CFSI Lessons learnt

NEA Supply chain management workshop
Lessons learnt

• Fraud: voluntary modification, distortion or omission of information or data
• A source of deviation… very small part of nuclear activities nonetheless with potential for significant consequences … insufficiently taken care of …
• Questions the robustness of the monitoring and inspection chain, at the top of which are the manufacturers and the licensees
• Specific causes

Financial pressure
Technical issues
Gaining time

Failed monitoring
Inadequate organisation
Copying documents

Assessment of stakes and requirements
Culture for justifying deviations
To be implemented by all of the actors of the control chain (suppliers, licensees, safety authority)

### To inform
- Whistleblowing process
- Reporting to ASN
- Information of stakeholders

### To improve oversight and inspection practices
- Inspections including a « fraud » dedicated part
- Inspections of suppliers
- Training inspectors
- Enforcement

### To use third parties
- Oversight of activities (manufacturing)
- Sampling and independent measures

### To get the control chain fully involved
- To support certification (eg. ISO 19443)
- Protection of data
- To adapt regulation if necessary
- ASN wrote a letter to all nuclear installations licensees in May 2018
  - Setting a reminder that the licensees are responsible to understand the full extent of frauds and to take the appropriate actions to prevent, detect and mitigate them
  - Detailing how ASN considers the regulation already applies to CFSI in developing the requirements from the Order of 7 February 2012 setting the general rules relative to basic nuclear installations, with regards to fraud detection, prevention and mitigation
  - Expressing additional demands in order to improve the quality of the whole supply chain
  - The letter sets up bases for inspection as it implies requirements for licensees to take specific measures

- Answers required for September 2018, being analyzed
• Dedicated inspections of suppliers facilities and headquarters (licensees and manufacturers) to perform
  ▪ Fraud dedicated agenda tested in August 2018 (inspection of Flamanville 1)
    • Check: presence, identity (site access files) and qualification of operators
  ▪ Inspections of NSSS suppliers planned in November and December 2018

• Human resources
  ▪ Recruitment of inspectors with expertise in fraud detection: still on going
  ▪ Making ASN inspectors aware of CFSI during training sessions

• Whistleblowing system to capture and assess every type of irregularity (CFSI included) information ready to operate
  ▪ Subsidiary but legal last step to solve with French data protection authority before implementation (compliance with GDPR)

• Compiling the French CFSI events on going
  ▪ Inspection guide planned
  ▪ Information of stakeholders through the ASN annual report
• Variety of cases and causes
• Consideration for penalties
  ▪ Fraud lies within a more general approach than nuclear field ➔ direct penalties in the hands of ASN are not trivial
• Communication, in a context of
  ▪ whistleblowing and data protection
  ▪ Involvement of justice (point 1)
• Weighting the stakes for inspection resources management