



The Labour Director-General

**The Nuclear Safety Authority
Director-General**

Statement of the Nuclear Safety Authority and of the General Directorate of Labour on the implementation of the European radiological monitoring document proposed by HERCA (Heads of European Radiological Competent Authorities)

I. Context

At the initiative of the Nuclear Safety Authority (ASN), the Heads of European Radiological Competent Authorities (HERCA) was created in 2007 with the aim of achieving better standardisation with regard to radiation protection in Europe.

Within the framework of its work in relation to radiation protection of outside workers¹, HERCA has adopted a radiological monitoring document ("*radiation passbook*") aimed at complying with the requirements of Euratom Directive 90/641 on the operational protection of outside workers exposed to the risk of ionising radiation during their activities in controlled areas.

On the basis of this document, the European Radiation Protection Authorities decided to initiate a stakeholder's consultation at national level.

In France, beyond the technical opinion of the French nuclear radiation protection and safety institute (IRSN) and in addition to the consultation of the government (Labour Ministry), ASN initiated a consultation in September 2010 of :

- the ASN Advisory Committees ;
- the social partners jointly represented in the COCT (Working Conditions Orientation Council), including trade union representatives.

Within the framework of this national consultation process, the Advisory Committee for radiation protection of workers and public in the field of industrial and research applications of ionising radiations, as well as for natural ionising radiations, (GPRAD) gave **its opinion** at the end of a meeting held on November 25, 2010. The experts from the Advisory Committee for medical and medico-legal applications of ionising radiations (GPMED) were associated with these deliberations .

¹ Extract from Euratom Directive 90/641:

- outside worker: "*any worker of category A (...) performing activities of any sort in a controlled area, whether employed temporarily or permanently by an outside undertaking*";

- outside undertaking: "*any natural or legal person, other than the operator, including members of his staff, performing an activity of any sort in a controlled area*";

Moreover, at the end of its meeting of March 8, 2011, the no. 2 specialised commission of the COCT (on the prevention of risks for health in the workplace) issued [its opinion](#) on the radiological monitoring document proposed by HERCA.

The present document details the statement of the ASN and the DGT in consideration of the opinions expressed by the stakeholders during the national consultation process.

II. Statement of the ASN and of the DGT

When transposing Euratom Directive 90/641, France opted for a centralised national network (SISERI) to ensure the follow up of the radiological monitoring of workers who are exposed to ionising radiations within French territory. This system also enables a dosimetric document to be issued to the workers called upon to execute an operation within a different member state.

1) The ASN and DGT approve the HERCA initiative as it aims at contributing to the implementation of an efficient European data system for individual radiological monitoring within a context of free movement of workers within Europe. Nevertheless, the ASN and DGT acknowledge:

- the difficulties in applying the system in paper form in view of the need to permanently update the data involved and the high demands placed on the reliability of this information;
- that, in the current status of national regulations and the regulations related to the confidentiality of the individual dosimetry data, prior reform are required in France in order to distribute some information contained in the radiological monitoring document on a Europe-wide scale .

2) On the basis of the conclusions of the national consultation of stakeholders, the ASN and DGT consider that :

- the introduction of the radiological monitoring document in France must be done in an electronic way in line with and as a complement to the existing SISERI system;
- the scope of application of the system proposed by HERCA, which is restricted to workers operating in a different member state for administrative simplicity purposes, must be applied without any restriction related to the classification of the workers (category A or B) or to the type of regulated area in which they operate (controlled or supervised area);
- the radiological monitoring document must be refocused on the initial objective of Euratom Directive 90/641. In particular, it will be necessary to evaluate the relevance and the justification of the distribution of data, in order to exclude those data which enable the professional activity of the workers to be tracked (data relating to the cumulative dose over the last five years) and those which do not contribute directly to the objective of operational monitoring sought by the document (lifetime dose).

3) The ASN and DGT propose the following two complementary actions:

- at European level the ASN and DGT encourage HERCA to pursue, in conjunction with the European Commission², the study of the feasibility of an electronic data exchange system to which the centralised systems of each member state would be connected and, in particular, the need to have a unique worker identification system;
- at national level, and with a view to the forthcoming discussions for the transposal of the future Euratom Directive, the ASN and DGT have decided to initiate a reflection process in order to update the regulatory provisions framing the dosimetry monitoring modalities. A working group, created among the COCT, will be set up for this purpose before the end of this year.

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² Notably with regard to the proposed Council Directive laying down basic safety standards for protection against the dangers arising from exposure to ionising radiation (adopted on 9/29/2011)