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Plan

Environmental requirements

This document defines the environment protection requirements to be met by the Companies within the scope of ITER worksite. The ITER Worksite must be exemplary from a quality, safety and environmental viewpoint.

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1. Purpose

This document defines the environment protection requirements to be met by contractors under ITER Organization responsibilities within the framework of the ITER worksite.

The ITER Worksite must be exemplary from a quality, safety and environmental point of view within the frame of the fulfilment of the Policy on Safety, Security and Environment Protection Management [13].

2. Scope

To ensure consistency and homogeneity, these environmental protection requirements are written in relation to Volume 1 of the PMAE [15]. ITER Organization communicates these requirements to bidders and contractors so that they shall apply them within the scope of works in the ITER Worksite (Inside and Outside INB).

Contractors must comply with these requirements and the regulations currently in force, and must report the compliance of the requirements to ITER Organization upon request by IO. They must implement suitable measures in order to eliminate or at least reduce to a minimum any adverse environmental impact generated by their activities.

The ITER Organization, through its surveillance actions as Nuclear Operator, will ensure that all contractors operating on the ITER Worksite meet these environmental requirements.

The requirements defined in this document may be further developed and adapted according to the progress of the ITER Worksite and evolving legal requirements.

3. Abbreviations

NHW

Non-Hazardous Waste

ASN	Nuclear Safety Authority (Autorité de Sûreté Nucléaire)					
BOD-5	Biological Oxygen Demand over 5 days					
CEA	Commissariat à l'énergie atomique et aux énergies alternatives					
CMA	Construction Management as Agent					
COD	Chemical Oxygen Demand					
DREAL	Direction régionale de l'environnement, de l'aménagement et du logement					
EPNS	Environmental Protection & Nuclear Safety Division					
HW	Hazardous Waste					
ICPE	Installation classified for the Protection of the Environment (Installation classée pour la protection de l'environnement)					
INB	Basic Nuclear Installation (Installation Nucléaire de Base)					
IO	ITER Organization					
MSDS	Material Safety Data Sheet					

PIC	Protection Important Component
PIA	Protection Important Activity
PO	Prefectural Order
PRE	Environmental Respect Plan
SDIS	Departmental Fire and Emergency Services (Service Départemental d'Incendie et de Secours)
TRO	Technical Responsible Officer

4. References

In addition to the general regulations particularly in the French Labour and Environmental Codes, the following requirements also apply within the scope of the ITER construction site:

4.1 Regulations

- [1] Act no. 2006-686 of 13 June 2006 on transparency and security in the nuclear field (ITER D 2794BL)
- Prefectural Order dated 15 February 2008 (15-2007-EA), modified by the Prefectural Order dated 7 February 2011 (45-2009), authorizing, under the Environmental Code, the implementation of the ITER worksite preparatory and RUN (Roads and Underground Networks) works (Water Law) transferred to ITER Organization (ITER D_33R2NR and ITER D_4BBXAY)
- Prefectural Order dated 23 December 2008 (2007-106A), modified by the Prefectural Order dated 25 March 2013 (52-2013 PC) authorising, under the Environmental Code, the operation of rock crushing machines, concrete batching plants and fuel storage and distribution facilities within the scope of the ITER construction. (ITER_D_33ASTS and ITER_D_M32FP2)
- [4] **Prefectural Order dated 1 December 2009 (2009-80A)** authorizing, under the Environmental Code, the use of cooling installations in the ITER Headquarters buildings, and also defining the conditions for the operations and emissions of both the sewage treatment plant and the rainwater drainage network on the ITER construction site transferred to ITER Organization (ITER D G34E9N)
- [5] **Decree dated 9 November 2012 (2012-1248)** authorizing ITER Organization to build the ITER INB (Basic Nuclear Installation). To be noted that this Decree is based on the preliminary safety report (RPrS rapport préliminaire de sûreté) and the impact study (ITER D C2JZNX)
- [6] **Order dated 7 February 2012** defining the rules concerning general nuclear installations (ITER D_7GJHSE)
- [7] ASN Decision 2013-DC-0360 dated 16 July 2013 related to INB control of hazards and health and environmental impact, modified by ASN Decision n°2016-DC-0569 of

- 29 June 2016 relative to the control of the nuisances as well as health and environmental impact of basic nuclear facilities (ITER D VBWE4S)
- [8] Order dated 9 August 2013 implementing the ASN Decision N° 2013-DC-0360, dated 16 July 2013 (ITER D JNNZRH)
- [9] ASN Decision N° 2013-DC-0379 dated 12 November 2013 establishing the international ITER Organization requirements for INB N° 174, called ITER, based at Saint-Paul-Lez-Durance (Bouches-du-Rhône), modified by the ASN Decision N°2015-DC-0529 dated 22 October 2015 and the ASN Decision N°2017-DC-0601 dated 24 August 2017 (ITER D TYNPAZ)
- [10] **ASN Decision 2014-DC-0417 dated 28 January 2014** relating to INB rules concerning the control of risks associated with fire
- [11] **Order dated 20 March 2014** implementing the ASN Decision N° 2014-DC-0417 dated 28 January 2014
- [12] Moreover, other ministerial Orders applicable to installations declared or authorised under ICPE regulations (ITER_D_7JFYC5)

4.2 IO procedures

- [13] ITER Policy on Safety, Security and Environment Protection Management (ITER D 43UJN7)
- [14] Impact Study (ITER D 742LH4)
- [15] IO Environmental Management System doc 1 : PMAE v1 (ITER D 97W4PN)
- [16] Environmental Respect Plan English template (ITER D 9FUP5C)
- [17] Chemical product management procedure (<u>ITER D TF5GP8</u>)
- [18] Procedure for management of Nonconformities (<u>ITER D 22F53X</u>)
- [19] Procedure for the management of Deviation Request (<u>ITER D 2LZJHB</u>)
- [20] ICPE pre-screening memo (ITER D XJ8K6C)
- [21] Piezometer memo (<u>ITER_D_XZTS9J</u>)
- [22] Provisions for Implementation of the Generic Safety Requirements by the External Interveners (ITER_D_SBSTBM)

- [23] List of ITER-INB Protections Important Activities (ITER D PSTTZL)
- [24] Working Instruction for intervention in case of Pollution or Overflow of the Rainwater Drainage Network (ITER D NEBB44)
- [25] Greenhouse gas memo (<u>ITER D YX2UF7</u>)
- [26] Quality Plan for the Management of Liquid Effluents of the CEA Cadarache Site (ITER_D_YHFB9E)
- [27] ITER Utility Networks Requirements related to Connections, Modifications and Releases (ITER D 2KNN2T)

5. Specifications

ITER is a basic nuclear facility (in French: "Installation Nucléaire de Base") identified in France by the number INB-174 and subject to the French Order of 7 February 2012 [6].

Contractors will perform or participate in the following PIA as defined by the above-mentioned Order [23]:

- Activities for the protection of the environment;
- Waste management.

The Contractor shall ensure that Suitably Qualified and Experienced Persons carry out these activities [22].

5.1 Work preparation phase

- The contractor shall fulfil all requirements of regulations in force and in particular those of the INB and of the existing ICPE. [6], [12]
- The contractor shall send ITER Organization, before the works start and in compliance with the above-mentioned commitments, the documented identification of all environmental impacts and hazards generated by its activities and products, with the detailed measures to be implemented to reduce the said environmental impacts, as well as a suitable monitoring plan and all documents required to ensure correct environmental management by applying them throughout the entire operation. [2] In this regard, the contractor working for IO on the ITER Worksite shall submit ITER Organization the Environmental Respect Plan (PRE) in compliance with the abovementioned commitments at least ten working days before the start of works and the document shall be approved before the start of the work. The PRE shall be reviewed by IO/EPNSD/Environmental Coordinator and approved by IO TRO. For activities

under CMA coordination, the PRE shall be reviewed and approved by CMA and EPNSD/Environmental Coordinator shall be copied for information. The proposed PRE template can be used. [16]

- The need for PRE shall be extended to any work on site (either by contractor or by IO staff). This shall apply to waste management as well.
- The contractor shall check that the chemicals to be used or the activities to be performed whether it can be fallen under the ICPE regulation [20]. In case ICPE thresholds are exceeded, the contractor shall prepare declaration files according to the article R512-47 of the French Environmental Code (including compliance matrix), registration files according to the article R512-46 and following of the French Environmental Code or authorization files according to the article R181-1 and following of the French Environmental Code. These files will enable IO to submit the requests to the Authorities (ASN or DREAL depending if the facility is inside or outside of the INB perimeter).
- For regulatory compliance, the contractor must regularly send ITER Organization all information concerning its regulatory compliance in its monthly report and must respond to all requests made by ITER Organization, particularly within the scope of periodical compliance assessments.
- The chemical management on the ITER project is done through the <u>Chemical product</u> management procedure. Before any hazardous chemical is brought to the ITER worksite, a Chemical Request must be submitted as per required in the procedure [17].
- Approved equipment and materials complying with the standards in force must be used (periodical general inspection reports sent to ITER Organization).
- All the employees have to follow the IO-F4E common newcomer safety/environment induction before any works begin.

5.2 Working phase

General measures are detailed in this document. Some extracts of limit thresholds are given for the equipment covered by the Prefectural Orders.

A report which is indicating water, electricity and fuel consumptions, but also the amount of inert, non-hazardous and hazardous waste, will be done by the contractors and sent to the ITER Organization on a monthly basis.

Any non-conformities against environmental requirements will be managed according to **Procedure for management of Nonconformities (22F53X).** [18]

5.2.1. Water and Soil Protection

- ➤ No uncontrolled spillage
- > Management of drippage, seepage, leaks, etc.
- > Treatment of polluted water (washing, etc.)
- Each company must keep a sufficient supply of spill kits and absorbent material, etc. (PO dated 01 December 2009) [4]. The spill kits shall be available in every machinery and worksite equipment.
- In the event of accidental spillage, absorb the liquid (with absorbent material, etc.) and collect all of the polluted absorbent material in order to store it in a sealed container labelled as containing hazardous waste. Discharge pollution is prohibited (PO dated 01 December 2009) [4].
- The contractor will record any localized incident (without any impact on the air, underground water or superficial water) (for instance: leaks) and will submit to ITER Organization within 48 hours. It could be done with an Environmental Observation Sheet (Appendix 1).

• In case of non-localized pollution (groundwater, etc.):

The company will inform the ITER Organization immediately in the event of water pollution, by calling the ITER guard post (+33 4 42 17 20 00) and informing IO Technical Responsible Officer and/or chief of installation and Environmental Coordinator.

In case of pollution of the rainwater drainage network, the working instruction shall be followed. [24]

- Specific sealed areas (such as impermeable ground, retention, etc.) must be used to park machinery (when not being used) and carry out minor maintenance (major maintenance operations prohibited on the worksite), including the recovery of rainwater, hydrocarbons and used oil to be sent for treatment.
- Machinery must be refuelled with great care using spillage preventive measures such as retentions, drip trays, spill kits. Description of the preventive measures shall be recorded in the PRE of the contractor.
- Refuelling or other activities likely to create a liquid pollution shall not be performed at less than 10 meters from any piezometer or the watercourse such as the rainwater network except when IO has confirmed the sufficiency of the preventive measures. If Refuelling activities need to be performed within 10 meters from any piezometer or the watercourse, a proper procedure shall be prepared in PRE to perform such activities describing how to environment will be protected while it is carried out.
- Rainwater that is likely to be polluted by oil shall be recovered (taking actions by the contractor who is the source of the pollution) and treated by means of oil trap type devices before release. (PO dated 15 February 2008) [2]

- It is forbidden to empty mud, muddy water or any other matter into rainwater collectors or drain systems. Suitable measures (pits or settling basins, etc.) must be implemented by contractors as soon as they are required. (PO dated 15 February 2008) [2]
- No other effluents than rainwater can be released in the rainwater network (PO dated 15 February 2008) [2] and as per indicated in the Quality Plan for the Management of Liquid Effluents of the CEA Cadarache Site. (ITER D YHFB9E) [26]
- Rainwater and treated wastewater released into the environment shall be free of floating material and products likely to produce toxic vapours or damage structures. The temperature of these effluents must be below 30°C and the pH must range between 5.5 and 8.5 and a total oil content must be below 5 mg/l and a suspended solids content must be below 30 mg/l. (PO dated 01 December 2009) [4]
- Only site domestic water will be sent to the ITER sewage treatment plant (water from washbasins, toilets, kitchens and showers, etc.). (PO dated 01 December 2009) [4]
- Regarding water released into the sanitary drainage network, the following rules apply:
 - Effluents potentially containing grease must go through a grease trap first
 - Waste water from floor cleaning in technical buildings is not allowed
- Release of waste water into the industrial effluents network is only authorised after prior approval of IO and CEA and after verification that its composition complies with the thresholds indicated in the characterization sheet validated upstream by the CEA as per indicated in the Quality Plan for the Management of Liquid Effluents of the CEA Cadarache Site [26]. The maximum daily volume which can be released by the overall project cannot exceed 60 m³ (as per the ITER impact study). [14]
- Connections to the platform water networks for filling/release purposes shall be assessed through a signed agreement ("regime d'autorisation") between the networks operator and the contractor. [27]
- It is forbidden to drag mud, soil or any other matter onto the connecting roads and public road (RD 952). (PO dated 01 December 2009) [4] (Wheel washer must be used, etc.)
- Car/wheel wash installations must have a closed circuit; the water/mud must be treated then evacuated as wastewater.
- Specific equipment cleaning areas, if necessary, shall be set up. The entire surface area of these areas must be sealed and the cleaning water must be collected for treatment before release (PO dated 15 February 2008) [2] as per IO, CEA or external company acceptance criteria and the Quality Plan for the Management of Liquid Effluents of the CEA Cadarache Site. [26]

- Equipment cleaning areas must be set up for the concrete work. Their surface must be sealed and the cleaning water must be collected for treatment before release. Cleaning water from concrete mixers and concrete pumps will be recovered for treatment prior to removal (settling pit for sludge, etc.) (PO dated 15 February 2008) [2] and it shall be applied for any concrete activity on ITER worksite as well.
- Any connection to, modification of or release into an ITER drainage network (whether
 permanent or temporary) is subject to a Permit to Work and a formal authorisation
 provided by the IO hydraulic networks operator. (ITER Utility Networks Requirements related to Connections, Modifications and Releases
 (ITER D 2KNN2T)) [27]
- Product containers (oil, petrol, etc.) will be sealed and stored above retention tanks. They will be identified by standardized labels (exact description of content, volume and warning symbol, etc.). Incompatible products will not be collected in the same tank. Any fixed or temporary storage of a liquid likely to create water or soil pollution shall be equipped with retention. A retention capacity will be at least the largest volume between 100 % of the capacity of the largest equipment and 50 % of the capacity of the overall stored volume. (PO dated 23 December 2008) [3] (PO dated 01 December 2009) [4]

In addition, as per the document ED753 made by the French National Institute of Research and Safety (INRS) (this document being based on the Ministerial Order dated 4/10/2010 about the prevention of accidental risks within an ICPE under Authorization), the retention have to be sized following:

- o For mobile containers with a capacity of less than 250 L, the retention must be determined as follows:
 - Overall volume stored below 800 L : Retention volume = stored volume
 - Overall volume stored over 800 L: Retention volume = 800 L at a minimum and 50% of the overall volume of the container of flammable liquids or 20% for any other liquid
- o For mobile containers with a capacity of more than 250 L, the retention must be the biggest value between 100 % of the greatest container on it and 50% of the overall volume stored.
- The storage of hazardous products will be limited as much as needed for performing the works during a period to be agreed by the IO and will comply with the requirements from the MSDS.
- Labelling of the chemicals, relevant hazard signage and MSDS shall be available in the vicinity of the storage area.
- Hazardous materials will be stored in specific storage areas adapted to the inherent risks following MSDS requirements and approval by ITER Organization.

- It is forbidden to store any hazardous product at less than 10 meters from any piezometers, manhole or rainwater network drain of the ITER worksite except when IO has confirmed the sufficiency of the preventive measures.
- Piezometers are protection important components (PIC). Piezometers must imperatively be protected (from machine damage for instance) as per the piezometer memo. [21]
- Piezometers must be reachable at any time as per the piezometer memo. [21]
- In the event of works that have to be carried out next to these piezometers, it will have to be properly analysed in the contractor environmental analysis and the PRE and subject to IO/EPNSD approval as per the piezometer memo. [21]
- The works on piezometers themselves will need a dedicated procedure validated by IO/SD/EPNSD. In the event of damage, a Non-Conformity Report will be opened by the contractor or by the person having found the non-conformity following the procedure [18]. The contractor shall define remedial and corrective action including control of the pollution, decontamination and take proper actions for the repairs.
- It is forbidden to dilute effluents (PO dated 01 December 2009) [4] (Order dated 07 February 2012) such as diluting industrial effluent with clean water or rainwater on the purpose to meet the thresholds.
- The direct or indirect effluents released into groundwater or environment surfaces are forbidden. (PO dated 01 December 2009) [4] (Order dated 07 February 2012) [6]
- When carrying out ground drilling, it is prohibited to create a connection between separate water tables. (Order dated 07 February 2012) [6]

5.2.2. Air Protection

- > Reduction of dust (water sprinkling if necessary),
- > Reduction of exhaust gases and fuel consumption.
- Observe speed limits.
- Whenever possible, stop machines when parked or when equipment is not in use.
- Reasonable water sprinkling for tracks and material storage areas, etc, in order to limit dust emissions. (PO dated 23 December 2008) [3]
- Maintenance of machinery shall be compliant with the manufacturer's instructions and the regulatory requirements.
- Emissions of toxic gases, volatile organic compound, gases that deplete the ozone layer shall be as much as possible limited and strictly respect the regulation in force.

- [5] In the event of leak or inadvertent equipment emptying of greenhouse gases, the measures shall be taken according to the Greenhouse gas memo. [25]
- Fuel consumption have to be monitored by the contractors and declared into their environmental monthly reports submitted to the IO for approval.

5.2.3. Waste Management

Contractors are responsible for waste disposal according to the following principles:

- Reduction of construction site waste to a reasonable, justified minimum.
- > Treat and optimize all waste produced in the best possible way, in accordance with the Environmental Code and the Prefectural Orders.
- ➤ Waste must be sorted on the worksite in order to manage and recycle the greatest possible amount of waste and to allow ITER Organization to track the waste.
- Waste must not be left on the ground either during or after the works.
- ➤ It is forbidden to burn waste. (PO dated 01 December 2009) [4] (PO dated 15 February 2008) [2] (Order dated 07 February 2012) [6]
- ➤ Waste Tracking Sheets must be always transmitted to the ITER Organization after they are received, and they must be integrated in the monthly reporting to the IO.
- ➤ The company could chose to manage its waste by itself but it must be indicated in the PRE and this must be done by respecting the French Environmental Code and the Prefectural Orders.
- As regards waste management, the best techniques available mentioned under Article 1.2 are those defined by the Ministerial Order [6].

The following waste categories (with examples) are given below:

• Non-hazardous waste (NHW):

- Non recyclable: household refuse, etc.
- Recyclable: paper, cardboard, plastics, wood, metal, etc.

• Hazardous waste (HW):

- Empty spray cans,
- Contaminated empty cans (oil, petrol etc.),
- Contaminated hoses, used oil filters (routine maintenance of engines), etc.,
- Contaminated cloths and gloves,
- Polluted absorbent materials (accidental spillage), etc.
- **Inert waste:** optimize the transport of earth and other inert materials in order to limit the amount of waste taken to landfill sites and examine any possible recuperation/recycling of soil or other materials that are not to be used as backfill.

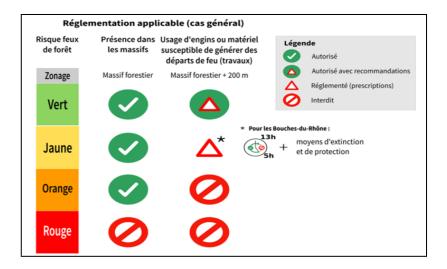
- Storage areas for worksite waste shall be sealed and runoff into these areas shall be collected and treated before release, if required. The sealing of polluting waste containers shall also be checked regularly.
- An area specifically dedicated to the collection of polluting and hazardous products shall be set up and clearly identified by the contractors.
- The waste will be sent to the appropriate waste elimination facilities and tracking proof (waste tracking sheet (*Bordereau de Suivi des Déchets*): the associated CERFA form) shall be provided to ITER Organization.
- Each company ensures the traceability of the waste it produces (Type, quantity, drainage channel...) (Order dated 07 February 2012) [6]. Each company keeps a waste register up to date for 3 years and the waste tracking sheet must be kept available for 5 years. this register have to include the list of data indicated in the Article 2 of Ministerial Order dated on the 29/02/2012 fixing the content of the registers mentioned in Articles R.541-43 and R. 541-46 of the French Environment Code.
- The process by-products have to be considered as waste as soon as they are evacuated from the worksite.
- The hazardous waste shall be evacuated through the corresponding channel according to what is written in the MSDS and official regulations.
- Waste quantities produced during the works have to be monitored by the contractors and declared into their environmental monthly reports submitted to the IO for approval.

Note: An optimized solution meeting the requirements of all contractors has been implemented on the ITER work site in order to centralize non- hazardous waste management. All contractors remain responsible of their hazardous waste management and for regulatory compliance on this topic.

5.2.4. Fauna-Flora Protection

- > Some trees are identified as ARB (Arbres Réservoirs de Biodiversité Trees important for biodiversity) and shall be protected in all situations.
- > It is forbidden to cut down trees without prior agreement from the IO,
- > Access to ecologically critical areas (fenced off areas) is prohibited. Protected species must be safeguarded as must for plant life (grass, undergrowth, etc.). (PO dated 15 February 2008) [2]
- It is strictly forbidden to damage the fauna and flora as a whole (woodland areas, grassy areas, etc.).

- Protected trees must be safeguarded (biodiversity reserve trees) like all fauna and flora species.
- Prefectural Order dated 28/05/2018 regulates access to areas with a forest fire risk from 1 June to 30 September. Works and activities are regulated according to the fire risk level in these areas (ranked green to red).



5.2.5. Noise and Vibrations Management

Limit noise pollution.

- Use machines that are approved and in compliance with the regulations in force (periodical general checks), that are in good working order (exhaust) and are correctly maintained.
- Maximum noise limits at the property boundary:
 - o Day (7am-10pm) except Sundays and public holidays: 60dB(A)
 - Night (10pm-7am), Sundays and public holidays: 50dB(A) (PO dated 01 December 2009) [4]
- Maximum noise emergence levels in areas where the noise is produced which are regulated according to the level of ambient noise:
 - o Noise level > 35 dB(A) and <45 dB(A):
 - o Day (7am-10pm) except Sundays and public holidays: 6 dB(A)
 - o Night (10pm-7am), Sundays and public holidays: 4 dB(A)
 - o Noise level > 45 dB(A):
 - o Day (7am-10pm) except Sundays and public holidays: 5 dB(A)
 - Night (10pm-7am), Sundays and public holidays: 3 dB(A) (PO dated 01 December 2009) [4]
- ITER Organization will check the acoustic levels at the boundaries of the ITER Worksite when the worksite undergoes major developments (when new equipment is

used, e.g. concrete plants, crushers, etc.) at least every 5 years. (PO dated 01 December 2009). [4]

5.2.6. Order, cleanliness and tidiness Management

- The ITER Worksite and its surroundings shall be cleaned whenever necessary. Failure to do this will not be tolerated. The installation surroundings will be landscaped and kept clean. Discharge outlets and their immediate surroundings will be carefully maintained (vegetation, grass, etc.). (PO dated 01 December 2009) [4]
- Both an initial and a final inventory will be performed in presence of the contractor and ITER Organization services (where relevant, the contractor will be responsible for bringing the worksite up to standard when necessary).
- If the contract holder is faced with an abnormal situation or an emergency, which has an impact on the environment, it shall immediately notify ITER Organization in order to obtain the instructions to be followed.

5.2.7. Water and Energy consumption

- > Implementation of measures that aim at limiting resource consumption by rationalizing their use.
- Worksite meters must be read before and after each period of worksite inactivity, in order to detect abnormal consumption. The reasons for abnormal consumption must be found and examined, and corrective steps must be taken.
- Water: report leakage and carry out repairs immediately; track watering and material storage (as required to limit flying dust, etc.) should be optimized.
- Any connection to or modification of an ITER Hydraulic network (whether permanent or temporary) is subject to a Permit to Work and a formal authorisation provided by the IO hydraulic networks operator. (ITER Utility Networks Requirements related to Connections, Modifications and Releases (ITER D 2KNN2T)) [27]
- Water supply facilities shall be equipped with meters in order to monitor consumption levels. (PO dated 01 December 2009) [4]
- Washing areas, if necessary, must be equipped with high-pressure cleaning equipment to limit water consumption.
- **Electricity:** turn off lights and electrical equipment when not in use, turn off heating and air conditioning when doors and windows are open, etc.
- Fuel:

- Observe speed limits.
- Drive slowly, with gentle acceleration, etc.
- Stop engines when parked or when equipment is not in use.
- Track consumption on a monthly basis (for worksite machinery and vehicles) and submit report to ITER Organization.

6. Management of deviations and non-conformities

The contractor will record any localized incident (without any impact on the air, underground water or superficial water) (for instance: leaks) and will submit to ITER Organization within 48 hours. It could be done with an Environmental Observation Sheet (Appendix 1).

Any deviation against environmental requirements will be managed according to **Procedure** for the management of Deviation Request (2LZJHB). [19]

Any non-conformities against environmental requirements will be managed according to **Procedure for management of Nonconformities (22F53X)** [18]

Appendix 1: IO template for Observation sheet

				Number :				Date:			
china eu india japan korea russia usa			Observation sheet		nature the htractor:		ure IO/EPN	NSD	Closed on :/ Visa ;		
									_		
1	Object – Identification					•		ment 📙 S	nent 🗌 Safety 🗌		
	Sheet opened by :		(p	osition)							
	Description:										
	Causes:										
	Consequences:										
	This sheet is sent to the company concerned, to the Building Owner, to his support team and to the Safety and Environment Coordinators.										
2			Treatment	Proposed	d (company c	oncerne	ed)				
	Immediate or compensatory measures taken :										
	Treatment : corrective an	d preventiv	ve actions :	:							
	Detail of the actions(s) (one cause at a time)					Person esponsible or the actio		ine	Impact		
	Plans or documents to be updated:										
	Name : Company :	Position :	ion : Date :				Signature :				
3	Decision of the Building Owner, his support team or the Environment/Safety Coordinators										
	Accepted										
			Conditions:			Reasons:					
	Name : Position : Date :			Signature :							