

PHILIPPINE NUCLEAR RESEARCH INSTITUTE
REGULATORY BULLETIN
NUCLEAR REGULATIONS, LICENSING
AND SAFEGUARDS DIVISION

BULLETIN No. 04-02

February 17, 2004

**PREPARATION AND ISSUANCE OF
THE CERTIFICATE OF TRANSPORT**

A. ADDRESSEES

All PNRI licensees

B. PURPOSE

This bulletin is a reiteration of the PNRI regulations requiring all PNRI licensees to ensure that any package containing radioactive material that is transported or shipped to and from an authorized location must comply with the requirements for the safe transport of radioactive materials. Specifically, the regulations require that transport documents must include a *Certificate of Transport* that describes the particulars about the radioactive package and other information about the consignor and consignee. This bulletin sets the guidelines for the licensee who will be authorized to approve and issue the *Certificate of Transport* if it would be inconvenient or difficult to secure the same *Certificate of Transport or CT* from PNRI. It is expected that all licensees will review this bulletin and assure that internal procedures for the transport of radioactive materials comply with the regulations. This bulletin confirms that the licensee is ultimately responsible for the safe transport of his licensed radioactive material in accordance with the regulations and the specific conditions of the license.

C. DESCRIPTION OF CIRCUMSTANCE

The Certificate of Transport (CT) is the document that describes the condition of the transport package containing the radioactive material, and other information about the consignor/consignee and the means of transport. The radiation levels measured at specific areas of the package must be in accordance with limits specified in CPR Part 4, "Regulations for the Safe Transport of Radioactive Materials in the Philippines". If the package meets the requirements for transport, in accordance with the regulations of PNRI and other regulatory agencies that govern public or private conveyances, the licensee can transport the package to and from authorized locations. As the Competent Authority defined in CPR Part 4, PNRI is responsible for the approval of the Certificate of

Transport. Presently, only PNRI, through its inspectors, approves and issues the CT after the inspector has verified that the transport package meets regulatory requirements. PNRI inspectors are usually requested to conduct actual inspection of transport packages and issue the CT if the package is located in Metro Manila or conveniently accessible to PNRI inspectors; for example: transport of radioactive material from a Manila Port of Entry to a licensed user, or transport of radiographic device from a Manila office to a provincial jobsite. While the CT issued by PNRI assures the safety of the radioactive package when transported from Metro Manila to its destination, there is no assurance on the safety of the same radioactive package when it is transported back to Metro Manila or to another destination without a verified CT. PNRI has observed that some licensees have disregarded such practice and transport their radioactive packages without a Ct from the PNRI.

D. DISCUSSIONS

Compliance with CPR Part 4, “Regulations for the Safe Transport of Radioactive Materials in the Philippines”, ensures the safety of the public and the environment whenever radioactive material is taken outside its authorized location and transported along public thoroughfares on any public or private conveyance. CPR Part 4 addresses, among others, the safe transport of radiographic sources from one job location to another and back to the authorized storage location, the shipment of disused sealed sources and radioactive wastes to a disposal facility or to its original supplier for appropriate disposal, and the delivery of imported radioactive materials from the port of entry to the authorized user. CPR Part 4 requires that the radioactive package being transported be approved for shipment by the PNRI. The approval of shipment is contained in the Certificate of Transport (CT) that shows proof that the radioactive package is safe for transport on any type of convenience to the indicated destination.

The PNRI, through the PNRI inspectors, have been approving and issuing such CT. However, under current circumstances, this practice has become inconvenient and impractical since the number and frequency of radioactive materials being transported have increased considering the limited number of PNRI regulatory inspectors who are available to undertake actual inspection of packages, and when a radioactive package located in Mindanao or Visayas is transported to another authorized location. Hence, the effectiveness of the regulations may be compromised.

To address this problem, PNRI stresses the right and responsibility of the licensee under the terms conditions of the license to ensure that radioactive materials are transported safely to and from any location authorized in the license in accordance with CPR Part 4. In so doing, the licensee may approve and issue the CT of his radioactive package, under a specific authorization from PNRI, if a CT to be issued by PNRI becomes impractical or inconvenient. This PNRI statement is not a new requirement but rather an extended clarification of the regulations to improve its effective implementation. However, PNRI will still carry out approval and issuance of the CT for radioactive packages upon the request of the licensee.

The Radiological Health and Safety Officer (RHSO) designated in the license shall be responsible for ensuring that this requirement is met and implemented by establishing the necessary administrative controls and transport procedures affecting their licensed material and facility. Administrative controls would involve such prerogatives and authorities accorded by the licensee to the RHSO and personnel undertaking transport activities. These include the facilities and amenities that the licensee should provide to ensure compliance with the transport regulations. The transport procedures include procedures for determining the acceptability of the packaging material, the transport vehicle or any form of conveyance, and compliance with the recording and reporting requirements in connection with the transport of radioactive materials.

PNRI shall determine the adequacy of these procedures and administrative controls before any licensee is authorized to approve and issue the Certificate of Transport for its radioactive materials in accordance with CPR Part 4. To avail of this specific authority, the licensee shall submit to PNRI for approval the following information:

1. Procedure for examining and approving a radioactive material package for shipment.
2. A description of each type of packaging or container used for shipment of radioactive material, including the type of construction material used, weight and the general outside appearance and dimension.
3. A description of the permitted contents of the packaging or container, including the physical and chemical forms, the activities in Becquerel (Bq).
4. A description of the transport vehicle to be used, and the stowage, rigging or placards to be used, if the licensee uses company – owned transport vehicle.
5. Arrangements for the use of private carriers or public conveyance instead of company-owned vehicle.
6. The form of the Certificate of Transport that will be used. (A model Form is enclosed)

In designing the form and content of the Certificate of Transport, the licensee must include the following information:

- (a) The date of issuance, and if appropriate, an expiration date.
- (b) The name, PNRI license number, address and tel /telefax /e-mail number of the licensee (consignor).
- (c) The name and address of the RHSO of the licensee (consignor).
- (d) The description of the radioactive material that will be transported and the measured dose rate on specific points of the package.
- (e) The Transport Index and, if appropriate, any restrictions on the mode of transport, and routing instructions.
- (f) The original location and address of the transport package.
- (g) The location and address of the destination of the transport package.
- (h) The name and address of the consignee (licensee), consignee's PNRI license number.
- (i) The name and address of the consignee's RHSO

- (j) Accurate and complete identification of the transport vehicle that will be used. If transport is handled by a carrier/forwarder, indicate the name of the carrier and other relevant information about the carrier.
- (k) The location on the Certificate of Transport where the signatures and identifications of personnel and officials responsible for issuance, certification, approval and receipt of the Certificate of Transport would appear.

In addition, the licensee shall provide the following:

- 1) Provisions for labelling and marking, such as radiation warning signs, symbols, and stickers in accordance with the transport regulations. Written warning signs attached to the package should be both in English and the Vernacular, as the case may be.
- 2) Provision for a safety locking mechanism on the package.
- 3) Procedure for the submission of a quarterly report to PNRI of the number of transports undertaken within the period.
- 4) Procedure for retention of copies of Certificates of Transport at licensee's authorized address for inspection by PNRI and for submitting quarterly reports to PNRI.

Based on PNRI evaluation of the information that are submitted by the licensee, PNRI will determine whether or not the licensee will be permitted to approve and issue the Certificate of Transport for its radioactive packages.

E. REQUIRED LICENSEE ACTION

Each licensee who shall benefit from the information in this bulletin must notify PNRI and comply with the aforementioned requirements. If you have questions about this bulletin please contact the person listed below.

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(Enclosure: As Stated)

Package Inspector: _____
(Printed Name) _____

Approved: _____
(Printed Name) _____