

Note:

This is a translation of the ESK recommendation entitled
“Harmonisierung von Meldekriterien für Vorkommnisse mit radioaktiven Abfällen mit vernachlässigbarer
Wärmeentwicklung”.

In case of discrepancies between the English translation and the German original, the original shall prevail.



RECOMMENDATION of the Nuclear Waste Management Commission (ESK)

Harmonisation of reporting criteria for incidents involving radioactive waste with negligible heat generation

1 Background

In the Federal Republic of Germany, there are about 50 facilities for the storage of radioactive waste with negligible heat generation. If the radioactive waste is stored in nuclear installations licensed according to § 7 or § 6 of the Atomic Energy Act (Atomgesetz – AtG), it falls within the scope of the Nuclear Safety Officer and Reporting Ordinance (Atomrechtliche Sicherheitsbeauftragten- und Meldeverordnung – AtSMV), which regulates, among other things, the reporting of safety-relevant events on the basis of specific reporting criteria. In addition, there are a large number of other storage rooms or storage facilities for radioactive waste with negligible heat generation that are operated on the basis of a handling licence according to the Radiation Protection Ordinance (Strahlenschutzverordnung – StrlSchV) and thus do not fall within the scope of the AtSMV.

In addition to these storage facilities, there are facilities for the treatment of radioactive waste with negligible heat generation which are operated on the basis of a handling licence according to the StrlSchV. These are, e.g., central and decentralised conditioning facilities.

According to the AtSMV, operators of nuclear installations in the Federal Republic of Germany must report reportable events to the relevant competent *Land* supervisory authorities. The Incident Registration Centre at the Federal Office for the Safety of Nuclear Waste Management (BfE) has the task of recording and documenting the reportable events reported to the BfE by the competent *Land* supervisory authority and evaluating them for the Federal Ministry for the Environment, Nature Conservation, Building and Nuclear Safety (BMUB).

The legal reporting obligations for the reporting of events/incidents in facilities with handling licences according to the StrlSchV are derived from § 51(1) StrlSchV. According to § 51(1) sentence 2 StrlSchV, the occurrence of a radiological emergency, an accident, an incident or any other safety-relevant event must be

reported to the nuclear supervisory authority without delay. The valid regulations in this respect are contained in the circular of the BMUB dated 30 March 2015 and are to be incorporated into the new StrlSchV.

In summary, it can be stated that, despite identical transport and handling processes, in the facilities licensed according to the AtG and the StrlSchV, different and interpretable regulations exist with regard to the obligation to report events.

The harmonisation of the reporting obligations is in compliance with the ESK guidelines of 10 June 2013 (*Leitlinien für die Zwischenlagerung von radioaktiven Abfällen mit vernachlässigbarer Wärmeentwicklung – ESK guidelines for the storage of radioactive waste with negligible heat generation*) and the ESK statement of 7 May 2015 (*Umsetzung der ESK-Leitlinien für die Zwischenlagerung von radioaktiven Abfällen mit vernachlässigbarer Wärmeentwicklung – Implementation of the ESK guidelines for the storage of radioactive waste with negligible heat generation*) since the requirements of the ESK guidelines and the regulations on implementation apply irrespective of the designation of the location where they are stored.

In addition to the reportable events in facilities with a licence according to the StrlSchV, also events/anomalies that are below the reporting threshold according to the AtSMV may constitute noteworthy events in the area of waste conditioning, internal transports and storage and should therefore be reported on the basis of uniform criteria.

For these events currently no precise criteria are established. However, they can be formulated, among others, on the basis of the ESK guidelines for the storage of radioactive waste with negligible heat generation in order to enable systematic recording and information sharing. Such noteworthy events include, for example, corrosion on waste drums, bulging drums and defects in crane systems or failure of transport equipment.

2 Objective and tasks

The objective of this recommendation is therefore, on the one hand, to bring about the harmonisation of the reporting procedures and concretisation of the reporting obligations according to the StrlSchV as well as the alignment with the more precise formulations of the AtSMV and, on the other hand, the formulation of criteria for noteworthy events for which systematic recording is appropriate.

The proposed reporting criteria apply to the handling of other radioactive material. This comprises both storage and treatment as well as the facilities and activities required for this purpose, including internal transports in all facilities for handling radioactive waste with negligible heat generation licensed according to § 7 StrlSchV.

The reporting criteria were formulated in accordance with the AtSMV (see Annex 1). For these criteria, special explanatory notes were formulated (see Explanatory notes concerning Annex 1).

In addition, criteria were formulated for recording noteworthy events below the reporting threshold (see Annex 2).

In order to ensure uniform use of the terms, definitions have been compiled on the basis of existing regulations (see Annex 3).