

Submitted by IAEA

Subject: Urgent matter re old/new regulations for RID/ADR
Meeting
Author: G.Dicke@iaea.org
Date: 5/16/00 9:02 AM

Dear Olivier,

TRANSSAC has been discussing the issue of implementation dates/transition periods as raised in the interagency report of our 27/28 March meeting. The discussion is not over yet and I tried to call you. If you can be reached please let me know at what telephone number and when. Since I will be in the meeting most of the time please let me know by email cc to Elfi (E.Herbst@iaea.org).

Briefly the following is being suggested. There does not seem to be a problem, at least in major parts of the world outside Europe because there is a regulation, similar to the related marginal in the ADR/RID regulations, which allows for international transport involving air or sea mode, the use of either the old or the new regulations. It seems that the marginal in the RID/ADR regulations had the same intent but did not foresee the drastic changes from the 85 to the 96 IAEA regulations.

One alternative which is likely to be suggested by TRANSSAC is that RID/ADR consider changing the marginal to be more comprehensive since this must have been the original intent. Therefore rather than allow just some parts of the new regulations being applied to international shipments involving air transport, allow all the requirements of ST-1 to be applied to such shipments. Is it possible to make such a change at this time? How long does it take to make this change?

In support of pursuing this alternative there is a very important issue discussed here. Specifically the fact that there are serious safety issues when the regulations are mixed (as would be possible with the current marginals). It is very important for safety that either the old or the new regulations apply rather than some mixture. These safety issues include for example the use of CSIs in the new regulations affecting the TIs and the related precautions.

Another issue is the transition period to be allowed for radioactive material shipments. As we discussed it would be possible to change the 18 month transition period to 6 months for Class 7. This would at least take care of the international shipments involving transport by sea since they allow either the old or the new regulations until the end of 2001. Would it be possible to be informed that the shorter transition period for Class 7 will be accepted for the RID/ADR regulations?

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Again, it would be desirable to discuss some of these details by phone, as soon as possible. My phone number is (+43) 1 2600 21263. Elfi will answer when I am not in or else there will be the possibility of leaving a message on my phone. I will also check my email.

Regards,

Gerry