Proposed amendments to GCU Appendix 9

Amendment history

Amended by	Date	Paragraph	Amendment
Jean-Marc Blondé	30/1/2018		Based on the minutes of the TTI WG meeting of Jan 2018
TTI WG decision	21/3/2018		See minutes of TTI WG meeting of March 2018
WU SG decision	29/5/2018		See minutes of WU SG meeting of May 2018

Title:	Locking of load unit (ILU) doors
Proposed amendment concerns RU/keeper/other:	SBB Cargo AG
Proposed amendment concerns:	☒ Appendix 9 ☐ Appendix 11
Proposer:	Jean-Marc Blondé
Location, date:	Olten, 30/1/2018
Concise description:	Precision regarding locking doors of load units (ILUs) - code 7.5.2

1. Starting point (current situation):

1.1. Introduction

Non-compliant closing or locking of doors is currently reported and recorded using codes 7.5.2.x

1.2. Mode of operation

1.3. Anomaly/description of problem

The issue of locking of doors consistently raises questions during staff training and technical inspections. This creates uncertainty among staff and requires clarification in the description of irregularities.

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)

Further details are provided in the explanatory text to rectify this situation. See details under point 4.

3. Additional text and/or modifications (relates 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	Category
Specific components of ILU, in particular those used for horizontal or vertical transhipment	7.5			
	7.5.1	Device for locking the dollies inoperative, defective or missing	Bind using wire. If not possible, detach wagon	4
	7.5.2	End doors on load units not ~~securely~~ closed or not properly locked		
	7.5.2.1	- door not closed	Close and lock. If not possible, detach wagon	5
	7.5.2.2	- ~~only one lock effective per load unit and door~~ Door not properly locked (not applicable to doors facing another load unit) if: • Upper cam not engaged or • Lower cam not engaged or • Horizontal locking lever not engaged	Rectify, if not possible, detach wagon	~~3~~ 4
	7.5.2.3	- reserved		

4. Reason:

The text requires precision for better understanding.

5. Assess potential positive/negative impacts

Assess the possible positive and negative impacts (operations, costs, administration, interoperability, safety, competitiveness, etc.), using a scale from 1 (very low) to 5 (very high): Justify observations

Positive impacts:
Operations, Interoperability, Safety, Competitiveness: value 3,

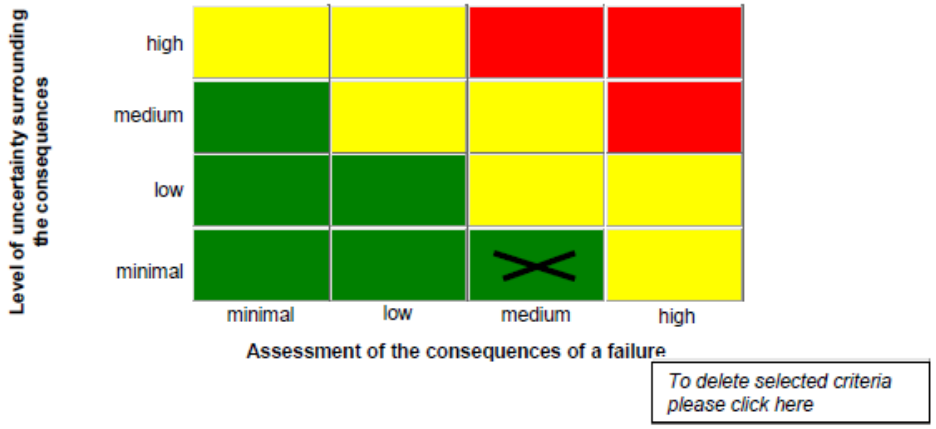
Safety: value 4

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.

Risk analysis conducted by:

6.1. Does the change have impact on safety?	☒No ☐Yes
Reason: The description of the irregularity was clarified by more accurate control of the door lock function. The level of required security remains unchanged.	
6.2. Is the change significant?	☒No ☐Yes
Reason: see template. Attach the "significant change?" test template **Results of preselected criteria:** Degree of innovation: low Level of complexity: low Consequences of failure: critical Traceability: high Reversibility: yes  *To delete selected criteria please click here*	

6.3. Determining and classifying risk:	☒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:** ☐ 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]