
New Guidance and Advice Note on the Carriage of Dangerous Goods

Office of Nuclear Regulation

RPC rating: validated

Description of proposal

This opinion provides comments on two updates to the Guidance and Advice Note on the Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations 2009 submitted as separate assessments:

- RPC-3699(1)-DECC-ONR - Inspection of transport security requirements
- RPC-3700(1)-DECC-ONR - Plan in writing: emergency arrangements

The new guidance is focused on providing clarity to Office of Nuclear Regulation (ONR) inspectors on what is expected in terms of demonstrating compliance with the security requirement of regulations concerning the transportation of radioactive material. The Advice Notes have been produced to aid the understanding of non-nuclear sector duty holders. No additional burdens are placed on industry as the process itself, and how the regulatory decisions are made, remain unchanged.

Impacts of proposal

There are 37 civil nuclear duty holders with primary responsibility for the safety of the sites they are licensed to run; 2,000 non-nuclear sector duty holders may also be affected. In year 1, a transport manager from each of the 37 nuclear licensed sites will need to read both core documents. In respect to other non-nuclear duty-holders, knowledge of the regulator and its work is patchy. The regulator argues that as the new guidance documents are not specifically aimed at them and are therefore unlikely to be read, a realistic estimate is that a maximum of 10% of the 2,000 duty-holders would read these documents.

On the Advice Notes, the regulator estimates that they will need to be read and understood by the 37 civil nuclear duty-holders, and by an estimated 25% of the non-nuclear duty-holders.

In subsequent years, it is anticipated that non-nuclear duty holders are unlikely to look at the guidance, but a number of nuclear duty holders may read through the

guidance in advance of any inspection. ONR assumed that 20 sites will be inspected every year.

The regulator anticipates that non-nuclear duty holders will reread the advice notes in advance of any inspection by ONR to determine their compliance with the regulation. Typically, ONR inspects 100 non-nuclear duty-holders per year.

The table below summarises the costs of the guidance updates:

Title	Number of pages	One-off cost	On-going cost
Inspection of transport security requirements			
Core guidance	13 pages	16,000	400
Advice note	4 pages	11,000	2,000
Total		27,000	2,400
Plan in writing: emergency arrangements			
Core guidance	15 pages	20,000	600
Advice note	3 pages	7,000	1,300
Total		27,000	1,900

Quality of submission

The regulator has provided clear and proportionate assessments of the impacts of the guidance. To improve the assessments, the regulator should provide further evidence to support their estimates of the impacts on non-nuclear duty holders. However, the EANCB would round to zero even if all non-nuclear duty-holders incurred costs. Therefore, the RPC is able to validate the EANDCB.

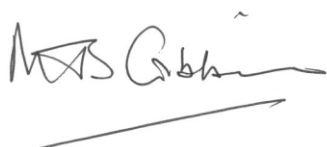
Departmental assessment

Classification	Qualifying regulatory provision
Equivalent annual net cost to business (EANCB)	All zero
Business net present value	All zero

Opinion: BIT assessment
Origin: Domestic
RPC reference number: RPC-3699(1)-DECC-ONR
RPC-3700(1)-DECC-ONR
Date of implementation: June 2016

RPC assessment

Classification	Qualifying regulatory provision
EANCB – RPC validated ¹	All zero
Business Impact Target (BIT) Score ¹	All zero
Small and micro business assessment	Not required



Michael Gibbons CBE, Chairman

¹ For reporting purposes, the RPC validates EANDCB and BIT score figures to the nearest £100,000.