Europe, EACA and a comprehensive European study

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Contents

› Europe

› The Study: “Comprehensive examination and analysis of transport of nuclear materials”

› Status of the Study and role of EACA
The European Union

28 Member States (2018)

- Treaty on European Union (1992)
- Treaty establishing the European Economic Community (1957)
- Treaty establishing the European Atomic Energy Community (1957)
- Treaty establishing the European Coal and Steel Community (1951)

European Parliament
(Elections each 5 years)

European ‘Government’

Council of EU national Government Ministers

EU Council of Heads of State of EU Member States
Transport of RAM in EU Member States

Transport of DG:

› Modal regulations:


Transport RAM as practice:

› 2013/59/EURATOM (‘European BSS’)
The study

- “Comprehensive examination and analysis of transport of nuclear materials”

- EC / DG ENER project aimed at:
  
  - Identify actions/improvements to ensure highest possible level of radiation protection, nuclear safety and nuclear security in Europe. Promote, strengthen and harmonise the safety and security in transport, in line with the latest scientific and technological developments and taking account current and potential future radioactive material transport practices and procedures.

  - Identify actions or improvements at EU or national level which would be necessary to dispel some lack of trust in the Transport of Radioactive Material and ensure public confidence (transparency).

- Carried out by ENCO, involving EU CAs + Stakeholders
Timeline

› May 2017: Kick off
› Aug-Sep 2017: Comprehensive questionnaire EU Member States
› Jan 2018: Interim report
› Feb 2018: First Stakeholders Group workshop
› March/April 2018: Follow up questionnaire on Authorisations and questions on the NDT sector
› Sep 2018: Second Stakeholders Group workshop -> ENCO Final report
› Follow-up: Potential discussions at EC level (DGs and MS)
Scope and questionnaire

- Study based on comprehensive questionnaire to EU CAs:
  - >100 questions, >700 data fields
  - time consuming, not always easy or possible for CA to answer all questions!

- Prime responsibility for safety
- Packages not requiring approval by CA
- Public exposure
- Policy for review and revision of regulations
- Standards for compliance
- Capacity building
- Collaboration
- Peer review

- Segregation distances
- EPR
- Guidance
- Inspections
- Cost and assessment duration (e.g. for type B certifications)
- Denial of Shipment
- Public perception
- Open market
Typical finding from interim report

Prime responsibility for safety:

› Who should be authorised? Carrier, consignor? Different between MS.
› BSS looks at transport as a practice, ADR puts emphasis on consignor.

Some other findings:

› Differences between MS in liability and insurance provisions
› Issue of separation of expertise DGSA – RPE, RPO
› Compliance assurance of packages non CA – approval
Some ADR related issues

› Directive 95/50/EC - checks on road transport of dangerous goods:
  - Roadside checks for Class 7 may not be the most cost effective solution to assure the safety of transport of RAM
  - Might result in the penalising of carriers for consignor failures
  - Need for improved training of consignors (especially in case of repeated non-compliances)?
  - States with a single regulator covering facilities and transport of RAM appeared to have advantages in compliance checking

› The areas of transport that the community is most involved with has no modal based peer review, i.e. there is no review of compliance with ADR. unless done by the State itself.
Other topics

› Ensure that assessments are carried out on public exposure from transport activities on a regular basis (role for EACA?)
› Develop guidance on each area of the Compliance circle (TS-G.1.5)
› Explore IAEA mini-Transas mission to help maintain MS improvement (self-assessment / peer review).
› It may be appropriate for the EC to revise some of the details in 95/50/EC to focus on checks and data that are actually relevant to Class 7.
› The potential for EACA and MEDNET to influence regulatory improvement in Europe and how this can be supported may be worth exploring.
› The community standards for EPR were not set out clearly in some of the questionnaire responses. Further in-depth study may be required.
European Association of Competent Authorities (EACA)

› Informal network of European CAs

› Active members from 22 countries
  – www.euraca.eu
  – PDSR Guide
  – Technical guide – Compliance Inspections

› Last annual meeting Paris (23-24 May)
  – Discussion on ENCO study (process)
The Study and EACA

› EACA members are represented on the Stakeholders Group and welcome the opportunity to participate

› Too early for any conclusions, but:

  – Analysis and recommendations must be undertaken with care
  – It is important for the contractor to keep all MS involved drafting the final report (ENCO) and any follow up actions (EC)