

Amendment Proposal to GCU Appendix 9

Record of amendments

Amended by	Date	Paragraph	Amendment
Emmanuel Labalette	11/02/2019	Appendix 9 code 6.6.6	Filing, introduction
Charles-Antoine Alavoine	12/03/2019	Appendix 9 code 6.6.6	Amendment made
Charles-Antoine Alavoine	12/12/2019	Appendix 9 code 6.6.6	Amended as per minutes of meeting of October 2020
TTI WG decision	23/03/2021	Appendix 9 code 6.6.6	See minutes of TTI WG meeting of March 2021
WU SG decision	23/04/2021	Appendix 9 code 6.6.6	See minutes of WU SG meeting of April 2021
GCU JC decision	14/06/2021	Appendix 9 code 6.6.6	Approved

Title:	Self-discharging wagons – changes to 6.6.6 codes and introduction of codes 6.6.6.3 and 6.6.6.4
Proposed amendment made by: RU/keeper/other:	Prepared par SNCF/AFWP Appendix 9 subgroup
Proposed amendment concerns:	<input checked="" type="checkbox"/> Appendix 9 <input type="checkbox"/> Appendix 11
Proposer:	Charles-Antoine Alavoine – SNCF/Emmanuel Labalette – Ermewa Group
Location, date:	Clichy, 11/02/2019
Concise description:	Changes to 6.6.6 codes and introduction of codes 6.6.6.3 and 6.6.6.4

1. Starting point (current situation):

1.1. Introduction

There are no codes for discharge valves on wagons with direct and lateral discharge, which generally results in the inspector assigning incorrect codes.

1.2. Mode of operation

The GCU represents the core basis for contractual relations between keepers and ECMs. The text must be clear so that it can be applied by all parties in a simple and unequivocal manner.

The text has a section dedicated to self-discharging wagons which may be adapted, but the designations used may cause confusion. The provisions respond to a need for safety at the highest level.

The French gauge for discharging wagons is such that serious danger is presented if the lateral discharge flaps are not closed or not locked.

Danger to personnel

Danger to adjacent traffic

Given the significant level of risk, SNCF has taken provisional measures (inspection record) pending inclusion of this point in the GCU.

1.3. Anomaly/description of problem

The text has a section dedicated to self-discharging wagons which may be adapted, but the designations used may cause confusion.

In addition, the wording in codes 6.6.6 suggest that the actions to be implemented are not required if the discharge flaps are not closed and locked. However, such actions are required precisely when one of these irregularities or the other is observed.

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)

Modify codes 6.6.6.1 and 6.6.6.2 and create new codes 6.6.6.3 and 6.6.6.4 which specify the various types of wagon discharge. The benefits offered by this proposal are clarity and precision.

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

Amendment colour code:

Black: Current text, for info and remains unchanged

Red: new text

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

Component	Code no.	Irregularities/Criteria/Notes	Action to be taken	Irregularity class
Self-discharging wagons (Tads, Falns, Tals, etc.)	6.6.6	Discharge valve not closed and/or locked		
	6.6.6.1	empty wagon with axial flap	Close and lock. If not possible, K	3
	6.6.6.2	loaded wagon with axial flap	Close and lock. If not possible, detach wagon	4
	6.6.6.3	empty wagon with lateral flap	Close and lock. If not possible, detach wagon	4
	6.6.6.4	loaded wagon with lateral flap	Close and lock. If not possible, detach wagon	4

4. Reason:

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

A positive impact (+5):

- on cost as the wagon will be withdrawn from service in good time and can be repaired more quickly and without ambiguity,
- on safety as, as things stand, the wagon can run with a flap that is closed but not locked or clocked but no closed, which may result in an incident during circulation.

Positive impacts:

Operations, interoperability, competitiveness (value: 3)

Safety (value: 4)

6. Safety appraisal of proposed amendment

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

Performance of risk analysis is unnecessary where only recognised standards are implemented.

Safety appraisal performed by:

not done since adaptation results from the aforementioned standards.

6.1. Does the change made impact on safety?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes
Reason:	
6.2. Is the change significant?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes
Reason: see template. Attach the "significant change?" test template	
6.3. Determining and classifying risk:	<input 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
<i>For each type of risk, one of the following risk acceptance criteria is to be selected:</i> <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]