Export Control in the AREVA Group

In spite of the last FUKUSHIMA accident and the successive slow down in some national nuclear programs, the perspectives of the nuclear power are confirmed by the constant interest of most of the worldwide energy players. The major cause, susceptible now to dramatically slow down this new interest based on real needs, is the risk of diversion of components, materials and nuclear technologies for illegal purposes.

In the same way as the risk of accident and the problem of the nuclear waste constitute an important brake for the development of the nuclear energy, today the terrorism and the proliferation of weapons of mass destruction represent a major risk, threatening the revival and the harmonious development of the nuclear energy.

The greenhouse effect linked to the fossil fuels, the medium-term burnup of the resources and the increase of the energy demand of emerging countries (China, India, Brazil) allow to glimpse a resumption of the nuclear energy in more or less long-term.

Countries which had bet everything up to here on the fossil energy confront for some years with the increasing price of hydrocarbons and with the awareness of their impact on the environment. A risk of supply is besides induced by the sensitive character of the countries of export and the uncertainty of the still exploitable reserves at economically viable prices.

Even countries owning important fossil resources and having based up to here their development on the exploitation of their mines, try to diversify by turning to the study of possible applications of the nuclear energy.

New and less new applications of the nuclear energy come to the mind of the researchers, politics and decision makers. Neutron sources, production of radioactive isotopes, astrophysics, metrology, medicine, characterization of materials by new non-destructive nuclear methods, as well as the dismantling of the installations, the applications for the desalination of the sea water, for the naval and spatial propulsion arouse a big interest all around the world.

This multiplication of the nuclear applications produces a wider scattering of the nuclear technology and new products have regularly increased the lists of controlled products by every state.

After the Second World War the nuclear technology was mostly considered inappropriate for the export. It remains strictly regulated today, but the development of the civil applications urged states to facilitate the peaceful uses while establishing a strict control in the domains of the internal security and the nuclear proliferation.

For the AREVA group in particular, there isn’t a possible compromise between the export security and the business. There will be no business without security.
To consolidate his image and its activity and increase the confidence of his customers and the public opinion, the AREVA group takes over this challenge and engages his responsibility in order to continue mastering its exports safely.

At this end, AREVA decided to set up an Export Control program applied to all the products and in all the countries where the group operates. Export Control is a real culture in the company and a daily practice in the respect for the regulation and the value charter.

The AREVA business can drive to the export of products or to the transfer of technology considered as sensitive for the non-proliferation and the risks linked to the terrorism. This sensitiveness results from the nature of the products or from the country of destination and in certain cases both of them. In certain cases, this transfer can be internal to the Group, between Germany and France for example, or between France and the United States. It is the case for example for the transfers of information made necessary by the certification of the EPR with the American NRC.

Are concerned the dual use products and the related technology, designed for a civil use, but susceptible to be also used for military goals. We have to make sure that they will be only used in a civil purpose and that they will not be re-exported without our preliminary agreement. This is naturally a question of respect for the regulation, but also matter of ethics, image and reputation in the frame of the values of our group.

The growth of the nuclear market, new products and the appearance of new players, be they customer or partners, gives us the obligation to constantly adapt our export control system to make sure that it is increasingly effective and successful.

In this context we wanted to set up an Export Control program and an interactive e-learning training within the AREVA Group to make exports of sensitive products, raw materials and technologies more secure.

The export control is a daily undertaking which concerns all the stages of the nuclear cycle, from the design to fuel recycling. In concrete terms, every link in group, both operational and functional, and every level of management mast be made aware of the export control regulation and practice.

The subject is rather complex, the regulations are constantly evolving, and becoming familiar with them is necessarily a gradual process, but it must be made in-depth, hence the idea of regular training sessions. The General Secretariat and the Export Control Department, which is in charge for implementing the export control procedure within the Group, have developed an e-learning program in association with the AREVA University.

To confirm the long-lasting success of our international development, AREVA intends to implement with rigour and intelligence this culture of the control in the export.
The implementation of the Export Control in the Group declines in four fundamental stages:

- Policy and procedure
- Appointment of Export Control Officers (ECO)
- Training
- Audit and Self Assessment

Policy and procedure:
Policy is a brief document which reminds the objectives and the principles of the Export Control, its history and the obligation for every person of the group implied in an export, to conform to the procedures of the group as regards to export control. Policy applies to the entire company, subsidiaries and partners in the world through manuals of application appropriate for their operation and their organization in the respect for the applicable regulations and AREVA Value Charter. It recalls in particular the appointment of an Export Control Officer by entity, the organization of a training program and a program of assessment and audit.

Every business Group and business Units have their own procedure and all the subsidiaries and joint venture propose their procedures to a conformity audit and their exports to a quality audit.

Appointment of Export Control Officers
An Export Control Officer (ECO) is appointed in the group. He guarantees the implementation and the respect for Policy. He establishes and animates a network of ECO worldwide in the Group. The AREVA Export Control Officer nominates and coordinates a number of Export Control Officers in the Group.

He makes sure that any modification of the regulation, concerning the activities of the group is distributed to the exporters. He organizes regular trainings and conferences. He animates multidisciplinary committees to establish the more adapted strategy for the development of new products, strategy, cooperation or Joint-Ventures. He guarantees the good application of Policy in all the phases of the development of products and services or in the phase of mounting partnerships and Joint-Ventures as well as in the policy of procurement and supply.

Training
Training courses are regularly organized. The participants are informed of policies and Export Control procedures, of the history, the stakes and are made aware of the reflexes to have in respecting procedures and regulations. The training program is composed by the following elements: Ethics (Value Charter) of the Group, the Non-proliferation, the international regulations and more particularly that applicable in Europe (Germany and France) and in the United States. Particular attention is devoted to the Export Control practice in China, Japan and India.

A part of the training is dedicated to the practical process for obtaining an export license: the request, the process of approval at the ministerial level and the follow-up of the export license and its documentation.

An e-learning program was created to allow in an interactive way a larger number of persons to get quickly acquainted with the Export Control.
Audit and Self Assessment
Subsidiaries and Business Units are submitted to procedures of conformity audit and self assessment. The conformity audit is performed by the AREVA Audit department and the self-assessment by the ECOs as a Peer Review.
The AREVA Audit is performed in 6 weeks by 5 auditors and the final report is addressed to the AREVA management for follow-up of the findings. The self-assessment is generally performed by 3 expert ECOs who spend approximately 3 days at the site. The self assessment is prepared by the ECO of the unit to be assessed and the final report stays in the Unit for implementation.