Amendment Proposal to GCU Appendix 10

Amendment history

Amendment made by	Date	Paragraph	Amendment
B. Schlor, WG UIC Maintenance	2018/10/16	App10,5.3	First proposal draft
WG UIC Maintenance	2019/4/3	App10,5.3	Final version
Wagon User UIC Study Group	2019/5/22	App10,5.3	Approval
GCU CC	2019/6/18	App10,5.3	Approval

Title	Updating of Appendix 10, 5.3
Proposed amendment made by (RU / keeper / other body):	ÖBB – Technische Services / Maintenance WG (Appendix 10 GCU)
Proposed amendment concerns:	App10, 5.3
Proposer:	Bernhard Schlor
Location, date:	Prague, 2018/11/21
Concise description:	Abolishment of compulsory inspection of buffer attachment

1. Starting point (current situation):

1.1. Introduction

Compulsory inspection of buffer fastening bolts (starred point) duplicates buffer attachment inspections. Rules on inspection are already provided in Appendix 9, Annex 1, 5.4.4. The wagon inspector's scope is sufficient to require that buffers be re-fastened 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.

Inspection of buffers at fixed coupling points is to be retained as, depending on the type of wagon, sufficient access for the wagon inspector to the buffers cannot be guaranteed.

1.2. Mode of operation

1.3. Anomaly / description of problem:

Duplicate inspections of buffer attachment

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)

~~5.3* No buffer or buffer fixing bolt must be missing. All fixing bolts must be tight. This also applies to permanent couplings.~~

5.3.1 Buffers at the end of the wagon and buffer fixing bolts must not be missing. All fixing bolts must be tight.

5.3.2 * For permanently-coupled wagon units, neither buffers nor buffer fixing bolts must be missing at the fixed coupling point. All fixing bolts must be tight.

Colour code for changes:
Black: Current text, for info and remains unchanged
Blue: New text
Strikethrough blue text: text will be deleted

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

We are asking for amendments of 5.3 by adding 5.3.1 and 5.3.2 App10 according the above changes 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 and 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?	☒No ☐ Yes
Reason: No change to the target status; screw connections can still be checked in the workshop only in accordance with Appendix 9 (visual inspection and “hammer blow”). Checking that the torque is correct with a torque key is not technically possible and is therefore not permitted.	
6.2. Is the change significant?	☒No ☐ Yes
Reason: Clarification of procedure. No change to the instructions provided	
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]