

Amendment proposal to GCU Appendix 10

Amendment history

Amendment made by	Date	Paragraph	Amendment
B. Schlor, WG UIC Maintenance	2018/10/16	App10, 3.17	First proposal draft
WG UIC Maintenance	2019/4/3	App10, 3.17	Final version
Wagon User UIC Study Group	2019/5/22	App10, 3.17	Approval
GCU CC	2019/6/18	App10, 3.17	Approval

Title	Updating of Appendix 10, 3.17
Proposed amendment made by (RU / keeper / other body):	ÖBB – Technische Services / Maintenance WG (Appendix 10 GCU)
Proposed amendment concerns:	App10, 3.17
Proposer:	Bernhard Schlor
Location, date:	Prague, 2018/11/21
Concise description:	Abolishment of compulsory inspection of the condition of brake couplings

1. Starting point (current situation):**1.1. Introduction**

Compulsory inspection of brake couplings (starred point) duplicates brake coupling inspections. Rules on inspection are already provided in Appendix 9, Annex 1, 3.3.2. The wagon inspector's scope is sufficient to require that the brake couplings be changed if necessary. The wagon inspector currently has an extensive range of options, by means of IT support, to request that the workshop resolve problems, even if the problem is not the main reason for detachment of the wagon.

1.2. Mode of operation**1.3. Anomaly / description of problem**

Duplicate brake coupling inspections

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" (Source: BMJ Handbuch der Rechtsförmlichkeit – German Ministry of Justice)

2. Target situation**2.1. Elimination of anomaly/problem (goal)**

3.17(*) Missing or damaged brake semi-couplings must be replaced.

3. Additional text and/or changes relate only to proposed amendments to GCU Appendix 10:

We are asking for amendment of 3.17 App10 according the above change proposal

4. Reason:

Duplicate inspection provides no financial or safety-related added value for keepers or Rus.

5. Assess potential positive/negative impacts

Assess the impacts at the level of e.g. operations, costs, administration, interoperability, safety, competitiveness, etc., using a scale of 1 (very low) to 5 (very high).

Justify observations

Impacts on costs, administration, interoperability, safety, competitiveness:

Costs: 3 (reduced inspection costs due to elimination of duplicate inspections)

Administration: 1 (no impact)

Interoperability: 1 (no impact)

Safety: 1 (no impact)

Competitiveness: 1 (no impact)

6. Safety appraisal of proposed amendment

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

The risk assessment is rendered invalid inasmuch as only recognised regulations are implemented.

Risk assessment conducted by:

6.1. Does the change made impact on safety?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes
Reason: No change to the target situation; the defect is clearly identifiable during the checks performed as per Appendix 9. Therefore, an additional inspection when leaving the workshop is not necessary. The brakes cannot be rendered unsafe because any potential air loss caused by defective coupling will result in the train coming to a standstill.	
6.2. Is the change significant?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes
Reason: Clarification of procedure. No change to the instructions provided	
6.3. Determining and classifying risk:	<input checked="" type="checkbox"/> 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: <input type="checkbox"/> No <input type="checkbox"/> Yes (describe possible misuse):	
6.4. Have safety measures been applied?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes
For each type of risk, one of the following risk acceptance criteria is to be selected: <ul style="list-style-type: none"> • Code of practice • Use of reference system • Explicit risk estimate 	
6.5. Has a risk analysis been submitted to the assessment body?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes
Assessment body: Attach the verdict reached by the assessment body:	[Appendix]