

ONR Technical Inspection Guide (TIG)

The Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations 2009 – Radiation and contamination monitoring, and determination of transport index

ONR Technical Inspection Guide (TIG)

The Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations 2009 - Radiation and contamination monitoring, and determination of transport index

Authored by – Nuclear Safety Inspector, Transport Competent Authority

Approved by – Head of GB Transport Competent Authority

Issue: 3.1

Published: July 2024

Next scheduled review: July 2027

Document reference: NS-INSP-GD-068

Record reference: 2020/139132

Revision commentary

Issue	Description of update(s)
3	Formatting and references updated
3.1	Transfer of document to new template, and with minor amendments to text

Contents

1.	Introduction	4
	The Carriage of Dangerous Goods and Use of Transportable Pressure ment Regulations 2009	7
	Purpose of the Carriage of Dangerous Goods and Use of Transportable ure Equipment Regulations 2009	8
Carria	Guidance on inspection of arrangements and their implementation for ige of Dangerous Goods and Use of Transportable Pressure Equipment ations 2009	9
5.	Further reading	25
	ndix A – Guidance on arrangements for radiation and contamination monitori	_
Refere	ences	35

1. Introduction

- 1. The carriage of dangerous goods by road and rail in Great Britain (GB), including radioactive materials, is regulated by The Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations 2009 (as amended) [1] (also referred to as 'CDG 2009'). Regulation 32A of CDG 2009 makes it an offence for a person not to comply with any relevant provision as they apply to the civil carriage of class 7 (radioactive materials) dangerous goods.
- 2. The enactment in GB of the international requirements defined in both the Agreement Concerning the International Carriage of Dangerous Goods by Road (ADR) [2] and the Regulations Concerning the International Carriage of Dangerous Goods by Rail (RID) [3] is via CDG 2009, Regulation 5. ADR and RID establish standards of safety which provide an acceptable level of control of the radiation, criticality and thermal hazards to persons, property and the environment that are associated with the carriage of radioactive material. These standards are based on the International Atomic Energy Agency (IAEA) Safety Standard, 'Regulations for the Safe Transport of Radioactive Material [4]'. Explanatory material can be found in IAEA Safety Standard, 'Advisory Material for the IAEA Regulations for the Safe Transport of Radioactive Material' [5]. These publications are considered Relevant Good Practice (RGP) and ONR's policy is to reflect these standards and to encourage dutyholders to use them where appropriate.
- 3. ONR inspects compliance with CDG 2009, and also with the arrangements made under them, to judge the suitability of the arrangements made and the adequacy of their implementation. To support inspectors undertaking compliance inspections, ONR produces a suite of guides to assist inspectors to make regulatory judgements and decisions in relation to the adequacy of compliance, and the safety of dutyholder activities. This inspection guide is part of that suite of documents and provides guidance for inspections against CDG 2009.

1.1. Purpose

4. This guide has been prepared as an aid to inspection activities carried out by ONR inspectors at dutyholder premises, and other relevant places, in judging the dutyholder's compliance with the requirement for contamination and radiation monitoring of packages, packaging's, overpacks, containers, tanks, Intermediate Bulk Containers (IBCs) and conveyances, and subsequent determination of Transport Index (TI), as required by ADR/RID via CDG 2009, Regulation 5.

5. This guidance provides a framework for these inspection activities, within which the inspector is able to exercise their discretion. This framework is provided to facilitate a consistent approach to compliance inspection of CDG 2009.

1.2. Scope and applicability

- 6. The guidance is for use by inspectors in ONR. The guidance does not indicate when or to what extent inspections of the requirements of CDG 2009 should be carried out, as these matters are covered in individual inspector's inspection plans, which take account of priorities established by the relevant ONR programme.
- 7. A compliance inspection of a nuclear licensed site may be topic specific, such as an inspection of the arrangements for contamination and radiation monitoring, and subsequent determination of TI; however an inspection of other dutyholders is likely to cover a range of topics. Some aspects, for example, documentary information, may not necessarily be inspected at the premises.

1.3. Definitions

Table 1 - Table of Definitions

Term/acronym	Description
ADN	European Agreement Concerning the International Carriage of Dangerous Goods by Inland Waterway
ADR	Agreement Concerning the International Carriage of Dangerous Goods by Road [2]
CDG 2009	The Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations 2009 [1]
Class 7	The UN dangerous goods classification for radioactive materials
Competent Authority	The authority or authorities or any other body or bodies designated as such in each State and in each specific case in accordance with domestic law.
DGSA	Dangerous Goods Safety Adviser
EPD	Electronic Personal Dosemeter
GB	Great Britain
IAEA	International Atomic Energy Agency

Term/acronym	Description
IBC	Intermediate Bulk Container
IRR17	Ionising Radiations Regulations 2017
LSA	Low Specific Activity material means radioactive material which by its nature has a limited specific activity, or radioactive material for which limits of estimated average specific activity apply. External shielding materials surrounding the LSA material shall not be considered in determining the estimated average specific activity.
NDT	Non Destructive Testing
ONR	Office for Nuclear Regulation
Radioactive material	Means any material containing radionuclides where both the activity concentration and the total activity in the consignment exceed the values specified in ADR / RID 2.2.7.2.2.1 to 2.2.7.2.2.6.
RP	Radiological Protection
RGP	Relevant Good Practice
RID	Regulations Concerning the International Carriage of Dangerous Goods by Rail [3]
SCO	Surface Contaminated Object (SCO) means a solid object which is not itself radioactive but which has radioactive material distributed on its surface.
Special Form	Special Form radioactive material means either: An in-dispersible solid radioactive material; or a sealed capsule containing radioactive material.
TI	Transport Index
TIG	Technical Inspection Guide

2. The Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations 2009

- 8. The relevant regulatory requirements concerning the civil carriage of class 7 goods by road and rail in GB are set out in CDG 2009 [1] and subsequent amending regulations. Regulation 5 requires that no person is to carry dangerous goods, or cause or permit dangerous goods to be carried, where that carriage is prohibited by ADR or RID, including where that carriage does not comply with any applicable requirements of ADR/RID. Regulation 32A makes it an offence for a person not to comply with any relevant provision as they apply to the civil carriage of class 7 (radioactive materials) dangerous goods. Inspectors should consult these documents in preparing for and carrying out their compliance inspection.
- 9. The ONR is the Competent Authority for those functions in relation to the carriage of class 7 for which the Secretary of State for Defence is not the competent authority, except for the function in sub-section 1.10.1.6 of ADR (register of driver training certificates). The GB competent authority is to perform those functions that are identified in ADR, RID and European Agreement concerning the International Carriage of Dangerous Goods by Inland Waterways (ADN) as being the functions of a competent authority.
- 10. The CDG 2009 regulations themselves, as made, are available on through <u>Legilsation.gov.uk</u>. These regulations are subject to revision and up to date versions of legislation is available to inspectors via Westlaw UK.

Purpose of the Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations 2009

- 11. Regulation 5, in essence, requires that carriage of dangerous goods is to be in accordance with ADR or RID, as applicable. The objective of ADR/RID is to establish requirements that shall be satisfied to ensure safety and to protect persons, property and the environment from the effects of radiation in the carriage of radioactive material. This protection is achieved by requiring:
 - a) Containment of the radioactive contents;
 - b) Control of external radiation levels;
 - c) Prevention of criticality;
 - d) Prevention of damage caused by heat.
- 12. These requirements are satisfied firstly by applying a graded approach to contents limits for packages and conveyances and to performance standards applied to package designs depending upon the hazard of the radioactive contents. Secondly, they are satisfied by imposing conditions on the design and operation of packages and on the maintenance of packaging's, including a consideration of the nature of the radioactive contents. Finally, they are satisfied by requiring administrative controls, including, where appropriate, approval by competent authorities.
- 13. Dutyholders are required to comply with these Regulations. How this compliance is achieved is for the dutyholder to decide. However, ONR must judge the adequacy of this compliance. ONR carries out this function by compliance inspection.

4. Guidance on inspection of arrangements and their implementation for Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations 2009

4.1. General

- 14. This part of this guidance is to assist inspectors in judging the adequacy of the dutyholder's arrangements. These arrangements must be implemented adequately. This section is neither exclusive nor exhaustive and will be subject to review and revision in the light of operational experience. It does, however, provide aspects of ADR/RID (via CDG 2009) that can be examined during routine inspections of contamination and radiation monitoring, and subsequent determination of TI.
- 15. Check that arrangements are in place and procedures have been made to demonstrate compliance with the requirements of ADR/RID (via CDG 2009) that can be examined during routine inspections of contamination and radiation monitoring, and subsequent determination of TI, that they include the review and, whenever necessary, revision of such arrangements. Check that these arrangements are readily available, up to date, implemented adequately, as set out in the remainder of this section.
- 16. If dutyholders have generic models for such arrangements, then it is for the dutyholder to justify any deviation from the models. Any such deviations must comply with the requirements of CDG 2009, and hence also ADR/RID. Dutyholders may have generic (corporate) arrangements in place but, due to operational reasons, for example, they may not be applicable in certain circumstances, therefore they have adopted alternative arrangements (deviations).
 - Are the reasons given for deviating from generic arrangements reasonable, and not just because they are perceived as difficult to comply with?
 - Check that any deviations have been adequately justified.

- 17. Review the procedures to establish their validity, whether any changes have been made since the last review and, where applicable, whether the identified responsible persons are correct and are there any omissions. Note whether instructions, methods and management system requirements claimed in procedures have been followed and if any changes that have been made have been correctly incorporated and validated.
- 18. Have users of monitoring instruments/detectors developed specific measurement techniques relevant to their particular circumstances? Such techniques may include the use of wipes and appropriate survey instruments. The instruments and detectors should be selected to take into account the radionuclides to be measured.
- 19. A review of the justification of the measurement techniques should be limited to determining whether the author is qualified to undertake such an assessment, and that certain, specific considerations have been included. However, any concerns, inconsistencies and/or omissions regarding the competency of the person undertaking the assessment should be raised with the ONR or HSE Radiological Protection (RP) specialist inspectors as appropriate.

Examples could include:

- Has the dutyholder assessed and addressed all reasonably foreseeable contamination issues?
 - Does the dutyholder only measure where they expect to find contamination or do they also check other areas where it is possible to become contaminated?
 - Do such techniques include the use of wipes and appropriate survey instruments?
 - O Has consideration been given to the number of wipe samples to ensure that measurements taken are representative of the whole surface? An example of when this might occur is when routine surveys of very large packages, such as irradiated fuel flasks, is undertaken as it is common practice to select a large number of fixed general positions to assist in identifying patterns and trends.
 - For routine surveys on a very large package, such as an irradiated fuel flask, care should be taken so that the identical position is not wiped on successive occasions since this would leave large areas unchecked and would tend to 'clean' those areas that are checked.
 - Is direct monitoring for contamination used (rare), and if so, is it included in this justification?

- Do the instruments and detectors selected take into account the likely radionuclides to be measured?
- Has the dutyholder assessed and addressed all reasonably foreseeable radiation issues?
 - Does the dutyholder only measure where they expect to find higher levels of radiation or do they also check other areas where it is possible for higher levels of radiation to be encountered?
 - Do the instruments and detectors selected take into account the likely radionuclides to be measured?
- Has consideration been given to the suitability of the instrumentation
 with respect to the geometry of the package, the overpack, the freight
 container, etc., to be measured? For example, finned packages may
 result in narrow radiation beams.
- Has consideration been given to the suitability of the instrumentation with respect to the size (it ought to be small in relation to the dimensions of the package or overpack)?
- Has a competent person assessed such techniques and practices and deemed them adequate? What evidence is there of this?
- A qualified person must assess the extent of contamination and resultant radiation level of a package that is damaged or leaking, or suspected to have leaked or been damaged, and, where necessary, ensure additional steps to overcome and minimise the consequences of such leakage or damage at taken. Who has the dutyholder determined will undertake this?
 - What competency assessment (which may include function specific training) has been undertaken?
 - o What evidence is there of this and is it adequate?
- 20. In order to assess the adequacy of the monitoring equipment used to measure the radiation levels and/or contamination levels of the package, the overpack, the freight container, etc., considerations could include, but not necessarily be limited to:
 - Is it suitable for (sensitive to) the types of radiation encountered for example;
 - o Is account made of neutron dose where neutrons are expected?
 - Are appropriate gamma radiation level monitors used where gamma radiation is expected?

- Where a material emits different types of radiation are both aspects monitored or is this factored into the primary source of radiation? An example of this is an americium-241/beryllium source which produces gamma radiation and neutrons, it may not be practical to routinely monitor neutron dose rates. In these circumstances it would be appropriate to factor the neutron component into the overall radiation level. This can be inferred on the basis of gamma dose rate and verified by periodic measurement using specialist neutron monitoring equipment. Again, ONR would expect to see evidence that this had been suitably considered.
- Is non-fixed contamination determined by wiping a 300cm² area with an appropriate material (filter paper, wad of dry cotton wool, etc.)?
 - Has the methodology been suitably assessed by a competent person?
 - o What evidence is there of this and is it adequate?
- Is it functioning correctly are the battery(ies) charged? Does it switch on? Is the expected reading displayed (zero, background, or is it elevated/spurious)?
- Has it been maintained? Is it reliable? Is it in good condition? Has it been maintained adequately?
- Has the calibration been checked? Is it in date? Is evidence of the check available (certificate, calibration stickers on instrumentation etc.)?
 - If the monitoring equipment has not been checked for over a year and is being used to measure radiation levels in a controlled area, then also inform ONR or HSE RP specialist inspectors regarding potential breaches of the IRR 2017.
- 21. Persons undertaking the monitoring should be competent to do so:
 - Do they know how to operate the instrumentation? Have they received any relevant training to do so? Do they know how many readings/wipes to undertake (this is especially relevant on larger packaging's)?
 - Are they capable of interpreting the results of any measurements taken?
 - Do they know the applicable limits for radiation, contamination and TI?
 - What is the evidence for these and are they adequate?
- 22. Are operators adequately trained to ensure that the wipe samples are obtained in a consistent manner?
 - How are they trained and by whom?

- Is the training recorded? Is it refreshed?
- Do they follow an operating procedure which sets out the sampling regime? If not, how do they ensure consistency?

Radiation and contamination monitoring of packages, overpacks, containers, unpackaged LSA-1 or SCO-1

- 23. How does the dutyholder ensure that, except for packages or overpacks carried under exclusive use, the maximum radiation level at any point on the external surface of a package or overpack does not exceed 2 mSv/h?
- 24. How does the dutyholder ensure that the maximum radiation level at any point on the external surface of a package or overpack under exclusive use not exceed those specified in ADR/RID 4.1.9.1.12 and 7.5.11 CV33/CW33 (3.5)?

Table 2 - Maximum permitted radiation levels (in mSv/h) around packages, overpacks and vehicles

	Routine conditions of carriage ¹	Under exclusive use conditions ^{2,3}
Package or overpack ⁴ – maximum permitted dose rate at surface	2 mSv/h	10 mSv/h
Vehicle ⁵ – maximum permitted dose rate at surface	2 mSv/h	2 mSv/h
Vehicle ⁵ – maximum permitted dose rate at 2m from the surface	0.1 mSv/h	0.1 mSv/h

25. Does the dutyholder meet the requirements for exclusive use when utilising these higher limits?

¹ Figure in this column can be found in ADR 4.1.9.1.11 and ADR 7.5.11.CV33 (3.3)

² Exclusive use means the sole use by a single consignor of a vehicle or of a large container, where all loading, shipment and unloading is carried out according to the consignor or consignee directions, as required by ADR.

³ Figures in this column can be found in ADR 7.5.11 CV33 (3.5) but note that conditions apply.

⁴ Overpack means an enclosure used by a single consignor to contain usually more than one package into a single unit which is easier to handle and stow during carriage.

⁵ Although vehicle is the term referenced here, ADR quotes figures for the conveyance, where conveyance means a vehicle or wagon.

- 26. How does the dutyholder ensure that non-fixed contamination on the external surfaces of any package is kept as low as (reasonably) practicable, and does not exceed 4 Bq/cm² for beta and gamma emitters and low toxicity alpha emitters and 0.4 Bq/cm² for all other alpha emitters?
 - It would be appropriate for checks to be made to ensure that any buildup does not occur in areas where packages are regularly handled.
 Similarly, it is advisable to check gloves or other items of clothing of personnel routinely handling packages.
 - How does the dutyholder prevent surfaces from becoming contaminated in the first place?
- 27. How does the dutyholder ensure that containers, tanks, IBCs, as well as other packaging's and overpacks, used for the carriage of radioactive material are not being used for the storage or carriage of other goods unless decontaminated below the level of 0.4 Bq/cm² for beta and gamma emitters and low toxicity alpha emitters and 0.04 Bq/cm² for all other alpha emitters?
 - Do they identify packaging's and overpacks that cannot store or carry other goods?
 - By what means is this achieved (segregation, administrative techniques, etc.) and are they adequate?
- 28. A container, tank, or IBC dedicated to the carriage of unpackaged radioactive material under exclusive use shall be excepted from the requirements for decontamination and in ADR/RID 4.1.9.1.4 solely with regard to its internal surfaces and only for as long as it remains under that specific exclusive use. How does the dutyholder assess whether containers, tanks, IBCs or conveyances are transported under exclusive use?
 - How does the dutyholder ensure that such containers, tanks, IBCs or conveyances remain under that specific exclusive use?
 - By what means is this achieved (segregation, administrative techniques, etc.) and are they adequate?
 - Are the external surfaces of a freight container, tank, IBC under exclusive use being decontaminated to below applicable limits after each use?

- 29. It is ONR's expectation that a system of radiation monitoring, and contamination monitoring of external surfaces, will exist for each package, overpack, container, unpackaged Low Specific Activity (LSA)-1, or unpackaged Surface Contaminated Object (SCO)-1 every time they are consigned and/or received using appropriate instrumentation, unless excepted by ADR/RID or an adequate written justification of alternative arrangements. It would be appropriate for the adequacy of such arrangements to be reviewed at a suitable period, using a proportionate and graded approach, or after incidents, or when systems/practices change, and at least annually. It would also be appropriate for a record of the justification, and the results of subsequent reviews, to be made and retained for at least five years, in line with the Dangerous Goods Safety Adviser (DGSA) reporting requirements. Any alternative arrangements must comply with the requirements of CDG 2009, and hence also ADR/RID. Checks should consider whether:
 - the dutyholder undertakes radiation and contamination monitoring for each package, overpack, container, unpackaged LSA-1, or unpackaged SCO-1 every time they are consigned, unless excepted by ADR/RID;
 - instrumentation is designed and appropriate for the intended purpose.
 For example, an Electronic Personal Dosemeter (EPD) is not suitable for measuring package radiation levels.
- 30. For routine consignments of identical radioactive material(s), of identical activity values (i.e. A1/A2), in identical packaging's and consigned from one premises, alternative radiation and contamination monitoring arrangements may be acceptable. It would be appropriate for an adequate written justification of the suitability of such arrangements to be made, and reviewed at a suitable period, using a proportionate and graded approach, or after incidents, or when systems/practices change, and at least annually. It would also be appropriate for a record of the justification and the results of subsequent reviews to be made and retained for at least five years, in line with the DGSA reporting requirements. Any alternative arrangements must comply with the requirements of CDG 2009, and hence also ADR/RID. Any alternative arrangements must comply with the requirements of CDG 2009, and hence also ADR/RID. Examples include:
 - A special form gamma source in suitable packaging (a projection-type container) is transported to site each evening for a week to carry out site radiography. Radiation levels associated with this source are not likely to vary appreciably over the week considering the properties of the radioactive material involved. Routine confirmation of radiation levels around the package is appropriate to ensure the source has returned safely to its fully shielded position in the container ahead of transporting the package back to base.

- A radiopharmaceutical manufactured to a standard specification (i.e. specified radioisotope(s), specified activity, etc.) packed in a specific packaging and routinely consigned from a medical production facility. In this case it may be acceptable to measure the radiation level(s) for such a configuration and, provided that the radiation level is unlikely to alter from consignment to consignment, then this 'previously measured' radiation level may be quoted for future consignments of this specific configuration. The 'previously measured' radiation level must be reviewed at a suitable period, or after incidents, or when systems/practices change, and at least annually.
- A radiopharmacy prepares patient 'nuclear medicine' doses which are transported in a 'Type A' package to a nuclear medicine department in a hospital located a few miles away. Contamination monitoring of external surfaces of the package will be required on each occasion the package is consigned. This may be evidenced by monitoring undertaken as part of the process to transfer material from the production area of a facility to the dispatch area provided the dispatch area is demonstrably 'clean'. On a return journey, a package is likely to be 'empty' however contamination monitoring may still be required considering a range of factors including the working environment that the package has been used and kept in.
- A nuclear density gauge, incorporating two special form sources, which
 is transported on a daily basis for three weeks during a road construction
 project. Checks for package contamination are not routinely required
 considering the nature of the sources being carried and the working
 environment. Radiation levels around a package are not likely to vary
 appreciably over the course of the project considering the half-lives of
 these sources. Confirmation of the TI ahead of transport at the beginning
 of the project would suffice in terms of radiation monitoring.
- 31. When a freight container, tank, intermediate bulk container is used to transport packages of radioactive material, the requirements for non-fixed contamination and decontamination limits in ADR/RID apply in order to avoid contamination of packages by the internal surface contamination of the freight container, tank, intermediate bulk container or conveyance. It would be appropriate to consider the likelihood of contamination by environmental conditions. For example, NDT source packages being used in areas where open sources of radioactive material are also used, or special form sources are used in laboratories where liquid radioactive materials are also used. This contamination may deposit on the package whilst in use and then be transferred to the conveyance and / or other packages.

4.3. Radiation and contamination monitoring of damaged or leaking packages, and contaminated packages

- 32. If it is evident that a package is damaged or leaking, or if it is suspected that the package may have leaked or been damaged:
 - Do contingency arrangements under Ionising Radiations Regulations 2017 (IRR17) or a radiation emergency plan under CDG 2009 exist for dealing with such situations?
 - If not, assess requirement for an emergency plan under CDG 2009 using the relevant ONR Technical Inspection Guide, and inform ONR RP specialist inspector and/or HSE RP specialist inspectors regarding the potential breach of IRR17.
 - Leaks or damage may be determined through, for example:
 - general changes in package appearance (dents, creasing, misshaped)
 - staining of surfaces
 - o corrosion
 - Should access to the package be restricted? It would be appropriate for this requirement, and the means of achieving it, to be detailed in the emergency arrangements.
 - The carrier must, as soon as is reasonably practicable, arrange for the
 examination of the load so as to determine whether contamination has
 arisen, and if it has, arrange for the safe disposal of any part of the load
 that has been contaminated and for the decontamination of the transport
 unit or train.
 - O Where will the assessment take place?
 - Will it be done remotely using video / photographs etc., at the roadside, or is provision made for removal to an acceptable interim location under supervision?
 - Who will authorise such a transfer, and how? Will it be the DGSA, consignor's agent, and/or another role?
 - A package that has been involved in a radiation emergency must not be carried or caused to be carried unless the consignor or the consignor's agent has examined it and the consignor is satisfied that it complies with the requirements of CDG and has issued a certificate to that effect.

- How will the consignor or consignor's agent undertake such an examination? Will it be done remotely (using video/photographs etc.), or at the roadside?
- Who will authorise such a certificate? Has a person been identified within the consigning organisation to undertake this function?
- Are there adequate provisions for a qualified person to assess the extent of contamination and the resultant radiation level of the package as soon as reasonably practicable?
- Does the scope of the assessment include the package, the conveyance, the adjacent loading and unloading areas, and, if necessary, all other material which has been carried in the conveyance?
- The prime purpose of inspection by a qualified person is to assess whether leakage or loss of shielding integrity has occurred or could be expected to occur, and either give assurance that the package is safe and within the limits prescribed in the regulations or, if this is not the case, assess the extent of the damage or leakage and the radiological implications.
 - Who would be the 'qualified person(s)' and how is their competency to undertake the assessment demonstrated?
 - What are the arrangements for undertaking such an assessment, and do they consider the limits prescribed in the regulations?
- What are the arrangements for packages damaged or leaking radioactive contents in excess of allowable limits for normal conditions of carriage?
 - The arrangements should consider packages discovered or suspected to be damaged or leaking whilst being filled, packed, loaded, unloaded and during carriage.
 - Are these set out in the dutyholder's emergency arrangements?
 - Any inspection of a dutyholder's emergency arrangements should be undertaken in conjunction with the Technical Inspection Guide, NS-INSP-GD-066 [6].

- How will packages be repaired or reconditioned and decontaminated prior to being forwarded? This may not be a detailed plan if the consignor, for example, consigns numerous forms of radioactive materials and/or in several types of packaging's, as each case may vary considerably. Considerations may include the use of salvage packaging's/overpacks to transport damaged/leaking packages, arrangements for additional shielding to be utilised, locations where damaged/leaking packages can be transported to for recovery and/or repair, arrangements to seek advice from the dutyholder's DGSA (for example, with competent authority approvals for onward consignment where necessary), and the availability of staff (employees and contractors) to provide logistical assistance in the recovery of a damaged/leaking package, etc.
- Are the arrangements adequate? Do they prevent further leakage and spread of radioactive material? Do they ensure that advice and approvals are obtained, where necessary?
- 35. On rare occasions, it may be necessary to extend surveys and investigations back along the route, the conveyances and the handling facilities to identify and clean up any contaminated areas. Investigations may need to include the assessment of external dose and possible radioactive intake by transport workers and members of the public.
- 36. What are the arrangements for conveyances containing damaged packages which appear to be leaking, or appear to be damaged?
 - How are they to be detained and secured until they have been declared safe by a qualified person?
 - Are the arrangements adequate?
- 37. Confirm the dutyholder understands how to notify ONR of a transport incident?

4.4. Radiation and contamination monitoring of conveyances

- 38. How does the dutyholder ensure that the radiation level under routine conditions of carriage does not exceed 2 mSv/h at any point on, and 0.1 mSv/h at 2 m from, the external surface of the conveyance, except for consignments carried under exclusive use?
- 39. How does the dutyholder ensure that for consignments carried under exclusive use the radiation limits around the conveyance do not exceed those specified in ADR/RID 4.1.9.1.12 and 7.5.11 CV33/CW33 (3.5)(a)?

- 40. A conveyance and equipment used regularly for the carriage of radioactive material shall be periodically checked to determine the level of contamination. The frequency of such checks shall be related to the likelihood of contamination and the extent to which radioactive material is carried. Where the 'used regularly' criteria is met, and ONR interprets this to mean more than once or twice per month, the regulations provide some latitude in assigning a suitable monitoring frequency commensurate with the likelihood of contamination and transport frequency. The objective of this provision is to introduce a control mechanism to identify the presence of contamination and minimise its' spread. It is ONR's view that it is appropriate to consider whether the dutyholders' transport operations could reasonably foreseeably give rise to vehicle and equipment contamination which can be identified by periodic monitoring, and factor this in alongside the frequency with which radioactive material is transported. Examples include:
 - A vehicle is used on a weekly basis to carry only Special Form radioactive material between places/premises that do not pose a reasonably foreseeable contamination risk. The sources are unlikely to give rise to contamination unless they were damaged. The dutyholder has evidence that the continued source integrity is kept under review, and the sources have not been involved in any incidents or events, nor have they been subjected to harsh environmental conditions. As such they may be subject to a less frequent monitoring regime and an annual vehicle monitoring would not be unreasonable in these circumstances. If a dutyholder was to conclude that contamination monitoring of vehicles was unnecessary, they should be prepared to substantiate this approach.
 - Where vehicles are used to transport liquid radiopharmaceuticals on a daily basis, for instance, these would reasonably require frequent monitoring due to the potential for contamination of these packages. An appropriate monitoring frequency could be monthly where routine package monitoring also takes place.
 - A carrier transports large unpackaged items that have naturally occurring radioactive material present on surfaces. They do this according to client demand, which can vary, but experience indicates this typically happens ten times a month. In these circumstances, ONR's view is that undertaking quarterly contamination monitoring could be an appropriate approach.
- 41. Has an adequate assessment been undertaken to determine the periodicity of such checks? Considerations could include, but not necessarily be limited to, the following:
 - the frequency of carriage
 - the types of radioactive materials being carried

- the form of the materials being carried are they liquids, special form material, sealed sources, unpackaged materials etc.?
- the contamination potential of such materials
- the amount of radioactive material carried activity (Bq) and/or specific activity levels
- whether the conveyance is dedicated to the carriage of unpackaged radioactive material under exclusive use
- 42. Are adequate arrangements in place to ensure that a conveyance, or equipment or part thereof which has become contaminated or shows a radiation level in excess of 5 μSv/h at the surface, shall be decontaminated as soon as reasonably practicable by a qualified person and shall not be re-used unless the following conditions are fulfilled:
 - the non-fixed contamination shall not exceed the limits specified in ADR/RID 4.1.9.1.2
 - the radiation level resulting from the fixed contamination shall not exceed
 5 µSv/h at the surface
 - are the dutyholder's arrangements for decontamination of a conveyance, or equipment or part thereof which has become contaminated adequate
- 43. A conveyance dedicated to the carriage of unpackaged radioactive material under exclusive use shall be excepted from the requirements for decontamination and in solely with regard to its internal surfaces and only for as long as it remains under that specific exclusive use.
 - How does the dutyholder ensure that such containers, tanks, IBCs or conveyances remain under that specific exclusive use?
 - By what means is this achieved (segregation, administrative techniques, etc.)?
- 44. The external surfaces which are continually being exposed to the environment, and which are generally much easier to decontaminate, should be decontaminated to below the applicable limits after each use.
 - Does the dutyholder monitor and decontamination these surfaces after each use?
 - Are the arrangements adequate?

4.5. Determination of Transport Index (TI)

- 45. Is the TI for a package, overpack, container, or for unpackaged LSA-1 or SCO-1 derived in accordance with the following:
 - Determine the maximum radiation level (in mSv/h) at 1m from all the external surfaces of the package, overpack or container, or for unpackaged LSA-1 or SCO-1. The value determined shall be multiplied by 100 and the resulting number is the TI.
 - For uranium and thorium ores and their concentrates, are the maximum radiation level at any point 1 m from the external surface of the load taken as;
 - 0.4 mSv/h for ores and physical concentrates of uranium and thorium;
 - o 0.3 mSv/h for chemical concentrates of thorium; and
 - 0.02 mSv/h for chemical concentrates of uranium, other than uranium hexafluoride.
 - Are appropriate multiplication factors from ADR/RID Table 5.1.5.3.1 used for tanks, containers and unpackaged LSA-1 and SCO-1? A multiplication factor according to the size of the load should be applied in order to define the TI. The size of the load will normally be taken as the maximum cross-sectional area of the tank, freight container or conveyance, but where its actual maximum area is known, this may be used, provided that it will not change during transport. Is the value rounded up to the first decimal place, except that a value of 0.05 or less may be considered as zero?
- 46. Is the TI of a package determined based on measured radiation levels, considering the package in isolation?
- 47. If the measured radiation level comprises more than one type of radiation, is the TI based on the sum of all the radiation levels from each type of radiation? Note that it may not be reasonable for the dutyholder to directly monitor all radiation types. Where this is the case, contributions to the overall TI can be inferred, and verified by periodic measurement using specialist monitoring equipment.

- 48. An example of the above is a gauge containing a caesium-137 gamma source and an americium-241/beryllium neutron source. The TI for the gamma source is measured regularly by the dutyholder that uses it as being 0.2 but they don't have a neutron monitor. They do engage a radiation protection specialist under a contract for services who has neutron monitoring equipment, and this specialist confirms at routine visits that the neutron radiation level is approximately 1 μSv/h at 1 m from the gauge, so the neutron component of the TI is 0.1; the overall package TI is 0.3.
- 49. Is the TI determined by scanning all the surfaces of a package, including the top and bottom, at a distance of 1 m? How does the dutyholder ensure that conventional health and safety risks are adequately addressed when doing so?
- 50. Similarly, the TI for a tank, a freight container and unpackaged LSA-I material and SCO-I is determined by measurement at 1 m from the surfaces, but a multiplication factor according to the size of the load should be applied in order to define the TI. The size of the load will normally be taken as the maximum cross-sectional area of the tank, freight container or conveyance, but where its actual maximum area is known, this may be used, provided that it will not change during transport.
 - Does the dutyholder have adequate arrangements for this?
- 51. How does the dutyholder ensure that they obtain the highest value when determining the TI?
- Where there are protrusions on the exterior surface, are such protrusions ignored in determining the 1 m distance, except in the case of a finned package, in which case the measurement may be made at 1 m distance from the external envelope of the package?
- 53. For routine consignments of identical radioactive material(s), of identical activity values (i.e. A1/A2), in identical packaging's and consigned from one premises, alternative radiation monitoring arrangements may be acceptable for determining the highest radiation value at 1 m in order to determine the TI for such consignments. It would be appropriate for an adequate written justification of the suitability of such arrangements to be made, and reviewed at a suitable period, using a proportionate and graded approach, or after incidents, or when systems/practices change, and at least annually. It would also be appropriate for a record of the justification and the results of subsequent reviews to be made and retained for at least 5 years, in line with the DGSA reporting requirements. Any alternative arrangements must comply with the requirements of CDG 2009.

- An example could be where the radiation level at 1 m has been 'previously measured' for a specific configuration. This 'previously measured' level might then be used to determine the TI and may be quoted for future consignments of this specific configuration. It would be appropriate for the 'previously measured' radiation level at 1 m to be reviewed at a suitable period, or after incidents, or when systems/practices change, and at least annually.
- Does the dutyholder determine the TI for each overpack, container or conveyance as either:
 - the sum of the TIs of all the packages contained, or
 - by direct measurement of radiation level, except in the case of non-rigid overpacks for which the TI shall be determined only as the sum of the TIs of all the packages?
- 56. How does the dutyholder ensure that, except for consignments under exclusive use, the TI of any package or overpack does not exceed 10?
- 57. How does the dutyholder ensure that, except under the condition of exclusive use, and for consignments of LSA-I material, the total number of packages, overpacks and containers aboard a single conveyance shall be so limited that the total sum of the TI aboard the conveyance does not exceed 50?

4.6. Determination of Adequacy/Making a Judgement

- 58. It is for inspectors to apply their experience and discretion to determine the extent and depth of a particular inspection, taking due account of a number of factors such as safety significance, complexity and technical specialism.
- 59. In determining adequacy, the ONR Inspection Rating Guide should be used by inspectors [7].
- 60. Where inspection indicates that a dutyholder's arrangements fall significantly short of CDG 2009 requirements, and especially where enforcement action appears to be warranted, ONR's enforcement management model (EMM) [8] should be followed and the inspector should seek advice from the ONR Delivery Lead and Head of Profession, as appropriate.

5. Further reading

- 61. In addition to the references made throughout this guide, the following sources of material provide further information relating to this guides purpose and scope:
 - IAEA Specific Safety Guide No. SSG-86 Radiation Protection Programmes for the Transport of Radioactive Material [9]
 - IAEA Specific Safety Guide No. SSG-78 Compliance Assurance for the Safe Transport of Radioactive Material [10]
 - ONR's transport of radioactive materials <u>webpage</u> [11]
 - NPL Good Practice Guide No. 30 Practical Radiation Monitoring [12]

Appendix A – Guidance on arrangements for radiation and contamination monitoring, and subsequent determination of Transport Index

General

- 1. The dutyholder must have arrangements in place to demonstrate compliance with the regulations. These arrangements must be implemented adequately. This section considers aspects of the requirement for contamination and radiation monitoring, and subsequent determination of TI. It is neither exclusive nor exhaustive and will be subject to review and revision in the light of operational experience. If dutyholders have generic models for such arrangements, then it is for the dutyholder to justify any deviation from the models. Any such deviations must comply with the requirements of CDG 2009 [1], and hence also ADR [2]/RID [3].
- 2. The purpose of such monitoring, and subsequent determination of TI is to protect the workers, members of the public or the population from exposure to ionising radiation so far as is reasonably practicable.
- 3. Relevant procedures should be readily available and should be up to date, authorised and be controlled documents. The person responsible for compliance should be identified within the management system arrangements.
- Package radiation levels should be clearly defined and expressed as the corresponding dose rate in millisievert per hour (mSv/h) or microsievert per hour (μSv/h).
- 5. The TI, assigned to a package, overpack or container, or to unpackaged LSA-1 or SCO-1, is defined as a number (based upon associated radiation levels and load size) which is used to provide control over radiation exposure.
- 6. Contamination is defined as the presence of a radioactive substance on a surface in quantities in excess of 0.4 Bq/cm² for beta and gamma emitters and low toxicity alpha emitters, or 0.04 Bq/cm² for all other alpha emitters. Non-fixed contamination means contamination that can be removed from a surface during routine conditions of carriage. Fixed contamination means contamination other than non-fixed contamination.

- 7. Low toxicity alpha emitters are defined as natural uranium; depleted uranium; natural thorium; uranium-235 or uranium-238; thorium-232; thorium-228 and thorium-230 when contained in ores or physical and chemical concentrates; or alpha emitters with a half-life of less than 10 days.
- 8. Except as provided in ADR/RID 7.5.11, CV33/CW33, the level of non-fixed contamination on the external and internal surfaces of overpacks, containers, tanks, IBCs and conveyances shall not exceed the following limits:
 - 4 Bq/cm² for beta and gamma emitters and low toxicity alpha emitters;
 and
 - 0.4 Bq/cm² for all other alpha emitters.
- 9. The above limits are applicable when averaged over any area of 300 cm² of any part of the surface.
- 10. Contamination levels on the external surfaces of packages should be kept as low as practicable. The most effective way to ensure this is to prevent the surfaces from becoming contaminated. Loading, unloading and handling methods should be kept under review to achieve this.
- 11. The instrumentation to be used to measure the radiation levels and/or contamination levels of the package, the overpack, the freight container, or conveyance etc. should be selected to be sensitive to, and calibrated for, the type of radiation to be measured. It should be reliable, functioning correctly, in good condition, maintained and tested according to the manufacturer's instructions. Persons undertaking the monitoring should be competent to do so. In the case of a leaking, damaged or contaminated package a qualified person must assess the contamination and radiation level.
- 12. When monitoring finned flasks or other transport packages care ought to be taken where narrow radiation beams may be encountered and an appropriate instrument chosen for the work.
- 13. In a few cases, measurement of contamination may be made by direct reading of contamination monitors. Such a measurement will include both fixed and non-fixed contamination. Interference may also occur from gamma fields.
- 14. The level of non-fixed contamination may be determined by wiping an area of 300 cm². It would be appropriate for the number of wipe samples taken on a larger package to be such as to be representative of the whole surface and ought be chosen to include areas known or expected to be more contaminated than the remainder of the surface.

- 15. It would be appropriate for users to develop specific contamination measurement techniques relevant to their particular circumstances. Such techniques include the use of wipes and appropriate survey instruments. The instruments and detectors selected ought to take into account the radionuclides to be measured.
- 16. Operators should be competent to ensure that the wipe samples are obtained in a consistent manner.

Radiation and contamination monitoring of packages, overpacks, containers, unpackaged LSA-1 or SCO-1

- 17. Except for packages or overpacks carried under exclusive use under the conditions specified in ADR/RID 7.5.11, CV33/CW33 (3.5)(a), the maximum radiation level at any point on the external surface of a package or overpack shall not exceed 2 mSv/h.
- 18. The maximum radiation level at any point on the external surface of a package or overpack under exclusive use shall not exceed 10 mSv/h and may only exceed 2 mSv/h provided that:
 - the conveyance is equipped with an enclosure which, during routine conditions of carriage, prevents the access of unauthorised persons to the interior of the enclosure;
 - provisions are made to secure the package or overpack so that its position within the conveyance enclosure remains fixed during routine conditions of carriage, and;
 - there is no loading or unloading during the shipment.
- 19. The non-fixed contamination on the external surfaces of any package shall be kept as low as practicable and, under routine conditions of transport, shall not exceed the following limits: 4 Bq/cm² for beta and gamma emitters and low toxicity alpha emitters; and 0.4 Bq/cm² for all other alpha emitters. These limits are applicable when averaged over any area of 300 cm² of any part of the surface.
- 20. Containers, tanks, IBCs, as well as other packaging's and overpacks, used for the carriage of radioactive material shall not be used for the storage or carriage of other goods unless decontaminated below the level of 0.4 Bq/cm² for beta and gamma emitters and low toxicity alpha emitters and 0.04 Bq/cm² for all other alpha emitters.

- 21. A container, tank or intermediate bulk container dedicated to the carriage of unpackaged radioactive material under exclusive use shall be excepted from the requirements of 5.4 of CV33/CW33, and in ADR/RID 4.1.9.1.4 solely with regard to its internal surfaces and only for as long as it remains under that specific exclusive use. Therefore, it would be appropriate for the external surfaces of a freight container, tank or intermediate bulk container which are continually being exposed to the environment, and which are generally much easier to decontaminate, to be decontaminated to below the applicable limits after each use.
- 22. When a freight container, tank or intermediate bulk container is used to transport packages of radioactive material, the requirements for non-fixed contamination limits and decontamination limits in ADR/RID apply in order to avoid contamination of packages by the internal surface contamination of the freight container, tank or intermediate bulk container.
- 23. It is ONR's expectation that the consignor has the primary responsibility for ensuring that radiation and contamination levels of packages are in accordance with the regulatory requirements. However, consignors, carriers and consignees will all have some responsibilities in respect of package, conveyance, workplace and individual monitoring, depending on their individual circumstances.
- 24. It is ONR's expectation that a system of radiation monitoring, and contamination monitoring of external surfaces, will exist for each package, overpack, container, unpackaged LSA-1, or unpackaged SCO-1 every time they are consigned and/or received using appropriate instrumentation, unless excepted by ADR/RID or an adequate written justification of alternative arrangements.
- 25. For routine consignments of identical radioactive material(s), of identical activity values (i.e. A1/A2), in identical packaging's and consigned from one premises, alternative radiation monitoring arrangements may be acceptable.

Radiation and contamination monitoring of damaged or leaking packages, and contaminated packages

26. A package that has been involved in a radiation emergency must not be carried or caused to be carried unless the consignor or the consignor's agent has examined it and the consignor is satisfied that it complies with the requirements of CDG 2009 and has issued a certificate to that effect.

- 27. If it is evident that a package is damaged or leaking, or if it is suspected that the package may have leaked or been damaged, access to the package shall be restricted and a qualified person shall, as soon as reasonably practicable, assess the extent of contamination and the resultant radiation level of the package. The scope of the assessment shall include the package, the conveyance, the adjacent loading and unloading areas, and, if necessary, all other material which has been carried in the conveyance. When necessary, additional steps for the protection of persons property and the environment, in accordance with provisions established by the competent authority, shall be taken to overcome and minimise the consequences of such leakage or damage.
- 28. The prime purpose of inspection by a qualified person is to assess whether leakage or loss of shielding integrity has occurred or could be expected to occur, and either give assurance that the package is safe and within the limits prescribed in the regulations or, if this is not the case, assess the extent of the damage or leakage and the radiological implications. On rare occasions, it may be necessary to extend surveys and investigations back along the route, the conveyances and the handling facilities to identify and clean up any contaminated areas. Investigations may need to include the assessment of external dose and possible radioactive intake by transport workers and members of the public.
- 29. Packages damaged or leaking radioactive contents in excess of allowable limits for normal conditions of carriage may be removed to an acceptable interim location under supervision. However, this shall not be forwarded until repaired or reconditioned and decontaminated.
- 30. Conveyances containing damaged packages which appear to be leaking, or appear to be severely dented or breached, should be detained and secured until they have been declared safe by a qualified person.
- 31. In the event that vehicle or package contamination is found during routine monitoring, the source of the contamination should be determined where possible, any additional control measures should be introduced, and the monitoring frequencies should be reviewed, and increased as appropriate. Where monitoring results indicate no contamination is present, there may be scope for decreasing monitoring frequency.
- 32. The dutyholder should be aware that in any transport incident, ONR should be notified. In addition, they should understand how to complete an INF1 following the incident, as stipulated within ONR-RIO-PROC-002 [11].

Radiation and contamination monitoring of conveyances

33. The radiation level under routine conditions of carriage shall not exceed 2 mSv/h at any point on, and 0.1 mSv/h at 2 m from, the external surface of the conveyance, except for consignments carried under exclusive use.

- 34. For consignments carried under exclusive use the radiation limits around the conveyance are:
 - 2 mSv/h at any point on the outer surfaces of the conveyance, including the upper and lower surfaces, or, in the case of an open conveyance, at any point on the vertical planes projected from the outer edges of the conveyance, on the upper surface of the load, and on the lower external surface of the conveyance; and;
 - 0.1 mSv/h at any point 2 m from the vertical planes represented by the outer lateral surfaces of the conveyance, or, if the load is carried in an open conveyance, at any point 2 m from the vertical planes projected from the outer edges of the conveyance.
- 35. A conveyance and equipment used regularly for the carriage of radioactive material shall be periodically checked to determine the level of contamination (to avoid contamination of packages by internal surface contamination of the conveyance). The frequency of such checks shall be related to the likelihood of contamination and the extent to which radioactive material is carried.
- 36. ONR's interpretation of 'used regularly' is when the occurrence of use is repeated, constant or frequent. Therefore, if a conveyance is used to carry radioactive materials regularly (i.e. more than once or twice per month) then periodic checks should be undertaken.
- 37. Except as provided in paragraph (5.5) (of CV33/CW33), any conveyance (internally or externally), or equipment or part thereof which has become contaminated above the limits specified in ADR/RID 4.1.9.1.2 in the course of carriage of radioactive material, or which shows a radiation level in excess of 5 μSv/h at the surface, shall be decontaminated as soon as reasonably practicable by a qualified person and shall not be re-used unless the following conditions are fulfilled:
 - The non-fixed contamination shall not exceed the limits specified in ADR/RID 4.1.9.1.2;
 - The radiation level resulting from the fixed contamination shall not exceed 5 µSv/h at the surface.
- 38. A conveyance dedicated to the carriage of unpackaged radioactive material under exclusive use shall be excepted from the requirements of 5.4 of CV33/CW33, and in ADR/RID 4.1.9.1.4 solely with regard to its internal surfaces and only for as long as it remains under that specific exclusive use. Therefore, it would be appropriate for the external surfaces of a conveyance which are continually being exposed to the environment, and which are generally much easier to decontaminate, to be decontaminated to below the applicable limits after each use.

Transport Index (TI)

- 39. The TI is a number which is used to provide control over radiation exposure when a package is being transported. Not all types of package require a TI, because radiation levels around some types of package are low.

 Where yellow package labels are required on the outside of a package, a TI must be established and recorded on that label, and in the relevant transport documents.
- 40. The consignor should be able to demonstrate to the competent authority an appropriate way(s) to determine the TI.
- 41. Except for consignments under exclusive use, the TI of any package or overpack shall not exceed 10.
- 42. The TI for a package, overpack or container, or for unpackaged LSA-1 or SCO-1 shall be derived in accordance with the following procedure:
 - Determine the maximum radiation level in units of millisievert per hour (mSv/h) at a distance of 1m from all the external surface of the package, overpack or container, or for unpackaged LSA-1 or SCO-1. The value determined shall be multiplied by 100 and the resulting number is the TI. For uranium and thorium ores and their concentrates, the maximum radiation level at any point 1 m from the external surface of the load may be taken as:
 - 0.4 mSv/h for ores and physical concentrates of uranium and thorium;
 - 0.3 mSv/h for chemical concentrates of thorium;
 - 0.02 mSv/h for chemical concentrates of uranium, other than uranium hexafluoride;
 - For tanks, containers and unpackaged LSA-1 and SCO-1, the value determined above shall be multiplied by the appropriate factor from ADR Table 5.1.5.3.1;
 - The value obtained in shall be rounded up to the first decimal place (e.g. 1.13 becomes 1.2), except that a value of 0.05 or less may be considered as zero.
- 43. It would be appropriate for the TI of a package to be determined on the basis of measured radiation levels, considering the package in isolation and, if the measured dose rate (radiation level) comprises more than one type of radiation, then the TI ought be based on the sum of all the dose rates (radiation levels) from each type of radiation.

- 44. The TI is determined by scanning (surveying) all the surfaces of a package, including the top and bottom, at a distance of 1 m. The highest value measured is the value that determines the TI. Similarly, the TI for a tank, a freight container and unpackaged LSA-I material and SCO-I is determined by measurement at 1 m from the surfaces, but a multiplication factor according to the size of the load should be applied in order to define the TI. The size of the load will normally be taken as the maximum cross-sectional area of the tank, freight container or conveyance, but where its actual maximum area is known, this may be used, provided that it will not change during transport.
- 45. It would be appropriate, where there are protrusions on the exterior surface, for the protrusion to be ignored in determining the 1 m distance, except in the case of a finned package, in which case the measurement may be made at 1 m distance from the external envelope of the package.
- 46. The TI for each overpack, container or conveyance shall be determined as either the sum of the TIs of all the packages contained, or by direct measurement of radiation level, except in the case of non-rigid overpacks for which the TI shall be determined only as the sum of the TIs of all the packages.
- 47. Except under the condition of exclusive use, and for consignments of LSA-I material, the total number of packages, overpacks and containers aboard a single conveyance shall be so limited that the total sum of the TIs aboard the conveyance does not exceed 50.
- 48. Any package or overpack having a TI greater than 10 shall be carried only under exclusive use.
- 49. Where the measured or calculated TI does not align with the maximum radiation levels described in ADR Table 5.1.5.3.4, then the highest of the transport categories is assigned i.e. where the TI is 1, but the maximum radiation level at the surface of the package is 0.6mSv/h, using Table 5.1.5.3.4, the package could not be transported with II-Yellow labels, and instead III-Yellow labels would need to be used.

Table 3 - Categories of package, overpacks and containers

Conditions						
Transport Index	Maximum dose rate at any point on external surface	Category				
06	Not more than 0.005 mSv/h	I - WHITE				
More than 0 but not more than 1 ¹	More than 0.005 mSv/h but not more than 0.5 mSv/h	II - YELLOW				
More than 1 but not more than 10	More than 0.5 mSv/h but not more than 2 mSv/h	III - YELLOW				
More than 10	More than 2 MSv/h but not more than 10 mSv/h	III - YELLOW ⁷				

Note: In order to determine the TI you can also measure the maximum radiation level at 1m from all external surfaces in microsieverts per hour and divide this figure by 10. This may be easier if your monitoring instrument reads in these units. In any case, the value you get should be rounded up to the first decimal place (for example, 1.13 becomes 1.2), except where a value of 0.05 or less is recorded and it may be considered zero.

⁶ If the measured TI is not greater than 0.05, the value quoted may be zero in accordance with 5.1.5.3.1 (c).

⁷ Shall also be carried under exclusive use except for containers (see Table D in 7.5.11 CV33 (3.3)

References

- [1] HM Government, "The Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations (CDG) 2009 (UK Statutory Instrument 2009 No. 1348)," 2009. [Online]. Available: https://www.legislation.gov.uk/uksi/2009/1348.
- [2] Economic Commission for Europe, "ADR 2023 Agreement concerning the International Carriage of Dangerous Goods by Road," 1 January 2023. [Online]. Available: https://unece.org/transport/standards/transport/dangerous-goods/adr-2023-agreement-concerning-international-carriage.
- [3] EU, "Convention concerning International Carriage by Rail (COTIF) Appendix C: The Regulation concerning the International Carriage of Dangerous Goods by Rail (RID)," 1 January 2023. [Online]. Available: https://otif.org/fileadmin/new/3-Reference-Text/3B-RID/RID_2023_e_30_June_2023.pdf.
- [4] IAEA, "Safety Standards Series No. SSR-6 Regulations for the Safe Transport of Radioactive Material," 2018. [Online]. Available: https://www-pub.iaea.org/MTCD/Publications/PDF/PUB1798_web.pdf.
- [5] IAEA, "Safety Standards Series No. SSG-26 Advisory Material for the IAEA Regulations for the Safe Transport of Radioactive Material (Rev. 1)," 2022. [Online]. Available: https://www-pub.iaea.org/MTCD/Publications/PDF/PUB1953_web.pdf.
- [6] ONR, "NS-INSP-GD-066 The Carriage of Dangerous Goods and use of Transportable Pressure Equipment".
- [7] ONR, "ONR-INSP-GD-064 General Inspection Guide," [Online].
- [8] ONR, "ONR-ENF-GD-006: Enforcement".
- [9] IAEA, "Safety Standards Series No. SSG-86 Radiation Protection Programmes for the Transport of Radioactive Material," 2023. [Online]. Available: https://www-pub.iaea.org/MTCD/Publications/PDF/PUB2052_web.pdf.
- [10] IAEA, "Safety Standards Series No. SSG-78 Compliance Assurance for the Safe Transport of Radioactive Material," 2023. [Online]. Available: https://wwwpub.iaea.org/MTCD/Publications/PDF/PUB2033_web.pdf.
- [11] ONR, "Transport of radioactive material," [Online]. Available: https://www.onr.org.uk/transport/index.htm.
- [12] National Physical Labatory (NPL), "Good Practice Guide No. 30 Practical Radiation Monitoring (Issue 2) (ISSN 1368-6550)," 2014. [Online]. Available: https://www.npl.co.uk/special-pages/guides/gpg30 radiation.
- [13] ONR, "ONR-RIO-PROC-002 Process for Notifying Incidents to ONR".