

*{Safe transport of radioactive material (DS 495)}*

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: J. JALOUNEIX Page.... of.... Country/Organization: IRSN/France				Date: 22/04/2016			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1	General	Add a paragraph dealing with the interface between safety and security in the document.					
2	References	Add reference to documents of the nuclear security series.	At least references to NSS 20, NSS 13 and NSS 14 should be added.				
3	Section 3	At least awareness or training in the security field should be mentioned.	Interface with security issues and requirements should be mentioned.				
4	Section 5	Marking, labelling and placarding requirements should also take into account possible limitation due to security issues.	Interface with security issues and identification of possible conflicts between safety and security requirements.				

**TITLE**

DS 495 - Regulations for the Safe Transport of Radioactive Material – **SPESS** Step 6

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: Věra Starostová		Page 6 of.147.					
Country/Organization: Czech Republic/Státní úřad pro jadernou bezpečnost							
Date: 3.5.16							
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1	104/19	<p>sentence</p> <p>Finally, they are satisfied by making arrangements for planning and preparing emergency response in order to mitigate the consequences of potential <i>events</i>.</p> <p>change to</p> <p>Finally, they are satisfied by making arrangements for planning and preparing emergency response in order to mitigate the consequences of potential <b>nuclear or radiological emergencies</b>.</p>	<p>1. compliance to GSR 7</p> <p>2. this Regulation deals with transport of radioactive materials and so potential events should also “radioactive material events”, i .e. nuclear and radiological emergencies.</p>				

## COMMENTS BY REVIEWER

## RESOLUTION

Reviewer: Věra Starostová

Page 17 of 147

Country/Organization: Czech Republic/Státní úřad pro jadernou bezpečnost

Date: 3.5.16

Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1	304	<p>text            „In the event of emergency during the transport of <i>radioactive material</i>, provisions established by relevant national and/or international organizations shall be observed to protect human life, health, property and the environment. <i>Consignors</i> and <i>carriers</i> shall establish, in advance, arrangements for preparedness and response for emergencies that may occur during transport in accordance with...“</p> <p>change by text            „In the event of <b>nuclear or radiological</b> emergency during the transport of <i>radioactive material</i>, provisions established by relevant national and/or international organizations shall be observed to protect human life, health, property and the environment. <i>Consignors</i> and <i>carriers</i> shall establish, in advance, arrangements for preparedness and response for <b>nuclear or radiologica</b> emergencies that may occur during transport in accordance with...“</p>	compliance to GSR 7				

COMMENTS BY REVIEWER

RESOLUTION

Reviewer: Věra Starostová Page 20 of 147  
 Country/Organization: Czech Republic/Státní úřad pro jadernou bezpečnost  
 Date: 3.5.16

Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1	313 point (c) (ii)	text „Available emergency response <i>information</i> and how to use it“ change by text „Available emergency response <b>documents</b> and how to use it “	compliance to text on the same page under point (a) (ii) (the last line)				
2	313 point (c) (iv)	text „...including any emergency response procedures for which the person...“ change by text „...including any emergency response procedures <b>described in emergency documents</b> for which the person	The responsibility cannot be achieved/ensured without proposed addition.				

DS 495 - Regulations for the Safe Transport of Radioactive Material – SPESS Step 6

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: Catherine Organo Page 1 of 2 Country/Organization: IRELAND / Environmental Protection Agency Date: 20 May 2016							
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1	General	Please add page Nos to the document	It could be helpful for reviewers				
2	General	Words in <i>italic</i> character throughout the document	Throughout the document, the terms in <i>italic</i> relate to words that are defined in Section II. Is this a new rule which will be applied to all IAEA publication or is it only for the purpose of the review process (to facilitate editing)?				
3	General	Why are paragraph numbers in the document starting at 101?					
4	101/11 to 13	... and on the General Safety Requirements No. GSR Part 3 [x],...	General Safety Requirements No. GSR Part 3 supersedes General Safety Requirements No. GSR Part 3 (Interim edition) issued in 2011, which itself superseded the International Basic Safety Standards that were issued as IAEA Safety Series No. 115 in February 1996 (hereinafter referred to as the 'BSS of 1996')				

5	104/17	... <i>approval</i> by competent authorities. Finally, they are satisfied by making	The full stop is missing before Finally				
6	226/2	... by its nature has a limited <i>specific activity</i> ,...	What is the meaning of the word 'limited' in this instance? Does it refer to a specific value?				
7	231/6	(a) <i>Excepted package</i> ;	Suggest adding the definition of <i>Excepted package</i> in Section II as well. The description in page 41 of TS-G-1.2 could be used				
8	204/3 and 243/1	Expand the definition of <i>Through or into</i> , in relation to Para 204: ... transported <i>Through or into</i> any other country	Does <i>Through or into</i> include the maritime area or national waters of a country? Should this be specified?				
9	304/6	... that are coordinated with respective off-site response organizations....	What does the word 'respective' relate to?				
10	309(b)(iv) and 309(c)	... relevant <i>competent authority(ies)</i>	What is the rationale for using the plural form of <i>competent authority(ies)</i> only in this paragraph 309 and not elsewhere in the document?				
11	REFEREN CES	The content of Reference [2] (International Basic Safety Standards for Protection against Ionizing Radiation and for the Safety of Radiation Sources, Safety Series No. 115, IAEA, Vienna (1996)) needs to be replaced by full reference to IAEA GSR Part 3	Key reference which needs to be updated				
12	Annex II	Suggest removing Annex II altogether, or else it should be part of the standard content of all IAEA publications	Consistency across IAEA publications				