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**ECONOMIC COMMISSION FOR EUROPE**

**INLAND TRANSPORT COMMITTEE**

**Working Party on the Transport  
of Dangerous Goods**  
(Sixty-seventh session,  
Geneva, 8-12 November 1999)

**SPECIAL TRAINING OF RADIOGRAPHERS AND OTHER PROFESSIONALS**

**Submitted by the Government of the Netherlands**

**Analytical summary:**

The purpose of this document is to exempt radiographers and other professionals only carrying their equipment containing radioactive materials of Class 7 from the provisions of the basic and specialization training of ADR.

**Action to be taken:**

Amendment of marginals 71 315 and 10 381 (2) of ADR.

**Related documents:**

Appended are:

the list of members of CEOC (Confederation européenne des organismes de contrôle) with their representatives in CEOC;

the list of those members of CEOC who participate in the working group for Non Destructive Testing, with their representatives.

**Introduction**

As from 1997 drivers of all vehicles carrying radioactive materials are subject to the basic and specialization training of drivers. Marginal 71 315 of ADR states that irrespective of the permissible weight of the vehicle the requirements of marginal 10 315 with regard to approved training and the

issue of an approved training certificate apply to drivers of vehicles carrying radioactive material covered by one of the Schedules as mentioned in this marginal.

This change in the 1997 edition of ADR had a severe impact on professionals carrying their equipment to the place where they have to carry out their profession (for example radiographers). They are obliged to obtain certification as the driver of the car that takes them to their job. The job itself consists of taking away the shielding material and application of the radiation that is set free.

In most, if not all countries, the possession of radioactive material and equipment that produces ionising radiation is subject to strict regulations resulting from a Nuclear Power Act. This means that the professionals that possess, handle and apply radioactive material must have passed considerable training, examination and certification. This education is either controlled directly by the governmental authorities or indirectly through the legislation on power equipment and the education of personnel according to European Standard 473 for Non Destructive Testing, or by both. Because these regulatory requirements for radioactive material and equipment emitting ionising radiation are different in the various countries, it is impossible for these professionals to carry out their work in another country than that in which they have received their training.

Taking into account that international harmonisation of these requirements is still a long way off, it should be obvious that whatever regulation the ADR prescribes, the result will never be that these people can cross borders with their equipment in order to carry out their activities in another country.

This proposal is endorsed by CEOC. Members of this federation (see annex) are institutes appointed by the governmental authorities that survey the safety of industrial installations in Europe.

### Proposal

Add the following paragraph to marginal 71 315:

*(5) If, according to other regulations applicable in the country of a Contracting Party, professionals carrying only their equipment have undergone approved equivalent training and examination under a different regime or for a different purpose covering the subjects referred to in paragraph (2), all training requirements, including certification, applicable to the carriage of dangerous material of Class 7, may be totally or partially dispensed with.*

*Such training and examination may only be recognized by other Contracting Parties if the competent authority of that Contracting Party has declared this on the certificate issued.*

Add the following text to marginal 10 381 (2)b):

The driver's training certificate..... Appendix B.6 *and if applicable the certificates as referred to in marginal 71 315 (5).*

## Justification

### *Safety*

The safety of the transport of the materials concerned remains the same, because after introduction of the proposed addition, the most demanding of one of two sets of requirements remains valid for every Contracting Party. The fact is that for those Contracting Parties that have a regulation in place for this category of professionals, the present version of ADR adds unnecessary barriers, whereas for those Contracting Parties that have less demanding requirements from other legislation, the present content of ADR sets a minimum safety level.

The radiographers are certified according to a strict regime in which a renewal of certification takes place every 3 or at a maximum 5 years. This ensures that experience and knowledge are always fresh.

The professionals are already trained to take the radioactive material out of the package and to apply the radiation. In that situation the radiation levels are a factor 1000 to 10.000 higher with respect to the levels of the shielded material. Therefore it may be concluded that the expertise of the trained professional is in principle more than sufficient.

### *Feasibility*

Those professionals working with radioactive materials in different places within the country of a Contracting Party, as well as their employers, are affected by the proposed addition to ADR. The number of industrial radiographers in the member states of the European Union only exceeds 5000. This category probably forms the majority. The proposed addition exempts these professionals from training hours, the cost of training, the cost of certification and re-certification and from the effort of studying and passing the examination.

All radiographers have to comply with an international training and examination scheme. A radiographer carrying out his work independently must have passed examinations RT1 and RT2. For each level, 8 hours have to be spent on radiation safety and carriage. The level of the examination is harmonised by the International Committee for Nondestructive Testing in the Requirements of Technical Knowledge of NDT-Personnel of Recommendation ICNT WH 17-85, part. 9.5.

In the Netherlands, radiographers have also to undergo a course entirely on radiation protection, including transport regulations. This course consists of 32 hours theory, 8 hours practice and 4 hours examination. The cost involved for this course is approximately \$ 2500 per person.

The cost of training for the ADR basic and specialisation courses is about 3600 \$ per person. This could be avoided if this proposal were adopted.

### *Enforcement*

The radiographers should carry on the transport unit their radiographers certificate RT2 and the diploma of the course on radiation protection.

The government authorities themselves supervise the training of the professionals. Therefore they are in a good position to judge whether the training of these professionals is in accordance with the above proposed paragraph (5) of marginal 71 315 of ADR. If this is not the case the regulations of the special training as referred to in marginal 10 315 and the other paragraphs of marginal 71 315 of ADR are fully applicable to these professionals.

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