VIRTUAL MEETING

47TH COMMISSION ON SAFETY STANDARDS (CSS)

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Spain´s Nuclear Safety Council Covid-19 situation management

Presented by: Javier Dies, Commissioner CSN, Spain.

The Nuclear Safety Council (CSN) as a main goal has adopted the objective to maintain work and functionality as usual as possible, mostly by implementing telework. In fact, only the essential personnel (around 5% of personal staff) are present at CSN Headquarters.

The CSN Board of Commissioners maintains its activity through regular virtual meeting as usual and enhanced as result of very intense regulatory activities carried on.

The board has taken very important decisions. On May 7th, Almaraz PWR two units, each one 1000 MW, Operation License renewal, and Periodic Safety Review, as well as Long-term operation, has been approved by the Spanish Nuclear Safety Council.

Immediately after this approval, work has started on Vandellós II NPP 1000 MW renewal of Operation License, including Periodic Safety Review.

At the same time several refueling outages affected by Covid constrains have been subject to review. NPP Almaraz I, NPP Asco I, NPP Trillo.

With regard resident inspectors' activities, they maintain site coverage while maximizing teleworking in as much as possible. Each resident inspector is visiting the NPP at least twice a week on a random basis. For the case of reloads outages, resident inspector works on-site, on a shift scheme.

Scheduled Emergency Plan Exercises have deferred during this period. These exercises are foreseen to be rescheduled to the last quarter of 2020.

During this period, meetings with utilities, fuel manufacturing company, as well as waste management company have been kept by videoconference with no major difficulties. On-line training activities have also been maintained

This crisis is an opportunity to setup the tools for teleworking at an excellent level, not just to survive, we have to achieve a high quality of teleworking, with the appropriated hardware, software and adopted procedures, because, may be in the future we will need again.

***Annex**. Spain's Nuclear Safety Council (CSN) COVID-19 situation management*

Spain's Nuclear Safety Council (CSN) COVID-19 situation management

(as of 11/05/2020)

Presentation: The purpose of this paper is to present the COVID-19 management established within the Spanish Nuclear Safety Council (CSN) to handle the continuous service of the Spanish nuclear safety and radiation protection authority and the choices taken to do so.

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Spanish Nuclear Safety Council management of the Covid-19 situation

National background	
General	
Spanish authorities instructions regularly delivered	Yes –President of the Government, relevant Ministries and regional governments (Autonomous Communities).
Clear established and regularly updated provisions	Yes: • March 9th, the Interterritorial Board of the National System of Health established an agreement on applicable measures to regions with significant spread of COVID-19. • March 14th, the Government issued the National Response Framework according to Royal Decree 463/2020, declaring a state of alarm in Spain for the management of the health crisis caused by COVID-19. The RD explicitly identifies the NPPs as essential services to continue operative in safe conditions. • April 28th, the Government approved the national guidelines for the progressive end of the confinement measures and the reestablishment of non-essential activities.
CSN	
Provisions for the CSN	The Nuclear Safety Council (CSN), following the recommendations issued by the Government of Spain in relation to COVID-19, decided to temporarily suspend activities at its headquarters, guaranteeing, in any case, the operation of the organization. Provisions are made by CSN Board of Commissioners and are in accordance with the recommendations of the Government. Some of the most relevant actions which have been implemented follow: • **Issuance of an Integrated Continuity Plan, prioritized and updated on a weekly basis.** • Cancelation of travels and external visits to CSN Headquarters. • Identification of risky groups. • Identification of essential personnel present at CSN Headquarters. • The CSN Board of Commissioners maintains its activity through regular virtual meetings. • Telework implementation, with specific indications for resident inspectors.

	• Official register availability and minimum physical attendance • Establishment of a contingency plan devoted to keep the Emergency Response Organization (ORE) • Inspections just limited to the essential ones, if needed. Baseline and routine inspections associated to systematic plans have been suspended. • The scheduled examination process for obtaining licenses for operators and supervisors has been postponed. • Internal and external communication has been reinforced (especially focusing on operating NPPs and medical facilities).
Contingency plan	• The CSN Pandemic Plan (Integrated Continuity Plan) has been elaborated under the emergency situation in March 2020, addressing the measures adopted to ensure that CSN mission is achieved while guarantying protection of workers and preventing contagion. • The Plan is updated on a weekly basis in order to reflect the implementation of practical measures and to incorporate information potentially interesting or impacting on the CSN activity.
Staff of CSN	450 employées
Missions of the CSN	
Sustained missions - Summary	The scope of CSN activity is focused on guaranteeing the nuclear and radiological safety, with the adverse conditions caused by the COVID-19 pandemic, specially affecting the systematic inspection plans. Main aspects, concerning the CSN functions as regulatory authority that CSN keeps running are: • To keep channels of internal and external communications: Official register, electronic signature, contact points (email, web, etc.). • Identification of stakeholders and communications related to the applicability of the Royal Decree: considerations on the interruption of terms applicable to administrative procedures and the exceptions set forth by CSN, based on safety reasons. • Issuance of CSN authorizations on specific matters, eg: some type of modifications of radioactive facilities, start up permits for radioactive facilities based on video and telematics verifications, personnel licenses, etc • Issuance of reports to the Executive branch of the Government for approval of new radioactive facilities, major modifications of authorizations of both nuclear and radioactive facilities. • Requirements to the licensees to provide CSN with their contingency plans. • Prioritize the licensing, supervision and control activities, according to the essential activities of licensees; specifically, NPP in operation have restricted their works to prevent contagions. • Instructions for Resident Inspectors (RIs) in NPPs: permanent daily communication with NPP and with CSN. During outages, it has been established a shift attendance on site.

	• The CSN maintains daily contact with NPPs regarding nuclear security and contingency plans associated to COVID-19. These plans were sent to the CSN and they have been updated accordingly with the evolution of the pandemic. Contingency plans ensure protection against the established Design Basis Threat.
Currently	Since 2nd April the CSN updates weekly the Integrated Continuity Plan to guarantee the oversight and enforcement activities to enable physical distancing and minimize face-to-face interactions.
Key activities	With some limitations, the main CSN activities are ongoing by telework: **Regulation**:The CSN Board of Commissioners keeps their activity. **Public communication:** on-going, mainly through: • Information posted on the website and press releases as well as other channels available, notably twitter. • Specific attendance of public consultations channels (mailbox, specific e-mail contacts, telephone...). • Issuance of communications related to specific concerns on nuclear and radioactive facilities and associated activities. **Control:** • Inspection (see hereafter): Limited to indispensables, unless resident inspection during outages. • Reporting nuclear and radiological events: handled by teleworking. Surveillance of radiological environment mainly ongoing by the national automatic stations: ongoing, in touch with supporting organizations. Information related to environmental radiological surveillance throughout the Spain´s national territory is accessible at the following links: **https://www.csn.es/mapa-de-valores-ambientales https://www.csn.es/kprgisweb2/index.html?lang=es** **Licensing processes:** • Individual authorizations: handled by teleworking • Analysis and assessment of technical documents: handled by teleworking
Inspections	
Routine inspections	• From the earliest stages of the management it was agreed that a common contact point should channel the communications among the NPPs and the CSN. • Scheduled inspections within systematic plans have been interrupted. Just reactive inspection will be performed, or any other needed. The issuance of certificates to make it possible the associated logistic activity has been managed.

	□ The CSN resident inspection is maintaining site coverage by maximizing the use of telework. Each RI will visit the NPP at least twice a week on a random basis. □ During outages the RI will work on-site, on a shift scheme. □ Scheduled Emergency Plan Exercises, have been deferred during this period. These inspections are foreseen to be rescheduled to the last quarter of 2020
Confirmed inspections	Just reactive inspections, based on nuclear and radiological safety reasons, will be performed if needed in response to risk-significant events.
Nuclear Power Facilities	
Continuity plan	□ NPP are in operation to ensure national power supply. The supervision of refueling activities are prioritized, paying special attention to the modifications of the scheduled plans. □ CSN regulations do not require that licensees have continuity of operation plans. However, the CSN has requested detailed information related to the management of operations during pandemic conditions, to be able to develop its own Plan for Continuing Operations.
Staffing	□ The oversight of operating NPPs will be performed by the resident inspection unit, mainly through telework, as a regular basis. The resident inspectors have remote access to the necessary and vital NPP information. □ During outages the resident inspection will work on-site, on a shift scheme. □ Daily communication with the NPPs continues as usual. □ Licensees are implementing site-specific responses to minimize the risk of disease transmission and overall impact on facilities □ The shift members of the CSN Emergency Response Organization (in particular RIs) have been informed on the contingency plan for keeping their capabilities available.
Planned maintenance	□ All the plants have limited their activities to the essential ones to guarantee nuclear safety, according to the Technical Specifications and the applicable licensing basis. □ Some power reactors, with scheduled refueling outages have adapted their plans to COVID conditions. This is under the focus of the CSN oversight, considering the possibility of addressing potential exemptions if needed.
Other facilities	
General Note	□ All inspections are delayed, except for essential inspections, which may include the response to incidents and accidents. □ Facilities are implementing flexible staffing measures to reduce person-to-person contact.
Fuel Facilities	□ The only fuel manufacturing facility in Spain stopped the production on 2nd April. The CSN keeps active tracking with the COVID impact on the plant.

	• Definitive shut down prior to decommission "Quercus" former uranium concentrates factory, performs basic maintenance and sampling requirements, but normal security surveillance.
Waste disposal facilities	• The low and medium radioactive waste disposal facility “El Cabril” has suspended all expeditions planned and has send a plan for minimum services and minimum essential operations personnel.
Independent Spent Fuel Storage Installations	• ISFSIs continue to operate normally with flexible staffing measures to reduce person-to-person contact. The facilities are managed according to the needs of the plant where they are located and the applicable administrative controls.
Radioactive Materials facilities	• CSN Oversight: All routine inspections have been delayed, with reactive and special inspections performed on a case-by-case basis, if needed. • Issuance of a notice with clarifications on the applicability of RD 463/2020, including instructions and indications attending FAQs (through web, mailbox, email, phone). • Issuance of a notice extending the validity of radioactive facilities licenses, associated training courses and accreditations during COVID.
Decommissioning	• The licensee communicated their contingency plans to cope with COVID. • The activities are limited to the essential ones. • The CSN keeps the continuous supervision through the resident inspection, providing daily information and focusing on essential works.
Radioactive facilities	
Main statement	Medical radioactive facilities licensing procedures continue, in order to contribute to maintaining the country global health capability. • Regulatory position to grant the initial operation of medical facilities by replacing the required inspections in support of this authorizations with an ad-hoc procedure including verifications by videoconference. • Issuance of a notice with clarifications on the applicability of RD 463/2020, including instructions and indications attending FAQs (through web, mailbox, email, phone). • Issuance of a notice extending the validity of radioactive facilities licenses, associated training courses and accreditations during COVID.
Inspections	• Routine inspections have been temporarily postponed. Reactive inspections, or those responding to events, will be performed on a case-by-case basis. • The inspections needed to support the initial operation have been temporarily replaced by an ad-hoc procedure including certain verifications by videoconference.

Staffing	Many radioactive facilities have reduced their staff on duty. CSN has not identified so far any significant safety impact, taking into account that CSN has adapted their usual activities to the pandemic circumstances in order to continue with its oversight functions.
Crisis management	
Emergency shift	• 24/7 Operations Center - Emergency shifts appropriately staffed • From the initial stage of the declaration of state of alarm the minimum staff personnel attending the Emergency Room at CSN Headquarters was defined. • Since the very beginning of the COVID the CSN established a specific plan devoted to keep the Emergency Response Organization operative and with its necessary resources. • The members of the ORE have been informed of the main and more relevant instructions to make effective their incorporation to the emergency shifts. • The emergency provisions include external organizations supporting the CSN activity (radiological protection measurements). .
Calls to the emergency shift	Through normal means (professional phones and email)
CSN Daily running	
Staff	
Teleworking – all staff	Mandatory telework from March 16th, 2020, the CSN began allowing full-time telework for all employees in response to the COVID-19 pandemic.
Specific cases	• Those staff require specific permissions for on-site work (Resident inspectors). • The essential personnel at CSN headquarters was identified from the beginning of the COVID. This information is part of the CSN plan. • The CSN managed the obtention of special permissions to avoid the transportation and logistics needs, when necessary, in coordination with the competent authorities.
Material	
Personal computer	• Staff is using both CSN laptops and personal laptops enabled with communication tools. • CSN is involved in a continuous effort to enhance the availability of tools needed to develop the plan of activities in this working mode (PC, connection devices, videoconference applications...)
Phones	Only some have professional telephones (top management + the ones often abroad) – Calls forwarded to personal telephones if needed.
Others	• Remote access: available to all staff • Emails (CSN has given instruction so as to prioritize this means of contact) • Video conferences • Audio conferences • Intensified communications delivered by website
Communication with stakeholders	

Paper mail	• The CSN has very limited ability to process paper mail inquiries from the public during the COVID-19 public health emergency. The CSN continues to respond to phone calls and emails from the public. The FAQs received were a relevant input in the issuance of notices related to the RD and the applicability to the administrative procedures. • The telematics register make it possible to incorporate the documentation into the internal system.Once per week one person attends physically the register at CSN Headquarters.
Others	Phone and email communication as usual. The CSN continues to issue press releases electronically, and is using social media postings (Twitter) to highlight agency actions during the COVID-19 public health emergency.
Meetings	• Suspended physical meetings have been cancelled. • Videoconference tools are being widely used for meetings, as necessary.
More information	Additional information has been posted at the CSN COVID-19 information website (both in Spanish and English languages): CSN WEB COVID-19