

TANTALUM-NIOBIUM INTERNATIONAL STUDY CENTER

Ulric Schwela
Former Chair of the
International Steering Committee on Denial of Shipment

Overcoming Denial of Shipment of NORM:
Addressing the Implementation of
Transport Regulations

EU-NORM International Symposium Tallinn, 5th-8th June 2012

- Regulatory Infrastructure & NORM
- Implementation and Harmonisation
- Denial of Shipment
- ISCDOS what, why and where
 - Background and Function
 - Achievements
 - Current and Future Work



- Regulatory Infrastructure & NORM
- Implementation and Harmonisation
- Denial of Shipment
- ISCDOS what, why and where
 - Background and Function
 - Achievements
 - Current and Future Work



Naturally Occurring Radioactive Material

- IAEA Safety Glossary
 - K-40, Th-232, U-235, U-238
- IAEA BSS and RS-G-1.7
 - 1 Bq/g for Th-nat and U-nat
- IAEA TS-R-1 / SSR-6
 - x 10 for NORM restricted application
 - Up to 10 Bq/g in transport: "normal"!

Regulatory Infrastructure & NORM





- Regulatory Infrastructure & NORM
- Implementation and Harmonisation
- Denial of Shipment
- ISCDOS what, why and where
 - Background and Function
 - Achievements
 - Current and Future Work



Regulatory Implementation

National regulations = IAEA TS-R-1

≈ different requirements

regional requirements!

+ regional requirements!

+ port requirements!

+ port requirements!

Regulatory Implementation

National regulations = IAEA TS-R-1

All additional requirements to be included in TS-R-1 or eliminated



- Regulatory Infrastructure & NORM
- Implementation and Harmonisation
- Denial of Shipment
- ISCDOS what, why and where
 - Background and Function
 - Achievements
 - Current and Future Work

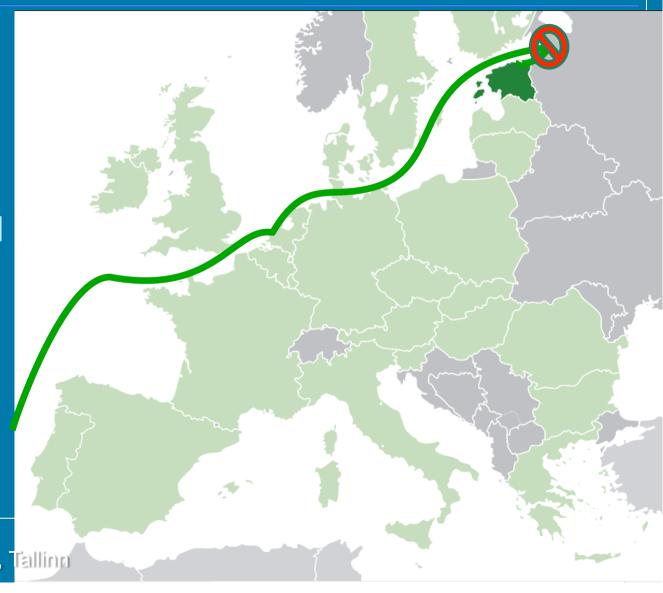


What is a Delay/Denial of Shipment

- A refusal (explicit or implicit) to carry a shipment of radioactive material though it conforms to all the applicable Regulations
- Includes where physical capability exists, but
 - those involved refuse to accept a product
- Does NOT include where physical capability
 - to handle product is not in place

Where might DOS occur for Sea

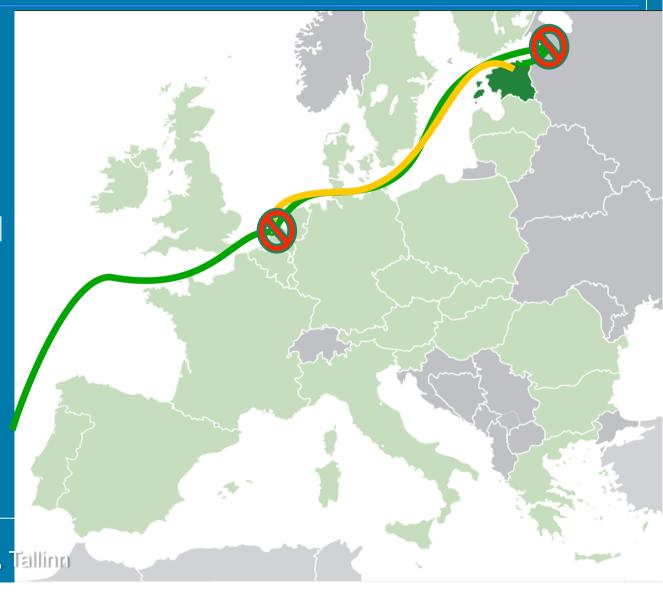
- Mainly Denials, 160 of 175 instances recorded
- Root cause either additional regulations, or simply local prohibition of Class 7
- Requires harmonisation



5th-8th June 2012, EU-NORM, Talling

Where might DOS occur for Sea

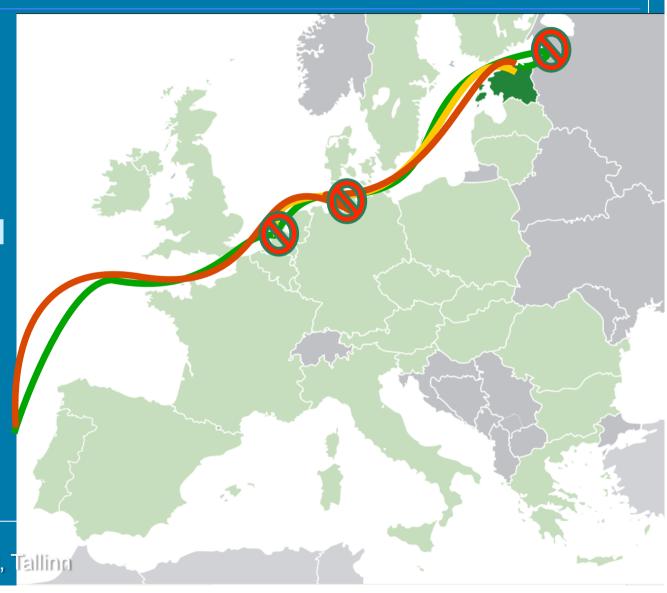
- Mainly Denials, 160 of 175 instances recorded
- Root cause either additional regulations, or simply local prohibition of Class 7
- Requires harmonisation



5th-8th June 2012, EU-NORM, Talling

Where might DOS occur for Sea

- Mainly Denials, 160 of 175 instances recorded
- Root cause either additional regulations, or simply local prohibition of Class 7
- Requires harmonisation

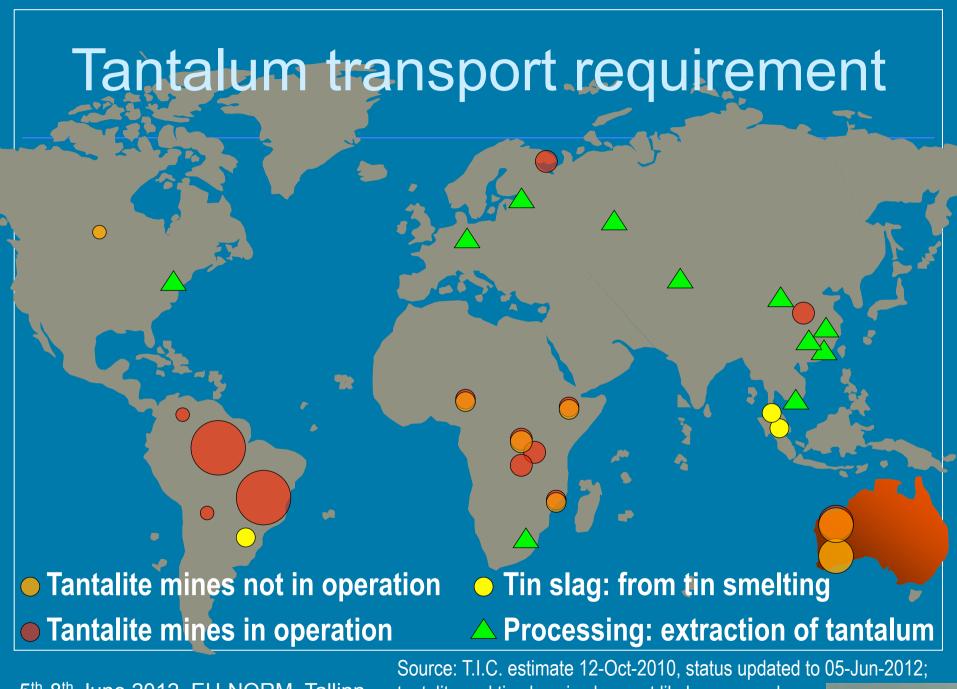


5th-8th June 2012, EU-NORM, Talling

Anecdotal Examples of DOS

- Djibouti: not an IAEA Member State
 - Lack of regulator and regulations
- Ethiopia: landlocked, relies on neighbours
 - Unable to get transport, mining stopped last week
- Germany: misinterpretation & port prohibition
 - Bremerhaven blocked Class 7; Hamburg hold-up
- Russia: definition of radioactive material
 - Surface dose rate limit of 3 microSv/h



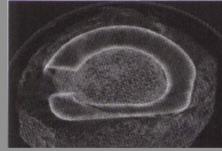


tantalite and tin slag size by most likely resource base

Tantalum in your life

















- Regulatory Infrastructure & NORM
- Implementation and Harmonisation
- Denial of Shipment
- ISCDOS what, why and where
 - Background and Function
 - Achievements
 - Current and Future Work

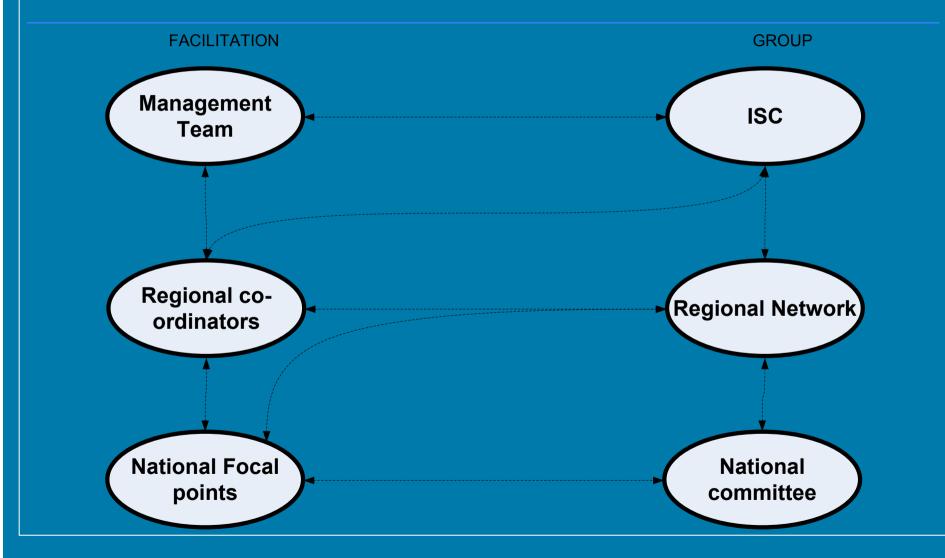


What is the ISCDOS?

- Joint body of UN agencies, national regulators and industry associations:
 - A IAEA, ICAO, IMO
 - IATA, ICHCA, IFALPA (ACI, IAPH, WTO)
 - IAEA Member States
 - Transport Edlow International; Isotopes ISSPA
 - Industrial ores T.I.C.; Nuclear industry WNTI
 - Carrier guest speakers, e.g.: Air Canada; Emirates;
 Hapag Lloyd



How is the ISCDOS Structured?





- Regulatory Infrastructure & NORM
- Implementation and Harmonisation
- Denial of Shipment
- ISCDOS what, why and where
 - Background and Function
 - Achievements
 - Current and Future Work



IAEA-WCO Security Document

- IAEA drafted Technical Guidance document for Customs to prevent Trafficking of RAM
- ISCDOS industry members became involved and provided considerable comment
 - Heavy activity December 2011 February 2012
- New IAEA-WCO draft document reflects industry's proposal for risk assessment basis



Communication Tools

Fact sheets on ⁶⁰Co, Medical Radioisotopes,

Tantalum raw materials, Uranium concentrates

- Video development
 - Iranian public information films
 - IAEA Transport Safety film:
 - Industrial source from MY to AU
 - 99Mo source from ZA to UK
 - Uranium concentrates in CA
 - Plans for extension to 60Co

http://goto.iaea.org/denialofshipment/



- Regulatory Infrastructure & NORM
- Implementation and Harmonisation
- Denial of Shipment
- ISCDOS what, why and where
 - Background and Function
 - Achievements
 - Current and Future Work



Training – Workshops

IAEA Department of Technical Cooperation

2012-May Jordan, ~30 countries

2012-June Gabon?

2012-? Caribbean

2012-? South America

- Also planned for Asia and Europe
- Self Assessment Tool: must detail regulations and additional requirements to obtain TC funding
- Two year programme, renewable



Lobbying – Successes

- Hamburg, Germany
 - Port authority misunderstanding of regulations
 - Clarified interpretation and released cargo
- Santos, Brazil
 - Port authority concern over radiation hazard from 'waste'
 - Industry and national regulator joint meeting
 - Clarified regulations and beneficial uses of radioactive material
- Port Everglades, FL, USA
 - Port authority misunderstood emergency arrangements
 - Industry contacted UK NFP; UK Maritime Authority; USA Coast Guard; Port Authority
- Useful template for a Port Task Force



Future Plan for ISCDOS

- Momentum built up, Action Plan end target 2013
- Future DOS responsibility may become part of Inter-Agency Committee on Transport (IACT)
- 2012-Feb Future Plan developed by ISCDOS
- 2012-Mar Approved by IAEA Director General
- 2012-Sep Subject to approval at IAEA GC
- 2013-Jun Last meeting of the ISCDOS



What should stakeholders do?

- IAEA Provide 'On-going Maintenance'
 - TC training and harmonisation programme
 - Drive DOS work within IACT
- Regulators Additional Requirements:
 - Advise the IAEA; identify and justify
 - Integrate them with TS-R-1 or eliminate
- Industry Report Instances:
 - Timely follow-up with NFP / RC / IAEA



ANY QUESTIONS?



Tantalum-Niobium International Study Center

Chaussée de Louvain 490

1380 Lasne, Belgium

Tel

Fax

E-mail : info@tanb.org

Web : www.tanb.org Ulric Schwela

: +32 2 649 51 58 +44 77 53 85 78 78

: +32 2 649 64 47 +44 12 53 82 32 84

tech@tanb.org