Strategic Plan

2011-2016

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1. Introduction

1.1 A Strategic Plan requires an Introduction explaining the approach, the importance of the new Law 33/2007, of November 7th, amendy the Law 15/1980 Creating the Nuclear Safety Council, to develop of the plan and the different changes that have taken place within the environment of the CSN at both national and international level, in addition to those occurring within the Council itself as a result of the previous Strategic Plan.

1.2 The present Strategic Plan, which covers the period 2011-2016, replaces the one designed for the period 2005-2010. The new plan deals with nuclear and radiological safety as the sole and fundamental objective around which will be developed the strategic courses of action for the period 2011-2016 for the performance of the regulatory activities of the Nuclear Safety Council (CSN).

1.3 The CSN, as the competent authority responsible for nuclear safety and radiological protection, intervenes in all the different areas of the regulatory process: the issuing of standards, the granting of authorisations and licences, supervision and control and the enforcement of sanctions. In this respect, it should be understood that the CSN carries out its regulatory activity by integrating the four functions referred to above within the limits established by its constitutional law (Law 15/1980 of April 22nd). All this qualifies the Council as a regulatory authority.

1.4 The activities performed by the CSN are comprised within the concept of public service, as a result of which all the interventions made by the Institution must be impregnated with the concept of serving the members of the public.

1.5 Furthermore, as a public entity, the CSN is required to act in accordance with criteria of social responsibility, managing public assets, resources and facilities in such a manner as to contribute to sustainable development and further public interest and the progress of the country.

1.6 The activities of the CSN affect three major groups: the Public Institutions (Parliaments, the Government of the Nation, the regional governments and local corporations), society (the general public and, in particular, the workers professionally involved in the facilities and activities, persons living in the

vicinity of the facilities and the personnel of the CSN, as well as the political parties, trade union organisations, non-governmental organisations involved in environmental protection and sustainable development, the media, professional associations, scientific and professional societies and international organisations), and companies having an interest in the issue (licensees of facilities and activities, manufacturers and suppliers).

1.7 The present Strategic Plan represents the commitment of the organisation as regards the fundamental objective of nuclear and radiological safety and the ways in which this objective may be met.

1.8 During the period of validity of the previous Strategic Plan there have been changes – partly driven from within the CSN– in both the environment of the Institution and within the Council which have been taken into consideration.

1.9 As regards the environment of the Institution, the Law 15/1980, of April 22nd, by which the Nuclear Safety Council was created, has been modified through the approval of Law 33/2007, of November 7th, which has also meant the drawing up and approval of a new Charter.

The new article 2 of the Law modifies the functions of the CSN, all of which correspond to nuclear safety and radiological protection issues – as was the case in the previous Law – this being reinforced in the Preamble with the emphasis placed on such issues and on the fundamental credibility of its objective interventions, which are to be undertaken under the necessary conditions of transparency, conditions that are in turn reinforced by the Law. Both the Preamble and the text also underline the need to develop or strengthen effective independence and efficiency. The following may be singled out from among the novelties introduced:

- Improvement of the efficiency, consolidation and confirmation of functions previously carried out by the CSN (such as those relating to security, standards or emergencies) and the assignment of new functions and competences, such as for example the radiological protection of persons subjected to medical diagnosis or treatment using ionising radiations. Likewise, and as regards efficiency, there have been significant changes in the organisational structure of the CSN.

- Strengthening of independence with the reform of the system of sanctions,

reinforcing the role of Congress in the appointment and dismissal of members of the Council, extension of the scope of the relations between the CSN and the Autonomous Communities and establishment of strict requirements for the contracting of external services.

- Reinforcement of the transparency of the organisation in its activities and setting up of the Advisory Committee, the objective of which will be to issue recommendations to the CSN in relation to questions established by Law 15/1980 and by the Charter approved by Royal Decree 1440/2010, of November 5th, and as regards transparency the possibility of receiving formal complaints of aspects potentially affecting the nuclear and radiological safety of the facilities and activities.

1.10 Furthermore, other changes in the environment of the CSN, both nationally and internationally, may be summarised as follows:

- Approval of European Union Council Directive 2009/71/Euratom, establishing a community framework for the nuclear safety of nuclear facilities; the commitment to harmonise the standards governing nuclear safety and radioactive waste management of the Western European Nuclear Regulators' Association (WENRA); and the already on-going updating of the European standards governing radiological safety.

- Publishing and updating of basic standards. Revision of section VII of the Regulation for the Protection of Health Against Ionising Radiations, in relation to natural radiation, approval of the Basic Directive on the Planning of Civil Defence against Radiological Risk and the forthcoming approval of the Royal Decree on the Physical Protection of Nuclear Materials and Facilities and Radioactive Sources.

- Increasing application to safety supervision of risk-informed methodologies, with the incorporation of transversal and cultural elements, the need for greater attention to be paid to potential degradation phenomena associated with the ageing of the installations and the updating and modernisation of the facilities, especially the instrumentation and control systems and the man-machine interface.

- The need to progress in the definition and implementation of long-term spent fuel and high level waste management strategies.

- Updating of the recommendations of the International Commission on Radiological Protection (ICRP).

- The sevee accident that occurred at the Fukushima nuclear power plant in Japan, as a result of the earthquake and subsequent tsunami, both large in magnitude, on March 11th 2011 will have important repercussions for nuclear facility safety measures across the world and poses a real challenge for the regulatory programmes.

- Knowledge of all the data required for adequate analysis of the accident and for the lessons to be learned will still require a time and it will be necessary for the competent international organisations responsible for nuclear and radiological safety and the management of emergencies to intervene. In this context, the CSN will actively participate in the different international forums studying the accident and its consequences, with a view to drawing whatever conclusions might be applicable in Spain to reinforce the safety of the nuclear power plants and the corresponding emergency response plans.

1.11 As regards the changes that have occurred within the CSN, many of them as result of application of the previous strategic plan, the main novelties are as follows:

- Important production of in-house standards, due fundamentally to the harmonisation commitments with WENRA, implementation of the Integrated Plant Supervision System (SISC), renewal of the technical and organisational systems relating to emergency management and the definition and performance of the activities of the Organisation in relation to natural radiation and physical protection.

- Performance of the IRRS mission to the Spanish regulatory system, of which the CSN is the fundamental element, one of the results of which has been the implementation of a management system based on the IAEA and ISO requirements.

- Continuous updating and improvement of information systems and promotion of electronic administration.

- Increasing growth of the communication activities and

transparency of the organisation, with emphasis on the publication of inspection reports and the minutes of the Board of Commissiones meetings and Commissions.

- Implementation of the competence-based and career management system and greater attention to the generational turnover of the personnel.

- Generalisation of an environment of austerity.

1.12 The following chapters deal with the mission, the vision and the values of the CSN and the hierarchical structure of the strategic objectives of the Plan and describe the sole fundamental objective of the CSN, the basic sub-objective and the instrumental objectives, along with the means for their compliance and measurement.

2. Mission, vision and values

2.1 The mission and vision of this Council were defined previously to this plan and have been strengthened with the approval of the Law 33/2007 and, in particular, its preamble.

2.2 **Mission:** To protect the workers, the population and the environment against the harmful effects of ionising radiations, ensuring that the nuclear and radioactive facilities are operated safely by the licensees and establishing measures for the prevention and mitigation of radiological emergencies, whatever their origin.

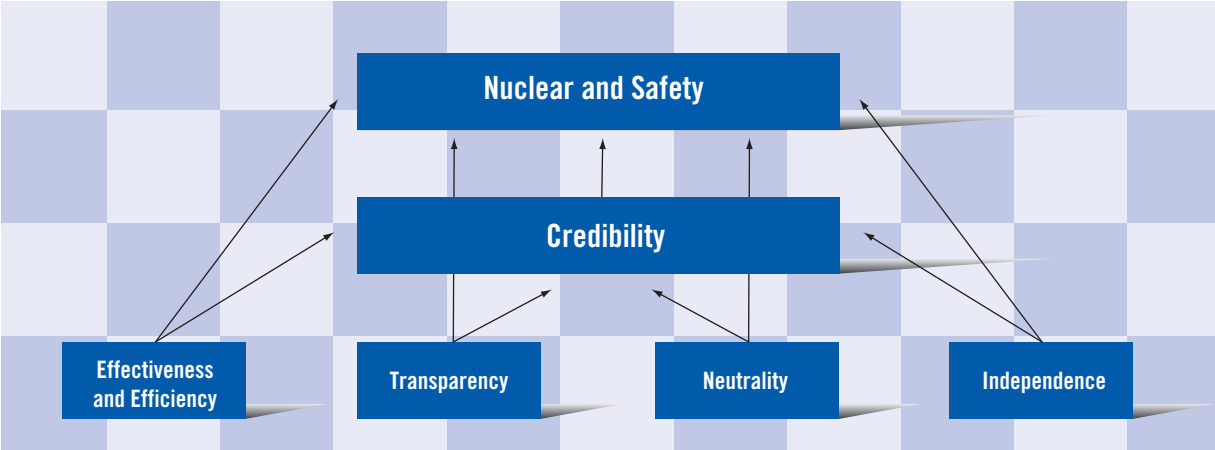
2.3 **Vision:** An Organisation independent from the public administration and the licensee holders of the facilities accountable to the Parliament of the Nation. Technically qualified for its proposals and decisions to be rigorous and to perform its activities efficiently and effectively and with transparency and neutrality with respect to questions of energy policy, such that it warrants the trust of Spanish society and constitute a reference at international level.

2.4 **Values:** The Council bases the performance of its functions and compliance with its objectives on the definition of and adhesion by its personnel to a series of personal values that are closely linked to the mission and vision:

- *Independence:* Act and take decisions objectively and impartially.
- *Transparency:* Provide relevant, valid and reliable information.
- *Competence and Responsibility:* Act with scientific, technical and legal rigour and with integrity, based on available knowledge and experience, sharing knowledge and best practices and assuming responsibility for actions and decisions.
- *Commitment:* Acquire a commitment to society through safety and the quality of the service rendered in compliance with the mission.

3. Hierarchical structure of the objectives

3.1 On the basis of the mission, the vision and the values, the contents of the different articles and the Preamble of the new Law 33/2007, of November 7th, the changes in the environment and the CSN itself, analysed in the Introduction, and the modern theory of Regulatory Authorities, which underlines the importance of these authorities having, to the extent possible and within their discretionary nature, a single fundamental objective with which to compare their activities, nuclear and radiological safety is defined as being the sole and fundamental objective of the CSN, with credibility being the basic fundamental sub-



objective and effectiveness and efficiency, transparency, neutrality and independence four instrumental objectives, all of these being objectives in themselves and, furthermore, necessary for achievement of those mentioned previously. These objectives will be addressed in detail during the period 2011-2016, with the instruments and methods of measurement to be explained below.

4. The sole and fundamental objective of the CSN: nuclear and radiological safety

4.1 All the CSN's strategic planning revolves around a single objective, with respect to which will be validated and aligned the set of strategic policies or courses of action defined and all the decisions taken and activities performed. This decision makes it possible to establish a hierarchical structure for the other objectives and allows the discretionary nature of the Council's regulatory actions to be reduced, unifying management around this single point of reference.

4.2 In keeping with the mission of the CSN and with the legislative framework defined in its constitutional Law, the sole and fundamental objective of this regulatory organisation is nuclear and radiological safety.

4.3 The objective of nuclear and radiological safety is to protect people and the environment against the risks associated with the use ionising radiations, as well as physical protection against possible threats to the facilities and activities that might give rise to such risks.

4.4 Bearing in mind that the party responsible for the safety of the facilities and activities is the licensee holder thereof, and that this responsibility cannot be delegated, this sole and fundamental objective of the CSN must be understood as consisting of establishing the regulatory framework and standards and overseeing compliance in order to protect people and the environment against the risks associated with the use ionising radiations.

4.5 In compliance with this objective, the CSN will require the Spanish nuclear facilities to

implement all safety measures deriving from the accident at the Fukushima Nuclear Power Plant and will promote improvement of the international standards and controls necessary to prevent significant off-site releases of radioactivity anywhere in the world.

5. Credibility as a basic sub-objective

5.1 In order to achieve its sole objective, it is essential that the Council be seen as being credible – a fundamental objective according to the aforementioned Preamble of Law 33/2007 of November 7th – in order for nuclear and radiological safety to be effective and to be perceived as such by society. Credibility is understood in two ways: as society's confidence in the capacity of the CSN to protect it against the harmful effects of ionising radiations, and as its trust in the Council as a result of the coherence of its actions, in terms of their objectiveness and predictability.

5.2 The first type of credibility is the confidence shown by society in the solidity and strength of the Institution in guaranteeing nuclear and radiological safety in compliance with the functions assigned to it. To achieve this, the Council must reinforce its authority, understood as being the legitimacy, dignity and excellence of the Institution, based on a prestige rooted in the quality of its technical and legal elements.

5.3 Consequently, the credibility of the regulatory authority will allow the measures adopted within the framework of responsibility of the Institution to be accepted by society overall, since its interventions will be perceived as guaranteeing the safety of the facilities and activities.

5.4 The second type of credibility arises from trust in the Council's continuing to exercise its regulatory activity avoiding arbitrariness and partiality in its decision-making. In order to be credible, the CSN must proceed as follows within its realm of competence:

- Base its activities on the constitutional principle of avoiding arbitrariness in the performance of the public institutions.
- Apply standards coherently over time, with the same decisions taken always in

response to the same standards and circumstances.

- Provide the regulatory framework with stability, within its realm of competence.

- Justify and reason whatever changes are to be made in the standards and their application, providing reasons for the decisions taken.

5.5 The key to success in the application of policies in a credible manner lies in the coherence over time of the decisions taken by the Council, i.e. in the maintenance of this criterion as a regulator as regards both the approval of standards and their continuous compliance, such that the actions of the Organisation be foreseeable for society.

5.6 The coherence of the decisions taken by the Council and the suitable stability of the regulatory framework create the incentives required for those responsible for the regulated activity to prioritise use of the available resources in order to improve the safety of the facilities and activities rather than search for possible advantages deriving from the modification in their favour of the standards when the regulatory practice is perceived to be unstable.

6. Instrumental objectives

6.1 With a view to reinforcing the sole and fundamental objective, and do so in a credible manner, four instrumental objectives have been defined: effectiveness and efficiency, transparency, neutrality and independence.

Effectiveness and efficiency

6.2 The Preamble of Law 33/2007, of November 7th, underlines the need to reinforce the effectiveness of the CSN. Effectiveness is an instrumental objective supporting both nuclear and radiological safety and credibility. It is the capacity to achieve the objectives mapped out by the Council and is to be understood in its three dimensions: regulatory effectiveness, the effectiveness of the human capital and the effectiveness of the management system.

6.3 In order to achieve excellence, effectiveness must be accompanied by the search for efficiency, as will be explained in section 7.7.

6.4 Equally important as the other instrumental objectives established in this strategic plan, effectiveness covers the most substantial part

of the Council's activity, for which reason the development of its instruments will tend to be more extensive than the rest of the objectives.

6.5 The Council must guarantee that its activities contribute to achievement of its sole and fundamental objective. In this respect, the institution must ensure a sufficient degree of regulatory power in all its dimensions (standards, authorisation and licensing, supervision and control, enforcement) to be effective in compliance with its functions.

6.6 As important as regulation is the human capital available for its development. In this respect, it is essential that attention be paid to the selection, training, knowledge management and demand for excellence and exemplariness of the persons to whom the task of regulating is to be assigned.

6.7 In order to ensure efficient compliance with its functions, the Council should also have a management system capable of integrating in an efficient and sustainable manner the internal practices relating to the regulation of nuclear and radiological safety, as well as processes relating to quality management, information systems and economic-financial management.

Transparency

6.8 The aforementioned Preamble of Law 33/2007, of November 7th, requires that the transparency of the CSN be reinforced. Transparency is one of the CSN's basic instrumental objectives and consists both of providing the members of the public with access to information and of facilitating understanding of the regulatory process by society.

6.9 Transparency is achieved by reducing the degree of unbalance in information among the different agents involved in nuclear and radiological safety. By way of an example, there may be situations of lack of proportion regarding information in the following cases:

- Since they are the owners of the facilities or the performers of the activities, the licensees have more exhaustive information on them than the regulatory authority, the lack of proportion favouring the licensee.

- Given the nature of the activity, the regulatory authority generally has more information on the different aspects of nuclear and radiological safety than the representatives of the institutions (Parliaments, Spanish Government,

Autonomous Communities, local corporations, etc.).

- Due to its focus on a specific issue and to the specialisation required, the regulatory authority has a much higher level of information that society at large.

6.10 There may be different degrees of unbalance in information. For example, it will tend to be greater among the general public than among other groups having a particular interest in the subject, such as environmentalist groups or the local corporations (and inhabitants) of areas housing the facilities and activities.

6.11 In order to achieve transparency, the Council shall reduce the degree of unbalance in facilitating access to the available information and involving society in the regulatory process as established by Law.

6.12 The efforts made by the CSN to have the different agents participate in transparency should be understood as being a CSN investment in achieving trust in the regulatory model. In short, greater transparency allows the credibility of the CSN among others to be increased and constitutes a greater guarantee of compliance with the sole and fundamental objective of nuclear and radiological safety.

6.13 In addition to the transparency of the CSN with respect to society, the Council should promote transparency in the flow of information from society to the Organisation. In this context, it may make use, among other measures, of the activities carried out by the Advisory Committee, as a key tool to improve transparency as set out in the aforementioned Preamble of Law 33/2007, of November 7th, or of the possibility of receiving formal complaints of known events potentially affecting the safe operation of the facilities and activities.

Neutrality

6.14 Neutrality is one of the instrumental objectives of the CSN and is understood as the non-adoption of a particular position, in favour or against, with respect to the use of nuclear technology and ionising radiations in any of their applications.

6.15 For the regulatory authority, this objective implies remaining alien to questions relating to energy policy decisions and their consequences for other economic sectors.

6.16 In this respect, the CSN must be consolidated as an impartial source of information and regulation, possessing the technical know-how and experience required for the neutral performance of its work. This allows for sound compliance with the fundamental objective of safety regardless of the energy mix, since the CSN limits its performance of its regulatory function, leaving the Parliament or the Government, as appropriate, to set out the objectives of the nuclear and radiological activities to be performed.

6.17 The policy of nuclear neutrality favours a strengthening of credibility before society and the objective of nuclear and radiological safety.

Independence

6.18 Independence is the capacity to take decisions with autonomy with respect to third parties. It is at the very roots of all regulatory authorities and is, therefore, a fundamental and instrumental objective of the Nuclear Safety Council. As a result, within the selective nature of the treatment given to different issues in this Strategic Plan, its development in the current situation will be more extensive since it is also a strength of the CSN that favours other objectives such as credibility and nuclear and radiological safety itself.

6.19 Independence is first achieved through an adequate institutional design as regards the status of the President and the Commisssioners, relations with the Government and Parliament, financial and organisational autonomy and the regulatory competences assigned.

6.20 The Board of Commisioners (President and Commisioners) is a collegiate management body and its members are appointed by the Government following an appearance before the Parliament, with the need for the support of an ample parliamentary majority. The duration of the term is six years, the members may be dismissed only on the basis of objective criteria contemplated by law and may be re-elected only for a second term.

6.21 The Council does not report functionally to the Government but is accountable as regards its activity only to Parliament through the corresponding parliamentary commission or panel, which may establish whatever resolutions it considers to be appropriate and request the appearance of those responsible for the Council. Nevertheless, the Council may voluntarily request to appear before Parliament in order

to deal with any question for which it is responsible and that it considers might be of interest to Parliament.

6.22 The above serves to reduce the problem of the "double agency". This situation is understood to exist when the legislative authority controls a Ministry that in turn controls the independent Agency or Council, this hindering the actual control of this body. The aforementioned problem is effectively reduced in the case of the CSN since it reports directly to Parliament.

6.23 Practically all the funding for the Organisation comes from collection of the public fees and prices for the services rendered to the agents, which the Organisation itself collects and manages in the terms established in Law 14/1999, of May 4th, on Public Prices and Fees. The rest of the financing, which comes from the resources of the State, is applied to the functions performed by the Council in relation to the radiological protection of the public and environmental surveillance and preparations for and management of nuclear and radiological emergencies. The economic-financial management of the CSN is subject to the control of the Delegate Inspectorate of the Ministry of Economy and the Exchequer and the State Auditing Department.

6.24 From the organisational point of view, the Organisation is responsible, within the legislation in force, for approving the list of posts of the civil servants belonging to the personnel of the CSN and proposals for modification of this list as regards contracted personnel. Likewise, the Board of Commisioners of the CSN is responsible for approving both the system for the professional development of the civil servants and the system for assessment of the performance of the personnel at the service of the Council. However, staffing and the remuneration of the personnel are subject to the general standards of the civil service.

6.25 As regards the regulatory competences assigned, the CSN is the co-regulator along with the Government for the enactment of standards governing nuclear and radiological safety, the granting of authorisations and licences and the enforcement of sanctions. As regards the functions of supervision and control, the CSN acts as the sole regulator.

6.26 The Council is the only body having its own regulatory capacity for aspects such as the drawing up of binding instructions and the

issuing of reports on requests for licences and authorisations, the said reports being binding if negative in their findings and as regards the conditions established when positive.

6.27 In addition, the Council has the capacity to caution and impose coercive fines, grant and withdraw the licences and accreditations of the operating personnel of the nuclear and radioactive facilities and the diplomas of the personnel of the radiological protection services or technical units so requiring and grant authorisations for Personal Dosimetry Services, Radiological Protection Services and Radiological Protection Technical Units.

6.28 Secondly, independence is achieved through the way in which the Council undertakes the exercising of its regulatory competences, avoiding any events or circumstances that might compromise nuclear and radiological safety due to the imposition of other alien or conflicting interests. The CSN must pursue independence from the Government, the licensees of the facilities and activities and, in general, all those having any interest in the issue.

- Independence from the executive is determined by the degree of autonomy and freedom available to the Council in the performance of the activities assigned to it by law. It is achieved also by avoiding the imposition of and requests for guidance regarding the regulatory activity for which it is responsible.

- Independence from the licensee holdes of the facilities and activities is achieved by avoiding any influence on the regulator by the regulated parties, implementing the internal control mechanisms required to eliminate conflicts of interests.

- The Council must also act independently from other players (the media and other stakeholders), avoiding any influence on its way of regulating and supervising that is alien or contrary to the sole and fundamental objective of nuclear and radiological safety.

6.29 Compliance with this instrumental objective is a necessary pre-requisite for the achievement of both the sole and fundamental objective of guaranteeing nuclear and radiological safety and of the fundamental sub-objective of obtaining credibility before society. Independence is, therefore, a crucial value for the strengthening of the institutional reputation of the CSN.

7. Instruments and measurement of compliance with objectives

Nuclear and radiological safety

7.1 Measurement of compliance with the sole and fundamental objective of nuclear and radiological safety will be based on the acquisition of the established indicators:

- No accident at any nuclear power plant implying substantial damage to the reactor core.
- No reactivity accident in the manufacturing of fuel, fuel pools or casks.
- No deterministic effect due to excessive exposures at regulated facilities.
- No release of radioactive material at any regulated facility causing an adverse radiological impact for persons, property or the environment.
- No event implying loss of control over nuclear material (during manufacturing, transport, storage or use) or sabotage of a nuclear facility.
- No statistically significant degradation of the operation of a nuclear power plant.
- No loss of control over high activity radioactive sources in the national territory.
- At most, five losses of control over low activity radioactive sources in the national territory in any one year.

All the instruments defined below for the rest of the objectives, and their measurement, are aimed at achieving nuclear and radiological safety.

Credibility

7.2 Credibility, in terms of the trust of society, shall be measured qualitatively by means of sociological surveys promoted by the Council or carried out independently by third parties.

7.3 Both efficiency and transparency, neutrality and independence contribute to the credibility of the Council, as a result of which the means applied to achieve these

instrumental objectives will also serve for the basic sub-objective of credibility in the eyes of society.

7.4 Credibility, in terms of the trust of society in the coherence or time-related consistency of the actions of the Regulatory Authorities, among other institutions, may be strengthened by applying universally accepted methodologies, such as for example the qualitative use of the Game Theory, which analyses interactions between players taking decisions and seeking to maximise their usefulness depending on the courses of action chosen by the rest of the players.

7.5 The relation between the regulatory authority, society and the regulated company is dynamic, inasmuch as it represents a game that is repeated, in principle indefinitely, and in which the credibility of the Regulatory Authority, based on stable, predictable, independent, transparent, neutral and efficient performance, is an essential condition in the regulatory process.

7.6 This qualitative application seeks to ensure that the strategic reactions of the different players (companies, government, environmentalist groups, municipalities housing nuclear facilities and other agents that might have an influence on nuclear and radiological safety) are positive, as regards what they perceive will be the strategic action of the CSN. If such perceptions lead to credibility vis-a-vis the said Regulatory Authority acting coherently and consistently over time in its decisions and in keeping with the objectives approved in this Strategic Plan, the reactions of these players will help to strengthen the aforementioned objectives.

Effectiveness and efficiency

7.7 Efficiency is to be understood as the ability to achieve objectives at the lowest cost and as the search for organisational consistency, which in this context refers to the capacity to make the interventions of the Council increasingly effective, ensuring compatibility between the organisational components such that there be increasing synergy between them.

In this respect, the sum of effectiveness and efficiency translates into “consistency”, understood in this case as being achievement of the objectives set out in section 3.1 with higher levels of accuracy (effectiveness) and lower levels of effort or cost (efficiency). In other words, with a terminological meaning

different from and complementary to the concept of "consistency over time" referred to in sections 7.4 and 7.6, among others.

7.8 The first measure of effectiveness is achievement of the strategic results. Specifically for this section the table including the indicators of certain processes and the tracking reports for the Annual Work Plan and sector-specific plans will be used. If necessary, this table will be extended to include the indicators of relevant items not covered by the table or the tracking reports.

The Council will implement the following instruments as means to achieve this objective:

7.9 Analysis of the main elements involved in the accident at the Japanese Fukushima nuclear power plant, with a view to learning and applying lessons allowing the safety of the facilities to be reinforced under all types of exceptional circumstances, including fortuitous ones, that might arise from extreme situations. The elements to be analysed will include aspects relating to design, operations in response to extreme accidents and emergency management in such situations.

7.10 In order to achieve this objective, the CSN will actively participate in the groups organised internationally to analyse the Fukushima accident, in particular within the framework of the EU and the IAEA and the associations of regulatory bodies of which the CSN is a member.

7.11 Completion and continuous updating of a solid set of standards including the requirements set out in the European directives, the standards of the IAEA and the reference levels agreed to within the framework of the harmonisation plan of the Western European Nuclear Regulators' Association (WENRA).

7.12 Complete and update the regulatory model in order to adapt it to the new standards developments and the new situations of the surroundings. Priority objectives in this context will be the completion of the regulatory model for the security of nuclear facilities and materials and radioactive sources and the updating of the regulatory model for the radiological protection of persons and the environment, under all situations of exposure, in keeping with the review and restructuring of the basic standards of the European Union.

7.13 Maintain technically solid and rigorous licensing and evaluation processes,

demanding as regards the documentation submitted by the licensees and their support organisations and providing feedback to the licensees in the event of deficiencies being detected in the said documentation. The maintenance of a high level of technical training among the licensees and their support organisations is essential for the safe operation of the facilities, and the CSN is obliged to ensure that such a technical level and training is maintained.

Likewise, in order to optimise the efficiency of the CSN resources, a systematic approach shall be established for the quality control of the documentation submitted by the licensees.

7.14 Strengthen the development and implementation of the programmes for the authorisation, inspection and control of radioactive facilities, the transport of radioactive materials and other related activities quickly and efficiently, ensuring that maximum priority is given to the radiological protection of persons and the environment.

7.15 In relation to spent fuel and radioactive waste, the CSN must maintain a high degree of technical knowledge and an updated supervision system ensuring that these materials are managed under due conditions of safety during all stages and conditions of storage.

7.16 Collaborate in the maintenance and updating of nuclear emergency plans and participate in the development of the national radiological emergency system, including collaboration in the drawing up of the action plans, training of the intervening personnel and the provision of equipment for characterisation and radiological protection measures in the different scenarios.

7.17 Maintain close surveillance over the operation of the nuclear facilities, improving and updating the supervision programmes through the use of risk-informed methodologies allowing attention to be focussed on the elements of greatest safety significance and incorporating the supervision of transversal and cultural elements playing a decisive role in the maintenance and improvement of safety conditions, such as the availability of adequate resources, the technical training of the personnel, a positive attitude to assuming responsibility at all levels of the organisation, promoting the reporting of deficiencies identified by the workers, and a solid troubleshooting programme.

7.18 Maintain processes for the review of the CSN's regulatory practices, using exercises for comparison with the practices of other regulatory bodies, among other resources, in order to improve the efficiency of these processes and keep them in line with the best international practices. These practices will include analysis of the contents of the periodic safety reviews and the systematic approach to renewal of operating permits undertaken to date by the CSN, with a view to making them more efficient and to focussing resources on those aspects that might contribute to improving the safety conditions of the facilities.

7.19 Pay special attention to the potential degradation phenomena that might appear at the facilities due to ageing, checking that the licensees have systematic ageing surveillance and management programmes, an adequate system for the management of spares and the replacement of equipment to prevent problems of obsolescence and plant technology modernisation and renewal programmes, such that the quality required of the equipment, systems and components necessary for the performance of safety functions is maintained at all times. Likewise, the updating and modernisation of the instrumentation and elements intervening in the man-machine interface will be promoted in order to facilitate and optimise the actions of the personnel in maintaining and operating the facility.

7.20 Continue to pay special attention to the analysis of operating experience in order to ensure that the licensees take adequate measures to correct iniciating events and their causes and that they apply the lessons learned from events at other facilities and international experience as a preventive measure. Complementary to the analyses performed by the licensees, the CSN will maintain its own system for the acquisition and analysis of international operating experience, using the information and lessons learned by other regulatory bodies and international organisations, such that there be assurance that these lessons are suitably applied in the Spanish facilities and practices.

7.21 Support the establishment, maintenance and quality of the infrastructures required for the use of nuclear energy and ionising radiations in Spain under suitable conditions of nuclear and radiological safety, maintaining the necessary physical protection of the facilities.

7.22 Maintain a high degree of technical training of the CSN personnel, updating the knowledge and application of new

methodologies and the state of the art. Also, promote the training of the CSN personnel in order to ensure the on-going updating of know-how in all areas of the Organisation.

7.23 Draw up a CSN personnel turnover plan in order to maintain the competence and capacity of the Council to fulfil its mission.

7.24 Maintain an active presence in international regulatory forums in order to promote and incorporate the best regulatory practices and the exchange of information allowing the CSN to continuously learn and improve in the fulfilment of its mission. In this respect, the Council's participation in the activities of the European Union, the IAEA, the OCDE/NEA and the regulatory associations International Nuclear Regulators' Association (INRA), Western European Nuclear Regulators' Association (WENRA), Heads of European Radiological Protection Control Authorities (HERCA) and Ibero American Forum of Nuclear and Radiological Regulatory Organisations (FORO) is of special interest.

7.25 Promote the establishment of a working environment based on the safety culture (nuclear, radiological and security) in the use of nuclear energy and ionising radiations, and apply the regulatory system in accordance with the principles of good practice, reliability and widening of scopes, with mechanisms for collaboration with the institutions and stakeholders and maximisation of the benefits of applying information technologies.

7.26 Consolidate the implementation and on-going improvement of the process-oriented management system, based on the requirements of the IAEA and the ISO standard, promoting a systematic approach of external audits and assessments and analysis of the best practices of other regulatory authorities. Likewise, the management system should incorporate measurement systems to assess the degree of compliance with the objectives of credibility, effectiveness, transparency, neutrality and independence.

7.27 Reinforce the Council's R&D activities in the establishment and follow-up of research plans relating to nuclear safety and radiological protection.

7.28 Continue the Council's efforts in competence-based management, furthering their detailed development through systematic adaptation to the best practices at international level.

Transparency

7.29 The measurement of transparency will be accomplished by assessing the degree of compliance with the CSN's obligations regarding access to information, the issuing of publications, the volume of replies to consultations and the activity of the Advisory Committee.

In order to achieve transparency, the Council will proceed as follows:

7.30 Establish a CSN External Communications Policy identifying the specific courses of action in scheduled communications and the models for action in response to non-scheduled circumstances and events.

7.31 Reinforce and/or extend the current policy of publications via the web and other media, promoting on-going improvement and accepting annual scrutiny by the Web Accessibility Panel of the General State Administration.

7.32 Extend the information published on the CSN website regarding calls for bids and the results of the awarding process for subsidies, contracts, arrangements and agreements in relation to R&D and scholarships granted by the Council.

7.33 Within the CSN's general Training Plan, extend the specific training programmes on institutional communication skills and relations with the press for technical personnel.

7.34 Promote and support the functions of the Advisory Committee, assigned by the constitutional Law and Charter of the CSN, as regards the issuing of recommendations to the CSN to guarantee and improve the levels of active transparency of the Organisation and propose measures favouring access to information and the participation of society in general.

7.35 Reinforce policies on communication and institutional relations with other international, national, regional and local organisations.

7.36 Promote the institutional relations of the CSN through the implementation of an External Relations Plan detailing the activities to be performed nationally and internationally.

7.37 Reinforce the action protocols in order to guarantee an agile response to consultations, giving priority to those that, in view of their higher degree of urgency or the seriousness of the events dealt with, require rapid resolution by the Council.

7.38 Reinforce internal communications actions, using and maximising the different channels available to the Council: meetings, periodic bulletins and CSN Intranet.

7.39 Facilitate and support the participation of the workers at the service of nuclear and radiological facilities and activities in the reporting to the Council – with suitable transparency – of known events that affect or might affect their safe operation and compliance with the nuclear and radiological safety standards in force.

Neutrality and independence

7.40 The degree of independence and neutrality of the Organisation shall be measured, among other methods, by means of opinion polls to determine the perception of the public, with value attached to the inclusion of credibility measuring tools.

The Council shall make use of the resources set out below to achieve its neutrality and independence objectives:

7.41 Draw up an in-house Code of Good Management Practice stipulating the conduct to be demanded from the members of the Plenary and other high-ranking Council staff members. Despite the fact that the activities of the top management of the CSN already meet the highest standards of Good Management, it would be advisable to formalise and make explicit the standards of conduct. In drawing up this code, the Council shall adhere to the directives set out in ministerial order APU/516/2005 on the adequate instrumentation of a Code of Good Management Practice for Public Administrations, which are in line with the sub-objective of credibility and the instrumental objectives.

7.42 Draw up a Code of Ethics applicable to all the personnel since, although the practices currently undertaken at the Institution are adequate from the point of view of ethics and independence, it would be advisable to formalise and make explicit the standards of conduct in order to ensure that they are clear and shared by all the personnel. The code should be aligned with the Mission, Vision and Values of the CSN and shall be oriented towards achieving the objectives defined in this Strategic Plan, such that whatever possible conflicts of interest might affect the independence and neutrality of the Institution are regulated.

7.43 Propose the reform of the legal framework of the Institution during the period of validity of this Strategic Plan, in order to increase the independence of the Organisation, in adherence to the philosophy of EU Nuclear Safety Directive 71/2009, in section twenty-four of the appendix, which advocates an increase in the independence from the Government, reinforcing accountability before Parliament and reducing even further the aforementioned problem of double agency.