

A decorative graphic consisting of a thin green circle on the left side, partially overlapping a horizontal green bar that spans across the middle of the slide. The bar has a slight gradient and is framed by dark green brackets on both ends.

White Paper of the French National  
Association of Local Information Commissions

A multi-stakeholder and inter-territorial  
perspective on decommissioning issues

Stéphane Baudé (Mutadis)

RICOMET conference, IAEA, Vienna, 27<sup>th</sup> June 2017

# The Local Information Commissions (CLI)

- The CLIs, local structures for vigilance and information at the local level created from 1977 to the 2000's, legally required
  - CLIs gather elected representatives, workers of the nuclear facility, environmental NGOS and qualified personalities.
- Their national association (ANCCLI) facilitates exchanges of information between CLIs and common reflections, supports the CLIs (notably through the Scientific Committee), facilitates relationships with the nuclear safety authority (ASN) and the TSO (IRSN) and give the CLIs a voice at the national level (incl. White Papers)
- Specific Permanent Working Groups within the ANCCLI including a Permanent Working Group on decommissioning

# Why did the CLIS and the ANCCLI issue a White Paper on decommissioning?

- Shutdown and decommissioning procedures have consequences that will significantly affect host territories.
- 29 nuclear facilities are shut down and being dismantled. 6 CLIS are already engaged on decom. issues. CLIs will be increasingly solicited on these issues and need to build their own approach
- Decommissioning is an industrial sector under structuring. These are enormous projects, which are bound to multiply in the future. CLIs have a role to play in informing about the business strategies that are implemented in their territory.
- Expectations of CLIs about decommissioning → Creation of a Permanent Working Group on this issue in June 2015. **White Paper issued in January 2017**
- White Papers on different issues previously issued by the ANCCLI since 2006: governance of nuclear activities, radioactive waste management, Cigeo

# Objectives and method

- A tool for the CLIs with the objective of
  - Awareness raising and training of CLIs on decommissioning
  - Valuing and communicating the role of CLIs and ANCCLI in decommissioning
  - Discussing with the other actors the role of the CLIs and the ANCCLI in a transparent and open governance system which meets the requirements of the Aarhus Convention
- Independent facilitator (Mutadis) in order to facilitate the work of the Permanent Working group:
  - Structured discussion method for a global strategic analysis of decommissioning issues from the point of view of the CLIs
  - Facilitation of the analysis of the experience of the CLIs
  - Independent analysis and synthesis of the existing legal framework for decommissioning
  - Facilitation of the formulation of action proposals

# Decommissioning, a key stake for territories hosting nuclear facilities (1/3)

- A deep change and a major challenge for the French nuclear sector and for the territories hosting nuclear facilities
- Decommissioning can lead to a significant evolution of the development project of the territories that host the nuclear sites, which will have to face a double transition
  - Active facility → decommissioning works → post-decommissioning
- This transition must be designed with the stakeholders of concerned territories. The CLIs have a role to play in informing about the strategies of companies implemented in their territory
- Decommissioning raises various issues including:
  - Safety of the facility and of the decommission works
  - Radiation protection of workers
  - Management of materials and waste generated by the decommissioning
  - Assessment of costs and decision-making processes on financial matters
  - Impact of decommissioning choices on possibilities of future uses of the site and on the development project of the territory

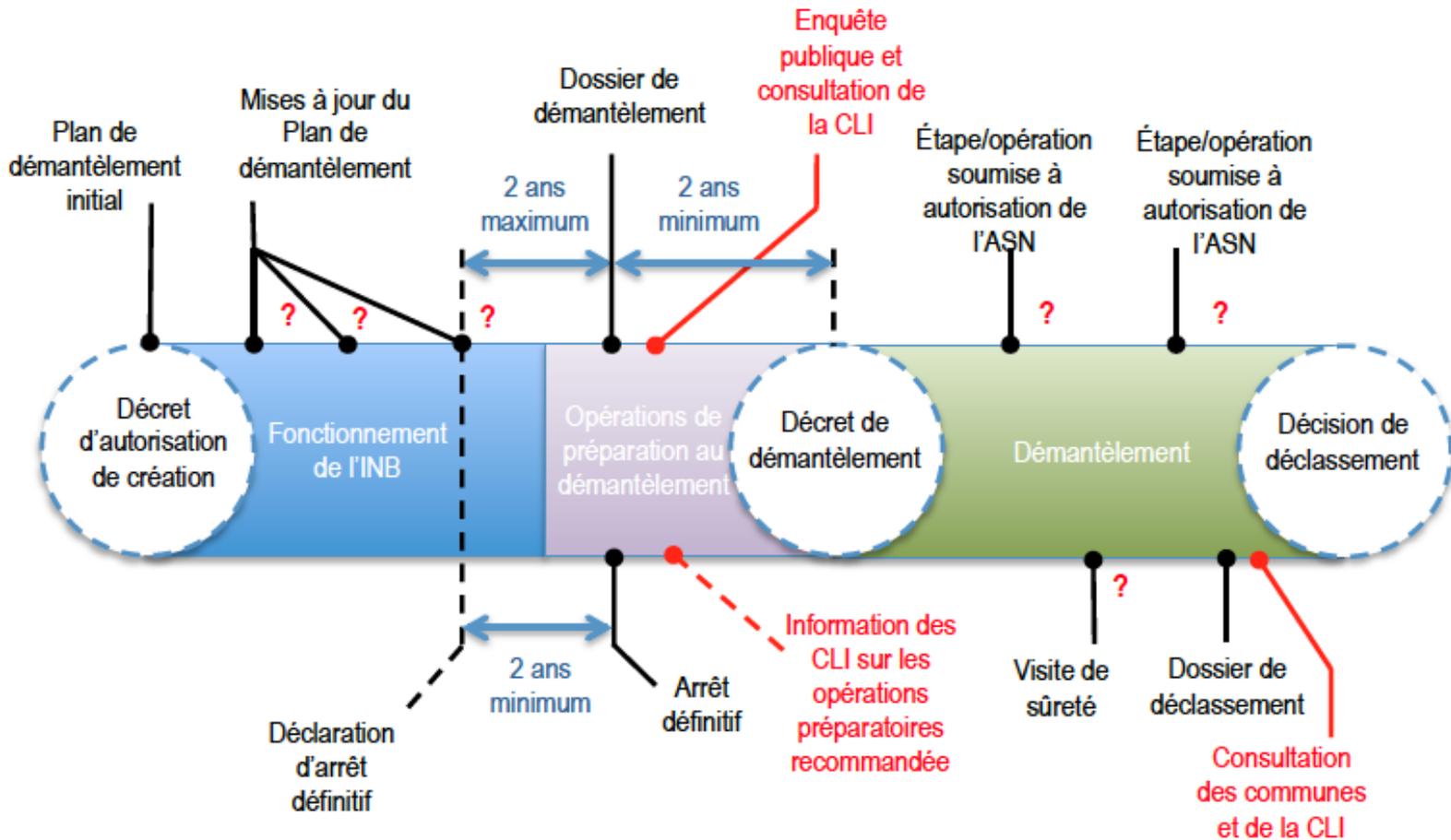
## Decommissioning, a key stake for territories hosting nuclear facilities (2/3)

- A question of **equity between territories** (producers of radioactive waste / "hosts" of waste products / French society as a whole) and between generations
- The **long-term issues** posed by the dismantling are being decided from now (and are conditioned by past choices). However, they are **overridden by short-term stakes** (shutdown or extension)
- Decommissioning issues **concern a large number of actors** (operators and subcontractors, ASNs, IRSNs, companies in the territories, elected representatives, populations, workers and trade unions, civil society organizations, etc.)
- However, the **decision-making and action system is concentrated** at the national level, where the main actors are the operators, the government, the ASN and the IRSN, then the decisions apply to the territories.

## Decommissioning, a key stake for territories hosting nuclear facilities (3/3)

- Since the French nuclear power plants were built over a short period of time, the precise meaning of **the concept of « immediate decommissioning » needs to be precised**
- This situation requires a **deep strategic reflection** so that the dismantling of French nuclear facilities be a strategic opportunity for the future rather than a fate for the territories and society.
- In order to meet transparency and participation requirements (in particular the Aarhus Convention) to which the CLIs and the ANCCLI are strongly attached, the **conditions for information and consultation with all concerned stakeholders must be built**, in order to have a clear and comprehensive strategy on the short, medium and long term.
- The CLIs and the ANCCLI represent a **resource** for this and they want to get involved in this.

# Identifying the legal role of the CLIs in decommissioning procedures



In red: steps where the CLIs must be consulted or informed. Question marks point steps where the role of the CLIs is not defined and where they wish to be consulted

# Requests voiced by the CLIs and the ANCCLI

- Faced with long-term decommissioning projects, CLIs intend to carry out their mission of follow-up and information mission **now, with continuity and in the long term**. The ANCCLI will support them.
- The CLIs will be proactive and demanding to **access information** within a timely manner, notably the documents of the decommissioning cases.
- The CLIs and the ANCCLI want to **initiate dialogue** with the ASN, the IRSN and the operators on the conditions and the means of an effective, continuous and lasting follow-up of the dismantling by the CLI.
- The CLIs and the ANCCLI **want their roles to be better defined** in the follow-up of decommissioning (updating of decom. plans, authorization procedures, safety reassessments during dismantling).
- The CLIs & the ANCCLI want to have **access to the public expertise** of the IRSN or the ASN and to have the means for independent expertise.
- The CLIs and the ANCCLI want to have the **human and financial means** enabling them to follow-up decommissioning operations at the level that is required by the importance of associated territorial stakes. 9

Thank you for your attention

The White Paper is available (in French) at the following address :

<http://www.anccli.org/les-livres-blancs>