

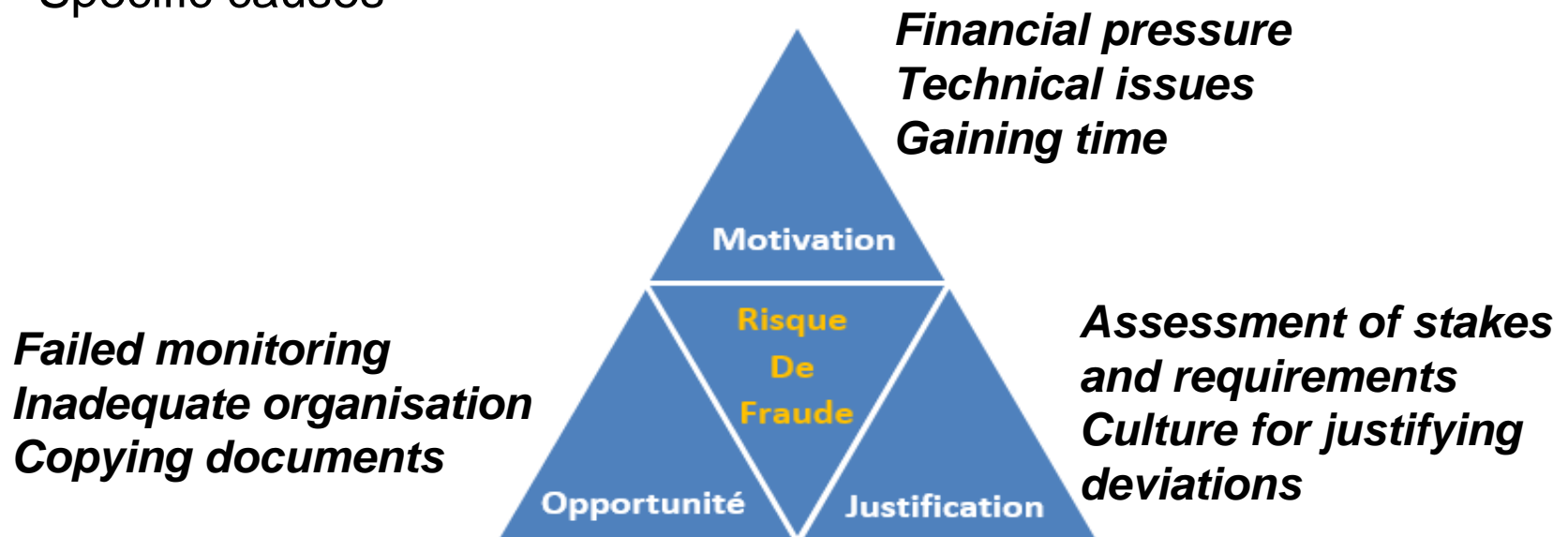


CFSI Lessons learnt

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



➔ 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**