

Amendment Proposal to GCU Appendix 9

Record of amendments

Amended by	Date	Paragraph	Amendment
Lukas Joa	10/2020	Appendix 9, 6.5.2.3 + 6.5.2.5 + 6.5.2.7	Draft
TTI WG decision	23/03/2021	Appendix 9, 6.5.2.3 + 6.5.2.5 + 6.5.2.7	See minutes of TTI WG meeting of March 2021
WU SG decision	23/04/2021	Appendix 9, 6.5.2.3 + 6.5.2.5 + 6.5.2.7	See minutes of WU SG meeting of April 2021
GCU JC decision	14/06/2021	Appendix 9, 6.5.2.3 + 6.5.2.5 + 6.5.2.7	Approved

Title	Irregularity class 5 for codes 6.5.2.3 + 6.5.2.5 + 6.5.2.7
Proposed amendment made by: RU/keeper/other:	DB Cargo AG
Proposed amendment to:	<input checked="" type="checkbox"/> Annexe 9 <input type="checkbox"/> Annexe 11
Proposer:	Sven Seligmann
Location, date:	Mainz, 18/09/2020
Concise description:	Modification of irregularity class 5 for codes 6.5.2.3 + 6.5.2.5 + 6.5.2.7

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

Codes 6.5.2.3 + 6.5.2.5 + 6.5.2.7 were introduced during update of Appendix 9 ed. 01/01/2020, The assigned irregularity classes are 5 with model K

1.2. Mode of operation

The keeper is advised of the irregularity via the damage report.

1.3. Anomaly/description of problem

Codes 6.5.2.3 + 6.5.2.5 + 6.5.2.7 were introduced during update of Appendix 9 ed. 01/01/2020, The assigned irregularity classes are 5 with model K.

This represents a procedure discontinuity with previous procedure (Model K max. irregularity class 4) and sets the quality requirements of these codes at a higher level than necessary.

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

No Yes (state which):

* "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 – guide published by German Ministry of Justice)

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

It is proposed to use " Superordinate codes" for irregularity not contained in the list.

3. Amendments/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: (if crossed out): text to be deleted

Component	Code no.	Irregularities/Criteria/Notes	Action to be taken	Irregularity class
Tank		Test date expired, RID load Without "L" marking		
	6.5.2.3	Tank full: – Deadline has expired ≤ 1 month	K	5 4
	6.5.2.4	– Deadline has expired > 1 month	Detach wagon	5
	6.5.2.5	Tank empty, not cleaned: – Deadline has expired ≤ 1 month or > 1 month	K	5 4
		6.5.2.6	With "L" marking Tank full: – Deadline has expired > 3 months	Detach wagon
	6.5.2.7	Tank empty, not cleaned: – Deadline has expired > 3 months	K	5 4

4. Reason:

Modification clarifies and applies quality requirements in accordance with current practice.

5. Assess potential positive/negative impacts

Assess the possible positive and negative effects (operations, costs, administration, interoperability, safety, competitiveness, etc.) on a scale of 1 (very low) to 5 (very high):

Reasoning behind amendment:

Impacts:

Operations, Interoperability, Competitiveness, Cost, Management: (grade: 1)

Safety (grade 1)

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.

Risk analysis conducted by:

6.1. Does the change made impact on safety?	<input type="checkbox"/> No <input checked="" type="checkbox"/> Yes
Reason: No, because there is no interference with railway operations for safety reasons.	
6.2. Is the change significant?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes
Reason: see 6.1	
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"> <i>Irregularities listed under 6.3.2 do not represent a new risk generated by the amendment but existed before.</i> 	
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]