

Regulatory Updates

Nuclear safety...

ASN New Year's greetings to the presse

January 2021

At the presentation of the first findings and the marking events of the year 2020, ASN delivers three messages:

- the need to uphold a culture of anticipation and precaution in all the players involved in nuclear activities
- the need to focus particular attention on maintaining key industrial capabilities to cope with the work required to enhance the safety of the facilities in operation
- the importance of the 5th PNGMDR creating real prospects of safe and sustainable management routes for all types of waste by 2035/2040

On 21 January, by video conference on account of the Covid-19 crisis, ASN presented its greetings to the press through its Chairman, Mr. Bernard Doroszczuk.

The ASN Chairman underlined that in 2020, "the safety of nuclear facilities remained at a satisfactory level on the whole for all the operators, and even progressed in terms of operating rigour, particularly with EDF, in the singular context induced by the management of the health crisis".

Mr. Doroszczuk drew attention to three findings that temper this broadly positive assessment:

- At EDF, the regression in worker radiation protection observed in 2019 continued and worsened in 2020, while the anomalies affecting items of equipment and which could have jeopardised their ability to fulfil their functions in the event of an accident persisted.
- At Orano, the improvements in the prevention of fire risks and in the legacy waste retrieval and packaging operations on some facilities are still too slow.
- At the CEA, new schedule slippages were observed, along with serious delays in its strategy for decommissioning the old facilities presenting the greatest risks, on which ASN and ASND made position statements in 2019.

These general findings are accompanied by three main facts:

The year 2020 was incontestably marked by the Covid-19 crisis. ASN considers that the nuclear licensees and the persons responsible for medical activities showed great responsiveness and adaptability in coping with this situation, and that the level of safety and radiation protection remained generally satisfactory during the crisis situation.

Nevertheless, vigilance is still the watchword. The postponement of numerous activities decided in spring 2020, combined with new restrictive measures imposed in autumn on account of the pandemic, resulted in a difficult situation for the nuclear licensees and persons responsible for activities using ionising radiation. And this situation persists in this start of the year. The rescheduling of reactor outages means that particular vigilance is necessary with regard to regulatory deadlines and applicable requirements.

ASN remains attentive to the measures, whether organisational or material, taken in the activities to ensure safety and radiation protection. It considers that the first lessons learned from the problems encountered during this health crisis confirm the need for all the nuclear activity players to maintain a culture of anticipation and precaution.

The year 2020 saw significant progress in examining the continued operation of the EDF's 900 MWe reactors beyond 40 years. The draft resolution concerning the generic part of this safety review is open to public consultation until 22 January, and ASN will draw its conclusions from this. At the present stage, ASN considers that the measures planned by EDF will enable the objectives of the safety review to be achieved, and bring the safety of the 900 MWe reactors to a level approaching that of third-generation reactors.

Achieving these objectives should make feasible the prospective continued operation of the reactors for ten years following their 4th periodic safety review.

ASN wishes to emphasise that the main point requiring particular attention is the industrial capacity of EDF and the nuclear sector players to cope with the significant increase in the volume of work that is vital to ensure the safety of the facilities in operation.

In the current sanitary and economic crisis situation, the State and the ordering customers must be particularly attentive to maintaining the key industrial capacities of the sector.

The preparation of the 5th PNGMDR represents an important challenge. ASN and the Ministry for Ecological Transition published a joint resolution on 21 February 2020 setting out the broad lines for the preparation of the PNGMDR (French National Radioactive Material and Waste Management Plan).

ASN has decided, in agreement with the Ministry for Ecological Transition, to cease its role as co-owner of the plan, which constitutes a management policy document that is the responsibility of the government.

It has thus refocused its action on the assessment and oversight of the existing radioactive material and waste management routes to ensure that they are safe. In 2020 ASN issued several opinions per management route concerning VLLW (very low level waste), LLW-LL (low-level long-lived waste), radioactive material and HLW-LL (high-level long-lived waste).

ASN considers, on the basis of the work and studies carried out in the previous issues of the plan, that this 5th PNGMDR should aim to be the "plan of solutions", making it possible to build real prospects of safe and sustainable management of all the types of waste by 2035/2040.



ASN issues its opinion on the radioactive waste legacy repositories within the framework of the 5th PNGMDR

February 2021

At the request of the Ministry responsible for energy (MTE), and within the framework of the French National Radioactive Material and Waste Management Plan (PNGMDR), ASN has issued its opinion on the management of legacy repositories of radioactive waste, in order to contribute to the guidelines for the 5th edition of this plan.

In successive editions of the PNGMDR, the licensees carried out studies and work to identify legacy repositories of radioactive waste and to explain the management methods adopted for each of them. Certain radioactive wastes were managed in the past in ways that have since changed. This is particularly the case with waste repositories on or near to the production sites.

These wastes, resulting from the decommissioning or post-operational clean-up of former plants or nuclear site earthworks, were also in some cases used as backfill on the land of the sites concerned, or were managed in conventional routes. The Environment Code defines legacy repositories as "prior to the year 2000, places for the disposal of radioactive wastes which are not under the responsibility of the National Radioactive Waste Management Agency [...] and for which the producers of the waste or those in possession of it did not, at the time it was placed there, envisage management in existing or planned external disposal routes dedicated to radioactive waste management, with the exception of disposal sites for mine tailings and waste rock".

After analysis of the studies received from the licensees concerning the legacy repositories placed under their responsibility, ASN expressed its positions concerning the investigation programmes implemented and the management principles for these repositories.

The investigation programmes

ASN considers that the principle of the approach adopted by the licensees to identify legacy repositories is pertinent. However, the way this approach is implemented by EDF needs to be improved and the status of certain legacy waste repositories needs to be clarified.

Guidelines for the management of legacy repositories

The public debate held in 2019, with a view to the drafting of the 5th edition of the PNGMDR, underlined that the local impacts of the management choices made in the plan need to be incorporated early on into all the decision-making processes.

ASN considers that the licensees studied an insufficient number of management scenarios for the waste present in the legacy repositories.

ASN recommends that the licensees give priority to scenarios entailing full retrieval of the waste from these repositories and transfer to existing or planned disposal routes. If the in-depth study of this scenario demonstrates that this is impossible, owing to the nature or the quantity of the waste, ASN recommends that the licensee examine other scenarios to allow management - in these routes - of the largest possible amount of waste contained in these repositories. It would therefore be useful to examine local disposal solutions.

ASN considers that pluralistic multi-criteria analyses are a pertinent decision-making tool for the long-term management of this type of site and that these methods should be applied consistently to the various waste management disposal routes. ASN thus recommends that a common analysis methodology be developed, ensuring that the approach adopted is proportionate to the issues involved in each route.

ASN also considers that the licensees should present the appropriate surveillance programme implemented on each legacy repository that would continue to hold waste. ASN also considers that the results of this surveillance programme should be regularly communicated to the public, taking account of the regulatory frameworks for the installations concerned.

ASN recommends that a pluralistic working group be set up, incorporating all the stakeholders, including the representatives of the regions involved, or liable to be involved.

This working group will take part in improving the methodological approach, in prioritising the work in the light of the issues, and will guarantee its completely objective implementation.

The licensees shall provide the competent local authority with a long-term management plan, taking into account the scenario chosen, at a date to be defined by the next PNGMDR, and considering the prioritisation work mentioned above.

Finally, ASN recalls the importance of setting up and preserving a trace and a record of these legacy repositories.

Ms Géraldine Pina Jomir appointed ASN commissioner

December 2020



@ Géraldine Pina Jomir

Ms Géraldine Pina has been appointed a member of the ASN Commission for a term of 6 years by a decree of the French President dated 15 December 2020. She succeeds Mr Philippe Chaumet-Riffaud, whose mandate expired on 10 December 2020.

Géraldine Pina Jomir is an assistant professor, a nuclear medicine physician at the Lyon-Est faculty of medicine and an electrical engineer.

In civilian life, Géraldine Pina Jomir is an engaged citizen, but she is also an army reserve physician specialising in NRBC (Nuclear, Radiological, Biological Chemical) hazard management.

Géraldine Pina Jomir received the Medal of Honour of the Armed Forces Health Service - Bronze echelon BO in December 2016. Géraldine Pina Jomir was appointed a Knight of the National Order of Merit on 17 October 2020.

