

STABILITY OF REGULATIONS VERSUS CONFUSION

Fernando Zamora

Area of Transport and Nuclear Fuel Fabrication

Consejo de Seguridad Nuclear (CSN)

TS-R-1 Review Cycles

Two years review cycle

Advantages

Urgent incorporation of changes to improve safety

Urgent incorporation of changes to adapt requirements to practical reality

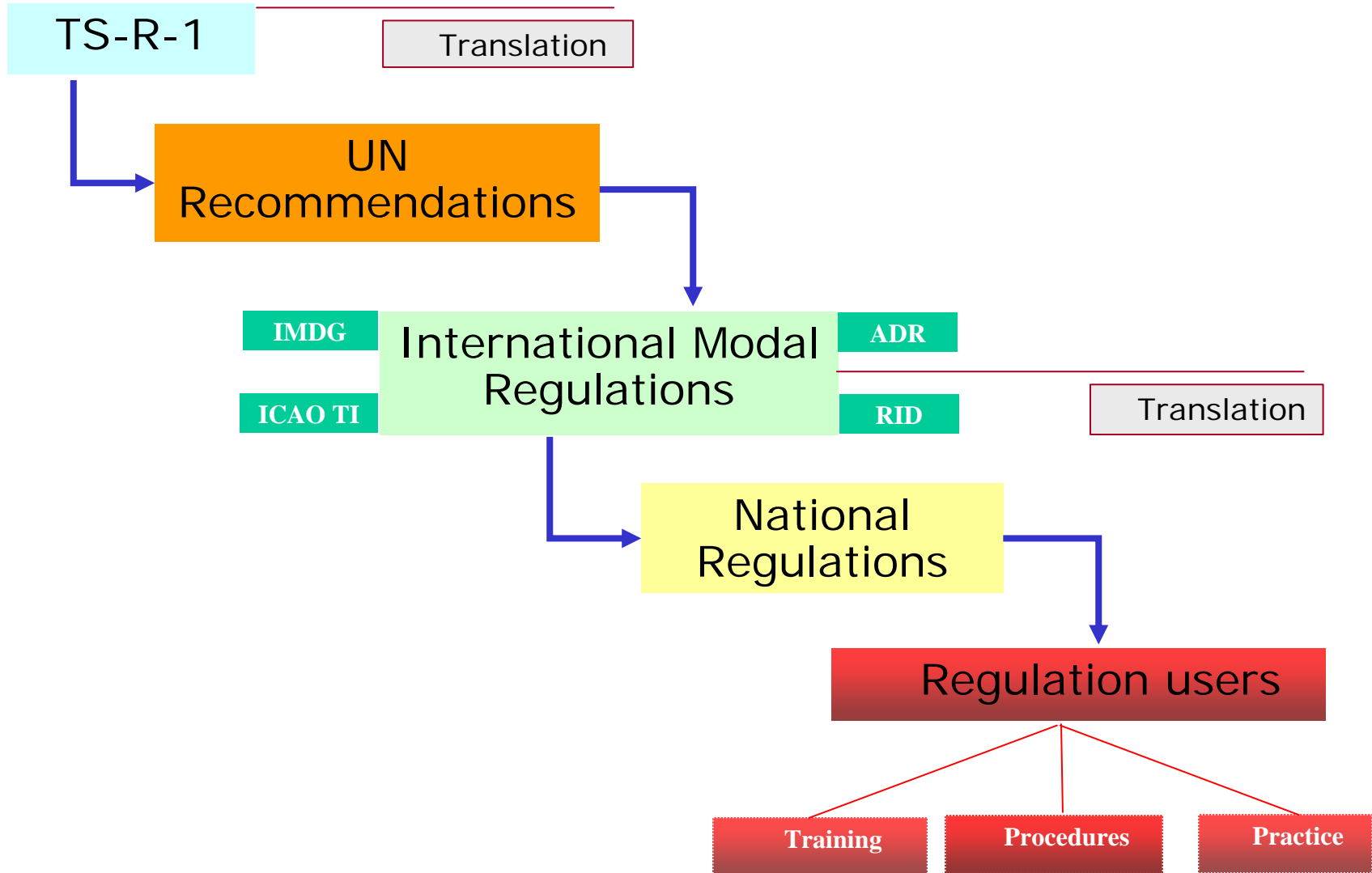
Consistency with the 2-year review cycle of Modal Regulations on the transport of dangerous goods

Frequent incorporation of numerous unjustified changes might make it difficult for the users to adapt to the regulatory changes and apply them correctly



It is essential that changes be fully justified

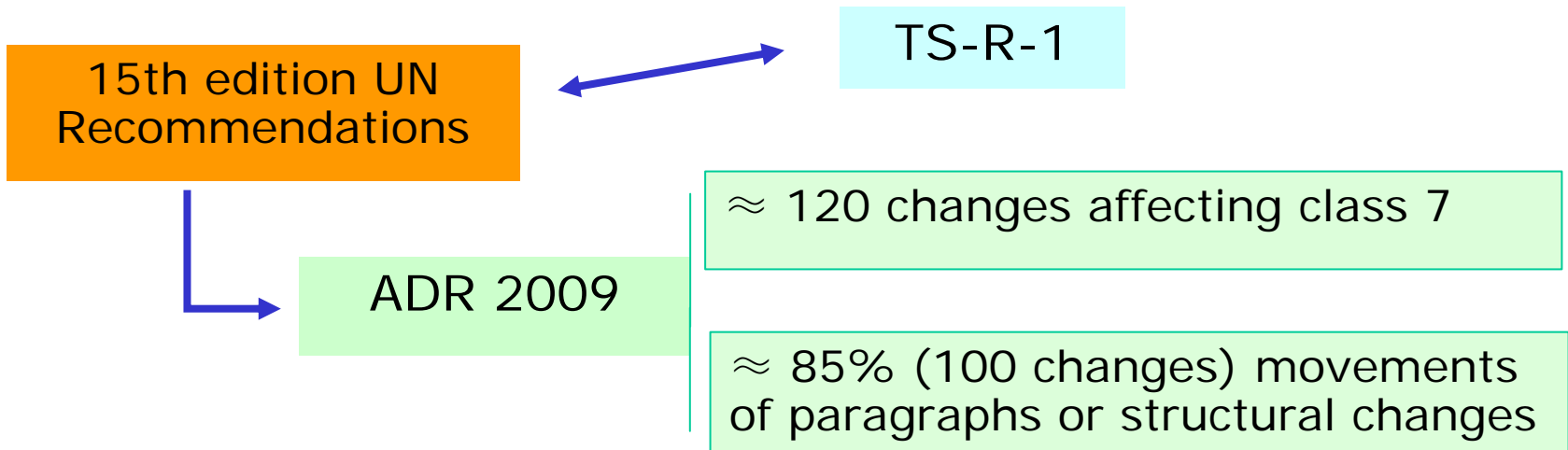
Modifications of Regulations a 'CHAIN PROCESS'



MINOR CHANGES

Enhanced clarity or a source of confusion?

- Many minor changes have been introduced in order to:
 - ❑ a supposed improvement in the clarity of Regulations
 - ❑ a theoretical harmonisation between Modal regulations and TS-R-1



- **Consequences:**

- ❑ Confusion
- ❑ An important informative effort was needed - www.csn.es

Problems of low stability in Regulations

- Excessive consumption of resources
- Source of errors in the requirements
- Lack of a promptly understanding by the users
- Confusion among users
 - □ Low degree of trust in the regulations
 - □ Lower degree of compliance with regulatory requirements
 - □ Safety-related shortcomings in the transport of RAM

So,

STABILITY prevents **CONFUSION** and favours **SAFETY**

CONCLUSIONS

- Review cycles are an **opportunity** to introduce the necessary changes, but **not an 'obligation'** to propose regulatory modifications
- **Modifications** of Regulations are positive when **really necessities**
- There should be a maximum **self-regulation** among those issuing proposals, to assure their real need before they are issued
- Instability in Regulations might lead to:
 - ❑ confusion among the users
 - ❑ lack of understanding of the requirements
 - ❑ lack of trust in Regulations
 - ❑ insecurity in application
 - ❑ inadequate compliance with requirements
 - ❑ shortcomings in relation to safety
- **Regulations should be as stable as possible and explanatory Guidelines should be used to clarify their requirements**