
CONSULTATION OF ENSRA ON THE PAPER FOR ACTION N° 10 OF
THE SET PLAN on « maintaining a high level of safety of nuclear
reactors and associated fuel cycles during operation and
decommissioning while improving their efficiency”

By e-mail addressed to the Chairman of ENSRA the Secretariat of the SET plan « Towards an Integrated Strategic Energy Technology (SET) Plan: Accelerating the European Energy System Transformation” of the European Commission invited ENSRA to take position on the targets/priorities proposed in the Paper for Action n°10 “Nuclear”. The SET plan presents ten key actions to address the European Commission’s Energy Union research and innovation priorities including action 10 on nuclear issues entitled “Increase safety in the use of nuclear energy”.

The Paper for action 10 named « maintaining a high level of safety of nuclear reactors and associated fuel cycles during operation and decommissioning while improving their efficiency” defines targets and priorities for implementation of the SET plan.

On behalf on ENSRA I would like to thank the Secretariat of the SET plan for this consultation.

ENSRA is an association of nuclear security regulators ; ENSRA is therefore not competent to comment on nuclear safety issues.

However, ENSRA members note that the first proposed target refers to “*maintaining a high level of safety and security*” and mentions that this can be achieved through organisational, operational and regulatory aspects as well as R&I. As a way to achieve this target, the EC proposes “observance of strict non-proliferation regime and physical protection of nuclear materials and facilities”.

ENSRA members fully support the objective of a high level of nuclear security and implementation of national regimes for physical protection of nuclear materials and facilities in line with the international legal instruments (in particular the Convention on Physical Protection of Nuclear Material as amended).

However, ENSRA would like to recall that security of nuclear facilities is a State sovereign responsibility and that the European Commission has no competence in this regard. It is therefore not possible for the European Commission to set itself a target on nuclear security of nuclear facilities. ENSRA recommends to the Secretariat of the SET plan to withdraw this reference (bullet point number 5 of target 1). For the same reason, ENSRA recommends the Secretariat of the SET plan to delete reference to the “*synergy between safety, security and safeguards*”.

ENSRA members would like to take the opportunity of this consultation to re-affirm that each of them is determined to ensuring the highest level of nuclear security and committed to working together with their national safety authorities at the management of nuclear safety and nuclear security interfaces.

On behalf of ENSRA,
The Chairwoman of ENSRA,

Géraldine Dandrieux