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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 is responsible for the correct implementation of the requirements of the TSN Act, particularly those concerning transparency.

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

ASN 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).

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.

Each year ASN presents its report on the state of nuclear safety and radiation protection in France to Parliament. Discussions with its institutional, parliamentary and locally elected audiences enable ASN to be more effective in the fulfilment of its remit and the exercising of the independence conferred on it by the TSN Act.

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. To accomplish this, ASN endeavours to make its means of action and the information media it uses evolve to meet the demands of both the general and the professional public.

Since 2002, ASN has published the follow-up letters for all inspections carried out in basic nuclear installations (BNI). Since 2008 it has extended this practice to the radiotherapy inspection follow-up letters and, since April 2010, to the follow-up letters to 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.). Each year ASN thus posts more than 1300 inspection follow-up letters on its website for all the activities it inspects.

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

As part of its approach to transparency and public information, ASN wishes 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. Thirteen consultations were posted online in 2010 (also see point 2|2 of this chapter and chapter 3).

1|2 ASN 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.

The ASN’s will to inform new audiences in new ways led to the creation in April 2009 of an institutional letter - *the ASN Newsletter* - issued in 1800 copies, the introduction of a new version of its website www.asn.fr in October 2009, and the recasting of its magazine *Contrôle* in November 2009.

In April 2010 ASN launched its internal newsletter *Transparence*, which is circulated in parallel to an external audience.

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

Today, ASN’s main vector for informing the public is its website www.asn.fr, which presents the current situation of nuclear safety and radiation protection in France, and the action and stances of ASN in its areas of competence. Website visitors are informed about subjects as varied as nuclear installations, radiotherapy, radioactive waste, radon, emergency situation management, industrial uses of ionising radiations, etc.

The website gives access to a unique documentary database on the life of the installations. The website ergonomics and graphics were completely revisited in 2009, resulting in simplified navigation (by category, by sector of activity, etc.), improved access to data and optimised downloading of information and selected publications.

A new sector of activities was introduced on the website in 2010, namely “Déchets/Installations en démantèlement” (Waste/Installations undergoing decommissioning), along with new sections, such as the pages devoted to the Scientific Committee, and to the strategy and doctrine of ASN. Several reports, including “Les sites pollués au radium et par d’autres substances radioactives” (Sites polluted by radium and other radioactive substances) and the Tritium White Paper have been posted online. In addition to the updating of all the regional pages, the 2009 results drawn from the ASN annual report have been integrated for each division. In the “Advisory Committees (GPE)” section of its website, ASN also provides summaries of the IRSN reports presented to the GPEs, and the opinions the GPEs returned to IRSN as technical advisors.

Lastly, to participate in the debate on the theme of nuclear safety, a public consultation was launched in May 2010 on “the revision of the general regulations for basic nuclear installations (BNI)” and will continue into 2011.

RSS web feeds are also available for real-time monitoring of the integration of the latest news and the updating of the ASN *Official Bulletin*. Since spring 2010 the website has been participating in social networks such as Facebook, Twitter and Dailymotion.

More than 300,000 Internet users consulted nearly 2 million pages online in 2010.

An English version of the website exists at www.french-nuclear-safety.fr. New sections were developed in the English version in 2010, namely the Scientific Committee and the ASN strategy and doctrine. Lastly, several issues of the magazine *Contrôle* have been fully translated and posted online.

1|2|2 The French Nuclear Safety Authority’s Newsletter

Since 2009, ASN has supplemented its editorial offering for its institutional audience (members of parliament, local elected officials, senior civil servants, CLIs, licensees and journalists) by launching the ASN Newsletter. With its one-page format printed on both sides, the newsletter develops selected fundamental topics in the “Enjeu” section, and publishes the latest news in brief. Ten issues are published per year, proposing regular sections devoted to ASN decisions and actions, and to news from the regulated sectors. It directs readers towards other ASN publications should they wish to further their understanding of a particular subject.

The newsletter is sent by post to some 1800 addressees each month, and since 2010 an electronic version can be consulted and downloaded at www.asn.fr, or sent by electronic-mail on subscription.

1|2|3 Contrôle magazine

Four times a year, ASN publishes the magazine *Contrôle*, with a circulation of more than 10,000 copies 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 section entitled “L’Essentiel”, reporting on ASN activities, especially at regional level.

The special report presents a given subject viewed from different angles so that readers can develop their own opinion.



Cover pages of the *Contrôle* magazine issues published in 2010

It presents the ASN view of the subject addressed and gives the various stakeholders concerned an opportunity 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 "L'Essentiel" section of the magazine presents extracts of press releases and information memos, summaries of inspection follow-up letters and incident notifications, and the ASN's regional actions.

In 2010 *Contrôle* covered the following subjects:

- Inspection of the nuclear reactor pressure equipment (no. 186 - February);
- ASN Report on the state of nuclear safety and radiation protection in France in 2009: (no. 187 - April);
- Monitoring of environmental radioactivity (no. 188 - July);
- Construction of the European nuclear safety and radiation protection area (no. 189 - November).

1|2|4 The 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 a reference document resulting from a collective analysis and synthesis of the status of the activities regulated by ASN in these two fields.

It provides a means of extending the scope of reflection to projects and outlooks on topical issues and to questions of particular importance at regional and national level.

Under the TSN Act, the *annual ASN Report on the state of nuclear safety and radiation protection in France* is submitted each year to the President of the Republic, to the Government and to Parliament. It is also sent to nearly 2,000 addresses: public authority representatives, local elected officials, licensees and heads of regulated activities or installations, associations, professional union organisations, learned societies, private individuals, etc.

The ASN publications can be consulted and downloaded at www.asn.fr. They are also available for consultation at the ASN's public information and documentation centre. It can also be sent free of charge, on request by letter to the following address: ASN Publications, 6, place du colonel Bourgoin, 75572 Paris Cedex 12.

1|2|5 Other ASN publications

In 2010, ASN added a written publication to its internal communication media intended more particularly for its staff. The first issue of this magazine, *Transparence*, which is published three times per year, came out in April 2010. Addressing the internal audiences of ASN, it endeavours to present a clear and educational description of ASN's missions, its activities, its

specialist fields and its internal organisation. It is also issued to targeted external audiences such as operational partners, CLIs, members of Parliament and engineering schools.

Another communication medium, the *Annual activity report 2009*, was published in the second quarter of 2010. It is an annual publication intended for all ASN employees, and can be distributed at the recruitment forums in which ASN participates. This report highlights information on subjects ranging from training or social dialogue to the quality management system and financial resources.

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; they 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, by involving the public to a larger extent in the debate on nuclear safety and radiation protection issues, and 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 institutional brochure describes the status of the ASN, its organisation and its activities. It is available in English.

The presentation brochures for ASN's eleven regional divisions describe 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.

These brochures are widely issued to government departments and ASN stakeholders (CLIs, licensees, professionals, environmental protection associations, the media, etc...).

b) The information sheets

These sheets are 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 information sheet collection:

- “Administration of stable iodine in the event of a nuclear accident”;
- “Radiation protection principles”;
- “Nuclear or radiology: which term to use?”
- “Radiation protection values and units”;
- “The French nuclear fuel cycle”;
- “Nuclear emergency situations” (sheet updated in 2010);
- “Radon”.



The collection of ASN information sheets

c) The Public Information and Documentation Centre

The Public Information and Documentation Centre in the ASN's Paris premises has been greeting visitors since 2004, allowing them to consult more than 3,000 documents relating to nuclear safety and radiation protection, and responding to the demands of various publics: private individuals, professionals, students, associations, etc.

It allows in-situ consultation of original administrative documents such as public inquiry files, 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.

The public has access to all the ASN publications.

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).

In 2010, the ASN Public Information and Documentation Centre responded to more than 2,000 queries from diverse publics. These queries concerned requests for administrative documents, the sending of publications, documentary searches, and taking stances on important issues.

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. Each year, several towns host this 250 m² exhibition for a few weeks.

The regional divisions assist with the events and conferences and the dissemination of information to elected officials, the local press and the general public.

In 2010, the “Nuclear applications and society: from understanding to regulation” travelling exhibition made its first presentation in Cherbourg, after which it proceeded first to Épinal, then to Saint-Étienne. It received nearly 2,200 visitors. The 6 thematic conferences associated with the exhibition were attended this year by nearly 350 participants. ASN has decided, in relation with the IRSN, to conduct a study in 2011 into its general public events strategy, with a view to optimising it.

e) Information on the fourth iodine tablet distribution campaign

The fourth campaign for the distribution of stable iodine tablets around EDF nuclear power plants ran between June 2009 and the first quarter of 2010. It concerned some 500,000 people situated in a 10 kilometre radius around the 19 French nuclear power plants. Particular efforts were made to inform the populations: nominative letters sent to each household concerned, national and local press relations, educational information documents (leaflets, posters, specific website at www.distribution-iode.com). Nationwide, 88% of the persons questioned had heard of this campaign, 49.2% of the populations concerned collected boxes of tablets from the pharmacy and more than 338,000 boxes were delivered. This first phase was completed by the posting of boxes of tablets to the persons who had not collected them from the pharmacy. The final level of coverage therefore approached 100%. A quantitative study carried out in November 2010 will provide insight into the major lessons to be drawn and the perception of the nuclear risk by the populations (also see chapter 5).

1|3|2 ASN and professionals

The objective of ASN's relations with its professional audience is to enhance knowledge of the regulations and to cultivate the technical, organisational and human aspects of nuclear safety and radiation protection.

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.

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

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

a) Publications for professionals

ASN produces publications intended for professionals to explain the regulations and encourage their application.

A notable action in the medical field in 2010 was the joint review of methods of experience feedback from the significant event notifications intended for health professionals by the learned societies of radiotherapy (SFRO - the French Society for Radiation Oncology / SFPM - the French Society for Medical

Physics/ AFPPE - the French Association of Electroradiology Paramedical Staff) and HAS (French National Health Authority), AFSSAPS (French Health Product Safety Agency) and InVS (French Health Monitoring Institute). In this context, a half-yearly bulletin has been prepared with the aim of enhancing the progress and experience-sharing action initiated by the radiotherapy centres to promote health treatment safety.

In addition, the second assessment of the significant radiation protection events concerning patients undergoing an external radiotherapy procedure and the equipment monitoring reports concerning radiotherapy devices (hardware and software) declared between 30 June 2008 and 30 June 2010 was published jointly by ASN and the AFSSAPS. It is available on their respective websites.

Other media have been published for professional medical trade fairs:

- the brochure dedicated to quality assurance in radiotherapy was updated at the National Congress of the SFRO held from 6 to 8 October 2010;
- the 2010 edition of the regulations guide on the radiation protection requirements applicable to medical and dental radiology was issued at the Annual Convention of the French Society of Radiology (SFR) in Paris (22-26 October 2010).

Regarding the transport of radioactive material, a survey of consignors, transporters and users of sources conducted by the ASN divisions in 2009 revealed shortcomings in the knowledge of the applicable regulations.

Table 1: the ASN guides

Title	Version date
Guide to methods of declaring and codifying criteria relative to significant events involving safety, radiation protection or the environment applicable to basic nuclear installations and to the transport of radioactive material	21/10/2005
Guide to regulatory requirements applicable to the transport of radioactive material in airport zones	01/02/2006
Guide relating to the order of 31/12/99. Subject: fire	01/04/2006
Safety guide relating to the final disposal of radioactive waste in deep geological formations	12/02/2008
Recommendations for drafting annual information reports for the public concerning basic nuclear installations	05/12/2008
Auto-assessment of risk exposure of patients receiving external radiotherapy	15/10/2008
Management of radiotherapy safety and quality of treatment	15/10/2008
Guide for applicants requesting shipment authorisation and approval of package models or radioactive materials for civil use transported on the public highway	07/04/2009
Evaluation of nuclear pressure vessel conformity	31/03/2009
Significant radiation protection event affecting a radiotherapy patient: declaration and classification on the ASN-SFRO scale	28/09/2010
Studying hazards in transport infrastructures concerned by the transport of radioactive material	30/09/2010

A brochure was issued to the transport professionals summarizing the broad principles of the regulations governing the transport of radioactive material.

- The collection of ASN guides

Ensuring that the professionals fully understand the regulations concerning nuclear safety and radiation protection is

one of ASN's prime objectives. The collection of "ASN guides" was created with this educational approach in view. Intended for external audiences, these guides present ASN's doctrine, provide recommendations, propose methods for achieving the objectives set by the texts, and share the methods and good practices resulting from experience feedback; as the term "guide" implies, they are not ruling documents.



Discussion meeting organised by the Marseille division on how the seismic risk is taken into account in the nuclear installations of south-east France – February 2010

The collection of ASN guides grew substantially in 2010 in a context of regulatory change, with the addition of guides in the medical, transport and nuclear fields.

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 regional meetings organised by the ASN divisions

Several discussions with professional audiences were organised by the ASN divisions.

In the health field, meetings with radiotherapy professionals were organised by the divisions of Paris (12 April), Marseille (19 November) and Nantes (16 December) to share experience on ensuring that treatments are safe and the results of the ASN inspections in this field.

In the industrial field, the Lyon division organised a meeting with industrial radiography professionals of the Rhône-Alpes and Auvergne regions on 10 February to sign a good practices charter.

Meetings with transporters, medical institutions, and users of gammagraphs and gammadensimeters were organised by the divisions of Lyon (4 February), Douai (16 June) and Marseille (30 September) to inform and promote awareness of the regulations governing the transport of radioactive material.

As a follow-on to the commemoration of the Provence earthquake of 1909, the Marseille division organised two meetings to discuss how the seismic risk is taken into account in the nuclear installations of south-east France. The first meeting held on 4 February addressed the Cadarache site, while the second on 7 December concerned Marcoule.

ASN participation in symposia and professional events

ASN took part in scientific medical conferences, in particular those organised by learned societies in the medical field: SFRP

(French Radiation Protection Society), SFR (French Society of Radiology), SFPM (French Society of Medical Physics), SRFO (French Society for Radiation Oncology), SIRLaF (International society of radiation biology in French language), ATSR (French Association for Technical and Scientific Radiation Protection), AFPPE (French Association of Electroradiology Paramedical Staff).

ASN was thus able to continue its discussions with professionals regarding changes in the regulation of radiation protection or its legislative framework, and answer specific questions.

In addition to its interventions at these events, ASN had stands at the following gatherings:

- the National Congress of the SFRO (6-8 October 2010), where the first convention between ASN and SFRO was signed on 8 October;
- the Annual Convention of the SFR in Paris (22-26 October 2010) where André-Claude Lacoste, ASN Chairman, gave a conference entitled “Findings and prospects in radiology” on 24 October;
- the 7th Meetings of “Persons Competent in Radiation protection” (PCR) (9-10 December 2010); ASN actively supports the PCR networks.

Other ASN interventions at regional events.

- the 5th Meetings of Val-de-Loire (18 June 2010) on the theme of floods and low-water conditions provided the opportunity to discuss the question of reactor cooling;
- ASN contributed to the National Risk Conference (21 October 2010) on the subjects of post-accident actions, control of urbanisation around BNIs and the extension of nuclear power plant lifetimes. This conference is organised every two years by the Nord Pas-de Calais DREAL (Regional Directorate for the Environment, Planning and Housing) and the ANRT (National Association for Technological Risks), under the auspices of the MEDDTL (Ministry of the Environment, Sustainable Development, Transport and Housing).

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.

The presence and contributions of ASN at such events, both regional and national, are a valuable means of informing the professionals and tightening relations with them - particularly in the small-scale nuclear sector - with a view to improving application of the safety and radiation protection principles.

- **ASN's contribution to improving international nuclear safety and radiation protection**

In 2010, ASN supported the IAEA initiatives to promote the nuclear safety culture internationally.

From 7 to 9 June 2010, ASN helped organise the IAEA seminar on waste management, alongside the DGEC (General Directorate for Energy) and ANDRA (French National Agency for Radioactive Waste Management). 110 participants from more than 50 countries met in Paris to discuss questions of State responsibility and the independence and duties of the national organisations, particularly with regard to informing the public.

During the AIEA "International conference on operational safety and performance of NPP's and fuel cycle facilities" held in Vienna from 21 to 25 June 2010, ASN presented a poster showing the process for reporting experience feedback on significant nuclear safety and radiation protection events in France, and to highlight some examples of international experience feedback sharing.

1|3|3 ASN and the medias

a) Press relations

The ASN press service is responsible for liaising with the media on the organisation's activities and the regulation of nuclear safety and radiation protection in France. This information communication action goes on throughout the year, becoming more intense during events that attract greater media attention.

ASN press relations help strengthen the organisation's credibility and legitimacy within its fields of competence.

Journalists were informed of ASN's activities on numerous occasions during the year:

- more than 30 press briefings at national and regional level helped ASN explain its activities and develop particular topics, and bring it closer to its various audiences;
- some twenty press releases, about one hundred information memos and numerous interviews enabled ASN to answer questions from the media, and clarify aspects of nuclear regulation in France, in application of its policy of transparency.

In 2010, the media questioned ASN on topical matters and strategic issues, such as the day-to-day safety of nuclear

Information on the environmental radioactivity monitoring network (RNMRE)

Created by article R.1333-11 of the Public Health Code, the role of the RNMRE (French National Network of Environmental Radioactivity Monitoring) 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 RNMRE 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 RNMRE.

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 RNMRE (public authorities, licensees, associations, CLIs, etc.). Each year the RNMRE collects 200,000 measurements, of which 120,000 are provided by the licencees.

ASN considers that the launch of the RNMRE website is a decisive step forward in terms of transparency. It also considers this to be just a first step in providing the public with environmental radioactivity monitoring information, and will ensure that the public and internauts are consulted about how they would like this website to develop. In 2010, ASN made a study of the data transmitted and proposed some fifty more precise rules governing the declaration of measurement results. Harmonising the declarations in this way will permit better inter-comparison of the data. Furthermore, ASN will ensure that the website can gradually acquire functions and information enabling the public to understand and interpret the results of environmental radioactivity measurements transmitted to the RNM.

More than 178,000 visitors logged on to the website in 2010 and nearly 9 million pages were consulted. After a consultation peak registered when the site was launched, its frequentation has stabilized at 3,000 visitors per month. The website has found a good echo abroad, with visitors from more than 20 different countries.

installations, the EPR reactor construction site at Flamanville, the level-2 incident at the ATPu (Plutonium technology workshop) in 2009 on the CEA (French Alternative Energies and Atomic Energy Commission) site at Cadarache, the EPR instrumentation and control assessment, the continuation of operation of nuclear power plants, or the level of safety of the new reactors built across the world. Some of these subjects aroused a great deal of media attention.

With regard to the radiation protection of patients, the functioning of radiotherapy centres and the ASN recommendations to improve the quality of treatment safety were subjects that interested journalists.

In 2010, ASN also held press conferences in which participated other institutions and working groups on various subjects:

- In February, ASN and the IRSN held a joint press brief on the launching of the RNMRE (French National Environmental Radiation Monitoring Network), in the presence of RNMRE representatives (see dedicated box in this chapter and chapter 5);
- In June, ASN and the MEEDDM (Ministry for Ecology, Energy, Sustainable Development and the Sea) presented the French National Radioactive Material and Waste Management Plan (PNGMDR). This plan is the fruit of the discussions of a pluralistic working group (waste producers, political and administrative representatives, organisations responsible for radioactive waste, associations, etc.) (also see chapter 16);
- In July, ASN presented - along with the Tritium working group - *the Tritium White Paper*, which reviews current knowledge of this radionuclide and presents the recommen-

dations formulated by the pluralistic think tank that worked on it. *The Tritium White Paper*, which has been circulated to the public authorities and environmental protection associations, and presented to the medias, is available at <http://livre-blanc-tritium.asn.fr> (also see chapter 3);

- in September, ASN participated with the MEEDDM in the presentation of report of the Limousin region GEP (pluralistic expert group) on the management of the former uranium mining sites in France.

ASN also has regular institutional meetings with journalists to present the organisation, its development, and its priorities and strategic orientations:

- each January, ASN presents its New Year greetings to the journalists of the national and international press;
- in early April, ASN presented its *report on the status of nuclear safety and radiation protection in France* to the OPECST (Parliamentary Office for the Evaluation of Scientific and Technological Choices) in front of some twenty journalists. The 2009 report was presented on 7 April 2010, that of 2010 on 30 March 2011.

Locally, the eleven regional divisions organise several regional conferences (20 press conferences in 2010) to present the ASN report and to sum up the activity of each division and any local particularities.

The press expressed their interest in ASN's assessment of the state of the nuclear installations, the results of the inspections in radiology departments, and its status and powers of sanction. Field reporting assignments enabled the media to

The ASN barometer

In 2010, 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 sample populations of the public with regard to its information actions. It enables ASN to adapt its information policy to its various audiences.

The sixth wave of this opinion survey took place in October and November 2010 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 rise in ASN recognition observed between 2007 and 2008, which was chiefly due to the high-profile media coverage of the incidents of Summer 2008 (SOCATRI site), is falling with the general public (-3 percentage points, 24% of persons questioned). The lack of news-breaking incidents has had a negative impact on public interest in nuclear-related questions, in spite of ASN's public information efforts: some thirty press conferences at national and regional level, some twenty press releases on varied subjects, about one hundred information memos published on www.asn.fr. ASN is nevertheless still spontaneously identified as being the government organisation responsible for nuclear regulation and inspection in France.

This being said, recognition of ASN by the informed public is up by 4 percentage points, giving a total of 79% of surveyed persons who knew the name ASN.

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 (79%, -1 percentage point in relation to 2009). This percentage reaches 92% (-1 percentage point) among the more informed public, thus confirming its greater familiarity with this role of ASN.

Identification of the regulation role, which had significantly increased in 2008, is slightly down: 12% of the general public mention it (-3 percentage points with respect to 2009) compared with 30% of the informed public (-3 percentage points).

As for the perception of its informative role, this has remained at the same level as last year with the general public (7%) and is rising with the informed public (20%, +3 percentage points).

understand the various steps in ASN's regulation and inspection work and inform their audiences of the measures taken to guarantee treatment safety.

Throughout the year ASN maintains relations with the international media on subjects relating to nuclear installation safety and responds to their queries.

Demands from the professional press have been increasing, particularly in the field of medical activity inspection.

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

In 2010, the ASN press department dealt with an event that mobilised its emergency centre: on 27 February, the EDF nuclear power plant at Blayais (Gironde *département*¹) preventively triggered its on-site emergency plan to cope with the possibility of flooding, given that the wind speed had reached and even exceeded the plan activation criteria (also see chapter 5).

c) Training in communication and media relations

With the aim of issuing high-quality, clear and understandable information, stripped of any 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. With a view to better responding to journalists' demands and expressing clear views, ASN spokespersons are trained in public speaking and communication with the media.

ASN inspectors receive training in written communication (drafting of information memos and press releases).

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, HTCTISN (French High Committee for Transparency and Information on Nuclear Security).

ASN organises discussions with these institutional audiences in order to report on its activity and duties and to tie relations with the Government players in order to be more effective in carrying out its duties:

- in April 2010, ASN presented its *Annual Report on the status of nuclear safety and radiation protection in France* to the OPECST. ASN was heard by the CECPP (Public Policies Assessment and Control Committee) chaired by National Assembly deputies René Dosière and Christian Vanneste;
- in May ASN was heard by the President of the Senate committee for the economy, sustainable development and national planning and development in the context of the bill on the new organisation of the electricity market (Nome);
- in November, ASN was heard by the OPECST concerning the French National Radioactive Material and Waste Management Plan (PNGMDR) ;
- in December, ASN participated in the 4th parliamentary meetings on French nuclear energy.

At regional level, the full ASN Commission or some of its members, met members of the National Assembly and members of the Senate. The discussions focused essentially on improving transparency and the debate on nuclear subjects.

ASN will continue to develop its relations with its institutional audiences in 2011.

1. Administrative region headed by a *préfet*.

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. ASN played a vital role in the creation in 1991 of the International Nuclear Event Scale (INES) published by the International Atomic Energy Agency (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 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 1st July 2008, for the INES scale to be used by the 60 member countries of IAEA to rate radiation protection events (excluding events affecting medical patients) resulting from the use of radioactive sources in medical, 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.

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 2: rating of significant events on the INES scale in 2010

Level	Pressurised water reactor	Other basic nuclear installations	Transport	Small-scale nuclear activities	Total
3 and above	0	0	0	0	0
2	1	1	0	1	3
1	74	20	9	37	140
0	642	148	53	121	964
Total	717	169	62	159	1107

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 SFPM (French Medical Physics Society), the final version of the scale was published on www.asn.fr, in July 2008.

• Presentation of the ASN-SFRO scale

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 (Grades CTCAE² - Common Terminology Criteria for Adverse Events), 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.

• Classification 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.

The environmental radioactivity index

Since 2008, ASN has been coordinating a pluralistic working group tasked with defining an environmental radioactivity index comparable with the pollution measurement scales. It is intended that this index should be complementary to the INES scale of radiological incident or accident severity by providing information on environmental radioactivity levels independently of any situation occurring in a nuclear installation.

The following objectives have been set:

- qualify the information relative to the levels of radioactivity in the environment by enabling the information to be put into perspective, with a rating that depends on the required population protection actions;
- be rapidly determined on the basis of radioactivity measurements and estimates;
- be usable in any place at any time independently of an incident or accident situation and situations managed under the emergency plans; continuation of the group's work in 2010 has resulted in a project that will be experimented in 2011.

2. CTCAE: Cancer Therapy Evaluation Program, August 2006, <http://ctep.cancer.gov>

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.

ASN ensures that these measures, which more particularly concern the licensees under its supervision, are applied. As the applicable rules are still recent and questions regarding their implementation can arise, ASN endeavours to facilitate communication between all the stakeholders regarding any difficulties encountered and the best practices to adopt.

2|1 Information released by the licensees

2|1|1 Information circulated on the initiative of 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.

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. After in-depth discussions with the CLIs, a new version of the guide was issued at the end of 2010.

Each year ASN analyses the licensees’ reports, and the main conclusions for 2010 are summarized below.



Examples of licensee reports produced in application of article 21 of the TSN Act

As in the previous years, ASN considers the results of the analyses to be positive on the whole. 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.

The effort to produce communication media adapted to the general public was continued.

Posting the reports online on the Internet is now the general practice, and it would be desirable for the reports from previous years to be kept available on the sites.

Contrasting situations do nevertheless exist in spite of the observed progress; some licensees only partially apply the recommendations of the ASN guide.

As a relatively general rule, the reports limit themselves to the headings explicitly mentioned in the Act, without addressing related subjects that would help give the public an overall vision of the impact of the site. Many of the reports contain few or no strategic orientations, long-term objectives or comparative data covering several years.

In general, the reports contain no qualitative or 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 nuclear information (Articles 19 and 21 of the TSN Act) would be appreciable.

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

Possible ways of improving the reports in the coming years could be to adopt a common title and include data on long-term objectives and development plans spanning several years.

ASN would like the annual public information reports to gradually replace other reports on similar subjects provided for by the regulations prior to the TSN Act. This worthwhile simplification does however imply that these annual public information reports must always contain all the necessary information, which does not yet appear to be the case.

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

ANDRA

ASN considers that the annual public information reports for the two waste disposal centres operated by ANDRA (CSM and CSFMA) increasingly correspond to both the letter and spirit of article 21 of the TSN Act.

Broadly speaking, these reports follow the recommendations of the ASN guide; more particularly, they apply the standard layout recommended in the guide.

They have a common graphic charter - much improved on that of the previous year - with numerous illustrations, and can be readily understood by the general public. The CSM report could nevertheless be usefully supplemented by including a number of general explanations that figure in the CSFMA report.

AREVA

Like last year, ASN observes that the annual public information reports on the installations of the AREVA group are readily accessible and understandable. The standardisation efforts noted for 2008 have been continued; the report follows the standard layout recommended in the ASN guide, the graphic charter and the volume of the documents are uniform, and a chapter is dedicated to communication and informing the public.

The question of access to the information requested by the public could however be given greater exposure. The presentation of subjects relating to transport could also be improved.

As a general rule, the data presented could be better put into perspective and objectives should be identified.

CEA

On the whole, the annual public information reports on the installations operated by the CEA have changed little with respect to those for 2008; they are generally sound information documents intended for the general public, addressing the headings mentioned in article 21 of the TSN Act. The language is understandable for the public and some explanations are included. The reports all follow the same layout plan, which nonetheless differs from that recommended by ASN.

Efforts must still be made to bring out the trends and performance of the BNIs by putting the data, experience feedback and objectives into perspective.

The risks and nuisance factors that are not specifically mentioned in article 21 of the TSN Act (microbiological risk, noises, odours, etc.) are never addressed, yet they contribute to the overall impact of the installation.

Public information actions are starting to be mentioned in the reports, but to varying extents.

EDF

As in the previous years, the annual public information reports on the nuclear installations of EDF satisfy the requirements of article 21 of the TSN Act. Moreover, with the exception of the Tricastin operational hot unit report, these reports generally follow the recommendations of the ASN guide.

The reports are sufficiently clear and well-organised to be understood by the general public, even if they still contain few graphics or diagrams.

Like last year, the reports could be improved by giving a more comprehensive presentation of the various sites (organisation, operation of its installations, on-site installations classified on environmental protection grounds), by systematically commenting and putting into perspective the data backed up by figures, by better describing the condition of the containment barriers, particularly with regard to the safety criteria, by mentioning all the ongoing administrative procedures, by expanding on information relative to events declared to ASN and formally presenting the opinions of the CHSCT (Committee for Health, Safety and Working Conditions) in an appendix.

In conclusion, although the quality of the reports has been maintained with respect to the previous year, it can be improved to better achieve the public information objective.

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

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

With entry into force of the TSN Act, the nuclear field 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 various measures to improve government-to-public relations and notably instituting freedom of access to administrative documents: the administration must thus communicate all the documents it holds to whoever requests them.
- chapter IV of part II of book I of the environment code which stipulates that the public authorities and the persons responsible for a public service duty relating to the environment must communicate the information they have concerning the environment to whoever requests it.

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.

By creating a right of access to information that is directly binding on the licensees, the TSN Act made a major innovation. Licensees 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 prime responsibility of the licensee: as the licensee has overall responsibility for the safety of its installation, it is also responsible for communicating on the risks created by its installation and the steps it takes 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 and 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 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. In 2010, ASN initiated discussions on a project to extend this right to the transportation of the main radioactive packages. It will submit a proposal on this subject to the Government at the beginning of 2011, as desired by the HCTISN (French High Committee for Transparency and Information on Nuclear Security).

ASN is monitoring the implementation of this new right. The information collected shows that it is as yet little used. Some organisations have nevertheless already exercised this right, particularly with respect to the Cotentin installations, the Chinon and Fessenheim nuclear power plants, and the Soulaire disposal centre. ASN also contacted those licensees that 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 that are referred to this Committee should be released. Since this right came into force, however, CADA has only dealt with a single case.

2|2 Public consultation about projects

2|2|1 Public consultation procedures

(also see chapter 3)

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

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 therefore now always subject to a public inquiry. These authorisations are also subject to the approval of the *Conseil général*³, the municipal councils concerned and the CLI (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 CODERST (Departmental Council for the Environment and for Health and Technological Risks).

ASN aims to ensure that these consultations enable the public and the associations concerned to express their views, in particular by verifying the quality of the licensee's files and by developing the CLI's resources so that they can express an independent opinion on the files (e.g. by consulting experts other than those of the licensee and ASN).

If this system is to work well, the public must obviously have as much information as possible. Certain communication restrictions are legitimately planned for in the interests of public safety or industrial and trade secrets, but ASN makes sure that any communication refusal is effectively justified.

3. *département*-level elected council

2|2|2 Developing public consultation

(also see chapter 3)

Further to an ASN proposal, the Government has voted a new provision in the law of 12 July 2010 on the national commitment for the environment (“Grenelle 2” Act), adding a consultation of the public in projects to increase discharges from a BNI by an amount that is not large enough to require a public inquiry (article 243 of the Act).

Moreover, to enhance the participation of public representatives in the decision-making process, the ASN Commission has decided from now on to propose that representatives of the CLI come and present their committee’s observations when it examines certain important files concerning a BNI.

Over and beyond the application of the legal and statutory public consultation procedures, ASN considers that information campaigns and suitable forms of public debate should be organised to encourage the public to adopt a proactive attitude to certain important issues. It was in this spirit that it organised regional open-day discussions on how the seismic risk is taken into consideration in nuclear installations in the south of France. Held in Marseille in February 2010 and in Avignon in December 2010, these open-days aroused an excellent response.

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

2|3|1 Local Information Committees (CLI) for the basic nuclear installations

The CLI operating framework

Creation of the CLIs began in 1981 in application of a circular from the Prime Minister Pierre Mauroy, and was generalised by the TSN Act of 13 June 2006 (article 22). The broad role of the CLIs is to monitor, inform and be a vector for discussion on questions of nuclear safety, radiation protection and the impact on the populations and the environment of the nuclear activities of installations on the site(s) that concern(s) them.

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

The CLI, whose creation is incumbent upon the President of the *Conseil Général*⁴, comprises various categories of members: representatives of *Conseils généraux*⁵, of the municipal councils or representative bodies of groups of *communes*⁶ and *Conseils régionaux* concerned, Parliament members elected in the *département*, representatives of associations for the protection of the environment

or economic interests, representative employee and medical profession union organisations, and qualified personalities. The representatives of Government departments, including ASN, and 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 2010, ASN devoted about 600,000 euros to CLIs and the CLI association. ASN once again 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, but 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 contribute 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. It encourages BNI licensees to facilitate CLI access - as early as possible - to the procedure files for which the opinion of the CLIs is required, so that they have sufficient time to produce a well-supported 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 work of experts other than those called on by the licensee or ASN itself.

2010 heralded the near-completion of implementation of the provisions of the TSN Act, with the setting up of new CLIs for sites that did not yet have one (nuclear centre of Fontenay-aux-Roses, SICN (*Société industrielle de combustible nucléaire - Industrial Nuclear Fuel Company*) at Veurey-Voroize, Strasbourg University reactor) and the updating of the composition and rules of functioning of the existing CLIs. Only one BNI site remains without a CLI (IONISOS at Dagneux in the Ain *département*) at the end of 2010. A CLI must moreover be created in the near future for the COMURHEX site at Malvesi (Aude *département*), where part of the installation has been reclassified as a BNI (also see chapter 16).

At the end of 2010 there were 36 CLIs created under the TSN Act. To this must be added the local information and monitoring committee (CLIS) of the Bure underground laboratory (Meuse *département*), created in application of 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).

4. *département*-level elected council

5. Regional-level elected council

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

CLI activity

The CLIs conduct their activity through plenary meetings, some of which are open to the public, and the specialised commissions they set up.

The annual public information report drawn up by the licensee was presented to the CLI in at least one case out of two. Significant events are also generally presented to the CLI.

Nine CLIs responded positively in 2010 to ASN's proposal to accompany an inspection.

Ten or so CLIs were consulted about licensees' projects in application of the procedures of the new BNI system. A similar number had expert appraisals carried out, as is provided for in the TSN Act.

Roughly half of the CLIs have their own website or pages on the site of the local authority that supports them. The same proportion of CLIs publish a newsletter or published an information brochure in 2010.

More detailed information on the action of some of the CLIs is given in chapter 8.

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

The TSN Act provides for the constitution of a federation of CLIs, and the decree of 12 March 2008 sets forth certain provisions that this federation must adhere to. ANCLI, the National

22nd Conference of Local Information Committees

The 22nd Conference of Local Information Committees brought together 180 participants on 8 December 2010 in Paris at the initiative of ASN and in partnership with ANCCLI.

The mobilisation of the CLIs was extensive and diversified: 95 participants represented 33 different CLIs.

As in previous years, the conference brought together CLI representatives, members of the HCTISN, representatives of the Conseils généraux and the préfetures⁷ of départements with CLIs, the Government departments concerned, associations and licensees of nuclear installations.

The conference debated on two topics, each the subject of a round table: control of urbanisation around BNIs and the decommissioning of BNIs. As a preamble, ASN and ANCCLI touched on a few topical subjects and the President of the HCTISN presented the High Committee's activity for 2010.

The conference was preceded by an "inter-CLI meeting" organised by ANCCLI, where CLI representatives and ASN discussed the financing of the CLIs and questions of access to expertise and skills building.



Opening of the 22nd CLI conference in Paris on 8 December 2010

7. Office of the préfet

Association of Local Information Committees, created in 2000, modified its articles of association in October 2009 in order to comply with these rules. It became the National Association of Local Information Commissions and Committees (ANCCLI). Pending the designation of new representatives of the CLIs, the association was run by an interim structure in 2010. Finally, the board of governors and the committee were designated at the general meeting of 26 November 2010. Mr. Jean-Claude Delalonde, President of the Gravelines CLI, was re-elected President of ANCCLI.

The activity of ANCCLI in 2010

The temporary nature of its administrative structure did not prevent ANCCLI from conducting its duties in 2010.

It responded to the various questions from the CLIs, ranging from legal or administrative matters to urbanisation and communication aspects.

In 2010 ANCCLI focused in priority on the question of financing the CLIs: many CLIs referred this question to the parliament members of their region.

The ANCCLI authorities

The ANCCLI working groups continued to function, in spite of the major restructuring within the CLIs.

- **The ANCCLI Scientific Committee**

This committee comprises independent unpaid experts from different horizons.

In 2010, the Scientific Committee published a complete synthesis of current knowledge on tritium, its management and its impact on man and the environment, entitled "*Le tritium - Actualité d'aujourd'hui et de demain*" (Tritium - A topic of today and tomorrow).

The Scientific Committee contributed to the work of the pluralistic tritium think-tank set up by ASN, and to the drafting of the Tritium White Paper (communication on the biological and health effects of tritium).

It also contributed to the feature article of *Contrôle* magazine no. 188, devoted to environmental radioactivity monitoring.

The Scientific Committee gave its opinion on various documents and took part in several working groups and scientific events.

It met five times in 2010.

- **The ANCCLI permanent groups and consultative committee**
ANCCLI has three "permanent groups":

- the permanent "Radioactive material and waste" group, which studies in particular the notion of reversibility (advantages/drawbacks of irreversible deep storage/reversible storage, the maintenance costs, how to guarantee the memory of storage site locations in the very long term, etc.) and the process to find a storage site for low-level long-lived waste (LL-LL);

- the permanent "Regions - Post-nuclear accident" group, which participated in the creation of NERIS, the European Platform for Preparedness for Nuclear and Radiological Emergency Response and Recovery, in order to integrate the

requirements of the CLIs and to keep itself informed of the new decision-making aids, new methods of information and data interchange and the processes of participative governance put in place in the management of emergency and post-accident situations at international level. At the same time, ANCCLI and the IRSN have initiated a pilot action to jointly develop a mapping tool that can correlate the data on the environmental and health consequences of nuclear accidents with the local cartographic representations applying a few selected scenarios. This tool should chiefly serve to help raise the awareness of regional stakeholders - elected officials in particular - to questions of post-accident situation management.

- the "EPR" permanent group which worked more specifically on the monitoring of the EPR construction site at Flamanville.

ANCCLI also has a consultative committee which in 2010 discussed the future orientations of the new federation.

These different working groups met ten times in 2010.

- **The ANCCLI senior executives club**

In 2010, ANCCLI created the CLI senior executives club to generate a dynamic current between the CLI prime leaders and technicians, and provide a forum to discuss experiences, areas of progress and difficulties encountered by each CLI, in order to have common grounds for work and reflection.

In addition to addressing questions of financing, communication and information procedures, the club devoted time to reflection on the ANCCLI's new website which will come on line in the very near future.

The assignment leaders club met six times in 2010.

ANCCLI partnerships

ANCCLI has very regular contact with ASN and participates in several working groups set up by ASN, such as the PNGMDR (French National Radioactive Material and Waste Management Plan) and CODIRPA (Steering committee for managing the post-accident phase of a nuclear accident or radiological emergency situation).

ANCCLI has concluded a cooperation agreement with the IRSN under which it leads many initiatives. The "ANCCLI/InVS/IRSN health impact" working group set up in 2008, for example, is finalising a guide for the CLIs entitled "Assessing the health risk for populations living near nuclear installations: contributions and limits of health analysis tools, considered in concrete situations".

The European Commission consulted ANCCLI when preparing its draft "Waste" directive.

Ever since the European Nuclear Energy Forum (ENEF) was created in 2007, ANCCLI has actively participated in the meetings of the Transparency working group set up further to the first forum.

- **The ACN initiative launched by ANCCLI**

The *Aarhus Convention and Nuclear* (ACN) is an initiative launched by ANCCLI and the European Commission in 2008 with the aim of progressing with the practical implementation of the Aarhus Convention in the nuclear field. After an

inaugural European workshop bringing together about a hundred participants from some fifteen member countries in June 2009, national round tables were set up in about ten countries.

Under the auspices of the HCTSIN and ANCCLI, the French round table will make recommendations on the following themes: LL-LL waste disposal site selection process, public access to information and participation in decision making, skills-building and access to expertise necessary for truly active participation.

The Secretariat of the Aarhus Convention has accepted to co-organise the final conference of the ACN initiative which should be held in early 2012 under the joint auspices of the European Union and the Aarhus Convention. This will be the first time that these two institutions jointly organise an event.

In the framework of the ACN initiative, ANCCLI took part in the first meeting of the Bulgarian round table in Sofia.

Participation in events

To conclude, ANCCLI contributed to various other events in 2010: the meetings of the Association “Deciding together: shared expertise and decisions: what modes of governance?”, the international colloquium on access to civil nuclear energy organised by the Government, the conference of the SFRP, the meeting of the national mirror committee of the working group on “Preparation of the ICRP’s new recommendations concerning geological storage of long-lived radioactive waste”, the ICSI (Institute for an Industrial Safety Culture) training day on industrial risks, etc.

2|4 High Committee for Transparency and Information on Nuclear Security (HCTISN)

The High Committee for Transparency and Information on Nuclear Security (HCTISN) created by the TSN Act is a body that informs, discusses and debates on nuclear activities, their safety and their impact on health and the environment.

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 CLIs (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 HCTSIN held four plenary meetings in 2010 and ran several working groups.

It also drew up a report on “Transparency and the management of nuclear materials and waste produced at the different stages of the fuel cycle” in response to a demand from the Minister of Ecology, Energy, Sustainable Development and the Sea (MEEDDM) and the OPECST. This report, which was produced by a working group led by Mr. Claude Gatignol, member of parliament for the Manche *département* and member of the High Committee, was handed over to the Minister and the OPECST in July 2010 (the press were invited to the meeting at the OPECST).

The High Committee continued its work on the theme of “Transparency and secrecy” and on the setting up of an Internet nuclear information portal. It raised questions relating to nuclear waste on several occasions (presentation of the PNGMDR, process for choosing the LL-LL waste storage site, situation of the old uranium mines, etc.). The High Committee also discussed aspects of the “cancer” plan concerning radiation protection, and conducted reflections on the environmental monitoring strategy, among other things.

At its plenary sessions the High Committee also addressed various topical questions by inviting the key players to give talks.

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

ASN considers that the HCTISN plays an important role in consultation and debate at national level, and contributes actively to its work.

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|5|1) produces an annual report of its activities, which it officially communicates to its supervisory Ministers and the HCTISN, the French High Public Health Council (HCSP) and the Working Conditions Guidance Council (COCT).

The 2009 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 (French version) and/or on a CD-Rom (English version), 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 2010, 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, and concurrently with the ASN letters, IRSN 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.

With regard to the "Nuclear energy and society" travelling exhibition, a new model entitled "intervention zones" has been added to the "And what if an accident happens?" module. In addition to this, the presentations integrated in the "environmental monitoring" model were updated further to the creation of the RNM website.

In 2010, the exhibition was presented at the Festival Hall of Cherbourg (Manche *département*), the Congress Centre of Epinal (Vosges *département*) and lastly at the CCSTI of Saint-Etienne (Loire *département*).

2, 200 people visited the exhibition over a total period of eleven weeks. Six conferences were organised in 2010, with attendance in excess of 350 people.

A study of how the current exhibition could be made to evolve is in progress.

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

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



The "nuclear energy and society" exhibition was presented in Cherbourg, Epinal and Saint-Etienne in 2010

SELECTION OF WEBSITES OF THE VARIOUS STAKEHOLDERS

Below ASN provides a non-exhaustive list of the main websites dealing with nuclear matters:

• International organisations and bodies

- <http://ec.europa.eu> (site of the European Commission);
- 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 (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 of Ecology, Sustainable Development, Transport and Housing);
- www.toutsurlenvironnement.fr/ (Public services environmental information portal);
- www.ifen.fr (site of the French Environment Institute, statistical department of the Ministry for the Environment);
- www.industrie.gouv.fr (site of the Ministry for the Economy, Finance and Industry);
- www.interieur.gouv.fr (site of the Ministry of the Interior, Overseas Territories, Territorial Collectivities and Immigration);
- 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 online legal publishing, under the editorial responsibility of the Government General Secretariat (SGG));
- www.meah.sante.gouv.fr (site of the national mission for hospital appraisal and audit);
- www.sante.gouv.fr (site of the Ministry of Health);
- www.sites-pollues.developpement-durable.gouv.fr (Polluted sites portal of the Ministry for Ecology, Energy, Sustainable Development, Transport and Housing, 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/opepst/ (section devoted to the Parliamentary Office for the Evaluation of Scientific and Technological Choices).

• Health agencies, technical experts and authorities

- www.anses.fr (site of the French Agency for Food, Environmental and Occupational Health and Safety);
- www.afssaps.sante.fr (site of the French Health Product Safety agency);
- 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 societies and think tanks

- www.aidn-sf.org (site of the International Nuclear Law Association (INLA));
- www.e-cancer.fr (site of the French Health and Scientific Agency for Cancerology);
- www.sfpn.asso.fr (site of the French Society of Medical Physics);
- www.sfro.org (site of the French Society for Radiation Oncology (INCa));
- 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 Golftech 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 Inter associatif Sur la Santé (inter-associations health collective));
- www.aviamfrance.org (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 French Association of Electroradiology para-medical 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 (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.dechets-radioactifs.com (educational site on radioactive waste published by ANDRA);
- www.aveva.com (official site of the AREVA group);
- www.aveva-nc.fr (formerly COGEMA);
- www.aveva-np.com (formerly Framatome-ANP, manufacturer of the French nuclear reactors);
- www.cea.fr (site of CEA - the French Alternative Energies and Atomic Energy Commission);
- <http://france.edf.com> (official site of EDF);
- 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.atominique.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

Informing the public about nuclear safety and radiation protection is one of ASN's fundamental roles. This role was conferred upon ASN from its inception, and was reinforced by the Act of 13 June 2006 relative to transparency and safety in the nuclear field. The Act, which makes it a duty for ASN to inform the public, defines transparency in the nuclear field as "all the measures taken to guarantee the public's right to reliable and understandable information concerning nuclear safety".

This duty to inform is materialised through numerous actions carried out at international, national and regional level. These actions are characterised by the multitude and diversity of the themes developed, of the audiences targeted (general public, medias, institutional and professional audiences), and of the information means used (press relations, events, publications, Internet, etc.).

In 2011, ASN will continue to enhance transparency and information on the subjects under its responsibility, together with the other players and stakeholders. ASN will develop the organisation of national and international debates on general subjects concerning nuclear safety and radiation protection, but also on society's approach to risk in general. 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 to an even greater extent.

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

As part of its international policy, ASN will actively contribute to the holding of a European conference on nuclear safety and radiation protection in 2011.

In 2011, ASN will also continue actions to develop application of the requirements of the TSN Act concerning licensee transparency and procedures relating to nuclear activities.

It will contribute to the revising of the procedures for public consultation – where nuclear activities are concerned – provided for in the act on the national commitment for the environment ("Grenelle 2" Act): this chiefly concerns the reforming of the public inquiries and the institutionalisation, further to an ASN proposal, of a procedure for consulting the public about projects that could lead to a significant increase in water takeoffs or discharges into the environment from a BNI, but which does not fall under the public inquiry procedure.

ASN will continue to see to the correct application of the new provisions concerning access to the information held by licensees and to the safety report. On this account it will examine the conditions of implementation of the recommendations the HCTISN should publish in early 2011 on the reconciling of transparency and secrets protected by law.

On completion of discussions that began in 2010, ASN will propose to the Government an extension, in the transport sector, of the right of access to the information held by those responsible for nuclear activities.

Finally, ASN will continue to support CLI activities. With ANC-CLI and in agreement with the licensees, it will establish 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.