</i>.</p> <p>(e) Unpackaged or packaged <i>fissile material</i> classified in accordance with para. 417(e) shall be transported on a <i>conveyance</i> or in a <i>large freight container</i> under <i>exclusive use</i> with no more than 45 g of <i>fissile nuclides</i>, except for <i>consignments</i> transported by air, which shall be in accordance with the requirements established in para. 579A. If <i>exclusive use</i> applies to a <i>large freight container</i> on a <i>conveyance</i>, the 45 g <i>fissile nuclide</i> mass limit shall apply to the <i>conveyance</i>.</p> <p>(f) <i>Fissile material</i> in <i>packages</i> classified in accordance with para. 417(eh) shall be transported in a <i>consignment</i> with no more than 45 g of <i>fissile nuclides</i>, except for <i>consignments</i> transported by air, which shall be in accordance with the</p>	<p>USA-01, reference to para 417(e) in paras 570(f) and 579A should be adapted to para 417(h).</p> <p>Final new/modified references to verify</p>				<p>ACT, to a subcritical mass.</p> <p>Proposed exception differs from that in 417(d) and (e) in that dilution of fissile material with non-fissile material allows for a greater per package mass limit.</p>
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		requirements established in para. 579A.					
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COMMENTS BY REVIEWER				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
WNTI-06	417(h)	<i>Packaging</i> containing 15 g or less of <i>fissile nuclides</i> , provided the mass of fissile nuclides does not exceed 0.5% of the mass the package has at least 200 g of solid non-fissile material for every gram of fissile nuclides in the package . Lead, beryllium, hydrogenous material enriched in deuterium, graphite and other allotropic forms of carbon may be present in the <i>package</i> but shall not be included in determining the required mass for solid non-fissile material, provided the <i>package</i> is transported subject to the <i>consignment</i> limit provided in para. 570(f).	Editorial. For clarification and consistency with the wording of the other subparagraphs of para. 417, e.g. (b) and (c)(ii). It seems important to clarify the quantity of non-fissile material that is required when the mass of fissile nuclides is not an integer.	X			TTEG-C
F-06	423(b)(ii)	Consumer products that either have either received regulatory authorization in accordance with para. 107(e) or do not individually exceed (...)	Editorial	X			
USA/NSGC-04	Para 427(a)	It is in a well-maintained condition and securely closed by a fastening device that cannot be opened unintentionally .	Clarification. It is unclear what the term “securely closed” means.			X	New proposal; See text concerning new proposals in IRN/NUSSC-02.
USA/TRA NSSC-10	430A	430A. When <i>special form radioactive material</i> is packed in a Type A package with other <i>radioactive material</i> , two UN numbers and proper shipping names shall be used: one for the <i>special form radioactive material</i> and one for the other <i>radioactive material</i> .	Why not apply this clarification to all package types?			X	This para. is only applicable to special form and non-special form in Type A packages due to the different UN numbers for special form and

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Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
							non-special form, e.g. UN2915 and UN3332. The UN numbers for Type B packages are not related to the form of the contents.
IRQ-6	para. 507 Line No. 2	In addition to the radioactive and fissile properties, any other dangerous properties of the contents of the package, such as explosiveness, flammability, pyrophoricity, chemical toxicity and corrosiveness, shall be taken into account in the classification, packing, labelling, marking, placarding, storage and transport in order to be in compliance with the relevant transport regulations for dangerous goods of each of the countries through or into which the materials will be transported, and, where applicable, with the regulations of the cognizant transport organizations, as well as these Regulations.	The dangerous properties must be clarified such as determined atmospheric pressure and aircraft altitude when transporting liquid materials turn them into gases and release associated materials.			X	New proposal; See text concerning new proposals in IRN/NUSSC-02. NB: Only examples of dangerous properties are provided in the subject sentence, i.e. the list is not exhaustive.
IRN/ NUSSC-12	510	Qualified persons considered in 510 ph. Shall be have a skill related to mechanical, metallurgical and physics skill. Can describe this person in definition section.	Qualified persons is general and should be described specifically what skill have quality for inspection related defect and specially leakage.			X	New proposal; See text concerning new proposals in IRN/NUSSC-02.
IRN/ TRANSSC-02	511	The red text can be added to para 511. 511- <i>Packages</i> that are damaged or leaking <i>radioactive contents</i> in excess of allowable limits “specified in para xxx” for normal conditions of transport may be removed to an acceptable interim location under	Allowable limits specified in para 508 are for routine conditions . Allowable limits for normal conditions of transport must be defined, clearly.			X	New proposal; See text concerning new proposals in IRN/NUSSC-02.

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Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
		supervision, but shall not be forwarded until repaired or reconditioned and decontaminated.					
WNTI-07	515(d)	(d) — The requirements specified in para. 536A, if the package is marked with a package type.	- There is no need to remove the package type from an excepted package. The package type indicates the performance level applicable to the package and packaging (i.e. to what requirements the package has been tested), and should not be viewed as presenting what contents are transported in the packaging at a given time, similar to UN markings on packagings or tanks for transport of dangerous goods. The UN number indicates the content at a given moment, the package type indicates the testing and performance level achieved for the packaging composing a package.			X	There is no reason to exempt excepted packages from para. 536A.

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Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
			- To remove or to cover appropriately the package type may be very demanding and difficult to achieve technically and operationally, for no real gain in safety. For instance, we consider that it is both unnecessary and unwelcome to remove the mark “TYPE B(U)” in the case of an empty Type B(U) package that meets the requirements to be classified as an excepted package.				
F-07	Before 517	Requirements and controls for transport of LSA material and SCO in industrial packages or unpackaged <u>REQUIREMENTS AND CONTROLS FOR TRANSPORT OF LSA MATERIAL AND SCO IN INDUSTRIAL PACKAGES OR UNPACKAGED</u>	Title should be capitalized.	X			
BEL-05	517	517. The quantity of LSA material or SCO in a single Type IP-1, Type IP-2, Type IP-3 package, or object or collection of objects, whichever is appropriate, shall be so restricted that the external dose rate at 3 m from the unshielded material or object or collection of objects does not exceed 10 mSv/h. In addition when LSA material and SCO are packaged in a single	This returns to the text proposed by TTEG-OM-PrimRev15 , and not to the DS543 (Step_7_SSR6_31_Aug_2023) TTEG-RP text which seems more confusing			X	The dose rate of 10 mSv/h applies to the cumulative dose rates of all contents of the package and not separately to the individual components.

COMMENTS BY REVIEWER				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
		<i>industrial package, this requirement applies also separately to the LSA material, or to each group of LSA material when different groups of LSA material are packed together, and to the SCO, or each group of SCO when SCO-I is packed with SCO-II.</i>					
USA/TRA NSSC-11	517	517. The quantity of LSA material and SCO in a single Type IP-1, Type IP-2, Type IP-3 package, or object or collection of objects, whichever is appropriate, shall be so restricted that the sum of the external dose rates without shielding at 3 m from the LSA material, each group of LSA material (when different groups of LSA material are packed together), object or collection of objects, and each group of SCOs (when SCO-I and SCO-II are packed together), does not exceed 10 mSv/h.	This conflicts with paragraph 414B which does not address individual components of LSA, SCO mixtures. It is more restrictive, and thus acceptable, than 414B but requires 414B to be edited.	X	Para. 414B is proposed to be modified as follows: 414B. When <i>LSA material</i> and <i>SCO</i> are packed together in a <i>package</i> , the <i>radioactive contents</i> of the <i>package</i> shall be restricted as required by para. 517, and the activity in the <i>package</i> shall also be so restricted that the activity limits for a <i>conveyance</i> specified in para. 522 shall not be exceeded.		

COMMENTS BY REVIEWER				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
PAK-09	520	Original text before changes may be kept	<p>The proposed changes in the text are conceptual changes regarding the concept of exclusive use and transport of unpackaged radioactive material. These changes need detailed deliberations prior to its implementation. From the justification provided in the proposal/comment of WNTI-08 it seems that the requirement is only being explained. So it is proposed that implication of both may be discussed prior to modification in text.</p> <p>In addition, there is also needs to analyze impact of these changes in the regulations</p>			X	There have already been deliberations concerning this proposal by TTEG-OM and by TRANSSC.
F-08	521		<p>Consistency with the resolution table (TTEG-OM-PrimRev15) to be checked.</p> <p>A part of the text "<i>When different groups of LSA material and SCO are packed in the same industrial package, and when those different groups satisfy the condition for different types of package, the material to be transported shall be assigned to the higher type</i>"</p>	X			See WNTI-08.

COMMENTS BY REVIEWER				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
			<i>of package. For this purpose, Type IP-1 shall be regarded as the lowest type.</i> " seems to be missing.				
WNTI-08	521	521. <i>LSA material</i> and <i>SCO</i> , except as otherwise specified in para. 520, shall be packaged in accordance with Table 5. When different groups of <i>LSA material</i> and <i>SCO</i> are packed in the same industrial package, and when those different groups satisfy the condition for different types of package, the material to be transported shall be assigned to the higher type of package. For this purpose, Type IP-1 shall be regarded as the lowest type. The packing of <i>LSA material</i> and <i>SCO</i> , when packaged in a single <i>Type IP-1, Type IP-2 or Type IP-3 package</i> , shall prevent mixing of the <i>LSA material</i> and the <i>SCO</i> under routine conditions of transport.	Para. 521 was discussed during the review process and during the first steps of the revision process. It was also discussed between the original proposer (WNTI) and the TTEG-RP, following the request from the TTEG-OM and TRANSSC 46. The text that is added in blue was part of the text that was agreed with the TTEG-RP and that is included in the file with the proposals that were assigned primarily to the TTEG-OM (TTEG-OM-PrimRev15).	X			
PAK-10	521	...during normal conditions of transport.	The said requirement sets criteria for applicability of Industrial package type (Type IP-1, Type IP-2 and Type IP-3) for LSA and SCO materials. Furthermore, the requirement states that LSA and SCO materials shall be prevented from			X	Normal conditions of transport are represented by Type A testing. IP-1 is not subject to Type A tests, IP-2 is only subject to certain Type A tests and IP-3 is subject to

COMMENTS BY REVIEWER				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
			mixing during routine conditions of transport. It may be re-iterated that Type IP II and III packages are designed for normal condition of transport which needs clarification				Type A tests for solid material.
USA/TRA NSSC-12	521	521. <i>LSA material</i> and <i>SCO</i> , except as otherwise specified in para. 520, shall be packaged in accordance with Table 5. The packing of LSA material and SCO, when packaged in a single Type IP-1, Type IP-2 or Type IP-3 package, shall prevent mixing of the LSA material and the SCO under routine conditions of transport.	Shipments of SCO and LSA mixtures in a waste package are very common. Appears this provision prohibits them. What is wrong with contaminated building and equipment debris that satisfies SCO requirements being shipped with contaminated soil that satisfies LSA requirement in an IP waste box? Such shipments appear to be approved in other sections of SSR-6, see Table 9 and 546A	X	No justification for the revised text is available concerning the mixing of LSA and SCO.		
UK-04	521		Query how the non-mixing requirement here would be implemented. Would this not end up more like packages within	X			See USA/TRANSSC-12

COMMENTS BY REVIEWER				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
			a freight container rather than a freight container used as a package? Concerned that this proposal will introduce complex interpretations.				
PAK-11	522	When different groups of <i>LSA material</i> and <i>SCO</i> are carried in the same hold or compartment of an inland waterway craft, or in another <i>conveyance</i> , the activity shall be so restricted that the following condition is met: $\sum_i \frac{LSA \text{ activity } (i)}{Activity \text{ limit for } LSA (i)} + \frac{SCO \text{ Activity}}{Activity \text{ limit for } SCO} \leq 1$ <p>.....</p>	The modified text as agreed after TRANSSC-46 meeting for comment # WNTI 16(c) is not included/inserted. Please correct.			X	The text of the revised para. 522 is based on text that was provided by WNTI after TRANSSC 46 and reviewed by TTEG-RP. For details, please see the resolution table of proposals that were primarily assigned to TTEG-OM, i.e. "TTEG-OM-PrimRev15", or current revision.
WNTI-09	Para. 523(a)	Determine The maximum <i>dose rate</i> shall be determined in units of millisieverts per hour (mSv/h) at a distance of 1 m from the external surfaces of the <i>package, tank or freight container</i> used as a <i>packaging</i> , or of the unpackaged <i>LSA-I, SCO-I</i> and <i>SCO-III</i> . The value determined shall be multiplied by 100. (...).	Editorial. Consistency with para. 524(a).	X			

COMMENTS BY REVIEWER				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
F-09	523(b)	For <u>a</u> tanks or <i>freight containers</i> s used (...)	Editorial In consistency with para. 523(a), singular should be used.	X			
F-10	523(b)	(...) for unpackaged LSA-I <u>LSA-I</u> , SCO-I <u>SCO-I</u> and SCO-III <u>SCO-III</u> , (...)	Editorial The terms “LSA-I”, “SCO-I” and “SCO-III” should be italicised.	X			
F-11	524	(...) may determine the <i>TI</i> of a rigid overpack <u>overpack</u> or a (...)	Editorial The term “overpack” should be italicised.	X			
PAK-12	527	Updates required in document "SSR-6 (Rev. 2)) Proposals for Change and Identified Problems – TTEG-OM Primary"	Comment/proposal (OM-F-53) has been included in the draft. However, TRANSSC decision to include the text is not available.			X	The TTEG-OM Resolution Table has been updated to indicate the acceptance of the proposal by TRANSSC.
F-13	Table 9	<i>Overpack</i> containing only <i>excepted packages</i> (other than consignments <u>packages</u> accepted for international movement by post)	Consistency with the last entry of the Table 9.	X			

COMMENTS BY REVIEWER				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
WNTI-10	Table 9	<p>Entries: (...) Mixed packing of LSA material and SCO in a Type IP-1, Type IP-2 or Type IP-3 package containing LSA material and SCO (i.e. mixed packing) <i>Type A package containing special form radioactive material and other radioactive material (i.e. mixed packing)</i> (...)</p>	Editorial. Consistency with other entries, especially the following entry for Type A package.	X			
JPN/TRA NSSC-09	Para. 539	<p>The labels conforming to the applicable models in Figs 2–4 shall be affixed to either of the following:</p> <p style="padding-left: 40px;"> (a) — T<u>Two</u> opposite sides of the outside of a <i>package</i> (other than a tank or a freight container used as a packaging) or the outside of an overpack or (b) A<u>all</u> four sides of the outside of a <i>freight container</i> <u>(even when used as packaging)</u>, or <i>tank</i>. </p>	<p>In the table of proposals and outcome on TTEG-OM, which was uploaded on 31 Augst 2023, it was written as follows: TTEG-OM could not accept the proposed separation of (a) and (b), except with the following modified wording: Proposed reverting to original wording, and include “all four sides of a freight container (even when used as packaging), or tank”.</p>	X			

COMMENTS BY REVIEWER				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
PAK-13	542	Updates required in document " SSR-6 (Rev. 2)) Proposals for Change and Identified Problems – TTEG-C Primary"	Comment/proposal (WNTI-30) has been included in the draft. However, TRANSSC decision to include the text is not available.			X	The resolution table for proposals assigned to TTEG-C has been updated to indicate that the proposal was accepted by TRANSSC.
F-14	543	<i>Tanks, large freight containers carrying unpackaged LSA-I material, SCO-I or SCO-III, or packages other than excepted packages, and large freight containers used as a packaging*</i> shall bear (...)	Should be "used as a packaging" to be consistent with other Paras (e.g. 526)			X	See JPN/TRANSSC-10.
JPN/TRA NSSC-10	Para. 543	543. <u>Large freight containers and Tanks</u> , large freight containers carrying unpackaged LSA-I material, SCO-I or SCO-III, or packages other than excepted packages, and large freight containers used as packagings shall bear four placards that conform to the model given in Fig. 6.	Since placards are required for any freight container, it could simply be "Large freight containers and tank shall bear four placards that conform to the model given in Fig. 6.".	X	The exception for carrying excepted packages should be retained. The following text is proposed: <i>Tanks and large freight containers (other than large freight containers carrying excepted packages) shall bear four placards that conform to the model given in Fig. 6.</i>		

COMMENTS BY REVIEWER				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
CHN-02	544	The symbol”★★★★” “****” denotes the space in which the appropriate UN number for radioactive material, as specified in Table 1, shall be displayed.	The symbol in note should be the same as in Fig.7	X			
WNTI-11	544	544. Where the <i>radioactive material</i> is in a <i>tank</i> , or is unpackaged <i>LSA-I</i> , <i>SCO-I</i> or <i>SCO-III</i> being carried by a <i>freight container</i> , or where a <i>consignment</i> in a freight container is required to be shipped in a freight container under <i>exclusive use</i> and is packaged <i>radioactive material</i> with a single UN number, the appropriate UN number for the <i>radioactive material</i> (see Table 1) shall also be displayed, in black digits not less than 65 mm high, either: (...).	Editorial and subsequent clarification and correctness. According to the definition of “exclusive use” (para. 221), it is the freight container that is under exclusive use, not the consignment.			X	Proposed text is misleading; it gives the impression that a consignment must be shipped in a freight container.
IRN/ NUSSC-07	After 545	Consignee should have written procedures and manuals for use and maintenance of the packages. This procedures may be delivered to the consignee that provided by consigner.	The requirement of delivery, use and opening of the packages should be added to the publication. Need for adding a section to the publication with the title of CONSIGNEES RESPONSIBILITIES.			X	New proposal; See text concerning new proposals in IRN/NUSSC-02.

COMMENTS BY REVIEWER				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
F-15	546A	When <i>LSA material</i> and <i>SCO</i> are packed together in a <i>Type IP-1, Type IP-2</i> or <i>Type IP-3 package</i> , two UN numbers and proper shipping names shall be used: one for the <i>LSA material</i> and one for the <i>SCO</i>. The information required by subparagraphs 546(a)–(f) shall (...)	The terms proposed to be deleted are a duplication of 414A.	X	For clarification, para. 546A is proposed to be revised as follows: When <i>LSA material</i> and <i>SCO</i> are packed together in a <i>Type IP-1, Type IP-2</i> or <i>Type IP-3 package</i> , the information required by subparagraphs 546(a)–(f) shall be provided separately for the applicable UN numbers as required by para. 414A, followed by the statement “all packed together in a <i>Type IP-1</i> (or <i>Type IP-2</i> or <i>Type IP-3</i>) package”, and then by the information required by subparagraphs 546(g)–(n) as		

COMMENTS BY REVIEWER				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
					applicable to the <i>package</i> .		
F-16	546A	(...) followed by the statement “all packed together in a Type IP-1(or Type IP-2 or Type IP-3) package”, and then by the information required by subparagraphs 546(g)–(n) as applicable to the <i>package</i> .	Editorial	X			
WNTI-12	546A	546A. When <i>LSA material</i> and <i>SCO</i> are packed together in a <i>Type IP-1</i> , <i>Type IP-2</i> or <i>Type IP-3 package</i> , two UN numbers and proper shipping names shall be used: one for the <i>LSA material</i> and one for the <i>SCO</i> . The information required by subparagraphs 546(a)–(f) shall be provided separately for the <i>LSA material</i> and for the <i>SCO</i> , followed by the statement “ a All p Packed together in a One Type IP-1 (or Type IP-2 or Type IP-3) package”, and then followed by the information required by subparagraphs 546(g)–(n) as applicable to the entire <i>package</i> .	Editorial. - Term “All packed in one (...)” should be slightly modified for full consistency with IATA Dangerous Goods Regulations wording (paras 8.1.6.9.2 Step 6(f) and 10.8.3.9.2 Step 7) “All Packed in One” (description of package type). - Small editorial wording changes to improve understanding.			X	IATA wording does not cover all modes of transport. Grammar suggestions do not improve the text.
F-17	546B	When <i>special form radioactive material</i> and other <i>radioactive material</i> are packed together in a <i>Type A package</i> , two UN numbers and proper shipping names shall be used: one for the special form	The terms proposed to be deleted are a duplication of 414B. [This reference should be to para. 430A.]	X	For clarification, para. 546B is proposed to be revised as follows:		

COMMENTS BY REVIEWER				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
		radioactive material and one for the other radioactive material. The information required by subparagraphs 546(a)–(f) shall (...)			When <i>special form radioactive material</i> and other <i>radioactive material</i> are packed together in a <i>Type A package</i> , the information required by subparagraphs 546(a)–(f) shall be provided separately for the applicable UN numbers as required by para. 430A, followed by the statement “all packed together in one Type A package”, and then by the information required by subparagraphs 546(g)–(n) as applicable to the <i>package</i> .		
F-18	546B	(...) followed by the statement “all packed together in one Type A package”, and then <u>by</u> the information required by	Editorial	X			

COMMENTS BY REVIEWER				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
		subparagraphs 546(g)–(n) as applicable to the <i>package</i> .					
WNTI-13	546B	546B. When <i>special form radioactive material</i> and other <i>radioactive material</i> are packed together in a <i>Type A package</i> , two UN numbers and proper shipping names shall be used: one for the <i>special form radioactive material</i> and one for the other <i>radioactive material</i> . The information required by subparagraphs 546(a)–(f) shall be provided separately for the <i>special form radioactive material</i> and for the other <i>radioactive material</i> , followed by the statement “ a All p Packed together in e One Type A package”, and then followed by the information required by subparagraphs 546(g)–(n) as applicable to the entire package .	Editorial. - Term “All packed in one (...)” should be slightly modified for full consistency with IATA Dangerous Goods Regulations wording (paras 8.1.6.9.2 Step 6(f) and 10.8.3.9.2 Step 7) “All Packed in One” (description of package type). - Small editorial wording changes to improve understanding.			X	See WNTI-12.
WNTI-14	546C	546C. The transport of any empty large freight container or vehicle for which the provisions of para. 514 are applied, shall be subject to the requirements specified in paras 546(a), 546(b) and 546(c) applicable to the last unpackaged LSA-I or SCO-I carried in the vehicle or large freight container	The proposal WNTI-18 included proposals for new paragraphs 544A (WNTI-18(a)), 572A (WNTI-18(b)) and 546X (WNTI-18(c)). When looking at the file with the proposals that			X	The TTEG-OM resolution table entries for WNTI-18(a)-(c)/F-41 to -43 are confusing and do not include information indicating definitely that this proposal was accepted by

COMMENTS BY REVIEWER				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
		<p>preceded by the words "EMPTY VEHICLE, LAST LOAD:" or "EMPTY CONTAINER, LAST LOAD:" as appropriate, followed by the statement "EXCLUSIVE USE".</p>	<p>were assigned primarily to the TTEG-OM (TTEG-OM-PrimRev15), it is understood that all three sub-proposals and new paragraphs were accepted by TTEG-OM: new para. 544A with some slight modifications, new para. 572A exactly as proposed, and new para. 546X without comment. However, it seems that due to confusions / typos in the numbering of the sub-proposals and of the new paragraphs, the sub-proposal WNTI-18(c) / new para 546C was lost. Also, two other paragraphs 546A and 546B having already been created related to separate proposals, this may have added to this confusion.</p> <p>It is important to include this sub-proposal / new paragraph 546C, as the three sub-proposals / new paragraphs linked to proposals WNTI-18(a), (b) and (c) should be considered as a full set.</p>				<p>TTEG-OM or TRANSSC. In particular, this proposal introduces new terms, which are not used or defined in SSR-6.</p>

COMMENTS BY REVIEWER				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
USA/TRA NUSSC-13	550	Return to current text: If the dangerous goods documentation is presented to the carrier by means of electronic data processing or electronic data interchange transmission techniques, the signature(s) may be replaced by the name(s) (in capitals) of the person authorized to sign.	Do not see the benefit of specifying means of electronic transmission methods. In post-COVID age, electronic signatures are very common. Is this acceptable? What happens when documentation includes certificates that were signed electronically and not by hand?			X	This text is consistent with the wording in the Orange Book.
IRN/ NUSSC-04	par. 554	A new paragraph can be added here as: <i>“Some document maybe prepared by the carrier company for RMs transportation such as....”</i> (See next comment).	It deduced from this par. 554 that the <i>carrier</i> has no responsibility in regarding to provide documents for transport of RMs and the <i>consignor</i> must provide in the transport documents a statement regarding needed actions.			X	New proposal. See text concerning new proposals in IRN/NUSSC-02. NB: Para. 554 deals with the responsibility of the consignor, only.
IRN/ NUSSC-08	557	Any incident that occurs in related to the shipment of packages, carrier shall immediately report to appropriated regulatory authority related to transportation of materials in each country.	Incident related radioactive materials shall notify to regulator. Need for adding a paragraph to the publication with the title of INCIDENT REPORTING.			X	New proposal. See text concerning new proposals in IRN/NUSSC-02. NB: To a certain extent this proposal is covered by para. 309.

COMMENTS BY REVIEWER				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
IRN/NUSSC-10	557	Immediately shall notify to regulatory body and carrier for excess non- fixed radioactive surface contamination and/ or external radiation level on packages. This notification shall consider in appropriate procedures	Excess contamination or shall be notified.			X	New proposal. See text concerning new proposals in IRN/NUSSC-02. NB: This proposed requirement is covered by para. 309.
IRN/TRANSSC-03	558	Add following subparagraphs to para 558: (f) Certain <i>shipments</i> subjected to para 825	the <i>consignor</i> shall notify the <i>competent authority</i> of the country of origin of the <i>shipment</i> and the <i>competent authority</i> of each country <i>through or into</i> for all <i>packages</i> and <i>shipments</i> subjected to para 802 that need to <i>Multilateral Approval</i> . <i>Packages</i> containing <i>fissile material</i> & Certain <i>shipment</i> must be added to para 558.			X	New proposal. See text concerning new proposals in IRN/NUSSC-02. NB: This proposal is unnecessary because such shipments are subject to multilateral approval, which provides an opportunity for each country through or into which the shipment is transport to request notification.
WNTI-15	570(e)	(e) Unpackaged or packaged <i>fissile material</i> classified in accordance with para. 417(e) shall be transported on a <i>conveyance</i> or in a <i>large freight container</i> under <i>exclusive use</i> with no more than 45 g of <i>fissile nuclides</i> on the	Editorial. Simplification and subsequent clarification.	X			

COMMENTS BY REVIEWER				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
		<i>conveyance</i> , except for consignments transported by air, which shall be in accordance with the requirements established in para. 579A. If exclusive use applies to a large freight container on a conveyance, the 45 g fissile nuclide mass limit shall apply to the conveyance.					
WNTI-16	570(f)	(e) Unpackaged or packaged fissile material classified in accordance with para. 417(e) shall be transported on a conveyance or in a large freight container under exclusive use with no more than 45 g of fissile nuclides, except for consignments transported by air, which shall be in accordance with the requirements established in para. 579A. If exclusive use applies to a large freight container on a conveyance, the 45 g fissile nuclide mass limit shall apply to the conveyance. (f) Fissile material in packages classified in accordance with para. 417(e) shall be transported in a consignment with no more than 45 g of fissile nuclides, except for consignments transported by air, which shall be in accordance with the requirements established in para. 579A.	Editorial. Subparagraph 570(f) is an unnecessary duplicate of the first sentence in subparagraph 570(e).	X			

COMMENTS BY REVIEWER				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
WNTI-17	572	572. Where the <i>radioactive material</i> in or on the <i>vehicle</i> is unpackaged <i>LSA-I material</i> , <i>SCO-I</i> or <i>SCO-III</i> , or where a <i>consignment</i> is required to be shipped in a vehicle under <i>exclusive use</i> and is packaged <i>radioactive material</i> with a single UN number, the appropriate UN number (see Table 1) shall also be displayed, in black digits not less than 65 mm high, either: (...).	Editorial and subsequent clarification.			X	There is no requirement for a consignment to be shipped “in a vehicle”. And, the whole sub-section concerns transport by rail and road, i.e. transport only with vehicles.
CDN/TRAN SSC-02	572A	572A. Any empty vehicle for which the provisions of para. 514 are applied shall bear placards as required by paras 571 and 572 for unpackaged LSA-I, or SCO-I, or SCO-III previously transported in this vehicle.	Paragraph 572A should include SCO-III.			X	SCO-III must meet the non-fixed external surface contamination limits as specified in para. 508, which also apply to packages; therefore, this requirement is not appropriate for SCO-III.
USA/Editorial-02	Page 81: paragraph 579(A)(b)	The term “build-up” is used, yet this term is not defined/clarified.	SSR-6 (Rev. 2) should not have unfamiliar/undefined terms.	X	“at the build-up” has been replaced by “during the loading”.		
WNTI-18	579A(b)	(b) In a certified closed rigid <i>aircraft container</i> with rigid or flexible doors, of internal volume of more than 3 m ³ , used by a single <i>consignor</i>	Editorial. “Present or represented” should be written in a more logical	X	For readability and to incorporate this change and the change USA/Editorial-		

COMMENTS BY REVIEWER				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
		and security sealed. For loading of the <i>aircraft</i> container, the consignor shall provide instructions to the airline company and shall be represented or, failing that, shall be represented at the build-up of the <i>aircraft container</i> to verify correct implementation of instructions.	order, “present” being the primary option.		02, the sentence is proposed to be revised as follows: “The <i>consignor</i> shall provide instructions for the loading of the <i>aircraft</i> container to the airline company and shall be present or, failing that, shall be represented during the loading of the <i>aircraft</i> container to verify correct implementation of the instructions.”		
USA/ NSGC-05	Para 579A(b), Line 2	Change “security sealed” to “securely sealed.”	Grammar, consistency, and clarity.	X			For consistency of terminology use in SSR-6 (see, e.g. para. 641 and 643) and appropriate grammar.
IRN/ NUSSC-05	par. 589	A new paragraph can be added here as: “ <i>The competency of the carrier company to fulfil the regulation of RMs transport (for example radiation protection during of loading, stowage, and carriage, handling and unloading of the package, overpack) must be assessed by the competent authorities (CAs)</i> ”.	The <i>carrier</i> ability and competence should be assessed by the competent authorities (CAs). Possible approaches (registration, licensing, permits, etc.) used by the CAs of Member States to assessment of the <i>carrier</i> company			X	New proposal. See text concerning new proposals in IRN/NUSSC-02. NB: The activity referred to in this proposal should be part of the compliance assurance programme of the

COMMENTS BY REVIEWER				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
			competency should be mentioned.				competent authority. See SSG-78.
USA/TRANSSC-14	604A	604A. The design of special form radioactive material shall take into account ageing mechanisms.	Do not believe this is required. US position is that use of US special form certificate requires source to be as described in certificate (thus the source must be “as manufactured”)			X	The requirement in para. 604A has the objective of ensuring that the source will be “as manufactured” during its lifetime. Also, this requirement is consistent with the ageing management requirements for packages.
IRN/TRANSSC-04	605(b)/Line 1	The red text can be added to para 605(b). 605(b)- If subjected to the tests specified in paras 736 and 737, the “activity of “airborne release in gaseous and particulate forms of up to 100 µm aerodynamic equivalent diameter would not exceed 100A 2. A separate specimen may be used for each test.	The quantity of airborne release must be clarified.			X	This text is not needed for clarification. 100A ₂ is a nuclide-specific amount of activity, i.e. quantity. See also, paras 605.1 to 605.9 of SSG-26 (Rev. 1).
F-19	624(b)	(...) except for a <i>package</i> whose <u>maximum dose rate at the its external surface of the package is below 50 µSv/h, (...)</u>	Editorial – Proposal for a more concise wording.	X			
F-20	626(c)(ii)	(...) except for a <i>package</i> whose <u>maximum dose rate at the its external surface of the package is below 50 µSv/h, (...)</u>	Editorial – Proposal for a more concise wording.	X			

COMMENTS BY REVIEWER				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
F-21	627(d)	(...) except for a <i>tank</i> whose <u>maximum dose rate at the its external surface of the tank is below 50 µSv/h, (...)</u>	Editorial – Proposal for a more concise wording.	X			
WNTI-19	626(b) 627(b) 627(d) 629(c) 630(b)	<p>626. (...).</p> <p>(b) They are designed to satisfy the requirements prescribed either in:</p> <p>627. (...).</p> <p>(b) They are designed to satisfy the requirements prescribed either in: (...)</p> <p>627. (...).</p> <p>(d) They are designed so that aAny additional shielding that is provided shall be capable of withstanding the static and dynamic stresses resulting from handling and routine conditions of transport and (...).</p> <p>629. (...).</p> <p>(c) They are designed to conform to the International Organization for Standardization document (...).</p> <p>630. (...).</p> <p>(b) They are designed to satisfy the requirements prescribed for (...).</p>	Editorial. Consistency with paras 626 (a), 627(a), 629(a) and 630(a).	X			
BGD/ NSGC-02	Para No.: 628, Line No.: 01	Reasons should be mentioned to delete this paragraph.	Not clear why this paragraph was deleted.			X	As recorded in the Resolution Table for TTEG-PPA, para.

COMMENTS BY REVIEWER				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
							628 is proposed to be deleted as part of the resolution of proposals F-21/WNTI-11. NB: The topic of para. 628 is now covered by para. 627.
F-22	629(c)(ii)	(...) except for a <i>freight container</i> whose <u>maximum dose rate at the its external surface of the freight container</u> is below 50 µSv/h, (...)	Editorial – Proposal for a more concise wording.	X			
F-23	630(b)(ii)	(...) except for an <i>IBC</i> whose <u>maximum dose rate at the its external surface of the IBC</u> is below 50 µSv/h, (...)	Editorial – Proposal for a more concise wording.	X			
IRN/ TRANSSC -05	631/line 1	The red text can be added to para 631. 631- <i>Packages</i> designed to contain uranium hexafluoride shall meet “ the requirements specified in paras 607–618 and, in addition, the requirements of paras 619–621 if carried by air and ” the requirements that pertain to the radioactive and fissile properties of the material prescribed elsewhere in these Regulations.	All <i>Packagings</i> and <i>Packages</i> shall meet “General Requirements for all <i>Packagings</i> and <i>Packages</i> (paras 607 – 621)” but it is not declared in para 631 for <i>Packages</i> designed to contain uranium hexafluoride.			X	New proposal; See text concerning new proposals in IRN/NUSSC-02. NB: This proposed text would be a duplication of requirements that are already referred to in the first sentence of para. 631.
F-24	648(b)	(...) except for a <i>package</i> whose <u>maximum dose rate at the its external surface of the package</u> is below 50 µSv/h, (...)	Editorial – Proposal for a more concise wording.	X			

COMMENTS BY REVIEWER				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
IRN/ TRANSSC -06	651/Line 1	The red text can be added to para 651. 651- A <i>Type A package</i> designed for “to contain” gases shall prevent loss or dispersal of the <i>radioactive contents</i> if the <i>package</i> were subjected to the tests specified in para. 725, except for a <i>Type A package</i> designed for tritium gas or for noble gases.	It has more clarification.	X			For consistency with wording in, e.g. para. 650.
USA/TRA NSSC-15	653/1	Revise “temperature of 38°C and the solar insolation conditions”	Insolation is always solar and paragraph 654 states “... in the absence of insolation...”	X			Corresponding changes made to the following paras: 657, 667(a), 728, 728(b), 812(d),
BGD/ NSGC-03	656, Line No.: 01	Reasons should be mentioned to delete this paragraph.	Not clear why this paragraph was deleted.			X	In accordance with the Resolution Table for TTEG-PPA, para. 656 is proposed for deletion as part of the resolution of WNTI-20. The topic of para. 656 is now covered by paras 653 to 655.
CHN-03	659,671	It would restrict the accumulated loss of <i>radioactive contents</i> in a period of one week to not more than 200 100 TBq10A ₂ for krypton-85 and not more than A ₂ for all other radionuclides.	New A ₂ value for Kr-85 in table 2. Basic radionuclide values			X	See section 9.1 of the Report of the Working Group on A₁/A₂ .

COMMENTS BY REVIEWER				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
CHN-04	659,671	Where mixtures of different radionuclides are present, the provisions of paras 405–407 shall apply, except that for krypton-85 an effective $A_2(i)$ value equal to 200 ¹⁰⁰ TBq10A ₂ may be used.	New A2 value for Kr-85 in table 2. Basic radionuclide values			X	Please see comment for CHN-03.
PAK-15	667(b)	...radioactive material	Refer Term “solid radioactive material” has been used which is not consistent with the existing terminology. Further, use of new types of terminologies can causes more complexity in transport regulation			X	The term “solid” is necessary to exclude liquid and gases in the case of LSA-II (See para. 409(b)).
BEL-02	667(b)	<p>667. <i>Type B(M) packages</i> shall meet the requirements for <i>Type B(U) packages</i> specified in para. 652, except that:</p> <p>(a) For a <i>package</i> to be transported solely within a specified country or solely between specified countries, ambient temperatures and solar insolation conditions other than those given in paras 653–657 and conditions other than those given in paras 639 and 660–666 may be assumed with the <i>approval</i> of the <i>competent authorities</i> of these countries. The requirements for <i>Type B(U) packages</i> specified in paras 655 and 660–666 shall be met as far as practicable.</p>	<p>LSA-II (409(b)), LSA-III (409(c)), SCO-I (413(a)) or SCO-II (413(b)) material that will be transported in a type B(U)/B(M) package (normally in an industrial package, see para 521) could be material that does not comply with para 517 (external dose rate at 3 m from unshielded material or object or collection of objects > 10 mSv/h).</p> <p>In order to limit the consequences (in terms of dose rate) after accidents associated with this kind of material to the same level as</p>			X	Para 667(b) addresses Type B(M) packages containing LSA II/III or SCO I/II material. Test requirements with respect to para 659 are 10 mSv/h in 1 m distance under ACT (Type B requirements) and no loss or dispersal of material under NCT (Type A requirements).

COMMENTS BY REVIEWER				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
		(b) For a <i>package</i> containing solid <i>radioactive material</i> for which the conditions of paras 409(b) or (c) or the conditions of paras 413(a) or (b) are met, the requirements given in paras 659(a) and (b)(ii) shall not be applicable, provided that, if the <i>package</i> were subjected to the tests specified in paras 719–724, it would prevent loss or dispersal of the <i>radioactive contents</i> and if the <i>package</i> were subjected to the tests specified in para 659(b), the loss or dispersal of the <i>radioactive contents</i> shall be so restricted that the external dose at 3 m from the lost or dispersed material does not exceed 10 mSv/h.	that associated with Type A packages, it's essential to limit the loss or dispersal of radioactive material in such way that the external dose rate be lower than 10 mSv/h at 3 m (~100 mSv/h at 1 m) from this potential unshielded material or object or collection of objects. There is few evidence that any supplementary operational controls (812(b)) could compensate the absence of limitation or restriction regarding loss or dispersal of the radioactive contents in ACT.				The application of unshielded LSA dose rate requirements (10 mSv/h in 3 m distance) is not appropriate because the shielding is still present under ACT and loss or dispersal of material is prevented under NCT.
F-25	667(b)	For a <i>package</i> containing solid <i>radioactive material</i> for which the conditions of paras 409(b)(ii) or (c) or the conditions of paras 413(a) or (b) are met, (...)	Precision for consistency as para. 409(b)(i) concerns liquid radioactive material (tritiated water).	X			
JPN/TRA NSSC-11	Para. 667(b)	(b) For a package containing solid radioactive material for which the conditions of paras 409(b) or (c) or the conditions of paras 413(a) or (b) are met, the requirements given in paras 659(a) and (b)(ii) shall not be applicable, provided that, if the package were subjected to the tests specified in paras 719–724, it would	Clarification From the viewpoint of preventing the loss or dispersal of contained material, the description is insufficient. Specifically, securing the Section 409(b) powder exemption; Loss and			X	The reference to paras 409 and 413 provides only the material characterization. The requirement to prevent loss or dispersal of contents reflects Type A

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Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
		prevent loss or dispersal of the radioactive contents. <u>This solid radioactive material shall not include any powder or non-fixed contamination.</u>	dispersion of free non-fixed contamination under Section 413(b) is not considered to be demonstrated. Therefore, an explanation should be added.				requirements. So, the prevention of loss or dispersal should also include powder or non-fixed contamination. The problem of powder or non-fixed contamination is covered by the definitions of LSA II/III and SCO-I/II, which assure that unacceptable doses after accidents will not occur.
BGD/NSGC-04	Para No.: 676, Line No.: 01	Reasons should be mentioned to delete this paragraph.	Not clear why this paragraph was deleted.	X		X	As recorded in the TTEG-C resolution table, para. 676 is proposed as a result of deliberations on proposal S-12. Development of text for SSG-26 has been delayed.
PAK-14	676	Insert text in track changes "Will be deleted after finalization of text for SSG-26 after TRANSSC 47."	The para has been deleted as per resolution of comment/proposal of TTEG C-S-12. However, it was agreed to develop the SSG-26 text prior to TRANSSC 47. It should b			X	See BGD/NSGC-04.

COMMENTS BY REVIEWER				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
			linked with the deletion of the para				
IRN/ TRANSSC-07	680(a) 680(b)(ii)	<p>The red text can be added to para 680(a) & 680(b)(ii).</p> <p>680(a)- Multiple high standard water barriers, not less than two of which would remain watertight if the <i>package</i> were subject to the tests prescribed in para. 685(b), a high degree of quality control in the manufacture, maintenance and repair of <i>packagings</i>, and tests to demonstrate the closure of each <i>package</i> “as specified in REF XXX” before each <i>shipment</i>; or</p> <p>680(b)(ii)- A high degree of quality control in the manufacture, maintenance and repair of <i>packagings</i>, coupled with tests to demonstrate closure of each <i>package</i> “as specified in REF XXX” before each <i>shipment</i>.</p>	The REF XXX for acceptance tests and the criteria for each test to demonstrate the closure of each <i>package</i> must be defined, clearly.			X	New Requirement; NB: Such specific tests and criteria are design dependent and must be specified by the designer. They can’t be specified in a way to be included in SSR-6.
F-26	681	It shall be assumed that the package <u>package</u> is reflected by at least 20 cm of water.	Editorial The term “package” should be italicised.	X			
G-01	681	<u>To consider the contingency, that the packages becoming immersed in water or buried in snow (para. 673 (a) (v)), it shall be assumed that the package is reflected surrounded by at least 20 cm of water acting as a neutron reflector.</u>	Clarification It should be made clearer what exactly is being reflected.			X	Proposed language would be better as technical basis/advisory material. Existing requirement is clear.
G-02	683 (a)	The <i>package</i> shall be subcritical under conditions consistent with the <i>Type C package</i> tests specified in para. 734,	Clarification	X			New proposal; however, it provides clarification.

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Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
		assuming <u>neutron</u> reflection by at least 20 cm of water but no water in-leakage.					
G-03	684 (a)	There shall not be anything between the packages, and the package arrangement shall be reflected on all sides <u>surrounded</u> by at least 20 cm of water <u>acting as a neutron reflector</u> .	Clarification			X	New proposed language does not improve existing language.
G-04	685 (a)	Hydrogenous moderation between the packages and the package arrangement reflected on all sides <u>surrounded</u> by at least 20 cm of water <u>acting as a neutron reflector</u> .	Clarification			X	New proposed language does not improve existing language.
IRN/NUSSC-06	par. 685 (b)	<i>More limiting means that.....</i>	<i>“Whichever of the following is the more limiting” is Not clear. More explanation for clearance is needed.</i>			X	Existing text is clear.
WNTI-20	686	686. The <i>CSI</i> for <i>packages</i> containing <i>fissile material</i> shall be obtained by dividing the number 50 by the smaller of the two values of <i>N</i> derived in paras 684 and 685 (i.e. <i>CSI</i> = 50/ <i>N</i>). The value of the <i>CSI</i> shall not be rounded down except that a value of 0.05 or less for any <i>package</i> , which may be considered as zero (i.e. <i>N</i> is effectively equal to infinity in both cases).	Editorial. Simplification and subsequent clarification. The text between brackets is not of a regulatory nature. It would be more appropriate to include this text in the Advisory Material or in the Safety Basis Document, with additional explanation concerning the meaning of “effectively equal to infinity”.	X			

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Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
IRN/NUSSC-17	Section: Requirement s for industrial packages: req. for type IP-1	----	It is suggested to provide information about relevant tests for demonstrating ability of package to withstand normal condition of transport. If there are requirements in the other standards			X	New Proposal; See text concerning new proposals in IRN/NUSSC-02. NB: Tests for demonstrating the ability to withstand NCT are already provided in paras 719 to 724.
IRN/TRANSSC-08	702/Line 4	Use “requirements & criteria” instead of “standards” in para 702. 702- After the specimen, prototype or sample has been subjected to the tests, appropriate methods of assessment shall be used to ensure that the requirements of this section have been fulfilled in compliance with the performance and acceptance “requirements & criteria” standards prescribed in Section VI.	Section VI defines the requirements and criteria for acceptance of tests and doesn’t mention to defined standards, particularly. Then the word “requirements & criteria” is better choice than “acceptance standards” in the last line.			X	New Proposal; See text concerning new proposals in IRN/NUSSC-02. Furthermore, this change would not be consistent with para. 701.
F-27	801		Why UK-06 final proposal is not implemented with introduction of para 801A and 801b?			X	The basis for the decision is recorded in the TTEG-PPA resolution table under proposals UK-01, UK-06 and UK-07.
IRN/NUSSC-11	802	Recommended that added a paragraph for packages without design approval that are under operation. Does permitted use of this packages or not? What requirements shall be considered for packaging with such conditions?	There are packages without design approval in some countries.			X	New Proposal; See text concerning new proposals in IRN/NUSSC-02. NB: All designs,

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Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
							which are not listed in para. 802 are not subject to competent authority approval and can be used without competent authority approval.
PAK-17	809 (d)	(d) The proposed operating and maintenance instructions for the use of the <i>packaging, including operational measures, such as calculations or additional shielding, to assure that, prior to the loading of the radioactive contents within the packaging, the dose rates around the vehicle and the freight container, when applicable, comply with the limits in para. 566(b).</i>	The Incorporated text in the draft is different from agreed/approved text as per comment/proposal TTEG-PPA F-54			X	The text was revised prior to TRANSSC 46 to include dose rate limitations for a vehicle under exclusive use, i.e. para. 573. The TTEG-PPA resolution table has been revised to show this. Also, as part of SPESS Step 6, appropriate changes were made to the text during internal review of the manuscript.
IRN/NUSSC-01	<ul style="list-style-type: none"> Section VIII. Approval and Administrative Requirements (par. 810) References section 	<ul style="list-style-type: none"> A new paragraph (maybe 810) should be added as” <i>some of the mentioned document needed</i> for approval in par. 809 (such as (a) to (d), (e), etc.) <i>should/could be gathered by the applicants in a unique document addressed as Package Design Safety Report (PDSR).</i> A new paragraph (maybe 811) can be added as” <i>to demonstrate compliance of a package design for transportation of</i> 	For approval of package designs (when they are subjected to competent authority), IAEA Safety Standards Series No. SSG-66, published in 2022, recommendation on preparation (format) of a Package Design Safety Report (PDSR) for transport of Radioactive materials and			X	New Proposal; See text concerning new proposals in IRN/NUSSC-02.

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Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
		<p><i>Radioactive materials (RMs), the format and content of the PDSR would be coincident with SSG-66.</i></p> <ul style="list-style-type: none"> A new reference ([7]): <i>IAEA Safety Standards Series No. SSG-66, Format of the Package Design Safety Report (PDSR) for transport of Radioactive materials, 2022,</i> 	should be referenced in the content and added to reference section of the next version of SSR-6.				
BEL-03	812(a)	<p>An application for <i>approval</i> of a <i>Type B(M) package design</i> shall include, in addition to the information required in para. 809 for <i>Type B(U) packages</i>:</p> <p>(a) A list of the requirements specified in paras 639, 653–657, 659 and 660–666 with which the <i>package</i> does not conform;</p>	<p>The list of the requirements (for type B(U)) with which the package does not conform in para 812 (a) does not reflect the proposed change in WNTI-35 or the proposed change to WNTI-35:</p> <p>para 659 should be added to be coherent with the proposed changes of para 667(b).</p>			X	This list only refers to the references in para. 667(a), which do not include para. 659.
CDN/ TRANSSC-01	Table 2 and Transitional Arrangements in Paras 819, 820 and 823	It is proposed to extend the transitional periods in paras 819, 820 and 823 beyond the 7 years used in the 2018 regulations. The transitional period should be discussed and agreed upon by all member states, but 10 years is proposed as a minimum.	The suggested changes to Table 2 will impact design and require updates to the packagings, and may also require new packagings to be designed, built, and certified. The design to certification of new packagings is not a fast process. Sufficient time must be allocated to allow the industry to adapt to the new requirements and plan for the design and certification of new packagings.	X			NB: The concept of a 10-year transitional period for no new manufacture of packagings after the publication of a new edition of SSR-6 is described in para. 820.7 of SSG-26 (Rev. 1).
F-29	819 a) ii	(...) May continue to be used <u>until 31 December 2035</u> , provided that all the following conditions are met (...)	Safety concerns: the packagings having at least 32 years with a	X			

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Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
			design of more than 50 years could not more be used.				
F-30	819(a)(i)(3)) 819(b)(ii)(2) 819(c)(ii)(2) 820(a)(iii) 820(b)(iii) 820(c)(iii)	(...) Section IV of the 2018 Edition of these Regulations may be used until 31 December 2032 <u>2030</u> .	To be clarified why the TTEG RP proposal (31 December 2030) has not been introduced in the draft. An impact study could be carried out with all operators to fix the deadline (to have arguments / justification for the delay). For this target, a survey could be sent.			X	The TTEG-OM resolution table explains the process for gathering input and moving forward with proposals for transitional arrangements.
WNTI-21	819(a)(ii)(2)** 819(b)(ii)(2) 819(c)(ii)(2) 820(a)(iii) 820(b)(iii) 820(c)(iii) ** should be 819(a)(ii)(3)	The activity limits and classification in Section IV of this edition of these Regulations are applied. Section IV of the 2018 Edition of these Regulations may be used until 31 December 2032 <u>2035</u> .	The modifications of A ₁ /A ₂ values is a very significant change in the Regulations that will have a significant impact on the classification of the radioactive material to be transported, the need to update package design safety reports (including the calculation of the release of activity and potential consequences on the allowable leak rate) and operating instructions (if the allowable leak rate	X			

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Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
			<p>has to be modified), changes in the operation (if the allowable leak rate has to be modified), design, testing, licensing manufacturing and commissioning of new packages (when the current package design is no longer suitable due to a new classification of the material linked to new A₁/A₂ values.).</p> <p>Identifying all the impacts and developing appropriate solutions will take time. Some consequences might be identified late in the process.</p> <p>It is hence proposed to extend the transitional period until 31 December 2035. This would correspond to 10 years after the publication of the new edition of the Regulations, and also to two package design approval cycles, as – in most instances –</p>				

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Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
			<p>approvals are issued for a period of five years.</p> <p>Note that this assumes that the next edition will be published in January 2026, as indicated in the latest revision of the “2021 Transport Regulation Revision Quality Plan”. Would the publication of the next edition be delayed, the transitional period should be extended accordingly.</p>				
WNTI-22	819(c)(i)** 820(c)(i)	(i) The <i>package design</i> is subject to <i>multilateral approval</i> after 31 December 2032 2035 .	Consistency with the above comment WNTI-21. The deadline for accepting the use of packages that meet the requirements of the 2018 Edition of the Regulations should be the same as the deadline for accepting the use of Section IV of the 2018 Edition of the Regulations, to allow smooth implementation of the latest edition of the Regulations.	X			
	819(c)(ii)(4)	(4) The packaging was not manufactured or modified after 31 December 2032 2035 .					
	823	823. (...). No new manufacture of <i>special form radioactive material</i> to a <i>design</i> that had received <i>unilateral approval</i> by the <i>competent authority</i> under the 2018 Edition of these Regulations shall be permitted to commence after 31 December 2032 2035 .					

COMMENTS BY REVIEWER				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
		**819(c)(i) May continue in transport provided that they were prepared for transport prior to 31 December 2032 -2035 and are subject to the requirements of para. 822, if applicable; or					
USA/TRA NSSC-16	819(c)(ii)(2)	The activity limits and classification in Section IV of this edition of these Regulations are applied (Section IV of the 2018 Edition of these Regulations may be used until 31 December 2034);	According to the SPESS process the rules are scheduled to be published on January 1, 2026. There are a large number of changes to the A ₂ values. It is not clear that if some existing shipments of Type A quantities become Type B packages, it is not clear that a significant number of packages, if needed, can be designed, tested, approved and fabricated in less than 6 years. Eight years would be more appropriate.			X	See CDN/ TRANSSC-01 and WNTI-21.
UK-01	819/820/82 1/821A/82 1B/823		Query whether the dates used across these paragraphs should be more consistent. e.g. for 2018 regs transition 819 has no manufacture after 31 Dec 2032			X	No proposal submitted. See CDN/ TRANSSC-01

COMMENTS BY REVIEWER				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
			<p>821B has no new manufacture after 31 Dec 2035</p> <p>823 has no new manufacture after 31 Dec 2032</p> <p>Unsure of rationale for difference – especially between approved packages and special form as both are CA approved.</p>				
F-31	819(b) ii	<p><i>Packages</i> that meet the requirements of the 1996 Edition, 1996 Edition (Revised), 1996 (As Amended 2003), 2005, 2009 or 2012 Editions of these Regulations: (...)</p> <p>The activity limits and classification in Section IV of this edition of these Regulations are applied (Section IV of the 2018 <u>corresponding</u> Edition of these Regulations may be used until 31 December 2032);</p>	Clarification: to avoid any confusions			X	This proposal would represent a change in requirements from the current text that refers to “this Edition”, which was the 2018 Edition.
F-32	819(c)	<p>(c) <i>Packages</i> that meet the requirements of the 2018 Edition of these Regulations: (...)</p> <p>(ii) May continue to be used, provided that all the</p>	It is not really a transitional arrangement as no modification of para. 306 appears in this new (2025) edition.	X			

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Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
		<p>following conditions are met:</p> <p>(1)The applicable requirements of para. 306 of this edition of these Regulations are applied;</p> <p>(2)<u>(1)</u> The activity limits and classification in Section IV of this edition of these Regulations are applied (Section IV of the 2018 Edition of these Regulations may be used until 31 December 2032);</p> <p>(3)<u>(2)</u> The requirements and controls for transport in Section V of this edition of these Regulations are applied; and</p> <p>(4)<u>(3)</u> The <i>packaging</i> was not manufactured or modified after 31 December 2032.</p>					
F-33	819(c) [Should be 820(c)(ii)]	<p>(d) <i>Packagings</i> that were manufactured to a <i>package design</i> approved by the <i>competent authority</i> under the provisions of the 2018 Edition of these Regulations (...)</p> <p>(...)</p>	It is not really a transitional arrangement as no modification of para. 306 appears in this new (2025) edition.	X			

COMMENTS BY REVIEWER				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
		<p>(ii) The applicable requirements of para. 306 of this edition of these Regulations are applied.</p> <p>(iii)<u>(ii)</u> The activity limits and material restrictions in Section IV of this edition of these Regulations are applied (Section IV of the 2018 Edition of these Regulations may be used until 31 December 2032);</p> <p>(iv)<u>(iii)</u> The requirements and controls for transport in Section V of this edition of these Regulations are applied.</p>					
F-28	820(b)(iii) 820(c)(iii)	The activity limits and material restrictions classification of Section IV of this edition of these Regulations are applied. (...)	<p>Consistency with previous paras. (819(a)(i)(3), 819(b)(ii)(2), 819(c)(ii)(2), 820(a)(iii)).</p> <p><u>If accepted, this could also be reflected in paras. 111 and 231 as Section IV is entitled Activity limits and classification.</u></p>	X			
WNTI-24	820	820. <i>Packages requiring competent authority approval of the design shall meet this edition of these Regulations in full except that:</i> (...)	According to para. 832.2 in the Advisory Material [SSG-26 (Rev. 1)], “it is essential that easy means are available, preferably in the identification mark,			X	The approval certificate provides the edition of the Regulations. The symbol “18” would not add specific value. The

COMMENTS BY REVIEWER				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
		<p>(c) <i>Packagings</i> that were manufactured to a <i>package design</i> approved by the <i>competent authority</i> under the provisions of the 2018 Edition of these Regulations may continue to be used provided that all of the following conditions are met:</p> <p>(i) The <i>package design</i> is subject to <i>multilateral approval</i> and the symbol “-18” is added to the type code in the identification mark assigned to the approval certificate after 31 December 2032.</p> <p>(ii) The applicable requirements of para. 306 of this edition of the Regulations are applied.</p> <p>(iii) The activity limits and material restrictions of Section IV of this edition of these Regulations are applied. Section IV of the 2018 Edition of these Regulations may be used until 31 December 2032.</p> <p>(iv) The requirements and controls for transport in Section V of this edition of these Regulations are applied.</p>	<p>for determining under which edition of the Transport Regulations the original package design approval was issued. (...). No symbol for the year means that the design is approved under the requirements of the current edition of the Regulations.”</p> <p>As the package designs approved under the provisions of 1985 or 1985 (As Amended 1990) Editions of these Regulations bear the symbol “-85”, and the package designs approved under the provisions of the 1996 Edition, 1996 Edition (Revised), 1996 (As Amended 2003), 2005, 2009 or 2012 Editions of the Regulations bear the symbol “-96”, it is appropriate that package designs approved under the 2018 Edition of the regulations bear the symbol “-18” after 31 December 2032, to</p>				implementation of a new symbol is not necessary because there are no significant safety-related changes to design and testing requirements for packages, as was the case with the 1996 and 1985 editions.

COMMENTS BY REVIEWER				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
			identify that they do not comply with the new latest edition of the Regulations.				
F-34	821	No new manufacture of packagings to a package design meeting the provisions of the 1985 or 1985 (As Amended 1990) Editions of these Regulations shall be permitted to commence. <u>Packages that meet the requirements of the 1985 or 1985 (As Amended 1990) Editions of these Regulations may continue in transport until 31 December 2035 unless they are used for long-term storage.</u>	Safety concerns: the packagings having at least 32 years with a design of more than 50 years could not more be used.			X	The continuation in transport of packages that meet the requirements of the 1985 or 1985 (As Amended 1990) Editions is addressed in para 820 (a): “may continue to be used”. Requirements related to “shipment after storage” included in 820 (a)(ii) with reference to the management system (para 306) and the scope of the Regulations (para 106) and in 820 (a)(iv) with reference to Section V and the para 503(e).

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Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
WNTI-23	821B	821B. No new manufacture of <i>packagings</i> of a <i>package design</i> meeting the provisions of the 2018 Edition of these Regulations shall be permitted to commence after 31 December 2035 2038 .	Consistency with the above comments WNTI-21 and WNTI-22. The comments WNTI-21 and WNTI-22 recommend an extension of three years for the end of the transitional period, from 2032 to 2035. It is appropriate to consider the same extension of three years in para. 821B, hence updating the deadline from 2035 to 2038.			X	See CDN/TRANSSC-01
WNTI-25	823	823. <i>Special form radioactive material</i> manufactured to a <i>design</i> that had received <i>unilateral approval</i> by the <i>competent authority</i> under the 1985, 1985 (As Amended 1990), 1996 Edition, 1996 Edition (Revised), 1996 (As Amended 2003), 2005, 2009, 2012 or 2018 Editions of these Regulations may continue to be used when in compliance with the mandatory <i>management system</i> in accordance with the applicable requirements of para. 306. The symbol “-18” shall be added to the type code in the identification mark assigned to the	See comment on para. 820.			X	See WNTI-24.

COMMENTS BY REVIEWER				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
		<p><i>approval certificate for a special form radioactive material design that had received unilateral approval by the competent authority under the 2018 Edition of these Regulations.</i> There shall be no new manufacture of <i>special form radioactive material</i> to a <i>design</i> that had received <i>unilateral approval</i> by the <i>competent authority</i> under the 1985 or 1985 (As Amended 1990) Editions of these Regulations. No new manufacture of <i>special form radioactive material</i> to a <i>design</i> that had received <i>unilateral approval</i> by the <i>competent authority</i> under the 1996 Edition, 1996 Edition (Revised), 1996 (As Amended 2003), 2005, 2009 or 2012 Editions of these Regulations shall be permitted to commence after 31 December 2025.</p> <p>No new manufacture of <i>special form radioactive material</i> to a <i>design</i> that had received <i>unilateral approval</i> by the <i>competent authority</i> under the 2018 Edition of these Regulations shall be permitted to commence after 31 December 2032.</p>					

COMMENTS BY REVIEWER				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
F-35	832	<p><u>(d) For certificates of approval of package design and special form radioactive material, and for certificates of approval of low dispersible radioactive material, the symbol “-18” shall be added to the type code if the table 2 of this Edition of these Regulations are not applied.</u></p> <p><u>If the table 2 of this Edition of these Regulations is applied, the symbol “-25” shall be added to the type code.</u></p>	Clarification for the Industry and competent authorities			X	See WNTI-24.
BEL-04	838(n)(ii)	<p>838. Each certificate of approval of the design of a package issued by a competent authority shall include the following information:</p> <p>[...] (n) [...] (ii) Any design feature of the package packaging that is relied on for criticality safety, as specified by the designer;</p>	<p>Criticality safety can also rely on the design features of the content.</p> <p>Moreover, since para 209 “Confinement system” would be deleted, it might be notable that these design features are to be specified by the designer, analogously to para 213 “Containment system”.</p>			X	There is no reason to refer to the designer in the approval certificate, and those features are related to the packaging.
PAK-16	838(n)(ii)(1):	Any criticality safety feature of the packaging that justifies specific attention	The statement inserted in the draft is slight different from the agreed text of proposal TTEG-C S-15 i.e" Any criticality safety feature of the packaging that justifies specific attention".			X	As part of SPES Step 6, appropriate changes were made to the text during internal review of the manuscript.

COMMENTS BY REVIEWER				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
WNTI-26	REFERENCES	[17] INTERNATIONAL ORGANIZATION FOR STANDARDIZATION, Nuclear Energy — Packagings for the transport of U uranium hexa fluoride (UF₆ UF ₆), ISO 7195:2020, ISO, Geneva (2020).	Editorial. Consistency with the formatting of the ISO standard.	X			
USA/Editorial-01	Reference 18	INTERNATIONAL MARITIME ORGANIZATION, International Maritime Dangerous Goods (IMDG) Code, IMO, London (2022).	IMO staff confirmed that the latest IMDG Code amendment 41-22 dates to year 2022.	X			
JPN/TRANSSC-12	Reference	[19] — INTERNATIONAL MARITIME ORGANIZATION, International Convention for Safe Containers, 1972 (CSC 1972), (2014 Edition), IMO, London (2014).	The reference is not used in the text and it should be deleted.	X			
WNTI-27	REFERENCES	[19] — INTERNATIONAL MARITIME ORGANIZATION, International Convention for Safe Containers, 1972 (CSC 1972), (2014 Edition), IMO, London (2014).	The reference [19] is not used in the text and should be deleted.	X			
WNTI-28	REFERENCES	[20] INTERNATIONAL ORGANIZATION FOR STANDARDIZATION, Radiation Protection — Sealed Radioactive Sources — Leakage Test Methods, ISO 9978:1992, ISO, Geneva (1992), and ISO 9978:2020, ISO, Geneva (2020).	Editorial.	X			

COMMENTS BY REVIEWER				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
JPN/TRAN SSC-13	Annex III	<p>The following consignments</p> <p><i>Conveyances and large freight containers</i> are required to be shipped under <i>exclusive use</i> when loaded with any of the following:</p> <p>The following consignments</p> <p><i>Conveyances and large freight containers</i> are required to be shipped under <i>exclusive use</i> when loaded with any of the following:</p>	<p>Changes in Annex III were submitted after TRANSSC 45 from WNTI as per “TTEG-OM-PrimRev15” and this was not discussed TTEG-OM nor TRANSSC46 plenary.</p> <p>The proposed text was included in DS543 except the first sentence.</p>	X			
JPN/TRANSSC-14	CONTRIBUTORS TO DRAFTING AND REVIEW	<p>Delete First</p> <p>Mr. Kuriyama</p> <p>Nuclear Regulation Authority Japan</p>	Affiliation is different.	X			