

# **Evaluation of Member States strategies and plans for the transposition of the Basic Safety Standards Directive (Council Directive 2013/59/EURATOM)**

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SFRP Congrès National de Radioprotection  
Lille  
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- Introduction
- Status of activities
- Outcomes



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# Objectives of the Project

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- 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
- Institut de Radioprotection et de Sûreté Nucléaire
- Gesellschaft für Anlagen- und Reaktorsicherheit (GRS) gGmbH
- Bel V



Task	Task description
1	Relevant Organisations & Advisory Committee
2	Preparation and performance of surveys
3	General workshop to present Member States' strategies & plans
4	Specific topical workshops
5	Summary & evaluation of Member States' strategies & plans for the transposition of the new BSS Directive



- Introduction
- **Status of activities**
- Outcomes



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





Activities	Status
<p>Conduct four <b>topical surveys</b> to collect information on MS strategies and plans for the transposition of the BSS Directive in the specific topical area.</p> <p>Organise <b>four topical workshops</b>.</p>	EP&R: Brussels, 03/12/2015: ✓
	NORM, building materials, Radon: Brussels, 07-08/06/2016: ✓
	Reference levels, dose constraints: Brussels, 09/06/2016: ✓
	Regulatory requirements, infrastructure: Luxembourg, 05-06/12/2016: ✓
<p><b>Final workshop.</b></p>	<p>Brussels, 27-28/06/2017</p>
<p><b>Finalisation of work.</b></p>	<p>10/2017</p>

- Introduction
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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.



# Initial Survey and General workshop



# Initial Survey – Current Status of Transposition Process

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



# Initial Survey – Current Status of Transposition Process

- 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

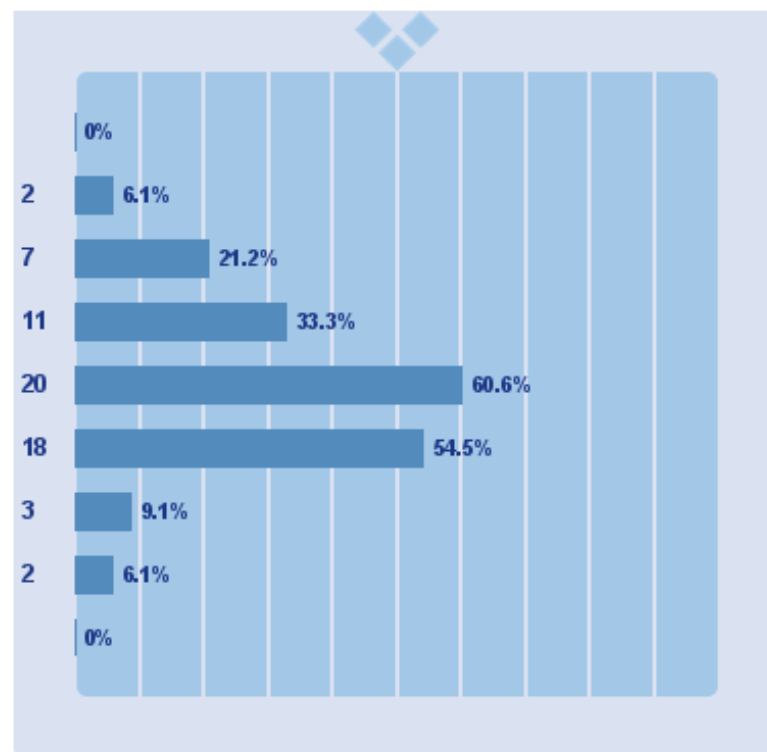
Drafting of transposition provisions has started

Drafting has been completed

The following provisions are already brought into force: .....

The transposition process is already finished.

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



- 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?

No

9

27.3%

Yes (please specify):

24

72.7%

- 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)**





- 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



- 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.



# EP&R Survey and Workshop



- 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.



- 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.



# 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**



# Reference Levels, Dose Constraints Survey





- 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



# Regulatory requirements and infrastructure



# Regulatory Requirements etc Workshop – Identified Issues

- 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



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

Opening Session Welcome and Introduction to Final Workshop		Session 2 Perspectives on Open Issues Chaired by Stefan Mundigl (EC DG ENER)		Session 3 cont. Status of Implementation by the Member States Chaired by Stefan Mundigl (EC DG ENER)	
13:00-13:10	A. Wertelaers (FANC) <i>Welcome</i>	09:00-09:30	J.-L. Godet (HERCA) <i>HERCA Action Plan: Status</i>	12:00-13:00	<i>Lunch break</i>
13:10-13:20	Michael Hübel, (EC DG ENER), Head of Unit <i>Introduction to the final meeting on summary and lessons learned from the transposition of BSS</i>	09:30-10:00	T. Colgan (IAEA) <i>IAEA experience on transposition of international BSS</i>	13:00-13:20	Chantal Mommaert (Bel V) <i>Results of Final Survey</i>
Session 1 Status of the project : Summary and Evaluation Chaired by Stefan Mundigl (EC DG ENER)		10:00-10:30	O. Guzmán (NEA) <i>NEA/CRPPH preliminary analysis of the INEX 5 exercise</i>	13:20-15:30	Round table of MS: Transposition status and remaining questions <i>Discussion moderated by EC and RISKAUDIT</i>
13:20-13:40	Chantal Mommaert (Bel V) <i>General Workshop</i>	10:30-10:45	<i>Coffee break</i>	15:30-15:45	<i>Coffee break</i>
13:40-14:10	D. Degueldre (Bel V) <i>Topical Workshop EP</i>	10:45-11:15	H. Van Marcke (SCK-CEN) <i>UNSCEAR-ICRP dose conversion factors</i>	15:45-16:00	Boris Brendebach (GRS), Technical Project Leader <i>Summary of the Round Table Discussion</i>
14:10-14:30	Etienne Minne (Bel V) <i>Topical Workshop NORM &amp; Radon</i>	Session 3 Status of Implementation by the Member States Examples of implementation (near) completion Chaired by Stefan Mundigl (EC DG ENER)		Closing Session Final remarks and Conclusions	
14:30-14:50	Christian Kennes (Bel V) <i>Topical workshop Reference Levels &amp; Dose Constraints</i>	11:15-11:30	Annie Vanderlinck (AFCN-FANC) <i>Latest implementation status of BSS in Belgium</i>	16:00-16:30	Final remarks on the meeting and project <i>RISKAUDIT</i>
14:50-15:10	Christian Kennes (Bel V) <i>Topical Workshop Regulatory Requirements and Infrastructure</i>	11:30-11:45	Speaker to be defined (SSM)	16:30-17:00	Michael Hübel (EC DG ENER), Head of Unit <i>Conclusions of the meeting and project</i>

- 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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