Merging of RA02 and RA03 in 7.1.6.11 and merging of HA03 to HA06 in 7.1.6.14

Transmitted by the Government of Germany

Introduction

1. At the 17th session of the Safety Committee from 23 to 26 August 2010, informal document WP.15/AC.2/17/INF.6 was presented. The document recommended that in 7.1.6.11 RA02 be merged with RA03 and in 7.1.6.14 HA03 be merged with HA04, HA05 and HA06.

2. The Safety Committee agreed to this recommendation in principle. This proposal contains a concrete solution based on a draft prepared by the Informal Working Group on Substances.
Proposal

3. It is recommended to merge in 7.1.6.11 Carriage in bulk the requirements RA02 and RA03 editorially as follows:

RA02: The materials may be carried in bulk provided that:

(a) They are carried in a vessel so that, under normal conditions of transport, there is no escape of contents or loss of shielding;

(b) They are carried under exclusive use if the contamination on the accessible and inaccessible surfaces is greater than 4 Bq/cm² ($10^{4}$μCi/cm²) for beta and gamma emitters and low toxicity alpha emitters or 0.4 Bq/cm² ($10^{-5}$μCi/cm²) for all other alpha emitters;

(c) Measures are taken to ensure that radioactive material is not released into the vessel if it is suspected that non-fixed contamination exists on inaccessible surfaces of more than 4 Bq/cm² ($10^{4}$μCi/cm²) for beta and gamma emitters and low toxicity alpha emitters or 0.4 Bq/cm² ($10^{-5}$μCi/cm²) for all other alpha emitters.

Surface Contaminated Objects (SCO-II) shall not be carried in bulk.

RA03: Merged with RA02

4. It is recommended to merge in 7.1.6.14 Handling and stowage of cargo the requirements HA03, HA04, HA05 and HA06 editorially as follows:

HA03: Any friction, impact, jolting, overturning or dropping shall be prevented during handling of these substances or articles.

All packages loaded in the same hold shall be stowed and wedged as to prevent any jolting or friction during carriage.

Stacking of non-dangerous goods on top of packages containing these substances or articles is prohibited.

Where these substances or articles are loaded together with other goods in the same hold, these substances or articles shall be loaded after, and unloaded before, all the other goods.

This provision does not apply if the substances or articles of Class 1 are contained in containers.

While these substances or articles are being loaded or unloaded, no loading or unloading operations shall take place in the other holds and no filling or emptying of fuel tanks shall be allowed. The competent authority may, however, permit exemptions from this provision.

HA04: Merged with HA03

HA05: Merged with HA03

HA06: Merged with HA03
Justification

5. The application criteria for equipment, rules for construction and provisions in Table A show that the requirements RA02 and RA03 as well as HA03 to HA06 are always assigned to the same entries. That is, they are always only used in conjunction with each other. Merging the respective requirements into one requirement makes Table A clearer and thus more user friendly.