

## The IAEA-tecdoc-1712 in the light of the new European BSS

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### **Abstract**

The IAEA-TecDoc-1712 publication entitled Management of NORM residues addresses the management aspects of NORM residues, including either their reuse as raw materials in an industry or disposal as waste following general rules set for radioactive waste. The main intention of this publication is to provide guidance to Member States on good practice in the management of NORM residues, bearing in mind that there is no single approach that applies to all situations. And actually this publication has provided well developed solutions for NORM management under different circumstances. But the adoption of this package of already developed solutions by the European Community Member States will face unreasonable troubles as a result of the current European regulatory inadequacies. Directive 2013/59/Euratom from 5 December, 2013 states: (16) *Protection against natural radiation sources, rather than being addressed separately in a specific title, should be fully integrated within the overall requirements. In particular, industries processing materials containing naturally-occurring radionuclides should be managed within the same regulatory framework as other practices.* This requirements puts the applicability of the solutions proposed by IAEA-TecDoc-1712 as NORM waste dilution and reuse in other industry under a question mark. Moreover the contradictions between the COUNCIL DIRECTIVE 2011/70/EURATOM of 19 July 2011 establishing a Community framework for the responsible and safe management of spent fuel and radioactive waste (article 2, point 2a) and the Directive 2006/21/EC of the European Parliament and of the Council of 15 March 2006 on the management of waste from extractive industries and amending Directive 2004/35 (10) makes impossible classification of NORMS into a certain class of radioactive waste that again leaves solution proposed by IAEA publication of concern without good legal justification. On the other hand the interpretation of clearance levels proposed in the IAEA-TecDoc-1712 exceeds the Directive 013/59/Euratom meaning of this term that creates a needs not covered by this directive. Such unclear situation in the international recommendations and regulations puts Member States not having well developed national legal system ruling nuclear safety and radioprotection into trouble.