

OSART Good Practices
CORP. INDEPENDENT OVERSIGHT
Organization of independent oversight

EDF corporate, France

Mission Date; 24 Nov.-5 Dec., 2014

Nuclear Inspectorate in DPN and overall review process EGCI in DIN provide independent assessment by a highly competent and experienced staff, whose insights are acted upon by line management.

Nuclear Inspectorate (NI) conducts a full-scope Overall Excellence Assessments (EGE) covering a broad scope of 13 functional areas. This function is resourced by 40 staff members of specific expertise with acquired experience and training. NI conducts EGEs on a 4-year cycle on all NPPs, and the EGEs are coordinated with WANO PRs and are conducted with highly competent staff experienced in operation. Assessors are highly respected by both Station Managers and corporate senior managers.

NI authorities laid down in DPN Quality Management document, sub process for "Risk Management and Internal Control" - NL PIL 90 N, N PIL 100 N, and MP1 defines duties, responsibilities and authorities for on escalation process with NI.

NI management manual procedure on qualification of all NI staff requires

Maximum four years term for inspectors in independent assessment group of NI,
Minimum requirements for NI staff include at least 5 years of operational experience on nuclear power plants, and Team Leaders are required to have held a senior managerial position on an NPP,

The annual review of the nuclear inspectorate's human resource process documents the effectiveness of the recruitment process (HR process review of 20 October 2014, ref. D4008.26.14147CR).

Administrative measures are in place to assist with the relocation of senior employees recruited from NPPs to join the nuclear inspectorate.

Independent assessment of all engineering centres is carried out within engineering division (DIN). Independent verification process ensures that all plant modifications are well defined and performed in such a way as to ensure safety is the overriding priority and thus strengthening the role of Design Authority. Significant design changes and modifications are evaluated and approved in CSNC.

All engineering centres are systematically reviewed by independent assessors every three years using overall review process (EGCI). The EGCI external independent assessment team focuses on safety issues in engineering activities. The team consists of well qualified and experienced staff with experience in plant operation as well as engineering. Independent audits are also performed as topical inspections based on management request. The effectiveness of EGCI independent assessments are reviewed on an annual basis during DIN Nuclear Safety Management Review process and during analysis of events.

Benefits:

Highly competent staff whose independent assessments are regarded by line managers and this provide value to operational safety improvement.

The DPN, DIN, CSNE are provided with diverse information by independent assessment line on safety issues as needed.

The EDF structure and arrangements ensure that corporate independent assessment line has a duty to raise significant safety issues to IGSNR and thus escalate any safety concern.

The EGE functional areas reviews are well coordinated with WANO Peer reviews in four

year cycles and EGCI reviews are performed every three years.

The EDF mobility program and rotation of experience staff between corporate assessment units and line management promotes self-assessment activities and ensures highly competent assessors for EGE and EGCI reviews.

EDF corporate, France

Mission Date; 24 Nov.-5 Dec., 2014

The independent function IGSNR (General Inspectorate for Nuclear Safety and Radiation Protection) reports directly to CEO.

Description:

The IGSNR comprises a team of five independent members, including the General Inspector. This team uses its own methods for independent assessment of corporate functions, nuclear sites and other EDF nuclear assets. The General Inspector reports to CEO and EDF Board of Directors (BOD). The annual report on independent assessment of EDF nuclear assets is submitted to CEO, BOD, French regulator (ASN) and also to the public.

A CEO decision establishing the IGSNR office and assigning its authorities and letters of CEO of EDF dated 30 July 1999, and 15 July 2014, empowered the General inspector to perform permanent independent assessments of all areas of EDF activities in nuclear and radiation protection areas.

The Inspector General is always selected from outside the EDF utility for 5-6 years term in order to bring independent views and fresh look to EDF nuclear safety processes.

The IGSNR team is highly qualified and has relevant experience from design to operational safety with broad experience in nuclear power operation and international practices.

The IGSNR has autonomous position and high level of authority and reports to CEO (legally assigned license holder).

Benefits:

The Annual Report of General Inspector for 2013 clearly confirms independence of this function. The report is submitted to the EDF senior management to challenge EDF line management in continuous improvement of the fleet.

This oversight function provides a link between corporate and group level to raise any safety concerns.

Line management at all three management levels uses this report for implementation of improvement actions which are tracked.

The IGSNR is a key component of continuous improvement of safety in all areas within both line management and independent assessment line of EDF.