





TEN KEY LESSONS FROM OVER A DECADE OF NORM REGULATION IN SPAIN

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1. MOTIVATION AND DRIVERS

2. LEGAL AND REGULATORY CONTEXT

3. LESSONS LEARNT

WHY CONTROL NORM?





- High **occupational radiation doses**, which can be effectively reduced with the introduction of radiation controls
- Environmental degradation due to poor waste management practices
- Potential **health hazard** to local population (chemical risks often outweigh radiation risk)



UNIQUE CHALLENGES

- Unknown **inventories**
- Managing very large quantities of NORM residues, a great part of which still needs disposal as waste
- Often multiple regulators for NORM
- Misperception of risk





EUROPEAN CONTEXT

- European Directives are legal acts issued by the EU that set out objectives Member states must achieve by transposing them into their national laws.
- **Directive 2013/59/Euratom** establishes the basic safety standards (BSS) for protection against the dangers arising from exposure to ionizing radiation within the European Union.
- Some requirements on NORM control were already established in the **1996**'s BSSD, but BSSD 2013/59 fully equates work activities involving NORM with other ionizing radiation related practices.

SPAIN – EARLY STEPS

- 2004-2009: CSN-funded R&D projects on NORM
- Legislative and regulatory changes in 2010 to ensure that the sanctioning regime would cover NORM involving activities and to clearly assign responsibilities
- **CSN Instruction IS-33** issued in **2012**, requiring all industrial activities on a positive list to conduct safety assessments and introduce radiation protection controls when warranted
- Creation in 2015 of a dedicated Natural Radiation Section within CSN to oversee work activities involving exposure to NORM



LESSON 1: KNOW THYSELF



- Situation and gap analysis:
 - Number of potentially affected facilities; distribution by sector and geography.
 - Rough estimate of NORM residues national inventory.
 Current management routes.
 - Infrastructure and services; number of RP educated professionals who can acquire competence in NORM management and potential trainer providers.
 - \circ Related policies and regulation.

LESSON 2: ENSURE THE REGULATORY BODY HAS STATUTORY POWER AND ENOUGH RESOURCES

P&S, law, reg. Safety guides, authorization, compliance

Guidelines, education & training, service provision

LESSON 3: ONE SIZE DOES NOT FIT ALL

- (1) Extraction of rare earth elements
- (2) Production and use of thorium and its compounds
- (3) Production of tantalum, niobium and ferro-niobium
- (4) Mining of ores other than uranium ore
- (5) Production of oil and gas
- (6) Manufacture of titanium dioxide pigments
- (7) The phosphate industry
- (8) The zircon and zirconia industries
- (9) Production of Sn, Cu, Al, Zn, Pb, Fe and steel
- (10) Combustion of coal
- (11) Water treatment

IAEA, SRS No. 49



LESSON 4: RELY ON YOUR CORE VALUES

- Beneficence/non-maleficence
- Prudence
- Dignity
- Justice



Rolf Maximilian Sievert (1896–1966): A founder and the first Chair of ICRP (originally IXCRPC)



LESSON 5: APPLY A GRADED APPROACH



REGULATORY REQUIREMENTS AND OVERSIGHT IN SPAIN



LESSON 6: CREATE ALLIANCES







RP ROLES AND RESPONSIBILITIES FOR NORM

RP TECHNICAL UNITS (RPTU)

- Independent from the operator
- Authorized by CSN
- Conducts the risk assessment; develops the RPP

NORM Technical Officer

- Permanent company employee
- Education & training requirements
- Oversights the RPP
- ✓ Diploma for RPTU Head (granted by CSN; 300 hours of specialized training required, out of which 80 on NORM/radon)



LESSON 7: ENGAGE IN HANDS-ON WORK

- Regulators need to have a deep understanding of the sectors they regulate
- In order to better address and prevent problems, knowledge of workplace reality is paramount
- Collaboration with the sectors and other competent regulators (e.g. by joint inspection programs) contributes to acquire the necessary competences



LESSON 8: FOSTER COMPLIANCE

REGULATORY BODY

- Elaborate guidance documents
- Create steady communication channels (such as committees or WGs) with the regulated sectors
- Ensure availability of reliable services



OPERATOR

- Define and communicate expectations
- Provide information and training
- Lead by example
- Create a speak-up culture

LESSON 9: USE INDICATORS TO TRACK PROGRESS



"What is not measured cannot be improved"

- Enable more **outcome-focused regulatory approaches**
 - ✓ Number of notified facilities
 - ✓ Operators' annual reports (mandatory since 2024):
 - Worker doses
 - Amount of residues by management route
 - ✓ Benchmarking

LESSON 10: BE PATIENT





https://normxi2025.com/