

Change management - from the expectations of the competent authority to the implementation by the operator

Nuclear power plants and fuel cycle facilities are constantly changing, particularly in recent years with works related to the implementation of security reinforcements. The security of a facility can be weakened by a lack of anticipation of the potential impacts of the changes implemented on the facilities, in particular those relating to physical protection systems.

The French nuclear security competent authority has set a regulatory framework for enabling changes that could have an impact on security on site. The requirement set in the regulation concern modifications affecting one of the elements taken into account to license the operator. The regulation notably introduces the notions of simple information of the authority and authorization required before starting the works.

This general requirement takes into account the change in a large way and does not give any detail on the type of information to be transmitted according to the type of change, nor the nature of demonstration that this information should include.

In regards to nuclear security, the first major questions to consider before implementing works are:

- do the works improve security?
- do the works weaken security?
- in the latter case, what compensatory measures are planned?

The French nuclear security competent authority wants to constantly empower the license holder, that's why a collaborative work has been set up with the operator Orano to define a guide dedicated to the management of changes for the different nuclear sites it operates. The aim of this guide is, for each facility, to know what information the operator has to communicate to the authority before beginning the works. This information should systematically include the answer to the previous three questions. In addition, for changes which are not relating to physical protection, the operator has to be able to explain to what extent security by design has been taken into account.

In order to have a pragmatic and proportionate approach, the guide defines different levels of changes and associated instructions, ranging from minor modifications than can be implemented without notice to the competent authority to substantial changes for which prior authorization must be obtained before the works start.

The presentation aims to share the approach used with Orano :

- the guide used to manage changes on site,
- the nature of information required according to the type of works planned,
- the collaborative work done with the competent authority, through technical meetings
- the benefits of this process.

It should be noted that the approach used with Orano which operates fuel cycle facilities is relevant because it can be used with any other operator and could particularly benefit other countries which need to manage changes on the facilities, including nuclear power plants and research reactors.

State

France

Gender

Female

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