



ENISS Statement

Response to the review of the IAEA

Fundamental Safety Principles,

Safety Fundamentals SF-1, Vienna 2006

November 2018

Context

IAEA Safety Fundamentals, SF-1, stand at the top of the IAEA safety standards, stating the fundamental safety objective – to protect people and the environment from harmful effects of ionizing radiation – and ten associated safety principles which provide the basis for requirements and measures for the protection of people and the environment against radiation risks and for the safety of facilities and activities that give rise to those risks.

In 2018 the Commission on Safety Standards (CSS) decided to undertake a review of SF-1, requesting each Safety Standard Committee to provide its own review outcomes to the CSS.

As a recognised representative of the European Nuclear Installation licensees and an observer member of NUSSC¹, WASSC², RASSC³ and EPRESC⁴, ENISS considers important to express the European Licensees' position through this statement which was sent to the CSS and SSCs' Chairpersons in November 2018.

Position

New insights have been gained over the last ten years and were further developed and incorporated into IAEA or other international organisation documents since the publication of SF-1 in 2006. Although some of them may improve the information about the safety protection concepts currently described in SF-1, these concepts are not called into question and are still valid.

The overall process of the revision of the safety standards should be carefully assessed. Lessons learned from revisions in the last years have shown that different processes can be applied. For instance, covering a number of Safety Standards in a “thematic” revision is one way forward or providing amendments on specific items through addenda or companion documents may also be an adequate solution.

Nevertheless, any revision decision should be the result of a shared understanding which may take a significant time to be established (for example referring to a future safety report which should address the concepts developed in the UNSCEAR 2012 report on Attributing Health Effects to Ionising Radiation and Inferring Risks, as recommended by the Consultancy Meeting held in February 2018).

Any revision would require a large amount of coordination and adjustments due to the numerous participating parties. Moreover bearing in mind the considerable number of Safety Standards currently under revision or soon to be revised, it may be difficult to provide the quality of support needed.

Finally, the revision of SF-1 would inevitably result in a revision of a great number of already published Safety Standards and lead to a delay in the publication process of draft standards.

ENISS would therefore recommend performing a thorough gap analysis to assess the needs for changes taking into account potential benefits and contextual issues.

Also, any possible revision should be part of the long-term strategy for developing IAEA Safety Standards to ensure the necessary continuity and stability.

¹ NUSSC: NUclear Safety Standards Committee

² WASSC: WAste Safety Standards Committee

³ RASSC: RAdition Safety Standards Committee

⁴ EPRESC : Emergency Preparedness and Response Standards Committee