

DS543 Regulations for the Safe Transport of Radioactive Material, 2025 Edition
CSS Silent Approval

| COMMENTS BY REVIEWER | | | | RESOLUTION | | | |
|--|----------------------|---|---|------------|-----------------------------------|----------|---|
| Reviewer: All comments Page.... of 4 Country/Organization: Date: 2025-08-28 | | | | | | | |
| Comment No. | Para/Line No. | Proposed new text | Reason | Accepted | Accepted, but modified as follows | Rejected | Reason for modification/rejection |
| GER-05 | Para. 111 | Annex III provides a summary of <u>conveyances and large freight containers, required to be under</u> exclusive use... | Wording should be changed to reflect new title of Annex III | X | | | |
| GER-01 | Para. 222(d) | Any combination of <u>materials described in subparagraphs</u> (a), (b) and/or (c). | This statement refers to combinations of materials described in subparagraphs (a) to (c). We find the current wording “combination of subparagraphs” misleading. | | X | | We will revert to the original wording before editing, i.e. “Any combination of (a), (b) and/or (c).” |
| JPN-01 | P.23 TABLE 2 | TABLE 2. Table 2 <u>This table</u> has been deleted and its content has been incorporated in the Appendix. | “Table 2” should be replaced by “This table” for consistency. (e.g. see para. 209 in page 9) | X | | | |
| GER-02 | Para. 422(d) and (e) | We suggest to keep the previous wording. | Replacing “and” with “that” is changing the meaning of the statement. Paragraph 424 contains requirements not only for the material but also for the packaging. This was reflected by the previous wording. | X | | | |
| JPN-02 | P.33 Para. 506 | 506. Consignments shall be segregated from other dangerous goods during transport in compliance with the relevant transport regulations for dangerous goods | “cognizant” and “relevant” have different meanings and the proposed modification | X | | | |

| | | | | | | | |
|--------|-----------------------------------|---|---|---|---|--|--|
| | | of each of the countries through or into which the materials will be transported, and, where applicable, with the regulations of the <u>cognizant</u> relevant transport organizations, as well as these Regulations. | may change the meaning. Justification of the modification should be provided. | | | | |
| JPN-03 | P.38 Para.524 (a), (b), (c) | 524. The <i>TI</i> for each <i>overpack</i> ... (a) The maximum dose rate ... (b) For a freight container ... (c) The value obtained ... (a) <u>The maximum dose rate ...</u> (b) <u>For a freight container ...</u> (c) <u>The value obtained ...</u> | Formatting (proper indentation) | | X | | All formatting will be corrected during final layout |
| JPN-04 | P.39 Para.527 (a), (b), (c) | 527. The maximum <i>dose rate</i> ... (a) Exclusive use by ... (b) Exclusive use or ... (c) Special arrangement by ... (a) <u>Exclusive use by ...</u> (b) <u>Exclusive use or ...</u> (c) <u>Special arrangement by ...</u> | Formatting (proper indentation) | | X | | All formatting will be corrected during final layout |
| JPN-05 | p.40 532 | The last part of the last sentence should be returned to the text in Step11a. ..., unless <u>all</u> the marks of all the packages within the overpack are clearly visible. | The TE revision from “all the marks of the packages within the overpack” to “the marks of all the packages within the overpack” changes the meaning. The original requirement was that even if some packages were hidden by other packages, all marks required for the package were visible from the outside. However, after the amendment, even if only part of the marks is visible, marks shall be | X | | | |

| | | | | | | | |
|--------|-----------|--|--|---|---|--|--|
| | | | <p>visible from all packages. For example, if nine packages are arranged in a 3×3 pattern and placed in an overpack, it is no longer acceptable for the labels on the packages in the center to be hidden.</p> <p>Due to the significant impact on transport operations, the current wording should be retained.</p> | | | | |
| JPN-06 | p.41 | <i>This blank page should be deleted and the page number in the CONTENTS should be modified accordingly.</i> | The current p.41 appears as a blank page, but there may be no particular reason for it to be blank. | | X | | All formatting will be corrected during final layout |
| FRA-02 | Para. 653 | The modification should be rejected. | <p>In the version posted for silent approval by CSS, it is proposed to replace “applied prior to the tests” by “during testing”. Such a modification changes the primary intent of the proposal F-56 initiated during the SSR-6 review process. As a reminder, the justification provided by France to add “applied prior to the tests” in para. 653 was the following:</p> <p>“Clarification of understanding Precision that the thermal studies to determine the temperature of the package under ambient temperature plus solar insolation should</p> | X | | | |

| | | | | | | | |
|--------|-----------|---|---|---|--|--|--|
| | | | <p>consider the package in its initial state, prior to the tests to demonstrate the ability to withstand normal conditions of transport.”</p> <p>Thus, to be aligned with the discussions held during the review and revision process, France considers that the above-mentioned modification by the Agency’s Publication Section (MTCD) in para. 653 should be rejected.</p> | | | | |
| GER-03 | Para. 653 | The replacement is incorrect and should not be carried out. | <p>The requirement means that the package must first be exposed for one week to an ambient temperature of 38°C, the sunlight conditions specified in Table 12 and the heat generated by the radioactive contents. After one week, a steady state has been reached, and the tests specified in §719-724 must be carried out in this state. This sequence is clearly stated in Guide SSG-26, which explains SSR-6. Since the reader refers the word ‘test’ to the tests according to 719-724, the ambient conditions must exist before the tests (the tests themselves take a</p> | X | | | |

| | | | | | | | |
|--------|-------------------------------|---|---|---|--|--|--|
| | | | few minutes, so the ambient temperature is not very important for the massive packaging). | | | | |
| JPN-07 | P.68 Para.653 | 653. A package shall be so designed that, under an ambient temperature of 38°C and the insolation conditions specified in Table 12 <u>applied prior to the tests</u> during testing , heat generated within the package... | The part “applied prior to the tests” proposed for deletion by TE was added as a result of discussions on F-56 by TTEG-PPA during the Review Process. The modification proposed by TE may change the meaning. | X | | | |
| JPN-08 | P.113 APPENDIX | Note “(b)” should be inserted Pb-210(a) 1×10^1 <u>(b)</u> 1×10^4 (b) Pb-212(a) 1×10^1 <u>(b)</u> 1×10^5 (b) | Editorial | X | | | |
| JPN-09 | P.124 APPENDIX note (b) | Order of appearance in note (b) should be aligned: Th (natural)* Ra-228, ... Th-234 Pa-234m <u>Th-234 Pa-234m</u> <u>Th (natural)* Ra-228, ...</u> | Editorial | X | | | |
| GER-04 | Annex III title | SUMMARY OF <u>CONVEYANCES AND LARGE FREIGHT CONTAINERS REQUIRED TO BE UNDER EXCLUSIVE USE</u> | During the revision of SSR-6 an attempt was made to clarify that exclusive use applies to some conveyances and large freight containers. The first sentence in Annex III was changed to clarify this. | X | | | |
| JPN-10 | p.136 Annex III - Title | SUMMARY OF CONSIGNMENTS <u>CONVEYANCES AND LARGE FREIGHT</u> | The title of Annex III might be modified to more correctly reflect the contents of the Annex III | X | | | |

| | | | | | | | |
|--------|----------------------|---|--|---|--|--|--|
| | | <u>CONTAINERS REQUIRED TO BE UNDER EXCLUSIVE USE</u> | as described in its first sentence. | | | | |
| FRA-01 | List of contributors | <p>Chrupek, T. Authority for Nuclear Safety and Radiation Protection, France</p> <p>Féron, F. Authority for Nuclear Safety and Radiation Protection, France</p> <p>Gauthier, F. Authority for Nuclear Safety and Radiation Protection, France</p> <p>Ledroit, F. Authority for Nuclear Safety and Radiation Protection, France</p> <p>Louis, B. Authority for Nuclear Safety and Radiation Protection, France</p> <p>Reculeau, J. Y. Defence Nuclear Safety Authority, France</p> | To reflect the change in the French context | X | | | |
| GER-06 | List of contributors | The Federal Office for the Safety of Nuclear Waste Management should be kept as it as originally | Official name of organisation in English is “The Federal Office for the Safety of Nuclear Waste Management (BASE)”, see Link | X | | | |
| GER-07 | List of contributors | Federal Ministry for the Environment, Climate Action, Nature Conservation and Nuclear Safety | <p>The name of our ministry has recently changed to: “The Federal Ministry for the Environment, Climate Action, Nature Conservation and Nuclear Safety (BMUKN)”, Link</p> <p>Could you hence please update the name accordingly.</p> | X | | | |

| | | | | | | | |
|--------|-------------------------|---|--|---|---|--|---|
| JPN-11 | P.138 – CONTRIBUTORS | The affiliations of French colleagues should be confirmed. - Ba, R. T. V. (ASN?) - Chrupek, T. (ASN?) - Duluc, M. (IRSN?) - Féron, F. (ASN?) - Gauthier, F. (IRSN?) - Ledroit, F. (IRSN?) - Louis, B. (IRSN?) - Reculeau, J. (should be ASND) | Update | X | | | |
| JPN-12 | p.144 INDEX | <i>A_I</i> : ... 404, 405 , 407, ... | 406 could be removed, but 405 should not be removed. | | X | | It's difficult to see in track changes, but these numbers have been replaced by an 'en' dash to indicate a range of numbers |
| JPN-13 | p.144 INDEX | <i>Consignment</i> : ..., 546, 546A , 547, ... | 546A should not be removed. | | X | | See above |
| JPN-14 | p.146 INDEX | <i>Low specific activity (LSA)</i> : ..., 571, 572 , 572A | 572 should not be removed. | | X | | See above |
| JPN-15 | p.147 INDEX | <i>Surface contaminated object (SCO)</i> : ..., 571, 572 , 572A, | 572 should not be removed. | | X | | See above |