

Proposed amendment to GCU Appendix 9

Record of amendments

Amended by	Date	Paragraph	Amendment
Lukas Halbig	03/03/2020		Draft
TTI WG decision	24/03/2020		See minutes of TTI WG meeting of March 2020
Approved by SG WU	26/05/2020		See minutes of WU SG meeting of May 2020
Approved by JC GCU	15/06/2020		

Title:	Detection of hidden damage/damage difficult to see
Proposed amendment made by: RU / keeper / other body	DB Cargo
Proposed amendment concerns:	<input checked="" type="checkbox"/> Appendix 9 <input type="checkbox"/> Appendix 11
Proposer:	Sven Seligmann
Location, date:	Mainz, 02/09/2019
Concise description:	Detection of hidden damage/damage difficult to see

1. Starting point (current situation):

1.1. Introduction
Damage and irregularities are identified with the aid of the labels provided in Appendix 9, Annex 11.
1.2. Mode of operation
-
1.3. Anomaly / description of problem
Despite the detailed descriptions shown on the labels, it is difficult for inspection and maintenance personnel to identify damage and irregularities on the wagon that have already been detected by other personnel in order to continue their inspections.

1.4. Does this concern a recognised code of practice* (e.g. DIN, EN)?
<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes
<p>* "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)</p> <p>"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)</p>

2. Target situation

2.1. Elimination of anomaly/problem (goal)
<p>Introduction of the following text: "As a complement to the traceability provided by the labels, visible damage must be marked in crayon".</p>

3. Additional text and/or change relates only to proposed amendments to GCU Appendix 9:

Amendment colour code:

Black: Current text, for info and remains unchanged

Red: new text

Blue: (if crossed out): text to be deleted

Annex 11

I, K, M, R1 and U labels – General

The labels mentioned in Annexes 1 and 8 (I, K, M, R1 and U) must be printed in either French, German or Italian. Translations into other languages can be attached. When used, they must always be filled out completely.

As a complement to the traceability provided by the labels, visible damage must be marked in crayon.

4. Reason:

Marking hidden damage and damage that is difficult to see will enable more rapid and more efficient appraisals of damage and irregularities that have already been identified.

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

Impacts:

Operations: 4

Interoperability: 1

Competitiveness: 1

Costs: 2 (exorbitant maintenance costs in the event of an overly severe assessment of damages)

Administration: 4

Safety: 1

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 study becomes obsolete insofar as only the known repositories are implemented

Safety study conducted by:

6.1. Does the change made impact on safety?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes
Reason: The damage is already documented and pinpointed using damage labels with the associated descriptions of damage. Labelling enables identification of damage that has already been detected in order to facilitate a more in-depth assessment.	
6.2. Is the change significant?	<input checked="" type="checkbox"/> No
Reason: level of innovation: low. Marking in crayon is already used for other things. Level of complexity: low. Few interfaces with other subsystems and persons concerned. Consequences of failure: minor. Defects are currently marked in crayon. Marking allows the damage detected to be located. Monitoring: high level of monitoring via the quality management system in the GCU. Reversibility: reversible. The request to provide markings can be withdrawn.	
6.3. Determining and classifying risk:	<input checked="" type="checkbox"/> deleted
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" (acknowledged technical rules) • 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]