

Brussels, 22th May 2014

To the attention of all contractors for the Nuclear production of Electrabel

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Concerns : Description of the rules in force for the transport of radioactive material for the Nuclear production of Electrabel

Dear Contractor,

The regulations applicable to the transport of radioactive materials for Electrabel's nuclear Generation are covered by Belgian legislation, which has incorporated the European Agreement concerning the International Carriage of Dangerous Goods by Road (ADR⁷) as well as other references such as those of the IAEA.

In order to ensure radioactive materials (ADR Class 7 or ADR7) are transported in compliance with the relevant regulations, Electrabel has substantially revised its procedure for such materials, both for those entering and for those exiting the Tihange site (CNT) and the Doel site (KCD). This means that a series of data and information required by the regulations and also necessary for the administrative and practical⁸ organisation of the transport of materials, **must** be in the possession of the Electrabel site concerned by your operations (if such operations require the transport of radioactive materials). These data must be transferred according to very specific procedures, which are set out at the end of this document. This applies for **all** transport of materials entering the Tihange and Doel sites which are already ADR7 **or will be ADR7** upon leaving the site in question.

This procedure was reinforced in January 2013: in the event the information requested **is not** in the possession of the site concerned **within the set deadline**, Electrabel reserves the right to refuse to send out or receive transported materials. Only a few exceptions will be considered and be subject to one-off authorisation.

⁷ The European Agreement concerning the International Carriage of Dangerous Goods by Road (ADR) (1957) has been revised every two years since 2001, primarily appendixes A and B. The latest applicable version is dated January 1, 2013.

This agreement was transposed into Belgian law through the Notice from the Belgian Mobility and Transport Federal Public Service (Service Public Fédéral Mobilité et Transports) published in its latest applicable version in the Belgian Official Journal on 5 June 2013.

⁸ For example, for site access, the identification and mobilisation of the staff or materials necessary, etc.

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Please note, if you were not already aware, that the procedures for gaining access to Belgian nuclear power plants were also modified in 2013. You are invited to contact your technical contact person at the Electrabel site in question for any further information you may require.

Best Regards.



P. Doumont

Director Health & Safety / Nuclear Safety / Security



W. De Clercq

Head of Generation & Procurement

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Organisation of the transport of radioactive materials for Electrabel nuclear Generation

1. The organisation of transport depends on three individuals:

(7) **YOU**, the contractor

(8) your **technical contact at the site** = the dedicated contact person with whom your services and operations are established

(9) the **transport organiser** = the dedicated staff member at the site in question for making all of the technical and administrative arrangements required for organising the transport of the materials.

For the Doel site (KCD), the following professional mailbox can be used to contact the transport organiser:

externradioactievtransportenkcd@electrabel.com

For the Tihange site (CNT), the following professional mailbox can be used to contact the transport organiser:

Cnt-transport-adr7@electrabel.com

2. Compulsory data to be provided to the transport organiser (NON-exhaustive list: refer to the applicable regulations, in particular the information required for the consignment note/CMR⁹):

- Full name of the sender and the consignee,
- physical and chemical form and radiological data (dose rate values and levels and type of contamination - labile or fixed) of the materials to be transported, etc.
For the radiological data, if the specific (detailed) values are not available when requested, a realistic estimation is required. It is highly advised to contact the transport organiser.
It is also crucial to specify clearly whether there are radiological risks and therefore specific protective measures to be planned (taken) for handling operations and/or lifting and unpacking.
- the type(s) of packaging used, with its (their) certificate(s) and/or its (their) approval(s), as well as the relevant validity dates
- the devices required for handling and lifting if applicable
- the transport authorisation(s) with the relevant references and validity dates
- proof of civil liability insurance and, wherever possible, all other information regarding the kind of risk covered (in other words, if there are other types of insurance policy) with the relevant references and validity dates
- the name of the crew member(s): driver, accompanier, etc. with a copy of their ADR7 certification
- proof of the driver's authorisation to secure the materials and/or proof of the individual who handled such operation's authorisation to do so
- the license plate numbers of the tractor and trailer

⁹ Convention on the Contract for the International Carriage of Goods by Road (CMR Convention), signed on 19 May 1956, in Geneva, Ord. of 23 December 1958, OJ 26 December 1958.

- *the UN name under which the transport will take place: in transport organisation at Electrabel, the two transport stages (consignment and shipping) are separated even if they could be combined. If materials are departing from an Electrabel site, Electrabel itself will establish the UN number as the sender, in compliance with the relevant regulations*
 - *the seal number if there is one (under Belgian regulations – Royal Decree of October 17, 2011 – locks and/or seals are mandatory for category A and B nuclear materials) with, if possible and authorised (see point (4) below), one or more photos. Electrabel highly recommends sealing packages containing class 7 materials*
3. *Electrabel also informs the contractor of the following:*
- (9) *For transported materials to be receivable, the request must have been made at least 15 calendar days before they are actually transported for the Doel site (KCD) and 7 calendar days for Tihange (CNT)*
 - (10) *when materials are unloaded at the Doel and Tihange sites, the sender must agree with his technical contact on the procedures for returning the containers. The packaging can depart unclassified (where technically possible), in which case in-depth radiological tests must be conducted ("release of materials"), which causes delays (min. 4 days at Tihange) and additional costs for the company, or even empty but still class 7, in which case it must at least be labelled with the number "UN 2908"*
 - (11) *Electrabel alone is not responsible for site access procedures; the technical contact person may specify which procedures the contractor must follow with the Belgian Federal Agency for Nuclear Control or other authorised bodies*
 - (12) *the use of communication devices (mobile telephones, laptops, tablets, etc.) equipped with a camera or image acquisition tool is **not permitted on the sites of Doel (KCD) and Tihange (CNT)***
4. *Specific arrangements at Electrabel for organising the transport of radioactive substances*
- <https://www.electrabel.com/assets/be/suppliers/documents/tihange/Livraison-materiel.pdf>
- https://www.electrabel.com/assets/be/suppliers/documents/doel/infos_kcd_FR.pdf
5. *Applicable legal and regulatory references (non exhaustive)*
- [10] *20/07/01 RGPRI*
Royal Decree of 20 July 2001 concerning general rules for the protection of the population, workers and the environment against the dangers of ionising radiation
Section II Physical and medical checks; Article 23 Physical check
 - [11] *17/10/11 RD Physical protection*
Royal Decree of 17 October 2011 relative to the physical protection of nuclear materials and facilities
Chapter III Physical protection of nuclear materials during transportation; Article 3 Minimum levels of protection
 - [12] *The European Agreement concerning the International Carriage of Dangerous Goods by Road (ADR) (1957) has been revised every two years since 2001, primarily appendixes A and B. The latest applicable version is dated January 1, 2013.*

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The ADR regulations specifically applicable to the transport of radioactive materials, i.e. class 7 materials, is subject to specific documentation.

[13] *Convention on the Contract for the International Carriage of Goods by Road (CMR Convention), signed on 19 May 1956, in Geneva, Ord. of 23 December 1958, OJ 26 December 1958.*

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