

# Sustaining Transport Options

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## Introduction

Transport is not a side issue in the nuclear fuel cycle; it is intrinsic to it. Transport is what makes the cycle go around. We are all familiar with the graphics typically used to display the fuel cycle. Beginning with the uranium mine site, the arrows carry the eye around the circle from refinement, conversion, enrichment, reversion and fabrication facilities to reactor site. And then in the case of reprocessing, the cycle spins off on another round, ultimately carrying spent fuel through the reprocessing cycle back once more to the reactor site. There are, of course, off-ramps to the cycle, carrying radioactive residues away for treatment, storage and disposal.

For decades the radioactive materials transport sector has safely and securely managed such shipments. Yet despite this excellent record, a worrying trend is that some shipping companies, air carriers, ports and countries have and are instituting policies of not accepting radioactive (or Class 7) materials.

Many things can affect the willingness of carriers to accept Class 7 consignments - maybe the operators are unsure about insurance implications. Perhaps they worry about the perception of other customers whose goods they want to carry. Maybe they think special handling procedures, or reporting requirements, are too complicated, or too onerous. Perhaps they are put off by problems with ports or terminals which themselves are not prepared to accept Class 7 cargoes. In short, the carriage of Class 7 goods may simply not look like it's worth the bother.

## Denial and Delay of Shipments

While reasons for carriers and ports to

deny shipments are many, they can be grouped into three categories - "fear", "image" and "perception".

Fear of what? We have encountered among carriers a fear of accidents, a fear of repercussions from their regular clients, a fear of reactions from ports. Sometimes there is a fear of protests from anti-nuclear groups, and there is a fear of delays to other consignments because of perceived special handling procedures for radioactive materials.

When does "image" become a problem? Too often the real benefits of radioactive materials are lost in uninformed negative images of accidents, of perceived health risks, of nuclear weapons; all of which can lead shipping companies to conclude that they don't need to be associated with our cargoes.

Then there are the "perceptions" or should I say "misperceptions". Some shippers believe that Class 7 carriage represents too much work for not enough commercial return. Others shippers suggest that regulations are difficult and complex, requiring special training and handling, with all the associated additional costs.

The decisions taken by shipping companies are based on maximising profit. If the return from carrying Class 7 materials does not seem substantial enough, then why bother in face of the fears, image and perceptions? Experience in some regions has shown that service availability and acceptance levels have rapidly declined in recent years. Shipping companies fear that the carriage of Class 7 cargo will result in unexpected delays with port clearance processes, or at worst, refusal to dock. And in some instances this is becoming a reality. There all too often is an evident

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general ignorance of the real facts within top-end shipping management at owner, financier and operator level.

Producer shippers accordingly are denied options for competitive choice of services. Shippers too often are met by a lack of standardisation in documentation. And of course, worst of all is when shipping lines deny or withdraw from services. This situation inevitably drives consignors to consider charter options; but this is not a panacea. Charters can mean reduced shipping schedules and a lack of delivery flexibility. This in turn results in increased overall inventory holdings, and increased total shipping and other related business costs.

There are carriers on many routes prepared to accept Class 7 consignments. But if denials and delays of shipments are to be overcome, then industry must overcome the problems of fear, image and perception.

### **Responses to the Problem**

Back in 2003 the International Atomic Energy Agency (IAEA) hosted a major international conference on transport safety for Class 7 materials. At that conference a number of papers focused on the increasing difficulty consignors of radioactive materials for medical applications in particular, including those requiring urgent transport, were facing with denials and delays.

The IAEA recognised that it had to make a best effort to do what it could to help alleviate the situation and the Member States of the IAEA at its subsequent Annual General Conference called for discussions to address the problems with refusal of shipments. In the following years the IAEA established a Fact-finding Discussion Forum to scope the multitude of reasons for denials and delay. The results of the fact-finding phase, found several participants recounted specific instances and expressed particular concern over the hardships encountered by patients requiring medical diagnosis and radiotherapy, and the difficulties for the nuclear industry transporting uranium ore or uranium oxide.

A small group of consultants, including a WNTI expert, produced recommendations for an IAEA action plan. This group considered the possibilities within the areas of education, communication and training.

Following the action plan the IAEA established an International Steering Committee (ISC) on Denials and Delays. The main outcome of the ISC is the establishment of National and Regional Focal Points (NFP, RFP), the roles and responsible of the NFP is to co-ordinate the response when a denial has been reported in their country.

Denial and delay similarly has been discussed in the International Maritime Organization (IMO). The IMO

Maritime Safety Committee (MSC) confirmed that all shipments of Class 7 radioactive materials, when carried in compliance with the relevant regulations, should not be denied on grounds of safety.

The IMO and IAEA has established a joint data base on incidents of denial and delays to class 7 cargoes, there are over 150 such reports up to June 2009. These reports are to be analysed to establish what general actions can be further developed.

While all such efforts by these inter-governmental organisations to address the problems of denial and delay can only be for the good, we should be under no illusions that by themselves they can convince reluctant carriers or ports to accept Class 7 cargoes. There is no one remedy for the multitude of denial and delay problems, and adequate responses to them probably have to pursue different avenues by different entities at different levels, all at the same time. But any efforts to allay fears, to correct misperceptions and to increase a proper understanding should be encouraged and supported.

In fact, much practical work already is being done in this area. For example, the WNTI undertook a major study of the industry experience with radiation dose exposure rates for transport workers to ensure that the radiation protection programme requirements of the IAEA transport safety regulations are well understood, and appropriately implemented within the transport industry. We have met with and provided information to transport service providers.

Importantly, the World Nuclear Transport Institute, representing industry, continues to address these issues and established an industry-led task force. The task force has developed a knowledge base which is a living document changing as the regulations are amended. The knowledge base covers topics such as radiation protection, segregation, insurance and liability, these are all explained in plain language to assist WNTI members having a consistent voice when dealing with service providers.

### **Harmonised Standards and Regulations**

Harmonised interpretation and application of internationally accepted standards and regulations help ensure safety and facilitate cost-efficient operations. Standards and regulations, however good, are not effective until they are implemented correctly at the operating level. It is the operator who experiences at first hand the differences of interpretation and approach from one national jurisdiction to another. Such differences can jeopardise safety and lead to confusion, duplication of effort, delays in obtaining approvals and inefficiencies for both industry and national authorities.

For the transport of radioactive materials, safety is based on principles developed by the IAEA. These

then are incorporated into the international modal regulations for sea and air transport, and the regional regulations for road and rail transport. They then are implemented nationally through processes specific to particular countries.

Overall, the nuclear transport industry experience of operating within the regulations has been positive. The issues which have arisen have related principally to differences in their interpretation by the modal organisations and competent authorities, coupled with different time schedules for implementation.

Industry must accept its own share of responsibility for developing industry-wide standards; industry benefits when it is able to work together to resolve different approaches and agree on the criteria for such key issues as criticality assessment, and package and handling procedures. That is one of the principal functions of the World Nuclear Transport Institute (WNTI); to encourage the development of industry-wide standards and consolidated positions and also to explain and promote them to national competent authorities. WNTI currently has industry-led task forces addressing standardised industry criteria for criticality assessment, denial and delay of shipments, industry standards for Uranium Ore Concentrates (UOC) packaging, waste management and security.

### **UOC Standards**

Although there is a standard way of transporting uranium ore concentrate (UOC) the methods employed in using 211 ltr drums and ISO containers vary considerably. For example, the drums themselves are not standard and have different lid fastenings. The drums are located and fastened in the ISO container in a variety of ways, and there is no standard for packaging the drum in the ISO container. Issues arise with regard to the packing material used to secure the drums including its disposal. The stowage of ISO containers on vessels varies considerably.

WNTI constituted a transport industry-driven task force to examine whether uranium producers and users could agree a set of minimum standards acceptable to all. The Uranium Concentrates - Industry Good Practices for ISO Containers in Multimodal Transport has now been produced and is available on the WNTI web site. Further development of industry standards for the transport of UOC samples and emergency response to incidents involving UOC are being pursued.

Although the present way of transporting UOC has proven to be completely safe and has served the transports for many years there are certain drawbacks, mainly the disposal of the drums after use. Therefore WNTI has proposed an examination of the transport of other bulk powders comparing these with the present way of transports of UOC.

### **World Nuclear Transport Institute (WNTI)**

If industry can agree consolidated industry positions that are constructive, and be convincing to national competent authorities, it can enhance safety while helping to reduce delays and duplication of effort; and thereby improving efficiencies for all concerned.

At the same time that WNTI is helping industry develop consolidated positions on the big issues, it is working within the key international organisations where it has status, notably the IAEA and IMO, to encourage efforts to simplify the transport safety regulations, the timely publication of guidance material to support implementation of the regulations, and a more common interpretation of the regulations themselves. Everyone benefits from a stable international transport safety regulatory regime - stability is good for safety and it is good for efficiency. More exchanges within industry, and between industry and the national competent authorities and international organisations, on experiences operating within the regulations can only help. Uniquely, the World Nuclear Transport Institute provides this opportunity specific to transport on an international scale.

### **Summary**

Ladies and Gentlemen, all of us have a shared interest in protecting and promoting safe, cost-efficient and secure transport. Just as the business becomes increasingly international, so too do the complexities of transport. And increasingly transport is becoming an important part of the overall cost-equation. It is also coming under greater public and regulatory scrutiny. The availability of carriers on many routes, access to ports, differing regulatory and other requirements from one jurisdiction to another, differing interpretations of just what is required, a lack of harmonisation in standards; all of these have a direct and potentially costly impact on producers. Now more than ever it is important that industry share its experiences and ideas, and collaborate in the development of consolidated positions. It has been proven in the World Nuclear Transport Institute that it is possible to do this without compromising commercial sensitivities. The WNTI is a catalyst for bringing industry together and it has the access where it counts to represent agreed industry positions.

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