PUBLIC INFORMATION AND TRANSPARENCY

CHAPTER 6

The TSN Act of 13 June 2006 constituted a significant innovation in that it defined transparency and the right to information in the nuclear field: "Transparency in the nuclear field consists in the set of provisions adopted to ensure the public's right to reliable and accessible information on nuclear security" (Article 1). ASN considers that it is responsible for the correct implementation of the requirements of the TSN Act, in particular those concerning transparency.

First of all, ASN is committed to intensifying its own actions with regard to transparency, through active communication with the general public, the media, the institutional public and professionals.

ASN then ensures that the TSN Act is implemented by the stakeholders. It supports the measures taken to promote transparency by the Local Information Committees (CLIs) and the High Committee for Transparency and Information on Nuclear Security (HCTISN).

Finally, in its nuclear licensee regulation and inspection activities, ASN intends to develop compliance with the transparency obligations stipulated by the TSN Act. The licensees are now required to release to anyone who so requests the information in their possession concerning the risks involved in their activities and the safety or radiation protection measures taken by them to prevent or mitigate these risks.

1 DEVELOPING RELATIONS BETWEEN ASN AND THE PUBLIC

1|1 From public information to transparency

Informing the public about nuclear safety and radiation protection is one of ASN's fundamental duties. It is also a historical duty which has changed as French society itself has evolved. Thus, at each institutional change concerning how the regulation of civil nuclear activities is organised in France, ASN's public information role was confirmed and developed.

In order to fulfil this role, ASN is looking to change its working methods and its information media in order to meet the expectations of the general and professional public, over and above the transparency requirements contained in the TSN Act.

Since 2002, ASN has published follow-up letters to all the inspections carried out in basic nuclear installations (BNIs), amounting to more than 750 follow-up letters per year. Since 1 July 2008, ASN has extended this publication to include radiotherapy follow-up letters (more than 150 per year) and, as of the 2nd quarter of 2010, intends to publish all the follow-up letters to the inspections of small-scale nuclear facilities. Small-scale nuclear activities include the industrial sector (suppliers of medical and non-medical sources), research and the entire medical sector (radiotherapy and brachytherapy, conventional and interventional radiology, nuclear medicine, etc.). In total, ASN will thus make more than 1,500 follow-up letters available on its website every year.

Since 1 October 2008, ASN also makes the opinions and recommendations of its Advisory Committees available on its website.

ASN applies its policy of "accountability" through its official presentation to Parliament of the annual ASN Report on the state of nuclear safety and radiation protection in France.

ASN informs and reports to the various opinion shapers and national and regional stakeholders (elected officials, representatives of environmental protection associations), as well as industry and the administrations.

At a local level, its public information role is carried out by the regional representatives and the heads of its eleven divisions.

The actions by the regional representatives and division heads with regard to public information are a means, at regional level, of informing elected officials, the media and the public of the state of nuclear safety and radiation protection, along with ASN's regulatory, legislative and emergency situation management actions.

1|2 ASN's information media

Convinced of the need to act with complete transparency, by producing reliable and accessible information, ASN has set up an information policy based on complementary

media, so that information is made accessible to its various audiences.

This desire on the part of ASN to report on its action in new ways and to new audiences, led in April 2009 to the creation of a monthly information medium, the ASN Newsletter. This was followed in October 2009 by the new version of its website www.asn.fr and in November 2009 by an overhaul of how news was covered in its *Contrôle* magazine. ASN now has a full range of media for informing the public about all aspects of its duties and its stance on strategic issues.

1|2|1 ASN's website, www.asn.fr

The ASN website, www.asn.fr, which has been ASN's main public information tool since it was created in 2000, received more than 430,000 visitors in 2009, who consulted nearly 2 million pages.

www.asn.fr presents nuclear safety and radiation protection news in France, as well as ASN actions and positions within its areas of competence. The site informs web users about subjects as varied as nuclear installations, radiotherapy, radioactive waste management, radon, emergency situations management, industrial uses of ionising radiations, etc. It gives access to more than 5,500 inspection follow-up letters, 1,350 incident notifications and 1,200 reference texts (Acts, decrees, orders, opinions, etc.), to nearly 500 national or regional news reports and to the decisions taken by ASN on the advice of its Advisory Committees.

Homepage of the ASN website: www.asn.fr

The new version of www.asn.fr aims to present more clearly organised content and facilitate access to national and regional news and to local information. To shed light on topical subjects, new sections present ASN's various regulation and inspection duties and the various sectors covered.

www.asn.fr also offers easier access to a unique documentary base on the life of the installations (inspection follow-up letters, reactor outages, incident notifications) or to regulatory texts. A number of more user-friendly browsing modes are proposed via the "contrôle" or "activités contrôlées" sections, or on the pages devoted to the installations in the regional sections. RSS web feeds are also available for real-time monitoring of news updates and the latest version of the ASN Official Bulletin.

A dedicated search engine proposing a selection of results by topic or by sector, plus information related to the question asked, enables the web user to carry out effective document searches.

In addition to this improved browsing, the content has been enriched and updated, to enable the general public to gain a clearer picture of the range of work done by ASN. A simplified scientific glossary and new interactive modules are provided to illustrate and help with understanding of the sometimes complex or technical subjects covered in the documents drafted by the various disciplines (incident notifications, inspection follow-up letters, etc.).

For participation in the public debate on the topic of nuclear activities and the regulation of safety, regular surveys and public consultations will be proposed on topical subjects.

Finally, a new version of the website in English was also placed on line. It places particular emphasis on topical events and news.

1|2|2 The ASN Newsletter

At the end of April 2009, ASN created an additional news medium: the ASN Newsletter. The double-sided ASN newsletter page is sent out every month to 2,000 recipients (members of Parliament, local elected officials, senior civil servants, but also associations, CLIs, licensees and journalists). The ASN Newsletter can also be consulted and downloaded at www.asn.fr.

Front covers of issues of *Contrôle* magazine published in 2009

This medium presents regular news sections devoted to ASN decisions, ASN actions (inspection in particular), and the latest news from the sectors regulated. Every month, a particular topic is spotlighted in the "Enjeu" section. ASN wanted to provide information that was concise, clear, categorized, highlighted the main items and directed the readers to other ASN information media to enable them to gain a clearer picture or deeper understanding of the subject. This new medium, 10 issues of which are distributed every year, can cover 20 to 25 subjects each month.


LA LETTRE
DE L'AUTORITE
DE SURETE NUCLEAIRE
Réglementer, contrôler, informer
asn
L'ESSENTIEL
ENJEU
Marcoule : l'ASN classe un incident au niveau 2 de l'échelle INES
L'ASN EN ACTIONS
Chantier EPR de Flamanville 3
Gestion des déchets radioactifs
Démantèlement des INB
ACTIVITÉS DU COLLÈGE
AGENDA

The French Nuclear Safety Authority newsletter

1 | 2 | 3 *Contrôle* magazine

Four times a year, ASN publishes a magazine called *Contrôle*, with a circulation of more than 10,000 both in France (national and local elected officials, media, HCTISN, CLIs, associations, licensees, administrations, private individuals) and abroad (safety authorities of countries with which ASN maintains close ties).

Contrôle comprises a detailed report on a specific subject concerning nuclear safety or radiation protection, entitled *"Les Dossiers de Contrôle"*, and a current affairs part reporting on ASN activities, especially at regional level.

The report gives a broad overview and a description of the various approaches to a given subject, to help the reader make up his own mind. The special report presents the ASN view of the subject covered and gives an opportunity for the various stakeholders concerned to express themselves: licensees, administrations, experts, environmental protection associations, journalists, etc. ASN's foreign counterparts are also asked for their viewpoint and an

article is regularly devoted to an example from a sector of activity other than nuclear. The *Contrôle* magazine special reports can be consulted on www.asn.fr.

Contrôle magazine also comprises a current affairs part which was reorganised and expanded at the end of 2009, to ensure clearer presentation, more pleasant reading and greater coordination with ASN's other information media. This complementarity in particular entails presentation of extracts from press releases and information memos, along with summaries of inspection follow-up letters and incident notifications. A reader wishing to read the full document is then invited to consult it on www.asn.fr, where it is easily accessible, especially using the search engine. This overhaul also led to the inclusion of new content concerning ASN activities (in France and abroad) and highlighting ASN's regional actions, with a harmonised presentation nationwide. For example, it contains minutes of CLI meetings in the section covering the installations over which the particular CLIs have jurisdiction.

Press briefings are organised when each issue of *Contrôle* is published. They are regularly attended by journalists from the mainstream press and from media specialising in the nuclear, environmental and medical fields.

In 2009 *Contrôle* covered the following subjects:
– Nuclear inspection: inspections by ASN (no. 182 – February);
– ASN Report on the state of nuclear safety and radiation protection in France in 2008: extracts (no. 183 – April);
– The continued operation of nuclear power plants (no. 184 – July);
– Safety in external radiotherapy treatments (no. 185 – November).

Contrôle is free and is distributed on the basis of voluntary subscription (subscription form available on www.asn.fr or by mail from the following address: ASN Publications, 6, place du Colonel Bourgoin, 75572 Paris Cedex 12). Out of print issues can be consulted on the website www.asn.fr, or in ASN's public information and documentation centre.

1|2|4 ASN Report on the state of nuclear safety and radiation protection in France

The ASN Report on the state of nuclear safety and radiation protection in France is the result of collective analysis and synthesis by all ASN entities. It is a reference document which every year presents the changes that have occurred and the problems that were encountered in the activities regulated and inspected by ASN. It is a means of broadening the scope of reflection to nuclear safety and radiation protection projects and outlook, on topical issues or subjects of particular importance.

ASN submits its annual report to the President of the Republic and to the Government and presents it to the members of the French Parliamentary Office for the Evaluation of Scientific and Technological Choices (OPECST) and to other members of Parliament. These hearings, to which the press is invited, take place in the National Assembly and in the Senate. The 2008 report was presented on 7 April 2009. This was an opportunity to discuss the significant events of 2008, but also the nuclear safety and radiation protection outlook and issues in France and abroad.

ASN's 11 regional divisions also present the report to the regional media. ASN's 2009 report will be presented to OPECST on 7 April 2010.

The ASN Report on the state of nuclear safety and radiation protection in France underwent a partial revision of its content in 2009. It now proposes a general introduction containing an editorial from the ASN Commission spotlighting a selection of important topics, plus a summary of the highlights of the year, focusing on a number of particular subjects. In line with the changes made to other ASN media, which place particular emphasis on local actions, the ASN report now includes a new part dedicated to the regional round-up of nuclear safety and radiation protection in France.

The ASN Report on the state of nuclear safety and radiation protection in France is sent out to nearly 2,000 recipients: representatives of the administration, local elected officials, licensees and those in charge of regulated activities or installations, associations, professional trade unions, learned societies, private individuals, and so on.

Since 1996, this report has been translated into English to promote exchanges between nuclear regulators and inform foreign nuclear safety and radiation protection stakeholders (experts, members of international organisations, licensees, researchers, journalists, teachers, etc.). Nearly 500 copies of the English version on CD-Rom are sent out in Europe, Asia and North America.

The French and English version of the ASN Report can be consulted and downloaded on www.asn.fr. The English version can be accessed at the following address: http://annual-report2008.asn.fr/. The English version of the 2009 report will be available at http://annual-report2009.asn.fr/ from the end of July 2010.

The ASN Report can be consulted at the ASN public information and documentation centre. It can also be sent free of charge, on request by letter to the following address:

The ASN information and documentation centre – 6, place du Colonel-Bourgoin – Paris 12

ASN Publications, 6, place du Colonel-Bourgoin, 75572 Paris Cedex 12.

1|3 ASN's audiences

1|3|1 ASN and the general public

Nuclear safety and radiation protection are not the exclusive preserve of the specialists and concern all citizens.

ASN has a major role to play in access to information and compliance with the transparency principles laid out by the TSN Act. It aims to provide the citizens with information that is as clear, complete and accessible as possible.

ASN hopes to go further in the future, by involving the public in the debate on nuclear safety and radiation protection issues, but also in its own decisions. ASN therefore intends to both initiate and participate in debates with the public.

ASN actions aimed at the general public

a) Brochures presenting ASN and its regional divisions

The ASN presentation brochure was updated in November 2009. It presents ASN's status, its organisation, its roles and the resources it deploys so that, on behalf of the State, it can regulate nuclear safety and radiation protection and inform the public. It is in particular distributed at meetings and events attended by ASN and is also available in English.

The presentation brochures for ASN's eleven regional divisions present the regulation of nuclear safety and radiation protection in the regions, placed under the responsibility of each of the ASN regional representatives and the contribution of the divisions to public information. They specify the nature of the installations regulated and give figures on the make-up of the ASN teams in each region and the number of inspections performed every year. Each regional brochure is incorporated into the ASN national presentation brochure. The regional brochures are distributed at meetings, at training sessions and at the regional symposia attended by the divisions. They are also communicated to the local administrations (préfectures, DRASS, DDASS, DRTEFP, etc.), to the stakeholders (CLIs, environmental protection associations, media, etc.), to the heads of the installations and activities regulated, to professional trade unions, and so on. They will be updated in 2010.

b) The information sheets

The ASN information sheets provide concise and pedagogical information on the main topics of nuclear safety and radiation protection.

These sheets are widely distributed among the general public and the teaching sector. They are available at the exhibitions and symposia in which ASN participates and are sent out to various information providers such as CLIs and the documentation centres for teachers.

The collection currently comprises 7 numbers.
Sheet no. 1, "Administration of stable iodine in the event of a nuclear accident";
Sheet no. 2, "Radiation protection principles";
Sheet no. 3, "Nuclear or radiological: which term to use?"
Sheet no. 4, "Radiation protection values and units";
Sheet no. 5, "The French nuclear fuel cycle";
Sheet no. 6, "Radiological emergency situations";
Sheet no. 7, "Radon".

c) The public information and documentation centre

The public information and documentation centre was inaugurated in 2004 and is open to all (professionals,

students, associations, private individuals) in ASN's Paris premises.

It enables visitors to consult more than 1,000 documents concerning ASN's areas of competence: nuclear safety, radiation protection, but also radiation physics, radiochemistry, design of nuclear installations, nuclear medicine, radioactive waste management, the fuel cycle, risk management, the environment, regulations, and so on. The centre promotes access to information and compliance with the transparency principles defined by the TSN Act. It allows in-situ consultation of original administrative documents such as public inquiry dossiers for the authorisation decree or for modifications to BNIs, or impact assessments and the annual reports from the licensees which, pursuant to Article 21 of the TSN Act, deal with the environmental impact of each BNI.

In this centre, the public has access to all ASN publications (*Contrôle* magazine, annual reports, information sheets, etc.). It can also consult French and international publications on nuclear safety and radiation protection produced by the various stakeholders (CLIs, nuclear licensees, IRSN and other technical experts, radiology and radiation protection learned societies, professional associations, environmental protection associations and so on).

Poster for the ASN/IRSN travelling exhibition "Nuclear applications and society: from understanding to regulation"

In 2009, the ASN public information and documentation centre welcomed about a hundred visitors and answered queries from more than 2,200 people (answers to questions from web visitors, requests for publications).

d) Exhibition: "Nuclear applications and society: from understanding to regulation"

ASN and IRSN organise an exhibition travelling around the regions, more particularly aimed at schoolchildren and the general public. The purpose of the exhibition is to provide simple, attractive and direct information on the assessment and management of nuclear energy related risks and the corresponding means of monitoring. Every year, 3 or 4 towns are chosen to host this 250 m² exhibition for a few weeks.

At each stop, the regional divisions help with the events and conferences and the dissemination of information to elected officials, the local press and the general public. ASN publications are also proposed to the visitors.

In 2009, after a presentation at Le Havre (Seine-Maritime *département*[1]), the exhibition was installed in Laval (Mayenne *département**), and then in Romans-sur-Isère (Drôme *département*). It received nearly 5,000 visitors. The 12 thematic conferences associated with the exhibition were this year attended by nearly 320 participants.

In 2009, a new interactive model was produced to make the exhibition more attractive.

1 | 3 | 2 ASN and professionals

The professional public is an audience of particular importance for ASN. Over and above its professional contacts with the main nuclear licensees, ASN is developing its ties with players in the radioactive materials transport sector and users of ionising radiations in the health sector. The fundamental objective of this communication with the professional audience is to promote familiarity with the technical, organisational and human aspects of the radiation protection regulations and culture.

ASN also aims to raise the awareness of stakeholders in industry and research in France of the major risks associated with the use of gamma radiography equipment and the problem of source theft or loss.

In addition to its website www.asn.fr, ASN drafts publications intended specifically for them and organises or takes part in many symposia, seminars and other events.

*Administrative region headed by a *préfet*.

Fourth iodine tablets distribution campaign around EDF nuclear power plants

This health risks prevention campaign was organised by ASN, the ministries responsible for the Interior and Health, with the support of EDF, the National Association of Local Information Committees (ANCLI), the National Order of Pharmacists, the retail pharmacy trade unions and the rural pharmacy association. About 400,000 homes and 2,000 establishments open to the public in 500 communes, were covered by this campaign.*

The goal of this new campaign is to increase the involvement of the citizens by sending them clear messages:
– in the event of a nuclear accident, taking stable iodine is a simple and effective means of protecting the thyroid against the effects of radioactive iodine;
– as young people and pregnant women are the most vulnerable, priority is given to protecting them;
– taking stable iodine must be associated with other protective actions.

Poster for the 4th iodine tablets distribution campaign

Operating experience feedback from previous distributions showed that public information needed to be intensified, by involving local stakeholders and ensuring that long-term measures were taken to raise public awareness. A working group piloted by ASN coordinated the communication plan for the pharmacy distribution phase, which ran from June to December 2009. It will then be required to propose long-term, comprehensive communication on all protective actions in a radiological emergency situation.

Numerous communication media were created: individual letters to each home within a 10 km radius around a nuclear power plant, website (www.distribution-iode.com), information brochures and posters. The approach was supported and communicated by the many stakeholders in the campaign: préfectures, ASN regional divisions, pharmacies, EDF nuclear power plants, Local Information Committees, town halls, health professionals, associations. Nationwide, nearly 50% of the persons concerned collected their boxes of tablets from their pharmacy, with more than 338,000 being distributed in this way. The campaign received good national and local media coverage, with nearly a hundred articles in the press.

The initial studies concerning this campaign showed that almost 90% of those concerned had been informed. This study will be supplemented by a qualitative and quantitative post-test during the course of 2010.

a) Publications intended for professionals

ASN produces publications intended for professionals, in order to highlight its actions and roles and to explain and encourage implementation of the regulations.

In 2009, it thus published a number of guides, aimed at the professionals whose activities it regulates, presenting regulations and good practices in the fields of nuclear safety and radiation protection: All the ASN guides are available on www.asn.fr.

– In the medical field, two quality assurance guides were produced and placed on-line on www.asn.fr: the guide for auto-assessment of "patient" risks in radiotherapy and radiotherapy safety and quality requirements. To support these recommendations, a brochure summarising the two guides was published and sent out to all the professionals concerned.
– In the transport sector, a guide was drafted to help with applications for shipment authorisation and approval of package models or radioactive materials for civil use transported on the public highway.
– In the nuclear sector, a draft guide entitled "Recommendations for producing annual information reports for the public, concerning basic nuclear installations" presents the licensee's obligations under Article 21 of the TSN Act. It will be distributed in 2010.
– In the health sector, the initial results of the significant radiation protection events concerning patients undergoing an

*Smallest administrative subdivision administered by a mayor and a municipal council.

external radiotherapy procedure and the equipment monitoring reports concerning radiotherapy devices (hardware and software) declared between 1 July 2007 and 30 June 2008 were published jointly by ASN and the French Health Product Safety Agency (AFSSAPS). These results were sent out to all the professionals concerned in September 2009.

The 2009 edition of the regulatory guide on radiation protection requirements applicable to medical and dental radiology was also made available on the website www.asn.fr and distributed at the Annual Convention of the French Society of Radiology (16-20 October 2009).

b) Professional symposia

ASN is also developing relations with professionals through the symposia it organises and through its participation in the events they organise.

These events are also opportunities for ASN to share ideas and experience with its foreign counterparts.

The professional symposia organised by ASN

Several debates on national or regional subjects were organised by ASN with the professionals.

The Lyons division organised a morning session to look at the role of the Local Information Committees (CLIs) as defined by the TSN Act, primarily with the aim of strengthening the regional CLI network.

In the health field, the Marseilles and Paris divisions organised meetings with radiotherapy professionals in order to present the results of ASN inspections in this sector. The Paris division convened a meeting of about a hundred stakeholders in the nuclear medicine sector to review

Environmental radioactivity measurements accessible on the internet as of early 2010

Created by Article R.1333-11 of the Public Health Code, the role of the French National Network of Environmental Radioactivity Monitoring (RNMRE) is to contribute to estimating the doses received from the ionising radiations to which the population is exposed as a result of all nuclear activities, and to inform the public.

In order to meet this transparency goal, the Network launched a website on 2 February 2010 to present the environmental radioactivity monitoring results and information on the health impact of nuclear activities in France. In order to guarantee the quality of the measurements, only those taken by an approved laboratory or by IRSN may be communicated to the Network.

To coincide with the launch of the website, a joint ASN and IRSN press conference was held in Paris, in the presence of representatives from the RNM.

On the recommendation of a steering committee, ASN is responsible for setting guidelines for this network, which is managed by IRSN.

Website of the national environmental radioactivity monitoring network, www.reseau-radioactivite.fr

The steering committee also ensures that the radioactivity data specified in Article R.1333-11 of the Public Health Code are made public. In addition it issues opinions on the summary reports on the radiological condition of the environment and the radiological impact of the main nuclear activities, whether they are written by IRSN or any other organisation.

During the course of 2009, the RNM gradually incorporated the various environmental radioactivity measurement results from the Network participants. Following a technical development phase, the website underwent pre-testing in September 2009 designed to analyse the overall understanding and assessment of the project by web users and the ergonomics and legibility of its portal and content.

The website, online since February 2010, includes the recommendations resulting from these tests.

International radiotherapy conference: a successful meeting with the patient radiation protection profession

The international conference entitled "Modern radiotherapy: advances and challenges in radiation protection of patients" organised by ASN in cooperation with IAEA, the World Health Organisation (WHO) and the European Commission (EC) took place from Wednesday 2 to Friday 4 December 2009 at the Versailles conference centre.

50 speakers from among the leading international specialists in radiotherapy and brachytherapy addressed some 330 participants from 34 different countries. 70 posters on the safety of radiotherapy care were presented and 11 institutional and industrial stands were set up.

The conference covered the following topics:
– new techniques, risks and benefits of radiotherapy and brachytherapy;
– challenges in radiotherapy: individual radiosensitivity, complications and their treatment;
– lessons learned from accidents;
– equipment safety, personnel management and training;
– regulations, audits, quality control and quality assurance;
– patient information.

On 3 December, Dr Daniel Nizri, general adviser for radiotherapy health care establishments, spoke on behalf of the Minister for Health and Sport, Mrs Roselyne Bachelot-Narquin, to restate her commitment to the radiation protection of patients, in particular through national radiotherapy measures and the cancer plans.

On Friday 4 December, the conference opened its work to patient associations for presentation of the cancer plan by Pr. Dominique Maraninchi, Chairman of the French National Cancer Institute (INCa) and for the "patients information" round-table chaired by Pr Simon Schraub, President of the Ligue contre le cancer. This round-table brought together representatives of the latter organisation, the Association of victims of medical accidents and the Association of the Épinal irradiation victims, as well as national and international players from the health sector in France and abroad.

The conclusions of the Conference were as follows:
– the key position of radiotherapy in the treatment and cure of cancers was restated;
– although technical developments in this field offer new benefits, they also create new risks. Operator training must therefore be improved and the initial use of these new techniques requires independent assessment by professionals, using procedures to be defined on an international basis;
– local and international efforts need to be intensified with regard to recording and analysing treatment side-effects and complications. Significant event notification systems must be developed to ensure analysis and operating experience feedback;
– the safety culture in the radiotherapy centres must continue to progress, through the use of quality assurance and risk analysis by professionals who are adequately trained and in sufficient numbers;
– greater involvement by the authorities is necessary in order to promote actions in the fields of quality assurance, risk analysis, clinical good practices and clinical audits;
– coordination of research programs is vital if quick and simple radiosensitivity tests are eventually to be developed;
– the patients and their associations need to be involved in assessing the quality and safety of treatment and in risk management and communication.

International radiotherapy conference organised by ASN from 2 to 4 December 2009 in Versailles

feedback from ASN inspections and discuss and share experience.

In the industrial sector, the Marseilles, Douai and Nantes divisions called a meeting of industrial radiology professionals in order to look at setting up good practice charters.

Two international meetings on seismic risks and patient radiation protection were also held in 2009. More than 900 professionals took part in these exchanges.

– On 17 June, the Strasbourg division and ASN's Nuclear Power Plants Department organised an international scientific and technical seminar entitled "International Scientific Seminar on Seismic Risk and Nuclear Safety: the ASN identifies new focuses for regulatory modernisation", at the Strasbourg conference centre, in partnership with the Swiss Federal Nuclear Safety Inspectorate (ENSI). The aim of this seminar was to determine the extent to which recent scientific advances in the field of seismic risk and improved knowledge of past earthquakes can help us to reassess and further enhance the safety of nuclear installations.

  This seminar was attended by more than 100 participants: researchers, experts, foreign safety regulators, environmental protection associations, journalists, etc.

– From 2 to 4 December, ASN organised an international Conference on radiation protection of radiotherapy patients, jointly with the International Atomic Energy Agency (IAEA), the World Health Organisation (WHO) and the European Commission (EC), at the Versailles conference centre.

ASN participation in symposia organised by the professions

ASN took part in scientific medical conferences, in particular those organised by learned societies in the medical field: French Radiation Protection Society (SFRP), French Society of Radiology (SFR), French Society of Medical Physics (SFPM), French Society for Radiation Oncology (SFRO), International society of radiation biology in French language (SIRLaF), French Association for Technical and Scientific Radiation Protection (ATSR), French Association of Electroradiology Paramedical Staff (AFPPE). ASN was thus able to continue its work with professionals concerning changes in the regulation of radiation protection or its legislative framework, and answer specific questions.

In addition to ASN interventions at these events, ASN stands were also set up, in particular at the national Conference of the French Radiation Protection Society in Angers (16-18 June 2009), and the Annual Convention of the French Society of Radiology in Paris (16-20 October 2009). A poster about quality management in radiotherapy was also presented at the 20th Conference of the French Society for Radiation Oncology (21-23 October 2009).

Other ASN interventions at regional events.

The Marseilles division took part in events (exhibition, conference, scientific symposium) held to commemorate the 1909 earthquake in the Provence region.

The 10th National Waste Conference, which took place on 21 and 22 October in La Baule (Loire-Atlantique *département*) was an opportunity for ASN to present and discuss nuclear issues.

More generally, the ASN divisions took part in professional meetings such as the regional seminars held by the Regional Union of private-practice physicians and the regional assemblies of health professionals (radiotherapists, radiation physicists, radiologists, oncologists, dental surgeons, stomatologists, etc.) and in continuous training courses, in particular for biomedical engineers or radiology operators, and for persons "with competence for radiation protection" (PCR) as defined by the regulations.

These interventions and presence at both national and regional level help to raise the profile of ASN and establish ties with professionals, particularly in the small-scale nuclear sector, in order to improve implementation of the safety and radiation protection principles.

1 | 3 | 3 ASN and the media

a) Press relations

The ASN press department is in charge of informing the media about ASN activities and current events as related to nuclear safety, radiation protection and their regulation. This information effort is sustained throughout the year and becomes more intense during media crises.

ASN press relations have helped raise the organisation's profile and strengthen its credibility and its legitimacy within its fields of competence, both nationally and regionally.

More than 30 press briefings, about twenty press releases, 90 information memos and numerous interviews enabled ASN to inform its various audiences.

In January 2009, in the presence of twenty or so journalists from the national and international press, the ASN Commission and Director General presented their New Year's wishes to the press and reviewed changes at ASN, two years after its transition to independent administrative authority status and the implementation of the TSN Act on Transparency and Security in the Nuclear Field, as well as strategic priorities for 2009.

ASN presented its New Year's wishes to the press for 2010 on 19 January. The ASN Commission reviewed ASN, its

Response to media queries

Continuously informing the public and responding to queries from the media is one of ASN's fundamental duties.

To perform this duty, ASN has a highly active communication policy designed to comply with the transparency requirements of the TSN Act and the expectations of the various audiences, especially the media.

Throughout the year, the journalists took an interest in ASN's activity sectors, leading to a rise in the number of queries, whether national, regional or international.

The main subjects dealt with

In the field of nuclear safety, the media questioned ASN extensively about topical issues: the day to day safety of nuclear installations, the EPR reactor construction site at Flamanville, the radiation protection incident on the Mafelec company site (Isère département), EDF laboratory approvals, fuel assemblies in the Tricastin and Gravelines nuclear power plants, the level 2 incident in the ATPu on the CEA site at Cadarache, the EPR I&C system evaluation.

The press also took an interest in more fundamental subjects (the continued operation or decommissioning of nuclear installations, how work is organised inside the plants, the growth of nuclear power in new nuclear countries, changes in nuclear safety, radioactive waste, and so on).

In the field of radiation protection of patients, ASN's suspension of three radiotherapy centres, the staffing situation in radiotherapy departments and their level of safety, drew the attention of the press throughout the year.

development, its relations with the various stakeholders in its fields of activity and the issues and outlook.

As part of its accountability obligation, ASN presented its 2008 Report on the state of nuclear safety and radiation protection in France to OPECST and about twenty journalists, on 7 April 2009.

The 2009 Report on the state of nuclear safety and radiation protection in France will be presented in the same conditions on 7 April 2010.

At the local level, the regional representatives and heads of regional divisions spoke on numerous occasions (interviews, press briefings) about topical subjects of regional interest.

Eighteen press conferences were organised by the eleven ASN regional divisions in France. A nineteenth conference was held for the first time on Reunion Island, a département for which radiation protection regulation and the implementation of regulations on the transport of radioactive materials are the responsibility of the ASN Paris division. To ensure accessibility to the local media, the divisions held a number of press conferences to present the ASN Report on the state of nuclear safety and radiation protection in France and present the state of nuclear safety and radiation protection for which the division is responsible. The press were present in force and expressed their interest in ASN's assessment of the state of the nuclear installations, the results of the inspections in the radiology departments, as well as ASN's status and powers of sanction.

The national and regional press also followed ASN in the field, in particular during inspections in the radiotherapy departments and radiology practices. These assignments enabled the press to understand the various steps in ASN's regulation and inspection work and comprehend the measures taken to guarantee treatment safety.

The ASN press department also maintained relations throughout the year with international media on subjects concerning the safety of the nuclear installations.

A press conference was held about an international initiative, the Multinational Design Evaluation Program (MDEP). It was chaired by the Chairman of ASN, André-Claude Lacoste and the Chair of the U.S. Nuclear Regulatory Commission (NRC), Gregory Jaczko, with the participation of the Nuclear Energy Agency (NEA) and reviewed the MDEP launched in 2007 with the aim of developing innovative approaches and pooling the resources and know-how of the nuclear regulators in charge of evaluating the design of new reactors.

The ASN press department also receives delegations of foreign journalists and presents how regulation and

inspection are organised in France, along with ASN's roles and duties.

Finally, the professional press took an interest in ASN's various actions and duties.

b) ASN and the media in emergency situations

Under the terms of the TSN Act, ASN's role in the event of an emergency is clear. It must "inform the public of the safety state […] and of the possible releases into the environment and their risks for personal health and the environment" (Article 4).

ASN must in particular be capable of responding to media queries in the event of a nuclear event. For this reason, some of the ten or so emergency response exercises organised every year include media pressure. This media pressure, simulated by journalists, is designed to assess the responsiveness of ASN when faced with the media, as well as the consistency of the messages put across by the various stakeholders, be they licensees or authorities, both nationally and locally.

In 2009, the ASN press department managed media relations during five events that mobilised its emergency response centre:

– on 24 January and 9 February, the EDF nuclear power plant at Le Blayais (Gironde *département*) preventively triggered its on-site emergency plan to deal with the possibility of flooding, given that the wind speed had exceeded the plan activation criteria;

– on 26 February, the same plant at Le Blayais automatically shut down its reactors 1 and 4. This shutdown was triggered by an influx of plant matter from the Gironde river, which clogged the reactor water intakes;

– on 2 December, the Cruas plant (Ardèche *département*) triggered its on-site emergency plan following loss of coolant on certain reactor systems, owing to a large-scale influx of plant matter carried by the Rhone river;

The ASN barometer

In 2009, in collaboration with the TNS SOFRES poll institute, ASN once again used the image and recognition barometer, launched for the first time in 2005. This barometer is designed to measure ASN's recognition level and the degree of satisfaction of two samples of the public with regard to its information actions. It enables ASN to adapt its information policy to its various audiences and to inform the general public.

The fifth wave of this opinion survey took place in October and November 2009 with a representative sample of the general public and a sample representing the more informed and professional public (in particular consisting of journalists, elected officials, association managers, administrators, CLI chairmen, health professionals and teachers).

The significant rise in ASN recognition observed between 2007 and 2008 and mainly due to its high profile at the time of the Tricastin incidents, stabilised in 2009. For the general public, the percentage of those who designated ASN as the organisation responsible for regulating nuclear activities in France, remained at 27%.

Similarly, among the more informed public, ASN's recognition level was equivalent to that of last year, with 75% of them being familiar with the ASN name, either spontaneously or when prompted.

When questioned about the content of ASN's duties, the French population are as numerous as last year in recognising ASN as the organisation in charge of regulating and inspecting nuclear installations and activities in France (80%, +2 points in relation to 2008).

This percentage rises to 93% among the more informed public, thus confirming its greater familiarity with this ASN role (+ 2 points).

Identification of the regulatory role – after the significant rise between 2007 and 2008 – fell in 2009, with 15% of the general public mentioning it (-3 points in relation to 2008) and 33% of the informed public (- 10 points).

The public perception of its information role remained at a level equivalent to that of last year for both categories (7% of the general public, 17% of the more informed public).

In 2009, ASN's image was one of greater effectiveness among the informed public with regard to all of its roles:
+ 8 points in relation to 2008 concerning the inspections carried out, + 5 points for the production of regulations, + 6 points for the information it disseminates to the professionals, + 9 points for the information it disseminates to the general public.

– on 27 December, the Fessenheim plant (Haut-Rhin *département*) triggered its on-site emergency plan following loss of coolant on certain reactor systems.

For these five events, the press department informed the public and the media in real time of how the situation was developing.

c) Training in communication and media relations

With the aim of issuing high-quality, clear and comprehensible information, stripped of any over-technical vocabulary, ASN offers all of its staff training in spoken and written communication and emergency management. This training is tailored to their various responsibilities.

The rating scales for nuclear incidents and accidents and radiotherapy radiation protection events

The need to inform the public of the severity of nuclear events, especially following the Chernobyl accident (1986), led to the developing of rating scales. The first scale was set up in 1987 by the CSSIN[1]. ASN played an essential role in the creation in 1991 of the "INES[2]" international scale for rating of nuclear events, published by IAEA. In 2002, ASN proposed a new scale to take account of radiation protection events (irradiation, contamination), in particular those affecting workers, regardless of the location of the incident.

In July 2007, ASN – together with SFRO - produced a scale for rating of radiation protection events affecting patients undergoing a radiotherapy procedure, which was published in 2008.

In July 2008, IAEA published a revised INES scale taking greater account of events occurring in the transport sector or entailing human exposure to radioactive sources.

In September 2008, ASN also invited HCTISN to take part in the task on which it has been working since 2007 with a view to creating an index for measuring radioactivity in the environment.

The INES scale

The INES scale is based on both objective and qualitative criteria. It is used by sixty countries and its purpose is to facilitate media and public perception of the scale of any nuclear incidents and accidents. It is not a tool for assessing or measuring nuclear safety and radiation protection and cannot constitute a basis for either compensation or sanction. The INES scale is not designed for international comparisons and in particular cannot be used to establish a cause and effect relationship between the number of incidents notified and the probability of a severe incident occurring on a given installation at a later date.

• Nature of the events rated on the INES scale
The INES scale enables ASN to rate all events occurring in civil basic nuclear installations and during radioactive material transport operations, according to their importance. It has also been possible, since 1 July 2008, for the INES scale to be used by the 60 member countries of IAEA to rate radiation protection events resulting from the use of radioactive sources in medical (except for patients), industrial or research installations.

• Use of the INES scale in France
All significant nuclear safety events must be notified to ASN by the licensees within 48 hours, with a proposed INES scale rating. ASN retains sole responsibility for the final rating decision.

Using the INES scale enables ASN to select those events and incidents which are sufficiently important for it to issue a communication:
– incidents rated level 0 are not the subject of an incident notification, unless they are of particular interest;
– events rated level 1 are systematically the subject of an incident notification published on www.asn.fr.

1. CSSIN: Conseil Supérieur de la Sûreté et de l'Information Nucléaires (High Council for Nuclear Safety and Information).
2. INES: International Nuclear Event Scale.

Incidents rated level 2 and above are also the subject of a press release and a notification to IAEA.

International transport incidents concerning a foreign country are also notified to IAEA as of level 1. In the event of loss of a radioactive source, this notification is made as of level 0.

Table 1: rating of significant events on the INES scale in 2009

Level	Pressurised water reactor	Other facilities	Transport	Total
3 and above	0	0	0	0
2	1	2	0	3
1	95	28	7	130
0	699	166	76	941
Total	**795**	**196**	**83**	**1074**

The ASN-SFRO scale

The purpose of the ASN-SFRO scale is to inform the public about radiation protection events affecting patients undergoing a radiotherapy procedure.

The scale was drawn up in July 2007 by ASN, jointly with SFRO, and was tested over a 12-month period. After joint evaluation with SFRO and the French Medical Physics Society (SFPM), the final version of the scale was published on www.asn.fr, in July 2008.

• Presentation of the ASN/SFRO scale
The events are rated on eight levels on the ASN/SFRO scale:
– levels 0 and 1 are used to rate events with no clinical consequences for the patient(s) concerned;
– levels 2 and 3 correspond to events categorised as "incidents";
– levels 4 to 7 correspond to events categorised as "accidents".

The severity of the effects is assessed with reference to the international clinical classification (CTCAE[3] grades), already used by the practitioners.

The effects considered in the notification to ASN are unexpected or unforeseeable effects due to inappropriate doses or irradiated volumes. Side-effects are not taken into account, whatever their grade, when resulting from the treatment strategy adopted by the practitioner in consultation with the patient and which are unrelated to any error in the volume irradiated or the dose delivered (notion of accepted risk).

For patients affected by a radiotherapy event, the resulting appearance of effects or complications may not be immediate. An event may therefore be temporarily rated at a given level which can then be subsequently modified according to the changes in the patient's state of health.

Unlike the INES scale, the defence in depth criterion (assessment of the level of safety of the radiotherapy activity) is not used in this rating, in order to avoid any confusion between the seriousness of a medical condition and a failure of the installation or breakdown in the organisation of a department.

• Rating criteria
As with the INES scale, the criteria for rating an event on the ASN-SFRO scale concern not only the confirmed consequences but also the potential effects of events. When several patients are affected by the same event, the rating level adopted corresponds to the most severe observed or anticipated effects. In the case of confirmed effects, the number of patients exposed is generally taken into account.

3. CTCAE: Common Terminology Criteria for Adverse Events, cancer therapy evaluation programme, August 2006, http://ctep.cancer.gov

The environmental radioactivity index

At the beginning of 2008, ASN set up an internal working group tasked with defining an environmental radioactivity scale or a scale of exposure in the environment comparable to the pollution measurement scales, and to produce a draft project.

At the same time, in its notice of 23 September 2008 on the 7 July 2008 event on the SOCATRI company's site, HCTISN expressed its desire "to take part in the study and development by the authorities of a scale to assess the severity of the dissemination of radioactivity into the environment, to enable the general public to more easily comprehend the events they are dealing with" and in its notice of 6 November 2008 on the radio-ecological monitoring of water in the vicinity of nuclear installations, the High committee recommended that "the work undertaken by ASN to study and develop a communication scale appropriate to cases of radiological pollution of the environment be rapidly completed".

ASN's progress on this work was presented to a plenary session of the High Committee on 18 December 2008. During this session, the creation of a working group chaired by ASN and comprising members of HCTISN and outside qualified personalities was decided. The stakeholders participating in HCTISN were invited to take part in the working group.

The working group met four times in 2009.

• Objectives of the index

Communication tools are already operational for characterising the severity of any incident or accident linked to a BNI or to a radioactive materials transport operation. The INES scale in particular considers the radiological consequences outside the site for an assessment of the severity of incidents or accidents. These consequences are assessed on the basis of the radioactive releases that could reach the public and the environment. The INES scale has also been supplemented by a part dealing with radiation protection incidents, as a means of assessing the severity of an event, particularly according to the level of exposure of the public and the number of individuals exposed.

The working group therefore set the following objectives for production of the index:

As a communication index, the environmental radioactivity index:
- *must qualify the information concerning the level of radioactivity in the environment: it must enable the information to be placed in context, with a range of situations, including a "normal" situation, an enhanced surveillance or investigation situation and an "abnormal" situation liable to lead to population protection measures;*
- *must be rapidly determined on the basis of radioactivity measurements and estimates;*
- *must be usable everywhere and at all times, regardless of an incident or accident situation and the situations managed by the emergency plans.*

These objectives were validated at HCTISN plenary session on 17 March 2009.

The work done brought to light the complexity and the conceptual difficulties involved in implementing an index of this nature. An initial draft index was produced by the working group. Work should continue in 2010 to finalise this project, in order to enable a trials phase to begin.

In 2009, communication training focused more particularly on:
- ASN's senior management, in regular contact with the local, national and international written and audiovisual media, to practice communications with the media, in particular in the capacity of spokesperson;
- ASN's inspectors, to familiarise themselves with communication and press relations, including in emergency situations, particularly through writing press releases and interviews with radio and television journalists.
- training 20 ASN staff in the role of press attaché, in order to boost ASN's information capability in an emergency situation.

1 | 3 | 4 ASN and the institutional public

ASN is also active in an institutional sector that comprises a large number of stakeholders: elected officials, public authorities, French High Committee for Transparency and Information on Nuclear Security (HCTISN).

In order to report on its activities and its duties, ASN organises exchanges with these institutional audiences. It forges ties with players at State level to ensure that it is as effective as possible in the performance of its duties and exercises the independence given to it by the TSN Act.

In April 2009, ASN therefore presented its annual Report on the state of nuclear safety and radiation protection to OPECST.

In October 2009, ASN was given a hearing by the sustainable development commission of the National Assembly on the subject of the incident that occurred in the ATPu (plutonium technology facility) on the CEA site at Cadarache.

Also in October, ASN was given a hearing by the Cour des Comptes (Government audit office) on the structure of the ASN's budget since its change in status.

In November, ASN was given a hearing by OPECST concerning its work on "reprocessed uranium: challenges and issues".

In mid-November, ASN was given a hearing by the Senate commission for the economy, sustainable development and land use planning on the subject of ASN's assessment of the EPR reactor I&C system.

The full ASN Commission, or some of its members, met members of the National Assembly and members of the Senate. The discussions in particular revolved around ensuring that ASN's status and missions were understood.

ASN also replied to the information request it received from HCTISN concerning information and transparency associated with the management of nuclear materials and waste produced at all stages in the fuel cycle.

In 2010, ASN will continue to develop its relations with its institutional audiences, at the national, regional and European levels.

2 ENHANCING THE RIGHT TO NUCLEAR SAFETY AND RADIATION PROTECTION INFORMATION

The TSN Act contains a number of extremely important provisions with regard to public information. Nuclear activities are now among those for which the Act requires the greatest possible transparency.

The Act in particular guarantees "the public's right to reliable and accessible information on nuclear security" (Article 1 of the TSN Act).

This right to information concerns all fields of ASN activity, and in particular:
– informing the public about events occurring in BNIs or during the transport of radioactive materials, about discharges or releases from BNIs;
– informing workers about their individual radiological exposure;
– informing patients about the medical procedure, in particular its radiological aspect.

For its part, ASN has for a number of years been developing a public information policy and therefore ensures the implementation of these new measures, which primarily target the licensees it regulates. As the applicable rules are frequently recent and their implementation can be problematical, ASN attaches great importance to allowing exchanges between all stakeholders concerning the problems encountered and the best practices to be employed.

2|1 Information released by the licensees

2|1|1 Distribution of information by the licensees

The main licensees of nuclear activities operate a proactive public information policy.

They are also subject to a number of legal obligations, either general (such as the environmental report required by the Commercial Code for public limited companies), or specific, such as those pertaining to the nuclear sector.

The TSN Act now requires that all BNI licensees issue a yearly report on their situation and their nuclear safety and radiation protection actions (Article 21 of the TSN Act).

The report on any given year must be published no later than 30 June of the following year.

The first annual public information reports were published in 2007.

ASN produced a writing guide for these reports so that they conform to the objectives of the Act and deliver information to the general public that is as complete and as accessible as possible.

Examples of licensee reports drafted pursuant to Article 21 of the TSN Act

Two interim versions of this guide were sent out to the licensees in February 2008 and then at the beginning of 2009. ASN asked the CLIs for their comments on the first reports from the licensees and on its draft guide. Extensive work was thus accomplished and was presented and discussed at the 21st CLI conference on 9 December 2009. A new version of the guide will be released in 2010 to take account of the conclusions of this work.

At the same time, and as in previous years, ASN in 2009 analysed the third edition of the reports (for 2008), the main conclusions of which are summarised below.

ASN's conclusions following this analysis are on the whole positive. The reports were submitted in good time and comply with the obligations laid out in the TSN Act with regard to the subjects to be addressed.

On the whole, efforts were also made to produce reports tailored to the target audience - the general public - through improved graphics, the use of clear language, informative diagrams and glossaries.

Although most reports are now available on-line, except for those from certain "small licensees", it would be preferable for the previous versions of the reports to remain accessible so that the results can be monitored over a period of time.

Despite the progress observed, there is a diversity of situations with some licensees failing to take sufficient account of the recommendations made in the ASN guide.

Generally speaking, the reports simply cover the headings mentioned in the Act. Many of the reports contain little or no strategic orientations, long-term objectives and comparative data.

In general, the reports contain no qualitative and quantitative elements concerning public information (number of queries, types, response times, etc.).

Finally, greater emphasis on transparency and on the public's right of access to information (Articles 19 and 21 of the TSN Act) would be useful.

For the coming years, ASN aims therefore to continue working with the licensees to share good practices and monitor progress.

One possible area of improvement for the coming years could be to group the reports under a common title.

ASN will in particular make efforts to ensure that the licensees adopt the new version of its implementation guide.

More precisely, the following observations concern the reports issued by the main licensees.

ANDRA

The reports submitted for 2008 by ANDRA, pursuant to Article 21 of the TSN Act for the two BNIs it operates (Manche repository and Aube repository for low and intermediate level waste) on the whole comply with the requirements of Article 21 of the TSN Act. ANDRA has in particular significantly improved the quality and above all the quantity of information concerning the Aube repository, thus responding to an ASN observation concerning the 2007 reports.

ASN is pleased to note that when producing its reports for 2008, ANDRA took account of the recommendations issued by ASN in its draft guide. The reports in particular follow the standard layout recommended by ASN.

In the reports transmitted by ANDRA however, the legibility of the text and graphics could be improved. Another possible improvement could be for ANDRA to describe how it responds to queries from the public (format and response time) and what these queries actually are (frequency and content).

AREVA

The 2008 reports from the nuclear licensees belonging to the AREVA group are easily accessible to the general public. On the whole, while the scope covered by the reports differs from one site to another, the unified graphics charter, the quality of the illustrations and level of language are particularly well-chosen and appropriate to the target audience.

AREVA took account of certain recommendations contained in the ASN guide. However, the intrinsic quality of these reports still varies widely from one licensee to another: the efforts made by Tricastin and the Franco-Belgian Fuel Fabrication Company (FBFC) to comply with the ASN guide should be mentioned, as should, however, the progress still needed from the La Hague and Melox sites.

Even if the reports often contain large amounts of data and figures, there is often a complete lack of context, concrete objectives and conclusions in terms of safety and radiation protection. Consequently, it would seem difficult for an inexperienced audience to reach an informed opinion.

Furthermore, as was the case last year, the subject of transport operations, whether inside or outside a nuclear site, is almost never dealt with, despite the inherent safety and radiation protection issues.

CEA

The 2008 reports for the BNIs operated by CEA are on the whole good information documents intended for the general public and dealing with the headings mentioned in Article 21 of the TSN Act. The language is comprehensible to the public and the reports also contain elements to help with understanding. Each centre is placed in a broader context and the strategy and objectives are stated.

However, ASN observed that CEA has added little to its reports, which on the whole remain very similar to the previous ones and fail to comply with a number of recommendations given in the draft guide sent out by ASN in February 2009.

It would therefore be advisable, in its future reports, for CEA to more clearly highlight the trends and performance of its BNIs, by putting the various data, operating feedback and objectives into some kind of context and perspective. CEA could also usefully supplement its reports by presenting the steps it takes with regard to public information.

Efforts are also needed in terms of graphics, as there is no homogeneity in the presentation of the reports.

EDF

As in 2007, EDF complied with the requirements of the TSN Act for the year 2008.

Significant improvements have been made to the reports since last year. This consists in:

– presenting these reports for the site as a whole rather than for each BNI;
– detailing and more clearly explaining the origin of releases (radioactive or other) and of radioactive waste.

These reports are clear and well-organised enough to be legible for the general public, even if they contain few graphics or diagrams.

Improvements could also be made:

– by giving a more complete presentation of the site, in particular its organisation, the operation of its installations and ICPEs;

– by systematically commenting on the numerical data and placing them in context;
– by being more precise with regard to the state of the containment barriers, particularly with respect to the safety criteria, which need to be restated;
– by presenting all the administrative procedures in progress, including those covered by the "BNI procedures" decree of 2 November 2007;
– by enhancing the information concerning events notified to ASN, and the results of the internal and external inspections performed.

These reports are available from the ASN Public Information and Documentation Centre.

2|1|2 Access to information in the possession of the licensees

Since the TSN Act came into force, the nuclear field now has a unique system of public access to information.

Previously, access to nuclear-related documents was governed by two general texts which also applied to other fields:
– the Act of 17 July 1978 introducing a variety of measures designed to improve relations between the administration and the public, which in particular instituted freedom of access to administrative documents: the administration was thereby required to release to whoever so requested the documents in its possession, whether it had received or produced them, with a number of exceptions primarily designed to prevent prejudice to public safety, industrial or commercial confidentiality, or to protect individual privacy and personal data; preparatory documents for a decision yet to be taken are also excluded from this right of access;
– chapter IV of part II of book I of the Environment Code, entitled "right of access to environmental information", which states that the public authorities and persons tasked with a public service duty relating to the environment, must communicate to anyone who so requests the information in their possession concerning the environment: this in particular concerns information regarding the state of the environment, information concerning decisions, activities and factors liable to have an impact on the environment, and information on human health, safety or living conditions whenever they could be altered by the environmental factors, or decisions taken in this field. As with the 1978 act, there are exceptions.

These two systems for access to documents and information naturally apply to the nuclear field. What they both share is an obligation of communication placed on the public authorities or those acting on their behalf.

Chapter I of part III of the TSN Act of 13 June 2006, contains a major innovation in that it creates a right of access to information that is binding on the licensees. They are now required to communicate to whoever so requests, the information in their possession, whether received or produced by them, concerning the risks related to their activities and the safety or radiation protection measures they have taken to prevent or mitigate these risks.

This arrangement is consistent with the principle of the responsibility of the licensee: as the licensee has overall responsibility for the safety of its installation, but also for communicating about the risks created by its installation and the steps it intends taking to prevent or mitigate their consequences.

As with the other access rights mentioned above, the TSN Act contains provisions, designed in particular to protect public safety or industrial and commercial confidentiality.

The procedures involved in the enforcement of this right are similar to those concerning the other access rights: if a licensee refuses to communicate the information requested, the applicant may refer the matter to the Committee of Access to Administrative Documents (CADA), an independent administrative authority, which will then rule on whether or not the refusal is justified. Should the parties involved fail to abide by the CADA ruling, the administrative courts will decide on whether or not the information should be released.

This new right is a major change to the legal and regulatory requirements of transparency as applied to nuclear activities. Currently, there is no equivalent applicable to other fields.

This right of access has applied to BNI licensees since the TSN Act was passed. As stipulated by the Act, ASN proposed to the Government that this right of access be extended to cover the information in the possession of those in charge of the main radioactive materials transport operations. This proposal has been debated since the end of 2009.

ASN is monitoring the implementation of this new right. The information collected show that it is as yet little used. Several organisations have however already implemented it, in particular with regard to the Cotentin installations and the Soulaines repository. ASN also contacted those licensees who had refused to communicate information, to encourage them to adopt a more flexible interpretation of the notion of confidentiality as protected by law. ASN also offered to provide CADA with technical opinions, as and when necessary, on whether or not the documents referred to this Committee should be released. However,

EXTRACTS FROM PART III OF THE TSN ACT ON PUBLIC INFORMATION AS REGARDS NUCLEAR SECURITY

Chapter I
Right to information on nuclear safety and radiation protection

Article 19
I. – Any person is entitled to obtain, from the licensee of a basic nuclear installation or, when their quantities are higher than thresholds laid down by decree, from the persons responsible for transporting radioactive substances or holding such substances, the information held, whether it has been received or drawn up by them, on the risks related to ionising radiations that can result from this activity and on the safety and radiation protection measures taken to prevent or reduce these risks or exposures, under the conditions defined in Articles L. 124-1 to L. 124-6 of the Environmental Code. […]

since this right entered into force, CADA has only dealt with a single case.

2|2 Public consultation about projects

2|2|1 Public consultation procedures

The Charter for the Environment enshrines the participation principle whereby on the one hand everyone has access to information about the environment, including hazardous activities and materials and on the other, the public is involved in drafting projects with an important impact on the environment.

Articles L.121-1 and following of the Environment Code created a National Public Debates Commission (CNDP), responsible for ensuring that the public is indeed involved in the drafting of national-interest planning and construction projects of the State, local authorities, public institutions and private individuals, in those categories of operations specified by decree of the *Conseil d'Etat*[6], if their socio-economic stakes are high or they have significant impacts on the environment or land use planning.

Nuclear projects are often subject to the public debate procedure. In 2005 and 2006, three public debates had thus concerned ASN. None have taken place since then, but the plans to build an EPR reactor at Penly, announced by the President of the Republic in 2009, should lead to a new debate, probably in 2010.

The TSN Act and its implementing decree of 2 November 2007 reinforced public information and consultation concerning BNI-related procedures. The authorisation decree and the final shutdown and decommissioning authorisation for a BNI are now therefore systematically subject to a public inquiry. These authorisations are also subject to the approval of the *Conseil général*[7], the municipal councils concerned and the Local Information Committee. Draft requirements to be issued by ASN concerning BNI water intake, discharges or detrimental effects are also presented to the CLI and the Departmental Council for the Environment and for Health and Technological Risks (CODERST).

ASN aims to ensure that these consultations enable the public and the associations concerned to make their viewpoints known, in particular by verifying the quality of the dossiers presented by the licensees and by devoting efforts to developing the resources available to the CLIs so that they can express an independent opinion on these dossiers (especially through the use of experts other than those of the licensee and ASN).

2|2|2 Developing public consultation on BNI discharges

In the same way as for the authorisation decree, a public inquiry is organised in the event of any significant modification to a BNI. A lesser modification of an installation may however lead to an increase in the discharge limit values. If such is the case, the current procedures require consultation of the CLI and the CODERST concerning the new requirements, but not a direct public consultation.

In 2008, ASN therefore decided to propose that the licensees in certain cases experiment with a public consultation procedure in which the licensee would make its

6. France's highest administrative court.
7. département-level elected council.

project impact assessment available. An experiment of this type took place at Cadarache in 2009.

ASN also proposed that a provision be incorporated into the national environmental protection bill, ("Grenelle II Act"), to make this consultation process systematic. This initiative was supported by the Government which presented a corresponding amendment, voted by Parliament.

2|3 The Local Information Committees (CLIs) and the National Association of Local Information Commissions and Committees (ANCCLI)

2|3|1 The Local Information Committees (CLI)

The CLI operating framework

Further to the circular from the Prime Minister, dated 15 December 1981, Local information Committees were set up in the 1980s around most of the nuclear installations, at the initiative of the *Conseils généraux*.

The TSN Act further enhanced CLIs by giving them a legal status. Its Article 22 provides for the creation of a CLI for each BNI (a CLI may be common to several installations near each other). It defines the role of a CLI as being a general one of monitoring, information and discussion concerning nuclear safety, radiation protection and the impact on individuals and the environment of the nuclear activities carried out on the site's installations.

The act confirms that creation of a CLI is the duty of the President of the *Conseil général* and gives the list of the various categories of members: representatives of *Conseils généraux*, of the municipal councils or representative bodies of groups of *communes* and *Conseils régionaux*[8] (concerned, members of Parliament for the *département*, representatives of associations for protection of the environment or economic interests, representative employee and medical profession labour unions, as well as qualified personalities. The representatives of Government departments, ASN, and those of the licensee have an automatic right to participate in the work of a CLI, in an advisory capacity.

The CLI is chaired by the President of the *Conseil général* or by an elected official from the département designated by him for this purpose.

The CLI receives the information it needs to function from the licensee, from ASN and from the other Government departments. It may request expert assessments or have measurements taken on the installation's discharges into the environment.

CLIs are financed by the regional authorities and by ASN. In 2009, ASN devoted about 600,000 euros to CLIs and the CLI association. It also submitted a proposal to the Government for implementation of the system provided for in the TSN Act, whereby the budget of the CLIs with association status (there are about half a dozen of them), would be topped up by a levy on the BNI tax, however this system has not yet been put into place.

ASN support for the CLIs is not restricted simply to financial aspects. ASN considers that correctly functioning CLIs make a contribution to safety, by regularly questioning those in charge and that this is an important factor in "ecological democracy". ASN also aims to ensure that the CLIs receive information that is as complete as possible. With the agreement of the licensees, it also invites CLI representatives to take part in inspections.

Apart from its direct support, ASN takes steps to ensure that a favourable environment is created for them. A circular sent out to BNI licensees at the end of 2007, had already encouraged them to facilitate CLI access, as far upstream as possible, to the procedure dossiers for which the opinion of the CLIs is required, so that they have enough time to produce a well-founded judgment. Similarly, ASN considers that the development of a diversified range of expertise in the nuclear field is essential if the CLIs are to be able to base their opinions when needed on the opinions of experts other than those called on by the licensee or ASN itself. It thus proposed that the French High Committee for Transparency and Information on Nuclear Security examine this issue.

The CLI operating rules and requirements are clarified by decree 2008-251 of 12 March 2008 concerning BNI Local Information Committees.

To help with implementation of the new legislation and regulations applicable to CLIs, ASN in October 2008 drafted a presentation memo that it sent out to the persons responsible locally.

Elections at the *Conseils généraux* and the municipal councils in 2008 delayed the CLI changes made necessary by the new legislative and regulatory framework. This delay was to a large extent made up in 2009, even if final conformity work will not take place before 2010. This in particular entailed adjustment of the composition of the CLIs according to the new rules, drafting of internal rules and regulations where they did not already exist and implementation of the new operating requirements. Ten BNIs did not have a CLI in 2008 and they either had to be created or the scope of certain CLIs already in their *départements* had to be extended to cover these BNIs.

8. region-level elected council.

EXTRACTS FROM PART III OF THE TSN ACT ON PUBLIC INFORMATION AS REGARDS NUCLEAR SECURITY

Chapter II
Local Information Committees

Article 22
I. – At all sites comprising one or several basic nuclear installations, as defined in Article 28, a local information committee is set up, tasked with a general follow-up, information and concertation mission in the field of nuclear safety, radiation protection and the impact of nuclear activities on persons and the environment as far as the site installations are concerned. The local information committee widely disseminates the results of its work in a form accessible to the greatest number. […]

The representatives of the Nuclear Safety Authority and of the other State services concerned, as well as representatives of the licensee can attend, in an advisory capacity, the sessions of the local information committee. They have access as of right to its work. […]

The licensee, the Nuclear Safety Authority and the other State services send it all the documents and information it needs to accomplish its missions. Depending on the case, the provisions of Article 19 of this Act or those of Chapter IV of Title II of Book I of the Environmental Code and of the previously mentioned Act No. 78-753 of 17 July 1978 apply to said transmission.

The licensee informs the committee of any incident or accident mentioned in Article 54 of this Act as soon as possible. […]

At the end of 2009, there were only three BNIs without a CLI: the Ionisos ioniser in Dagneux (Ain *département*), the SICN plant at Veurey-Voroize (Isère *département*) and the Strasbourg university reactor (these last two installations are currently undergoing decommissioning, but they nonetheless require a CLI because the decommissioning process is scheduled to last for a long period). Four new CLIs were created: the GANIL CLI in Caen, the Grenoble CLI for the high-flux reactor (RHF) at the Laue-Langevin Institute and the installations of the CEA's nuclear centre (currently being decommissioned), the Ionisos CLI in Pouzauges (Vendée *département*) and the Ionisos CLI in Sablé-sur-Sarthe (Sarthe *département*).

A number of consultative bodies which had been set up with a status different from that of the CLIs were replaced by ordinary law CLIs: this is the case with the Monts d'Arrée plant (in Brennilis in the Finistère *département*), the Manche repository (CSM), the FBFC plant at Romans-sur-Isère and the SOMANU plant in Maubeuge. A similar replacement should soon take place on the CEA site in Fontenay-aux-Roses. Finally, the scope of certain existing CLIs was extended: the Saclay CLI now covers the Electromagnetic Radiation Laboratory (LURE) in Orsay, while that in Cadarache will cover the Gammaster ioniser in Marseilles.

After these changes are complete, there will be about thirty-five CLIs covered by the TSN Act. To this must be added the local information and monitoring committee (CLIS) of the Bure underground laboratory (Meuse *département*), created pursuant to the Act of 30 December 1991 concerning research into radioactive waste management (the corresponding legal provision now appears in Article L. 542-13 of the Environment Code), along with about fifteen information committees created around defence-related nuclear sites, in application of Articles R.1333-38 and R.1333-9 of the Defence Code. For the Valduc site (Côte-d'Or *département*), there is also an advisory structure with association status: the Valduc information exchange structure (SEIVA).

CLI activity

CLI activity in 2009 was often marked by the process involved in bringing them into conformity with the TSN Act (updating of their membership, adoption of internal rules and regulations or adaptation of the former internal rules and regulations, etc.). The membership changes were carried out in most of the CLIs. In contrast, updating of the internal rules and regulations has yet to be done in several CLIs.

This situation did not prevent the CLIs from functioning in 2009.

They thus generally held one or more plenary sessions, often supplemented by specialised commission meetings ("communication", "reversibility", "siting" and "environment-health" commissions in Bure, "communication" and "environment" commissions in Cadarache, working group on long-term information of local residents concerning iodine tablets in Cattenom, "vigilance group" in Civaux,

"population protection" and "plant operations and impact monitoring" commissions in Golfech, "technical" and "population security" commissions in Gravelines, "communication" working group at La Hague, "design and expert appraisal" and "information" working groups at the Monts d'Arrée plant, monthly "vigilance unit" meetings at Nogent-sur-Seine, "health survey monitoring" and "groundwater monitoring" working groups at Tricastin, "economy" and "environment" commissions at the Valduc SEIVA, and so on).

A presentation of the annual operating results for the site was submitted to most of the CLIs, in particular to coincide with publication of the licensee's annual report as required by the TSN Act.

Particular events are generally presented to the CLI: a CLI session was thus organised at Cadarache after the ATPu incident (see chapter 15).

CLI consultation on certain BNI regulatory procedures, as required by the reform of the BNI system in 2006-2007, led to sessions of the CLIs at Chooz, Civaux and Flamanville (concerning discharges) and at Monts d'Arrée (concerning final shutdown and decommissioning plans).

CLIs are generally involved in the emergency exercises, the conclusions of which are presented to them.

The CLIs are invited to take part in ASN inspections: in 2008, the Cattenom, Fessenheim, Golfech, Gravelines, Nogent-sur-Seine and Soulaines CLIs responded to this invitation. They can also request or carry out particular assessments (Cadarache, Civaux, Golfech, Gravelines and Soulaines CLIs for environmental analyses, Fessenheim CLI for an assessment on the occasion of the 3rd ten yearly outage, Monts d'Arrée CLI for an assessment of the decommissioning project, Tricastin CLI for a health survey, etc.).

Some CLIs organised public events (Cotentin region inter-CLI meeting, public meeting on decommissioning organised by the Monts d'Arrée CLI, meeting to present the iodine tablets distribution campaign at Nogent-sur-Seine).

In order to inform the population, nearly half of CLIs publish newsletters. Others are offered space in the publications of the *Conseil général* or the *commune*.

Information about CLI activities appears on ASN's website and that of the ANCLI. Some CLIs also have their own website (AREVA La Hague CLI, Bure CLIS, Cadarache, Gard, Golfech and Gravelines CLIs, Valduc SEIVA). Others have pages on local authority websites (GANIL, Monts d'Arrée, Nogent-sur-Seine and Saclay CLIs, which will soon be joined by the Manche repository CLI and the Flamanville CLI).

2|3|2 The Federation of Local Information Committees: the National Association of Local Information Commissions and Committees (ANCCLI)

The National Association of Local Information Committees (ANCLI) was set up on 5 September 2000. This association constitutes a discussion and information network between the CLIs and provides a resource centre. It is the point of contact for the authorities and for national and international organisations working in the nuclear field. Its aim is to be the federation of CLIs, for which provision is made in the TSN Act.

In the last quarter of 2009, ANCLI adapted its articles of association so that it can perform in full its CLI federation role in accordance with the requirements of the decree of 12 March 2008. The CLI Federation is now known as the National Association of Local Information Commissions and Committees (ANCCLI). Interim structures have been set up, under the chairmanship of Mr Jean-Claude DELALONDE, pending the appointment of representatives from all the CLIs wishing to join the federation.

In 2009, ANCCLI held an ordinary general meeting, an extraordinary general meeting and a meeting of its board.

ANCCLI has a responsive administrative unit, comprising one full-time member of staff and four people each working 4 hours per week.

New content is added to the ANCCLI website (www.ancli.fr) at each important event affecting the association.

In 2009, ANCCLI continued to perform its role as an interface for questions, expert appraisals and assistance-advice for the CLIs. The CLI reorganisation process continued throughout 2009 and the CLIs therefore submitted a constant stream of legal, administrative and town-planning related questions to ANCCLI. Furthermore, the creation of new CLIs and the integration of the Local Information Committees, following the TSN Act, led to a whole range of new questions and queries. The new structures are thirsty for feedback from these twenty years of operation by the existing CLIs. Most of them quickly made contact with ANCCLI, which remained at their disposal at all times and did its best to answer their questions.

At the same time, in the face of this growing demand for information and in order to help the CLIs' main interfaces, the expert advisers, to the best of its abilities, ANCCLI organised an initial consultation and discussion meeting for them in December. The aim was to review

with them their training and information needs, CLI operation and financing, expert appraisals, and so on. 17 CLIs were represented, most of them being those that had been recently created.

ANCCLI has its own advisory committee, the Scientific Committee, which met 5 times in 2009. Its activities included the drafting of a White Paper on tritium. This document should be issued during the first quarter of 2010. The Scientific Committee also looked at the topic of environmental quality monitoring tools. This work will also be published. In 2009, the Scientific Committee also decided to submit its opinion on the draft guide produced by ASN concerning reactor ten-yearly outages. Finally, the Scientific Committee in 2009 gave consideration to a training curriculum intended for CLI members, and which will be proposed in 2010. It participated in the ANCLI Advisory Committees, the ASN Advisory Committees and the IRSN working groups.

ANCCLI in fact has three Advisory Committees dealing with radioactive materials and waste (GPMDR), the safety of nuclear installations and "Territories – post-nuclear accident" (GPPA) plus a consultative committee.

These groups held a total of 8 meetings in 2009.

– In 2009, the GPMDR focused on the topics of reversibility and LL-LLW (low level, long-lived waste). It therefore made contact with Mr Revol, Chairman of HCTISN so that on the one hand HCTISN could investigate the transparency surrounding the search for LL-LL waste management sites and on the other, he could set up a reversibility working group in order to made preparations ahead of time for the public debate scheduled for 2013. A think-tank for the concept of disposal reversibility was created in October 2009 to help with this ongoing process.

– The Advisory Committee for nuclear installations safety will be reactivated in the first quarter of 2010.

– After a preparatory phase lasting several years, which resulted in participation in the European Euranos-CAT 3-post nuclear accident project, in discussions and cooperation with Belarusian and Norwegian local authorities affected by the Chernobyl accident, in the Golfech seminar and the Nogent seminar with Euranos, the CLIs and ANCCLI decided to create a "Territories and Post-Accident" (GPPA) Advisory Committee. For nearly two years now, the GPPA has been basing its actions on actual preparedness in the field for post-accident situations.

In 2009, the GPPA gave its opinion on the national work done by ASN's CODIRPA (Steering committee for managing the post-accident phase of a nuclear accident or radiological emergency situation) and how it was presented in the regions. This program is remarkable, but a few points still need to be improved. It remains hard to implement at the local level (the vast majority of elected officials are not familiar with the CODIRPA program, communication between the various stakeholders poses problems, etc.). The GPPA faces numerous challenges: communicating about this issue, creating a link between nuclear and non-nuclear territories, etc, because the local players, in particular the elected officials, are heavily involved in the various issues that have become important for them, such as:

– the various procedures for controlling urban spread around BNIs, which significantly affect town planning projects and preparation of the local urban planning schemes (*plans locaux d'urbanisme*, PLUs);
– giving consideration to the work of CODIRPA at a local level which, for many elected officials, is an opportunity to discover the post-accident issue, with new responsibilities for the local authorities and totally new skill requirements;
– the vital need to create a link with the communal disaster contingency plans (PCS) and establish synergy between the various risk management fields;
– more generally, the question of compensation in a post-accident situation, at a time when the current arrangements and budgets would seem to be totally inadequate.

This whole context is being disrupted by the reorganisation of the local authorities, the reform of the local business tax and the reform of the CLIs (which mobilised the *Conseils généraux*).

At the same time, the GPPA has – since its creation – been engaged in a gradual strategy of construction and of human, technical and strategic investment. The key goal is the Post-Accident aspect, and preparedness at CLI level. The GPPA above all works for the benefit of the CLIs and the local authorities who wish to prepare for the post-accident phase. One of the key challenge is building the skills and competence of the local players to enable them to deal with a possible radiological event in their area, and its consequences. A first step was the identification of technical tools liable to facilitate investigations by local players into local preparedness for post-accident situations, and their assimilation by the members of the group. A number of CLIs thus began to familiarise themselves with tools resulting from the European EURANOS program, using them at a local level. The operating experience feedback from this approach is currently being analysed and these exchanges should continue and develop within the group, but also within the framework of the European technical platform for the preparation and management of nuclear and radiological accident and post-accident situations implemented in the post-Euranos European context, with

which the ANCCLI became associated at the end of 2009. The group will at the same time be relying on all the other possible sources liable to help build the skills of the local players, in particular the tools that the French experts would be able to propose. A partnership with IRSN on this point was decided on at the end of 2009.

Following its active participation, between 2007 and 2009, at the European Nuclear Energy Forum (ENEF) and in particular following the piloting of the European subgroup on "practical implementation of the Aarhus convention in the nuclear field", ANCCLI in partnership with the European Commission, the Ministry for Ecology, Energy, Sustainable Development and the Sea, in charge of Green Technologies and Climate Negotiations (MEEDDM) and HCTISN and with the support of ASN and IRSN, organised European workshops on 24 and 25 June 2009 in Luxembourg, on the theme of practical implementation of the Aarhus convention in the nuclear field. Fifteen countries were represented and one third of the participants represented civil society. The objectives included drawing wide-ranging, multipartite conclusions from the implementation of the Aarhus convention in the nuclear field within the European Union, to develop a network of local players and citizens, to prepare for national round-tables (national contexts, cross-disciplinary European themes) and to draw up a roadmap for 2009-2010, with a view to organising a European conference at the end of 2010. The first meeting of the steering committee took place on 3 December last at the MEEDDM.

It was with this in mind that Mr Jean-Claude DELALONDE, Chairman of ANCCLI, and Mrs Monique SENE, Vice-Chair, both members of HCTISN, proposed to HCTISN that they jointly organise the French national round-table, which would consist in studying the implementation of the Aarhus convention on the basis of actual cases such as tritium discharges, waste and post-accident management. HCTISN accepted this cooperation proposal. A first working meeting was held in November 2009. At the same time, ANCCLI continued to take part in the nuclear energy forum and spoke at the 4th Forum in Prague in May 2009.

In 2009, ANCCLI took an active part in various symposia and seminars. In January: intervention at the Conference of the European Economic and Social Committee (EESC); in June: ANCCLI participation at the SFRP national radiation protection conference; in September, ANCCLI participation in a visit organised for HCTISN by AREVA, to two ships belonging to the British INS company, the Pacific Pintail and the Atlantic Ospray in Barrow, to review work done on the question of maritime transport; in September: ANCCLI intervention at the tritium conference organised by the French Radiation Protection society; in November: intervention at the Paris Ponts et Chaussées engineering school on the topic of "civil society and nuclear activities"; in December: intervention at the EESC conference on the topic "Risks and opportunities of nuclear energy - views of civil society and stakeholders", talk at the annual conference of the Ukrainian nuclear regulator about the French model and the implications of implementing the Aarhus convention in the nuclear field.

ANCCLI maintains close contacts with the French authorities, especially ASN, and regular meetings are organised between ANCCLI and ASN to discuss topical issues (TSN Act, financing, status, town planning, etc.). Similarly, members of ANCCLI continue to actively participate in the ASN working groups (CODIRPA, working group on the French National Radioactive Materials and Waste Management Plan, tritium working group, leukaemia pluralistic working group and soon the pluralistic expert group, etc.). In 2009, ASN set up a working group dedicated to the 2009 iodine tablets distribution campaign, in which ANCCLI played an active role.

ANCCLI also helped organise the 21st annual CLI Conference (4 preparatory ASN/ANCCLI meetings). About a hundred CLI members attended this event: 27 CLIs were represented, along with the SEIVA and the Bure CLIS.

ANCCLI is continuing its cooperation with IRSN and its various working groups (monitoring committee, access to expertise, health impact) and is looking to expand this through the project for collaboration between the ANCCLI GPPA and the "post-accident" division of IRSN. Similarly, ANCCLI has been working with IRSN since 2009 on regional radiological observations. Following up on the work initiated in 2007 on the governance of nuclear activities, an IRSN/ANCCLI seminar was held on 10 and 11 June 2009 on the topics of "environmental monitoring at local level" and on "knowledge sharing, access to expertise and skill-building for CLIs".

15 meetings were organised on these subjects in 2009.

Mr Jean-Claude DELALONDE, a member of the IRSN Board as a qualified personality, took part in 4 meetings of this board in 2009.

ANCCLI takes part in the work of the Safety and Radiation Protection Research Steering Committee on the issues of nuclear safety and radiation protection in the constituencies.

ANCCLI and the CLIs are participants in COREX, a European program working to ensure long-term rehabilitation of living conditions in the regions affected by radioactive contamination following the Chernobyl accident.

21st Conference of Local Information Committees

The 21st Conference of Local Information Committees brought together 180 participants on 9 December 2009 in Paris at the initiative of ASN and in partnership with ANCCLI.

CLI mobilisation was extensive and diversified: about a hundred members from 27 different CLIs, thirty or so representatives of nuclear stakeholders (Andra, CEA, EDF, Areva) and about twenty associations and Government departments.

As in previous years, the conference brought together CLI representatives, members of HCTISN, representatives of the Conseils généraux and the préfectures of départements containing CLIs, the Government departments concerned, associations and licensees of nuclear installations.

The conference was preceded by an "Inter-CLI meeting" organised by ANCLI, which in particular comprised a debate between CLI representatives and ASN on the new status and responsibilities of CLIs resulting from the TSN Act.

The first round-table at the conference concerned the 3rd ten-yearly outages and the continued operation of nuclear reactors, especially the role of the CLIs. ASN presented the various options available to the CLIs for monitoring the progress and conclusions of these periodic safety reviews. CLI representatives were able to share their experiences. Debates with the EDF representative were held.

The second round-table was devoted to the organisation of environmental monitoring around the BNIs: who measures, what is measured, within what framework? How to guarantee the diversity of monitoring? What role could be played by structures outside the usual players (department-level laboratories, air quality monitoring associations (ASQA))?

The final round-table discussed public information about BNI impacts. This was an opportunity for a discussion about the annual public information reports the BNI licensees are required to publish under the TSN Act and the draft guide prepared by ASN to promote the development of good practices in the writing of these reports. The CLI members who worked on these reports for the six months preceding the conference, presented their analysis.

The conclusions of the debates will be incorporated into a new version of the ASN guide.

The event was closed by the chairmen of ANCCLI and ASN.

Wednesday 8 December 2010 was chosen as the date for the 22nd conference.

Opening of the 21st national CLI conference on 9 December 2009 in Paris

2|4 High Committee For Transparency And Information On Nuclear Security

The High Committee for Transparency and Information on Nuclear Security (HCTISN), created by the TSN Act, is an informative, discussion and debating body concerning the risks involved in nuclear activities and the impact of these activities on human health, on the environment and on nuclear security.

The High Committee is chaired by Mr Henri Revol, former senator for the Côte-d'Or *département* and former Chairman of the French Parliamentary Office for the Evaluation of Scientific and Technological Choices (OPECST). It comprises forty members appointed for six years by decree, including:

– two MPs appointed by the National Assembly and two senators appointed by the Senate;
– six representatives of the local information committees;
– six representatives of environmental protection associations and approved health system users associations;
– six representatives of persons in charge of nuclear activities;
– six representatives of representative employee labour organisations;
– six personalities chosen for their scientific, technical, economic or social competence, or for their information and communication expertise, including three appointed by OPECST, one by the Academy of Science and one by the Academy of Moral and Political Sciences;
– the ASN Chairman, a representative of the Institute for Radiation Protection and Nuclear Safety and four representatives from the ministries concerned.

The Chairman of the High Committee is appointed by decree from among members of Parliament, representatives of the local information committees and personalities chosen for their competence.

The High Committee held four meetings in 2009. It discussed BNI decommissioning strategy, iodine tablet distribution campaigns around nuclear power plants, the management of former uranium mining sites, the shortage of radiation physicists in radiotherapy centres and the management of radioactive waste, especially with regard to the notion of disposal reversibility.

In the autumn of 2009 it was asked by Mr Jean-Louis Borloo, Minister for Ecology, Energy, Sustainable Development and the Sea and by OPECST to look at the question of information and transparency in the management of nuclear materials and waste produced at all stages in the fuel cycle. Its response will be finalised at the first session of 2010.

EXTRACTS FROM PART III OF THE TSN ACT ON PUBLIC INFORMATION AS REGARDS NUCLEAR SECURITY

Chapter III
High Committee for Transparency and Information on Nuclear Security

Article 23
A High Committee for Transparency and Information on Nuclear Security is created. [...]

Article 24
The High Committee for Transparency and Information on Nuclear Security is an information, and debate body on the risks related to nuclear activities and the impact of these activities on personal health, on the environment and on nuclear security. For this purpose, it can give an opinion on any matter in these fields, as well as on surveillance and information related to them. It can also deal with any matter relative to the accessibility of information as regards nuclear security and propose any measure likely to ensure or improve transparency in the nuclear field [...]

Article 25
The High Committee for Transparency and Information on Nuclear Security can have consultancy services performed that are necessary to accomplish its missions and it can organise adversarial debates.
It publicly discloses its opinions.
It draws up an annual activity report which is also brought to public notice.
Persons responsible for nuclear activities, the Nuclear Safety Authority and the other State services concerned transmit to the High Committee all the documents and information that are useful in accomplishing its missions. Depending on the case, the provisions of Article 19 of this Act or those of Chapter IV of Title II of Book I of the Environmental Code and of the previously mentioned Act No. 78-753 of 17 July 1978 apply to said transmission.

ASN-IRSN "Nuclear applications and society" exhibition in the Le Havre (Seine-Maritime *département*) town hall

Following the work done in 2008 on the transport of plutonium between Great Britain and France, a delegation from the High Committee went to Cherbourg (Manche *département*) and then to England. The High Committee set up working groups to look at reconciling transparency and the level of secrecy protected by law and at the creation of a nuclear "information portal". Members of the High Committee are also actively participating in the working group set up by ASN to define an environmental radioactivity index.

The elements presented and debated at HCTISN meetings can be consulted on its website, www.hctisn.fr.

ASN considers that HCTISN plays an important role for consultation and debate at a national level and it actively contributes to the work of the High Committee.

2|5 Information released by the other stakeholders

Nuclear safety and radiation protection are complex areas in which many parties are involved.

Given the diversity of available information, the public can now make up its own mind in particular by consulting the websites of the main organisations concerned. The information they make available varies in nature, from the most general to the most scientific, aimed at an audience ranging from the layman to the informed professional.

2|5|1 The French Institute for Radiation Protection and Nuclear Safety (IRSN)

IRSN (see chapter 2, point 2|3|4) produces a public annual report of its activities, which it officially communicates to its supervisory Ministers and to HCTISN, the French High Public Health Council (HCSP) and the Working Conditions Guidance Council (COCT).

The 2008 version of this activity report is available in French and in English on the IRSN website and can be obtained on request, in paper format (VF) and/or on a CD-Rom (VA), from the Institute's communication department (IRSN, BP 17, 92262 Fontenay-aux-Roses Cedex).

In accordance with the requirements of the decree that created it, IRSN published the results of its R&D programmes, except for those concerning defence.

IRSN applies an information and communication policy that is consistent with the objectives defined in the objectives contract signed with the State. Some of its information actions are carried out jointly with ASN. This concerns transparency and the "Nuclear applications and society" exhibition.

In accordance with the 2006 Act on transparency and security in the nuclear field and the Institute's undertakings to the State in its objectives contract for developing transparency and greater involvement of society, IRSN therefore in 2009 published on its website www.irsn.fr, in

the "Avis et rapports *(opinions and reports)*" section, the summaries of the reports it presented to the ASN Advisory Committees following the analysis of the corresponding safety cases, as well as the opinions it submitted to the authorities. The Institute is continuing its efforts to make this nuclear safety and radiation protection information more accessible and more informative.

The changes made to improve and bring up to date the travelling exhibition "Nuclear applications and society: from understanding to regulation", co-managed by ASN and IRSN, continued in 2009.

The creation of a new interactive 3D model supplemented the "Nuclear Reactors" module (Reactors: Operation-Control-Safeguard model) and improved the interactive aspect of the exhibition.

A study is currently underway into possible future changes.

Finally, the exhibition's website underwent a complete graphic overhaul, consistent with its new visual identity.

In 2009, the exhibition was presented at the Le Havre town hall (Seine-Maritime *département*), at the Scientific, Technical and Industrial Culture Centre (CCSTI) in Laval (Mayenne *département*) and finally at the CCSTI in Romans (Drôme *département*).

It welcomed more than 5,000 visitors of all ages, accompanied at all times by a pair of guides, for a total exhibition time of more than 16 weeks.

In each town, a cycle of conferences enabled the local audiences to familiarise themselves with the subject and discuss it with members of IRSN and ASN. Twelve conferences were organised in 2009, with attendance in excess of 320 people.

For all information concerning the travelling exhibition: http://expo.irsn.fr/expo/

To find out more about IRSN: www.irsn.fr

SELECTION OF WEBSITES OF THE VARIOUS STAKEHOLDERS

Below is a non-exhaustive list of the main websites dealing with nuclear matters in the broadest sense:

- **International organisations and bodies**
  - http://europa.eu.int/comm/energy/index_fr.html (EU website);
  - www.iaea.org (site of the International Atomic Energy Agency);
  - www.icrp.org (site of ICRP, the International Commission on Radiological Protection);
  - www.nea.fr (site of the Nuclear Energy Agency).
  - www.unece.org/env/pp/treatytext.htm (site of the UNECE Aarhus Convention on access to information, public participation in decision-making and access to justice in environmental matters);
  - www.unscear.org (site of UNSCEAR - United Nations Scientific Committee on the Effects of Atomic Radiation);
  - www.who.int/en (site of the WHO, the World Health Organisation).

- **Government sites**
  - www.debatpublic.fr (site of the National Public Debates Commission: "first off" EPR public debate, Cotentin-Maine VHV line, HL-LLW nuclear waste public debate);
  - www.developpement-durable.gouv.fr (site of the Ministry for Ecology, Energy, Sustainable Development and the Sea);
  - www.ifen.fr (site of the French Environment Institute, statistical department of the Ministry responsible for the Environment);
  - www.industrie.gouv.fr (site of the Ministry for the Economy, Industry and Employment);
  - www.interieur.gouv.fr (site of the Ministry for the Interior, Overseas France and Territorial Communities);
  - www.ladocumentationfrancaise.fr (site of La Documentation française, the reference public documents publishing house);
  - www.legifrance.gouv.fr (site of Légifrance, a public service for on-line legal publishing, under the editorial responsibility of the Government General Secretariat (SGG);
  - www.meah.sante.gouv.fr/meah/ (site of the National mission for hospital appraisal and audit);
  - www.sante-sports.gouv.fr (site of the Ministry for Health and Sport).
  - www.sites-pollues.developpement-durable.gouv.fr (Polluted sites portal of the Ministry for Ecology, Energy, Sustainable Development and the Sea, dedicated to (potentially) polluted or radiation contaminated sites and soils (MIMAUSA inventory);
  - www.vie-publique.fr (service provided by La Documentation française as part of its general duty to provide information and documentation about political, economic, social and international current affairs).

- **Parliamentary assemblies (report from the French office for the evaluation of scientific and technological choices, bills, work done by committees, etc.)**
  - www.assemblee-nationale.fr (site of the National Assembly);
  - www.senat.fr (site of the Senate).
  - www.senat.fr/opecst/

- **Health agencies, technical experts and authorities**
  - www.afssa.fr (site of the French Food Product Safety agency);
  - www.afssaps.sante.fr (site of the French Health Product Safety agency);
  - www.afsset.fr (site of the French Agency for Environmental and Occupational Health Safety);
  - www.curie.fr (site of the Institut Curie);
  - www.has-sante.fr (site of the French National Authority for Health);
  - www.ineris.fr (site of the French National Institute for the Study of Industrial Environments and Risks);
  - www.invs.sante.fr (site of the Health Monitoring institute).
  - www.irsn.fr (site of the Institute for Radiation Protection and Nuclear Safety).
  - www.mesure-radioactivite.fr (site of the French national network of environmental radioactivity monitoring: roles, operations, laboratories, etc.).

- **Learned sociesties and think tanks**
  - www.aidnsf.org (site of the International Nuclear Law Association (INLA));
  - www.e-cancer.fr (site of the French national cancer institute);
  - www.sfpm.asso.fr (site of the French Medical Physics Society);
  - www.sfro.org (site of the French Society for Radiation Oncology);
  - www.sfrp.asso.fr (site of the French Radiation Protection Society);
  - www.sfr-radiologie.asso.fr (site of the French Radiology Society).

- **Local Information Committees (CLIs), High Committee for transparency and information on nuclear security (HCTISN) and information committees**
  - www.hctisn.fr (site of HCTISN);
  - www.ancli.fr (site of the national association of local information commissions and committees (ANCCLI);
  - www.clis-bure.com (site of the Bure CLIS);
  - www.cli-cadarache.fr (site of the Cadarache CLI);
  - www.cligolfech.org (site of the Golfech CLI);
  - www.cli-gravelines.fr (site of the Gravelines CLI);
  - www.commission-hague.org (site of the La Hague CLI);
  - www.cli-gard-marcoule.fr (site of the Marcoule CLI);
  - www.seiva.fr (site of the Valduc Seiva).

- **Patients associations**
  - www.hesperios.org (site of Hesperios, an association for people who have lost someone close as a result of a medical accident);
  - www.leciss.org (site of the CISS; Collectif Interassociatif Sur la Santé (inter-associations health collective);
  - www.aviamfrance.orgqui.html (Association for help to victims of medical accidents and their families);
  - www.ligue-cancer.net (The *Ligue contre le cancer* is a private and independent source of funding for cancer research in France).

- **Higher education establishments and research centres (engineering colleges, universities, university hospitals, etc.)**
  - www.ensi-bourges.fr (site of the Bourges École nationale supérieure, offering a specialised Masters' degree in nuclear safety and security);
  - http://graduateschool.paristech.org (site of the École Nationale Supérieure des Arts et Métiers ENSAM, offering a specialised Masters' degree in nuclear safety);
  - www.mines.net (site for the four engineering schools of Albi, Alès, Douai, Nantes with those of Nancy, Paris and Saint-Etienne, constituting the *Groupe des écoles des mines* (GEM);
  - www.polytechnique.fr (site of the École Polytechnique);
  - www.ujf-grenoble.fr (site of Joseph Fourier University in Grenoble, offering a Masters' degree in Engineering, Traceability, Sustainable Development, nuclear safety specialisation).

- **Professionals**
  - www.afppe.net (site of the de French Association of Electroradiology paramedical staff);
  - http://aftmn.free.fr (site of the French Association of Nuclear Medicine Technicians AFTMN);
  - www.polenucleairebourgogne.fr (site of the Burgundy companies, research centres and training centres cluster).

- **Scientific popularisation**
  - www.laradioactivite.com (general public science information site produced by CNRS researchers and CEA engineers);
  - http://fr.wikipedia.org/wiki/Accueil (site of the Wikipedia on-line encyclopaedia, created in 2001. It is multilingual, freely accessible and written by web users).

- **Associations**
  - www.acro.eu.org (site of the Association for the Control of Radioactivity in the West, "ACRO");
  - www.cepn.asso.fr (site of the Nuclear Protection Evaluation Centre);
  - www.criirad.com (site of the Committee for Independent Research and Information on Radioactivity);
  - www.dissident-media.org/infonucleaire;
  - www.ecolo.org/intro/introfr.htm (site of the "Association of Ecologists for Nuclear Power", AEPN);
  - www.fne.asso.fr (site of the French federation of nature and environmental protection associations);
  - www.global-chance.org (site of the "Global Chance" association);
  - www.greenpeace.org/france (site of Greenpeace);
  - http://nucleaire-nonmerci.net;
  - http://resosol.org/Gazette (The GSIEN Gazette, a publication of the Group of Scientists for Information on Nuclear Energy);
  - www.robindesbois.org (site of the "Robin des bois" association);
  - www.sfen.fr (site of the French Nuclear Energy Society);
  - www.sortirdunucleaire.org (site of the "Sortir du nucléaire" association).
  - www.wise-paris.org (Wise site).

- **Licensees (industry and research organisations)**
  - www.andra.fr (site of the National Agency for Radioactive Waste Management);
  - www.areva.com/servlet/home-fr.html (official site of the AREVA group);
  - www.areva-nc.fr (formerly COGEMA);
  - www.areva-np.com (formerly Framatome-ANP, manufacturer of the French nuclear reactors);
  - www.cea.fr (site of the Commissariat à l'énergie atomique (French atomic energy commission);
  - http://energies.edf.com/edf-fr-accueil/la-production-d-electricite-edf/-nucleaire-120205.html (EDF site devoted to the French nuclear power plants);
  - www.in2p3.fr (site of the National Institute for Nuclear Physics and Particle Physics);
  - www.iter.org (site of the international ITER project).

- **Trade unions**
  - www.atomique.com (site of CGT trade union members in nuclear power plants);
  - www.fnem-fo.org (site of the national energy and mines federation – FO).

3 OUTLOOK

The 13 June 2006 Act on Transparency and Security in the nuclear field, which created ASN, has increased transparency and the right to information on nuclear matters.

In accordance with the spirit of the law, ASN in 2009 intensified its own actions aimed at the general public, the media and its professional and institutional audiences.

The launch of the ASN Newsletter, the overhaul of the www.asn.fr website, the changes to Contrôle magazine, the conferences and symposia aimed at the professionals, the iodine tablets distribution campaign and the development of press and institutional relations are among the actions which contributed to increased transparency and which met the expectations of the various audiences.

In 2010, ASN will continue to enhance transparency and information on the subjects under its responsibility, together with the other players and stakeholders.

On its website, ASN will in 2010 be publishing all the follow-up letters to the inspections of small-scale nuclear facilities, along with the most important decisions and the IRSN opinions.

ASN will propose organising national and international debates on general subjects concerning nuclear safety and radiation protection, but also on society's approach to risk in general.

It will contribute to developing debate and discussion with the populations concerned by nuclear installation projects, by an activity using ionising radiations or by a radiological risk. It will hold local meetings and debates, in partnership with local organisations. In this context, the environment will be one of the focal points in 2010 through various actions: publications, press conferences, professional symposia, debate with the public and the stakeholders.

ASN aims to involve the public more closely in its decision-making process and to explain its decisions. It will thus promote public consultations via its website.

Developing exchanges with the institutions and stakeholders will also be one of the focal points of its public information actions.

As part of its active international policy, ASN will also be developing its work with the media, especially at a European and international level.

As ASN's aim is to make Europe an area with common nuclear safety and radiation protection policies and practices at the highest level, it will be preparing a European conference on nuclear safety and radiation protection.

In 2010, ASN will also continue to work towards implementation of the requirements of the TSN Act concerning licensee transparency and procedures concerning nuclear activities.

It will in particular contribute to the nuclear activities aspect of implementing the reform of the public consultation procedures stipulated by the national environmental protection Act ("Grenelle 2" Act) which should be finally adopted in the first quarter of 2010.

This in particular entails the reform of the public inquiry process and, at the proposal of ASN, making a public consultation procedure systematic for all projects liable to lead to a significant increase in the water intake or environmental discharges by a BNI.

ASN will be looking for practical measures to facilitate implementation of the new requirements concerning access to the information in the possession of the licensees and to the safety analysis report. In this respect, for 2010, it hopes in particular to see the completion of the work undertaken by HCTISN on reconciling transparency with the level of secrecy protected by law.

ASN will aim to complete the project to extend to the transport sector the right of access to information in the possession of those in charge of nuclear activities.

Based on the results of the discussions that took place in 2009, it will at the beginning of 2010 publish a new version of its drafting guide for the annual public information reports required from BNI licensees.

Finally, ASN will continue to support CLI activities. It will encourage the Conseils généraux concerned to complete the process to bring the CLIs into line with the new legal system created by the TSN Act. With ANCCLI and in conjunction with the licensees, it will aim to draft rules of good practice to make it easier for the CLIs to perform their duties. It will reiterate its proposals to the Government with a view to ensuring that the CLIs are given the resources they need.