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SFRP Congrès National de Radioprotection
Lille
07 June 2017
Overview

• Introduction
• Status of activities
• Outcomes
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• Outcomes
Objectives of the Project

- Evaluate Member States’ strategies and plans for the transposition and implementation of the new BSS Directive;
- Facilitate the detection of issues;
- Facilitate the exchange of experiences and resolutions of issues;
- Facilitate the identification of good practices;
- Identification of topical issues requiring further attention, action and activities.
RISKAUDIT Team

- RISKAUDIT
- Institut de Radioprotection et de Sûreté Nucléaire
- Gesellschaft für Anlagen- und Reaktorsicherheit (GRS) gGmbH
- Bel V
## Content of the Project

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<th>Task</th>
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<td>Relevant Organisations &amp; Advisory Committee</td>
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<td>Preparation and performance of surveys</td>
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<td>General workshop to present Member States’ strategies &amp; plans</td>
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<td>Specific topical workshops</td>
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<td>Summary &amp; evaluation of Member States’ strategies &amp; plans for the transposition of the new BSS Directive</td>
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## Status of activities

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<th>Activities</th>
<th>Status</th>
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<tr>
<td>Establish <strong>general contact points</strong> in each Member State, Candidate State</td>
<td>✓</td>
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<td>and EFTA state.</td>
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<tr>
<td>Conduct an <strong>initial survey</strong> to collect information on MS strategies and</td>
<td>✓</td>
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<td>plans for the transposition of the BSS Directive as a whole.</td>
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<tr>
<td>Organise <strong>general workshop</strong>.</td>
<td>Brussels, 01-02/12/2015: ✓</td>
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## Status of activities

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<tr>
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<tr>
<td>Conduct four <strong>topical surveys</strong> to collect information on MS strategies and plans for the transposition of the BSS Directive in the specific topical area.</td>
<td>EP&amp;R: Brussels, 03/12/2015: ✔</td>
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<td>Organise <strong>four topical workshops</strong>.</td>
<td>NORM, building materials, Radon: Brussels, 07-08/06/2016: ✔</td>
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<td>Reference levels, dose constraints: Brussels, 09/06/2016: ✔</td>
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<td></td>
<td>Regulatory requirements, infrastructure: Luxembourg, 05-06/12/2016: ✔</td>
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<td>Final workshop.</td>
<td>Brussels, 27-28/06/2017</td>
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<td>Finalisation of work.</td>
<td>10/2017</td>
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- The presented findings are preliminary reflections on an ongoing contract between the EC and RISKAUDIT IRSN/GRS international (Contract: No. ENER/2015/NUCL/SI2.701749), which have been produced exclusively by the contractor. Any opinions expressed/analysis of the findings are those of the contractor and do not represent the contracting authority's official position.
Outcomes

Initial Survey and General workshop
Initial Survey – Current Status of Transposition Process

• 28 participating countries: quite good for a non mandatory exercise
28 participating countries: quite good for a non mandatory exercise

At what stage of transposition of the new BSS Directive are you currently?

- Transposition was not necessary
  - No consideration has been given to the issue yet.
  - National body responsible has been designated but the actual work has not started yet.
  - National committee has been established and responsibilities for the specific areas have been assigned
  - Analysis of the necessary changes in legislation has been carried out
- Drafting of transposition provisions has started
- Drafting has been completed
- The following provisions are already brought into force: ……
- The transposition process is already finished.
Legislation that need to be adopted / amended

Spectrum of replies:

- There is no primary legislation, namely a dedicated Radiation/Nuclear Act. Transposition of BSS will therefore be difficult
- There will be a new Radiation Act, Radiation Decree, some specific decrees and orders of the Regulatory Body
- No new legislation on radiation protection as such needs to be adopted, as such legislation is already in place
Initial Survey – Self-Identified Issues

• Do you identify any issues challenging the transposition process in your country?

• Process related:
  • Approval process at government level may delay the transposition
  • Tight time-frame for implementation
  • Insufficient financial and human resources

Reminder from EC: art 33 of Euratom Treaty states that MS shall submit 3 months before adoption (deadline of 6 February 2018 for directive 2013/59/EURATOM)
General Workshop – Open Issues

• Dose constraints
  • Must dose constraints be transposed in regulations or do they have to be taken into account by the undertakings only, as a tool to optimize the exposure
• Education and training
  • Financial and human resources
  • New practices
  • Sensitivation of the public
• Justification
  • New classes or types of practices
  • Review existing classes or types of practices
• Graded approach
• Radon
  • Identification of areas
  • Need of a common approach for dose calculation for workers (EU directive mentions 6 mSv)
  • Need of a European standard on measurements
• Building materials
  • Need of a harmonised process at the European level
General Workshop – Recommendations

- The exchange should be continued in the very near future to support the ongoing domestic transposition process.
- The implementation of some requirements should be fostered by the establishment of practical guides at the European level. *(strongly emphasized by the EC)*
- HERCA initiatives and the EC initiatives should be coordinated in order to avoid, as much as possible, the duplication of work.
Outcomes

EP&R Survey and Workshop
EP&R Workshop – Recommendations

• The information exchange should continue to support the ongoing national transposition process.

• Integrating arrangements for emergencies should be met because recently each country makes separate arrangements. ENSREG is in the process of preparing a guideline related to this subject which is necessary to promote the harmonisation process.

• In case of a cross-border nuclear accident, all countries are fully sovereign in preparing for the emergency situation. Consequently, the types of protective actions, criteria for intervention levels for introducing protective actions, operational intervention levels, and methods for assessing source terms should be harmonised as much as possible.

• Regarding cross-border protective actions a more pragmatic approach is necessary with focus on:
  • Alignment of reference levels,
  • Common operational intervention levels, emergency action levels and observables as trigger levels for specific protective actions,
  • Consideration of monitoring strategies/concepts and “general principles” for the extension of planning zones in response.
EP&R Workshop – Recommendations

• MS should be aware of specific transboundary issues related to the handling of contaminated non-food products which is not properly addressed from a regulatory point of view.

• Nuclear safety authorities should continue to promote compatible response arrangements and protection strategies in the EU.

• HERCA initiatives and the EC initiatives related to EP&R issues should be coordinated in order to avoid, as much as possible, the duplication of work.
Outcomes

NORM, Building Materials, Radon Survey
The practical use of clearance/exemption levels in a NORM context
The guidance on establishing criteria and limits for discharge of NORM
A methodology for the dose assessment to the public from authorised NORM practices including the definition/selection of exposure scenarios
The implementation of a sound dose assessment methodology for building materials
Sampling and measurement strategies
Development of a common understanding for imported building materials

Reminder: ref level = 1 mSv, I indice (Ra 226, Th232, K40) may be used as a screening value to sort out materials liable to lead to more than 1 mSv (annex VIII) / List of candidate materials given in Annex XIII
Outcomes

Reference Levels, Dose Constraints Survey
RL, DC Workshop – Identified Issues

- Dose constraints for occupational exposure
- Dose constraints for the public
- Strategies for the transition from emergency exposure situations to existing exposure situations
- Import of contaminated products
Outcomes

Regulatory requirements and infrastructure
• Justification of consumer products and restrictions that might apply
• Need for information exchange with respect to justification in the MS
• Do regulatory authorities have adequate resources and skills to fulfil their tasks?
• Transparently publish the results of inspections
• The meaning of moderate amounts of radioactive material
• Do the provisions of the BSS Directive concerning the notification of workplaces also apply to practices dealing with NORM
• Need for a dose coefficient for radon
• Criteria for the registration
• Clearance of NORM residues as well as possibilities to track specific cleared materials.

Luxemburgian approach:
A graded approach is applied with respect to the need for trained personnel and safety assessments:
- class I: RPO and RPE, Safety assessment, Third party assessment possible,
- class II: RPO and RPE, (safety assessment?),
- class 3: RPO,
- class 4: contact person.

Authorization => Registration
Conclusions

- EC expressed that from this feedback it feels confident that the transposition process is well progressing in the MS!!

• Open issues for the final meeting
  • To be determined from the last survey
  • Nothing special arising from the first answers given by MS:
THANK YOU FOR YOUR ATTENTION

QUALITY MANAGEMENT

RISKAUDIT is certified by the TÜV Cert, Germany according to DIN EN ISO 9001:2008.

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