

Regulatory Updates

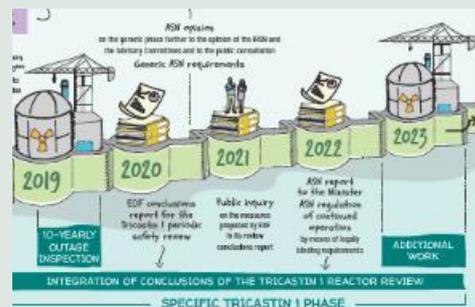
Nuclear safety...

Fourth periodic safety review of the 900 MWe reactors: ASN plans consulting the public at the end of 2020

April 2020

ASN is continuing its examination of the files constituting the generic phase of the 4th periodic safety review (PSR) of EDF's thirty-two 900 MWe reactors. It plans consulting the public at the end of 2020 on its draft position statement concerning the continued operation of these reactors. At present, ASN considers that the Covid-19 epidemic should have only a limited impact on its position statement schedule.

Since 2016, ASN - assisted by IRSN, its TSO - has been examining the studies conducted by EDF for the purpose of this review. These studies have enabled EDF to define the checks and modifications it plans implementing on its reactors. On 31st March 2020, IRSN sent ASN an opinion summarising the expert assessments it carried out. During autumn 2020, ASN will obtain the opinion of its Advisory Committee for Nuclear Reactors on the conclusions of its examination.



The generic phase of the PSR, which is common to all the 900 MWe reactors, will be followed by a phase specific to each reactor, taking into account their specific characteristics and the inspection results. ASN will then adopt a position regarding the continued operation of each reactor, after holding a public inquiry into the measures proposed by EDF.

The first specific position statement will concern unit 1 of the Tricastin NPP. Its issue is planned for 2022.

Announcement of the guidelines of the next National Radioactive Materials and Waste Management Plan (PNGMDR)

April 2020

Following the national debate on the management of radioactive materials and wastes, held in 2019, the National and Special Public Debates Commissions issued their conclusions on 25 November 2019.

In the light of the questions, subjects of interests and concerns that were raised during these debates, and further to discussions with various stakeholders, the Minister for Ecological and Solidarity-based Transition and the ASN Chairman confirmed that [the National Radioactive Materials and Waste Management Plan \(PNGMDR\) will be updated for a 5th edition](#), with a view to public consultation before the end of 2020. They also decided on the following guidelines:

- Improve coordination between energy policy and waste management policy: the frequency of the PNGMDR will be brought into line with multi-year energy programming, and the coordination with final shutdown and decommissioning strategies will be more clearly explained;
- Reinforce the governance of radioactive waste management: the PNGMDR drafting and oversight body will be expanded to include national elected representatives, include national elected representatives, civil society and representatives of local authorities, in addition to participation by environmental protection associations;
- Reinforce oversight of reusable nature of radioactive materials: for materials which are not currently reusable, industry will make a commitment to interim targets in the action plans, which will be periodically reassessed;
- Address the need for new spent fuel storage capacity: the PNGMDR will make provision for new centralised underwater storage capacity, taking account of the time needed to build it. It will study the conditions and situations in which dry storage could be of use;
- Whenever pertinent and by means of targeted exemptions, allow the reuse of certain very low level metal waste and define the conditions for such reuse;

- Continue with defining the conditions for implementation of the Cigeo project, notably the methods for involving the public in the fundamental stages of the project, as well as R&D on alternative management solutions;
- Reinforce the assessment of the impacts of the management choices on the country as a whole and on the economic, health and environmental issues (impact of transports, harmfulness of wastes, etc.): the public debate revealed particular sensitivity to these aspects.

ASN specifies the next steps in the decommissioning of the gas cooled reactors

March 2020

The six EDF gas cooled type reactors (GCR) were shutdown between 1973 and 1994. After the removal of the fuel, the installations have only been partially decommissioned.

To date, two of these reactors do not have the required authorisations to continue with decommissioning. The regulations require that ASN stipulate to EDF the deadline for submitting their decommissioning file. The four others have received a decommissioning authorisation based on a scenario set out by EDF in the early 2000s. This scenario consisted in filling the reactor core with water in order to perform the decommissioning operations. EDF aimed to complete decommissioning of these reactors in 2024, 2027 and 2031 respectively.

In 2016, EDF announced that it had finally opted for an air decommissioning scenario. This change entailed a significant postponement of the decommissioning operations on the pressure vessels of these reactors and EDF felt that the feasibility of these operations needed to be validated by means of an industrial demonstrator, with complete decommissioning carried out on one pressure vessel before decommissioning could begin on the other five.

After examination of the evidence presented by the licensee, and then consultation of both the licensee and the public, [ASN adopted two resolutions](#) on 3 March 2020 regulating the next steps in the decommissioning of these reactors.

In a letter, ASN required EDF to shorten the overall decommissioning schedule for these reactors, given the need to decommission each of the reactors in as short a time as possible.

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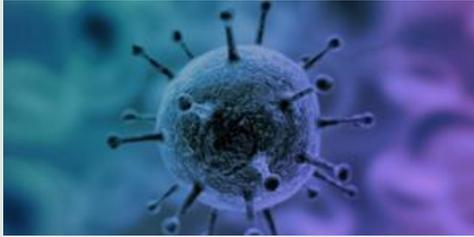
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In response to the Covid 19 epidemic, ASN has adapted its method of functioning while maintaining its rigour in the oversight of nuclear installations

March 2020



In the current situation of the Covid 19 epidemic on nuclear activities, ASN has worked closely with the nuclear licensees and activity managers to analyse the nuclear safety and radiation protection consequences of the measures taken to deal with the ongoing health emergency (management of the workforce present and their authorisations, management of activities during facility shutdowns, safeguarding of certain sites, steps taken in hospitals to guarantee the continuity of treatment for patients and so on).

With regard to the nuclear power plants (NPPs), EDF has given priority to the operating aspects that are vital for the supply of electricity and Orano has kept up activities necessary for the functioning of the EDF NPPs as regards the removal of spent fuel, fuel reprocessing and supplying the NPPs with fresh fuel.

In the meantime, ASN has maintained its highly stringent demands with respect to the nuclear licensees. Thus, ASN has had to draw EDF's attention to the situation of outside contractors' employees, by asking it to clearly define those maintenance or logistic activities whose continuity is vital, so that there is no ambiguity for these companies and their employees, and to ensure that the conditions of health and safety for all employees are clearly communicated and correctly implemented on the sites.

In this context, ASN has adapted its in-field oversight system by applying three principles:

- Excluding face-to-face contacts unless absolutely necessary, in order to limit propagation of the virus;
- Giving priority to the oversight of facilities remaining in operation;
- Maintaining oversight activities proportionately to the risks.

On-site inspections have been replaced by remote verifications, particularly concerning the examination of documents

test records, operational management documents, etc.), accompanied by audioconferences with the licensee.

Also, ASN labour inspection, which is competent for inspection in NPPs, has organised itself so that it can fulfil its role of monitoring employee work conditions for both EDF employees and outside contractor employees working on the sites.

In addition to this, ASN and the licensees hold regular audioconferences at national and local level to discuss the development of the situation and its consequences.

Besides, to enable the health professionals to focus on the health response to the epidemic, ASN has, until further notice, suspended its inspections in medical facilities carrying out nuclear activities, barring certain exceptions.

Finally, to contribute to the reduction of risk for its staff as a result of the current situation, ASN has triggered the red level of its business continuity plan: all staff are now teleworking, document exchanges with nuclear activity managers will whenever possible be electronic, and investigations and assessments will be performed remotely, if necessary by means of audio or video-conferencing.

The ASN on-call system, which is activated in the event of an emergency, remained unchanged.

Recommendations for improving radiation protection in the operating theatre during fluoroscopy-guided interventional procedures

March 2020

The number of fluoroscopy-guided interventional procedures is constantly increasing, particularly surgical procedures in operating theatres. They bring considerable benefits for the patient but present significant risks in terms of radiation protection, for the medical staff and patients alike.

[ASN recently published a document aiming to promote the setting up, within an operating theatre block,](#) of a

pragmatic teaching workshop adapted to professional practices and needs, entitled "the errors block". Its aim is to foster collective awareness of radiation protection in medical professionals.

ASN is working with the Ministry of Health to have the recommendations concerning the involvement of medical physicists and radiographers in the operating theatres, and the development and interoperability of operating theatre information systems, taken into account in the new activity authorisation systems.

Publication of the Order regarding the protection of radioactive sources against malicious acts: ASN will be fully implementing its source security oversight actions

March 2020

The [Order of 29th November 2019](#) concerning the protection of ionising radiation sources and batches of radioactive sources of categories A, B, C and D^[1] against malicious acts, published on 11th December 2019, specifies the conditions surrounding the application of the general objective set out by the Public Health Code.

This Order clarifies the provisions to be implemented for the protection of ionising radiation sources or batches of radioactive sources against malicious acts, both within the facilities and during transport operations.

This Order, which was entered into effect on 1st January 2020:

- Is part of the Government's national security strategy, in particular to counter radiological threats;
- Is based on recommendations from the International Atomic Energy Agency, which are already in effect in other countries, notably in Europe;
- Adopts a graded approach, with the organisational or technical arrangements being reinforced proportionately to the danger represented by the source(s) to be protected;
- Comprises interim provisions of up to two years, enabling the facilities or carriers concerned to define, plan and then implement these new requirements.

The 5,000 or so radioactive sources of categories A, B or C primarily concerned by this Order are used in the medical and industrial fields, while some of them are also used on worksites, for example to conduct non-destructive examinations on piping or pressurised equipment. About 300 facilities nationwide are concerned by the provisions of this Order.

ASN made an active contribution to the drafting of this Order. On 26th September 2019 it issued a positive opinion on this draft text.

The entry into effect of this Order will enable ASN to fully implement its source security oversight actions.

[1] Ionising radiation sources and batches of sources are classified in 4 categories (A to D) according to the danger they represent, with category A sources being the most dangerous and those of category D the least dangerous. This classification is set out in the Public Health Code (Appendix 13-8).