Study Group WAGON USERS

Proposed amendment to GCU Appendix 9

Record of amendments

Amended by	Date	Paragraph	Amendment
Stefan Zebracki	29/1/16		Drafted following TI WG meeting of January 2016
Approved by TI WG	31/3/16		See minutes of TI WG meeting of March 2016

Title:	Action to be taken, codes 7.6.4.11 and 6.5.5.12, “emergency control device”
Proposed amendment made by: RU / keeper / other body	DB Schenker Rail Deutschland
Proposed amendment concerns:	☒ Appendix 9 ☐ Appendix 11
Proposer:	Stefan Zebracki – Technical Wagon Dept.
Location, date:	Mainz, 29.1.2016
Concise description:	Adjustment of the action to be taken for codes 7.6.4.11 and 6.5.5.12. For RID loads, unscrewing the emergency control device is not an acceptable remedy for reasons of occupational safety.

1. Starting-point (current situation):

1.1. Introduction

The action to be taken currently prescribed in codes 7.6.4.11 and 6.5.5.12 is to unscrew the emergency control device.

1.2. Mode of operation

1.3. Anomaly / description of problem

Gas residues pressurised at up to 25 bars could potentially be released through the screw thread upon unscrewing the emergency control device.

1.4. Does this concern a recognised code of practice* (e.g. DIN, EN)?

☒No ☐ Yes (state which):

* “Code of practice: a written set of rules that, when correctly applied, can be used to control one or more specific hazards." (source: Regulation EC 352/2009, Article 3)

"Technical provisions laid down in writing or conveyed verbally and pertaining to procedures, equipment and modes of operation which are generally agreed by the populations concerned (specialists, users, consumer and public authorities) to be suitable for achieving the objective prescribed by law, and which have either proven their worth in practice or, it is generally agreed, are likely to within a reasonable period of time" (translation/source: BMJ Handbuch der Rechtsförmlichkeit – German Ministry of Justice)

2. Target situation

2.1. Elimination of anomaly/problem (goal)

See 3.

3. Additional text (relates only to proposed amendments to GCU Appendix 9):

We request amendment of codes 6. 5.5.12 and 7.6.4.11(Appendix 9, Annex 1) in line with the table below:

	6.5.5.12	Bottom valve emergency control device screwed in (tank-mounted valve open)	~~Unscrew emergency control device.~~ Detach wagon	5
	7.6.4.11	Bottom valve emergency control device screwed in (tank-mounted valve open)	~~Unscrew emergency control device.~~ Detach wagon	5

4. Reason:

For reasons of occupational safety, it is not possible to take any action. This is because gases (pressurised at up to 25 bar) could potentially be released through the screw threads upon unscrewing the emergency control device. Additionally, a non-sparking tool would be required.

5. Assess potential positive/negative impacts

E.g. on operations, costs, administration, interoperability, safety, competitiveness, etc., using a scale of 1 (very low) to 5 (very high).
Justify observations

Positive impacts:
Safety: (Value: 5).
Operations, Interoperability, costs & administration, Competitiveness: (Value: 2).

6. Safety appraisal of proposed amendment

Description of actual/target system, and scope of change to be made (see points 1 and 2).

Safety appraisal done by:

6.1. Does the change made impact on safety?	☐No ☐ Yes
Reasoning:	
6.2. Is the change significant?	☒No ☐ Yes
Reasoning: see template Attach the "significant change" test template.	
6.3. Determining and classifying risk:	☒ N/A
6.3.1. Effect of change in normal operation: 6.3.2. Effect of change in the event of disruption / deviation from normal operation: 6.3.3. Potential misuse of system: ☐ No ☐ Yes (describe possible misuse):	
6.4. Have safety measures been applied?	☒No ☐ Yes
For each type of risk, one of the following risk acceptance criteria is to be selected: • *Code of practice* • *Use of reference system* • *Explicit risk estimate*	
6.5. Has a risk analysis been submitted to the assessment body?	☒No ☐ Yes
Assessment body: Attach the verdict reached by the assessment body:	[appendix]