

Grandfathering of Competent Authority Approved Packages



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Transitional Arrangements (Grandfathering)

- Allows continued use of previously approved packages
- Limits construction of new packagings
- Limits types of changes that can be made to the design

NRC Implementation of Grandfathering

- Consistent with IAEA
- Safety-significant modifications require package upgrade
- Complete application for upgrade
 - New regulatory requirements addressed
 - New review guidance considered
 - Packaging drawings reviewed
 - Acceptance tests reviewed

Concerns with Grandfathering

- 1996 IAEA Changes
 - Terminated use of 1967 packages
 - Moved to 2-year revision cycle
- Potential impact to certified designs
 - Regulations become “moving target”
 - Rapid phase-out of certified packages

New Approach for Grandfathering

- Package standards are stable
 - Changes should be based only on safety
 - Regulatory stability is important to safety
- Changes in package standards few
 - Each change could include its own transitional arrangement
 - Certificate would indicate compliance

Advantages of New Approach

- IAEA revision process would dictate transitional arrangement
- Transitional period based on safety
- No generic grandfathering necessary

Conclusions

- Regulatory stability in package standards
- Grandfathering can be improved
- Consider specific transitional arrangements for each change in regulation