

Transitional Arrangements for Existing Packages

The adoption of new editions of the IAEA Transport Regulations does not necessarily mean that existing packages become inappropriate for future use unless safety-significant changes have been identified. Transitional arrangements therefore are needed whereby existing packages which are properly maintained and meet their original design intent may continue in use for a reasonable period after the new edition of the Regulations has been published. This has become known as grandfathering.

Following publication of the 1996 Regulations, the IAEA confirmed that continued use of existing packages approved under the two previous editions (1973 and 1985) would be acceptable. With such a time interval of about ten years between editions, the period of use of packages under unilateral approval would be about 20 years, which is reasonable for high-cost packages. However, with the current two-year review cycle it is important to assure a system which still allows a viable time period for continued use of existing packages approved under earlier editions.

The publication of the latest editions of the IAEA Transport Regulations as an “As Amended” edition, rather than a completely revised edition solves the issue for the time being. However, mindful that the regulations are subject to a two-year review cycle, industry through WNTI will continue to work closely with IAEA Transport Safety Standards Committee to ensure appropriate provisions.