

How to apply ALARA in the decommissioning and remediation

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4 topics identified :

- ▶ ALARA PRINCIPLE APPLICATION TO DECOMMISSIONING
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ALARA PRINCIPLE APPLICATION TO DECOMMISSIONING

- ▶ Definition of the “R” of ALARA :
 - ▶ Often → Reasonable = “Economically” reasonable
 - ▶ However :
 - ▶ Monetary value of man.Sv is not widely used
 - ▶ Consensus to use this tool as a decision assistance only instead of a real decision criteria
- ▶ Radiological analysis to be made at the decommissioning planning phase
 - ▶ Necessary to take the time to study different options even if the schedule runs fast
 - ▶ If not, it will be “to late to say no” !
 - ▶ Consensus about “the higher the RP stake is, the more ambitious optimization has to be
 - ▶ Distinction has to be made between nuclear and non nuclear facilities according to the risk level

ALARA PRINCIPLE APPLICATION TO DECOMMISSIONING

- ▶ How to convince project management that optimization means first “doses optimization” and not “cost optimization” ?
- ▶ Recommendation 1 : Showing benefits generated by a good ALARA study performed at the decommissioning planning phase
 - ▶ Considering each phase of the project and dose transfers from workers to another
 - ▶ Considering benefits for all fields (i.e. decon can impact dose but also radioactive waste amount)
 - ▶ Considering the impact of each unexpected event on schedule delays and costs
- ▶ Recommendation 2 : Increasing the RP culture of project management
 - ▶ Why is it important to apply ALARA principle ?
 - ▶ Probably a long term effort !

RADIOLOGICAL CHARACTERISATION

- ▶ Characterization / mapping : What are we talking about ?
 - ▶ Radiological inventory for waste management objective ?
 - ▶ Radiation protection for ALARA objective ?
- ▶ Input data are often conservative for RP assessments when obtained for waste management purposes
- ▶ ALARA needs more accurate data leading to cost issues but could be profitable to avoid non useful collective or personal equipment
- ▶ Recommendation 3 : Integrating a techno-economic analysis about benefits induced by a better characterization

RADIOLOGICAL CHARACTERISATION

- ▶ Characterization : When to proceed ?
 - ▶ Don't wait too much longer before characterizing to avoid losing a lot of information
- BUT
 - ▶ Wait sufficiently to identify which data are really necessary according to the schedule evolution → Importance of preliminary ALARA studies
- ▶ Which level of confidence do you have about your characterization data ?
 - ▶ Historical measurement are not necessarily usable for the future
 - ▶ Measurements could have been done with old and not adapted technologies
- ▶ Recommendation 4 : Do not forget to perform a preliminary ALARA study including the needs of data and their accuracy ?

RADIOLOGICAL CHARACTERISATION

- ▶ Characterization for ALARA purposes :
 - ▶ Mainly dose rates but not only
 - ▶ Gamma spectrometry can be useful :
 - ▶ As input data for modeling and dose rate calculations (shielding studies for example)
 - ▶ But needs a high level of expertise and a good knowledge of geometry
 - ▶ Alpha characterization : difficult to monitor
 - ▶ UV detection devices : raising technology / not mature yet
 - ▶ Laser technics : plasma analysis, filtered released substances from oxide layer analysis
 - ▶ Core sampling :
 - ▶ Very useful for mass activity measurements
 - ▶ But destructive and expensive technique
 - ▶ Is there any non-destructive mass activity measurement technology available ?
- ▶ Advice : Using new technologies can be profitable to ALARA to get more accurate data

ORGANIZATION AND SKILLS

- ▶ Holistic approach can be difficult to implement :
 - ▶ Industrial safety and RP staff are not necessarily in the same department
 - ▶ Communication and team work can be difficult
- ▶ Be careful ! There are differences between operation and decommissioning phases
 - ▶ Skills are different : RP experts in operation are not RP experts in decommissioning
 - ▶ Experience is generally missing : preferring experienced staff instead of workers not used to working in decommissioning (unless if specific training)
 - ▶ Vigilance decrease temptation :
 - ▶ A plant in decommissioning (no fission reaction, less criticality risk) does not mean “a plant with a lower RP risk level”
 - ▶ Low dose rates do not mean low doses. Especially in decommissioning where works can be very long
 - ▶ Different issues : alpha contamination and internal incorporation, frequent layout modifications, aggressive dismantling techniques, ...
- ▶ **Recommendation 5 : Integrating a specific module dedicated to RP in decommissioning in RP training courses at schools or before starting a new position in a company**

ORGANIZATION AND SKILLS

- ▶ RP technical expertise in decommissioning is a rare resource
- ▶ How to maintain a high level of RP expertise in sub-contractors ?
- ▶ How to strengthen sub-contractors loyalty ?
 - ▶ Paying more !
 - ▶ Giving a long term vision with long term contracts to avoid massive turn-over
 - ▶ Limiting successive layers of sub-contractors
- ▶ No recommendation : Open discussion

END STATE IMPACT

- ▶ Decision usually made at the beginning of the project according to the end state
- ▶ ALARA considerations are implemented according to the expected end state
- ▶ But who decides what will be the end state ? Political decision !
 - ▶ A beautiful green park or a new nuclear facility ?
 - ▶ ALARA could be a balance between workers dose to reach the end state and public dose when the end state is reached ?
 - ▶ End state impact on ALARA could be low for worker dose optimization but high for population dose optimization
- ▶ How to manage regulation evolutions over a long term ?
 - ▶ Decisions made at the beginning can be obsolete 15 years later
 - ▶ It's safer to decommission immediately
 - ▶ Lobbying to minimize regulation changing impact or having enough time to anticipate changes
 - ▶ It's better when Safety Authorities are stakeholders on the project but it's not always allowed (necessary to maintain a certain distance between Safety Authority and licensees)
 - ▶ Best recommendation : Follow Safety Authorities guidelines !!
- ▶ Open discussion