

Choose status. Project plan for the CEN Workshop on Design and Construction Codes for Gen II, III and IV nuclear facilities

Requests to participate in the Workshop and/or comments on the project plan are to be submitted to djida.laoubi@afnor.org 1

Recipients of this project plan are kindly requested to name all patent rights known to them to be relevant to the Workshop and to make available all supporting documents.

¹ Applications for participating in the Workshop and comments on the project plan that are not received by the deadline do not need to be taken into consideration. Once constituted, the Workshop will decide whether or not to consider the comments received in good time.

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Foreword (TO BE DELETED BEFORE THE PUBLICATION OF THE DRAFT PROJECT PLAN)

The content of the project plan is structured into chapters. These chapters represent the Workshop project plan's minimum content, as well as optional but recommended text modules. There is no restriction on the addition of further chapters if this is deemed useful.

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- Black font: Fixed text modules. Please do not change.
- Green font: Optional but recommended text modules. Please adjust according to your needs.
- <Red font>: Placeholder. Please fill in.
- Blue font: Explanation. Please delete in the final version.

Summary

1 Status of the project plan

Draft project plan for public commenting (Version 1.0)

This draft project plan is intended to inform the public of a new Workshop. Any interested party can take part in this Workshop and/or comment on this draft project plan. Please send any requests to participate or comments byemail to <u>djida.laoubi@afnor.org</u>.

All those who have applied for participation or have commented on the project plan by the deadline will be invited to the kick-off meeting of the Workshop on <2023-07-19>.

Approved project plan for CWA development adopted at the kick-off meeting of the Workshop on 2023-07-19 (Version <No 1.>)

2 Workshop proposer and Workshop participants

2.1 Workshop proposer

Person or organisation	Short description and interest in the subject
AFCEN	AFCEN is an international association. Its members are companies from the nuclear or conventional energy sector (when operating in the nuclear sector), whose activities are related to the technical fields covered by AFCEN codes.
Association Française pour les règles de Conception, de construction et de surveillance en exploitation des matériels des Chaudières Electro Nucléaires French Association for the rules governing the Design, Construction and Operating Supervision of the Equipment Items for Electro Nuclear Boilers.	 AFCEN has two main purposes: produce up-to-date codes offering accurate and practical rules for the design, construction and in-service inspection of components for use in industrial or experimental nuclear facilities (RCC- and RSE- codes), ensure certified and readily-available training programs enabling code users to achieve a high level of expertise, knowledge and practical skills in using AFCEN codes.

2.2 Other potential participants

This CWA will be developed in a Workshop (temporary body) that is open to any interested party. The participation of other experts would be helpful and is desired. It is recommended that:

- Technical safety Operators,
- • Safety authorities,
- • Manufacturers,
- Utilities,
- • Standards Developing Organisations,
- • Research centres,
- • Design offices

take part in the development of this CWA.

2.3 Participants at the kick-off meeting

List all participants at the kick-off meeting here or as Annex. If some of the participants are already known at the time this project plan is drawn up, they can be listed ahead of time. After the kick-off meeting, this table should be deleted and only the lower table shall be used.

The following persons or organisations already signed up to the kick-off meeting prior to the publication of the draft project plan.

Person	Organisation
Workshop proposer : Lucien ALLAIS & Bruno MARQUIS	Workshop proposer: AFCEN
Bruno AUTRUSSON	IRSN
Karl-Frederik NILSSON	JRC - European Commission (EC – EUROPA)
Pekka VALIKANGAS	<u>STUK</u>
Kim WAHLSTROM	<u>STUK</u>
Workshop secretariat: Djida LAOUBI	Workshop secretariat AFNOR

The present CEN Workshop is proposed by AFCEN and AFCEN members.

In addition, ENEF², SNETP³, and NUCLEAREUROP promote the participation among their members.

Workshop members are companies or bodies that are willing to participate to the Workshop in accordance with its project plan as it will result from the discussions at the kick-off meeting, on the basis of the present draft. The members are supposed to appoint experts in at least one of the PGs of the Workshop (see §5 below) and one delegate that will represent it in the decision making process of the workshop and normally attend the plenary meetings. It is expected that Workshop participants come from different European countries, representing different nuclear utilities and main European nuclear suppliers, and be in line with the Workshop objectives described in this document, in order to provide code evolutions proposals based on a vision of a broad representation of the European nuclear industry.

2.4 Registered Workshop participants

List all participants at the kick-off meeting who have adopted the project plan here or as Annex. Participants are not named as Workshop participants until the project plan has been adopted.

The following persons or organisations have registered as Workshop participants at the kick-off meeting and will actively participate in the development of the CWA.

Person	<u>Organisation</u>
Workshop proposer : Lucien ALLAIS &	Workshop proposer: AFCEN

² European Nuclear Energy Forum

³ Sustainable Nuclear Energy Technology Platform

Bruno MARQUIS	
Workshop chairmain:	
Bruno AUTRUSSON	AFCEN_
Karl-Frederik NILSSON	European Commission (EC – EUROPA)
Pekka VALIKANGAS	STUK
Kim WAHLSTROM	STUK

3 Workshop objectives and scope

3.1 Background

In the nuclear industry, specific design and construction codes provide a set of essential engineering tools for the design, construction, and integration of nuclear high safety class components and systems. These codes are the common reference between all stakeholders involved in the design and construction of power plants and other nuclear facilities, starting from the main supplier of the technology, the architect engineer, the operator, manufacturers and suppliers of components, contractors, to inspectors and safety authorities. These codes are a reliable basis to ensure the quality level of components and systems, necessary to meet high nuclear safety levels.

Codes permanently integrate the lessons learnt from the different stakeholders' industrial practice (both in terms of failures and in terms of best practices) and the safety requirements evolutions.

In the European Union, for historical reasons, the nuclear reactors in operation today were designed and built using either the US ASME Code, European codes (AFCEN for France, KTA for Germany), Russian codes (PNAE G-7), or even a mixture of codes adapted at a national level. This led to a European nuclear reactors fleet that has been built within a "patchwork" of reference codes, leading in some cases to over-costs in spare parts and to a more complex follow-up of activities. The need for harmonization of codes has been recognized at diverse occasions and some initiatives are already trying to improve the situation, such as the Multinational Design Evaluation Programme (MDEP), the CORDEL group of the WNA and NUGENIA.

On the one hand, the EC Directorate-General "Energy" has established a Nuclear Illustrative Programme (PINC), in which is stated the need of building new nuclear capacities by 2050. Indeed, this study stresses that meeting the commitments to reduce greenhouse gas emissions by 2050 will require the creation of new nuclear capacities. The recent international context () leading to a decrease in the supply of Russian gas reinforces this need.

A significant peak of investments is expected from 2030 onwards. One key condition for this achievement is to reduce construction times, and the other one is to prepare all the stakeholders (utilities, safety authorities, main industry partners, etc.) to a detailed evaluation of main reactors offered by the market. In any cases, standardization practices and vertical integration are highly recommended.

On the other hand, some European countries decided to phase out nuclear power. As substitution power sources are not immediately available, a short-term shutdown of the current fleet in these countries is not possible. One concern is then to be able to continue to operate safely their current fleet in a period of time that could last more than one decade. The recent international context (Ukrainian conflict) leading to a decrease in the supply of Russian gas reinforces also this need. In Belgium, for example, where the law provided for the abolition of nuclear power generation in 2025, it was decided to extend two reactors for a period of 10 years. Even in Germany, where all reactors were to be shut down by the end of 2022, it is under discussion to continue operating the last three reactors still in service. In this respect, the capitalization of operating and designing knowledge from all European countries appears to be beneficial.

In the framework of the call Euratom 2021, the Harmonise project, which will start at the end of 2022 and will last for three years, deals with the harmonisation of approval processes for innovative reactors at European level. As one of the outputs of this project is to highlight the needs related to Codes and Standard of innovative reactors that

would not be covered yet, a close link will have to be established with this project. Indeed, WS64 is the only European forum that can provide a solution to these highlight needs.

3.2 Scope

The planned CEN/CENELEC Workshop Agreement defines Recommendations to modify the existing AFCEN codes. It will be the continuation of CEN/WS 064 – Phase IV.

The proposed CEN/WS 64 phase IV will enable members to:

a) Identify and propose requests for changes to the AFCEN codes;

For existing good industrial and regulatory practices at European level that are not or only partially included in the AFCEN codes that are sufficiently mature, requests for modifications should be proposed. For their possible integration in the codes, these requests will then be processed by AFCEN according to the internal procedure in force.

This objective constitutes the finalisation of the work of the workshop since the less mature topics are the subject of the objectives described in b) and c) which are only intermediate steps.

b) <u>Identify and recommend medium-long term orientations</u> of evolution of AFCEN codes ;

Some rules presently considered cannot directly be included in the codes either because of an insufficient robustness of their demonstration or because there is no suitable way to deal with them in the current status of the code. When the integration of new rules of comparable nature or related to the same field seems feasible in a medium-long term period, a precise proposition on the evolution of the code structure could be recommended to allow it.

In this scope, the capability of the codes to deal with the greatest span of national safety regulations, as well as standards promoted by international organizations, will be sought.

 c) <u>Identify the R&D needs</u> associated to these recommendations ; Inventory of the R&D needs for the codification shall be established with a corresponding list of priority actions. Some R&D needs for setting design rules for some equipments or, more frequently, to get basic data for some materials, in particular for irredicted materials, were already identified (e.g. materials pet currently).

some materials, in particular for irradiated materials, were already identified (e.g. materials not currently used in the nuclear industry, proton irradiation effects on materials).

d) <u>Drafting technical documents</u> on subjects that have been investigated but that do not lead to a recommendation for modification or a proposal for an R&D programme. This is to capitalise on the work that has been done within the PGs. Later on, these technical documents can be used as a basis for modification requests or R&D proposals.

3.3 Objectives

The proposal consists of a voluntary mechanism for a broad set of partners involved with design, construction and operation of nuclear facilities or components in Europe. It is proposed to use AFCEN codes as a framework to support the process, in line with the motivations and ambitions underpinning phase 4 of the Workshop.

One of the main objectives of the CWA is to bring together and federate at European level the community of experts in the field of nuclear standards. Ithe goal is to continue and to strengthen the work carried out during the previous phases with the expansion of this community. A priority will be put towards stakeholders from countries wishing to equip themselves with new nuclear capacities. The availability of its codes by AFCEN will allow them to have access to good industrial and regulatory practices. Work from these technical exchanges and possibilities to codify practices around Europe will reduce the fragmentation at European level of good industrial practices in the nuclear sector to improve the competitiveness of the European nuclear industry. Similarly, the conditions for harmonisation of national regulation will be improved.

It will be also an opportunity for European operators to use AFCEN codes for their needs (LTO, share parts, new reactors) in their local context. During this process, other solutions in existing codes would be considered. The result could be a combination of solutions from other codes, sometimes also allowing alternative approaches. It will help to take account of ageing, to overcome difficulties on the supply of spare parts and to promote the development of innovative reactors.

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Another goal is to make AFCEN codes known to all entities involved in the evaluation of large nuclear commercial reactors during bidding process, and to be willing to properly evaluate proposals whether they are relied on AFCEN codes or not. Indeed, for safety authorities, it can be very interesting to have an **assessment tool to challenge reactor projects using other codes.** This openness also allows the **specific requirements of national regulations** to be taken into account.

3.4 Who should attend CEN Workshop 064 phase IV?

All organisations interested in Nuclear design and construction codes is invited to join CWA 064 - Phase IV.

3.5 The following stakeholders can participate to the WORKSHOP 064 PHASE 4: Related activities

The subject of the planned CWA is not at present the subject of a standard. However, there are committees, standards and/or other technical specifications that deal with related subjects and thus need to be taken into account - and involved, where necessary - during this Workshop:

- CEN/TC 430 Nuclear energy, nuclear technologies, and radiological protection
- CLC/SR 45 Instrumentation and control of nuclear facilities
- CLC/TC 45AX Nuclear Power Plants
- ISO/TC 85 Nuclear energy, nuclear technologies, and radiological protection

4 Workshop programme

4.1 General

The kick-off meeting is planned to take place on **19th of July 2023 on Zoom.** A draft for public commenting willbe published for 60 days. This workshop is composed by 4 Prospective Groups. Each PG has a specific scope:

- PG1 Mechanics GEN II-III
- PG2 Mechanics GEN IV
- PG3 Civil Works
- PG4 Electrical Equipment

Each PG will meet 4 times per year. Every year, a plenary meeting will be organised within the Workshop in order to monitor the works and steer the activities.

A total of <17 meetings per year (kick-off meeting, PG and Workshop meetings) will be held, during which the content of the CWA(s) will be presented, discussed and approved.

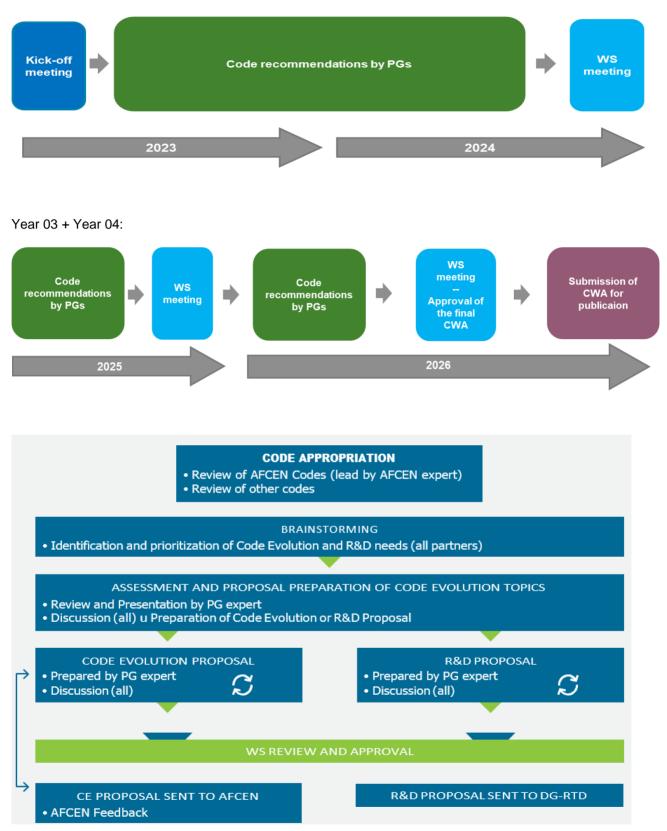
The CWA will be drawn up in English (language of meetings, minutes, etc.). The CWA will be written in English.

The CEN Workshop duration is 4 years. The works of the CEN Workshop will result in the delivery of a CEN Workshop Agreement (CWA) giving recommendations on evolution of AFCEN codes and the R&D needs associated to these recommendations. Additional technical papers could be delivered on specific technical issues.

For all meetings, systematic hybrid device will be available. All documents will be available on the CEN DOC platform for each PG.

The timeframe is defined as below:

Year 01 + Year 02:



4.2 Workshop schedule

The wokshop schedule is defined as below:

The following project schedule is for orientation only and is to be modified as the Workshop progresses. The amount and the duration of the various Workshop phases are particularly dependent on the requirements and wishes of the Workshop proposer.

Table 1: Workshop schedule (preliminary)

CEN/CENELEC Workshop	M01	M02	M03	M04 – M44		M45 N	/146 M47	M48
Initiation								
1. Proposal form submission and TC response								
2. Project plan development								
3. Open commenting period on draft project plan (mandatory)								
Operation								
4. Kick-off meeting								
5. CWA(s) development PG1/PG2/PG3/PG4								
6. Open commenting period on draft CWA(s) (optional)								
7. CWA(s) finalised and approved by Workshop participants								
Publication								
8. CWA(s) publication								
Dissemination (see 7)								
Milestones			к	V V M	V		M/A	P D

- В CEN/CENELEC BT meeting deciding on establishment of a CEN/CENELEC Workshop
- K Kick-off
- M Workshop meeting
 V Virtual Workshop meeting
 A Adoption of CWA
- Publication of CWA Ρ
- **D** Online distribution of CWA

5 Resource planning

The CEN Workshop members shall contribute equally to the administrative costs of the Workshop Secretariat and other logistical support, for instance the online conference tool.

Except this contribution, the registration and participation at this CEN Workshop is free of charge for its members, but each participant has to bear his/her own expenses for travel and subsistence.

The Secretariat adapts its intervention, for instance the number of meetings, according to funding available. It reserves the right to alert the members in case of cost or time overrun.

All interested parties in the Workshop's activities will participate to the fundings, as follows:

- A fee of 2000 €/year will be requested for each PG
- AFCEN will complete the fundings according to the number of PG participants.

In 2022, the distribution of participants to each PGs was the following:

- PG 1 : 11 members
- PG 2 : 10 members
- PG 3 : 8 members
- PG 4 : 7 members

NOTE: the phase III had the same funding system.

The registration fees of the CWA with the CEN are paid by AFCEN. AFCEN also takes care of the secretarial costs which are not covered by the financial contribution of the participants which is voluntarily limited to 2000 € per year and per PG.

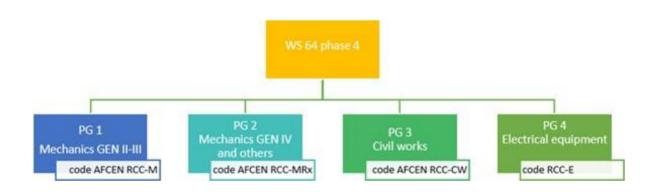
6 Workshop structure and rules of cooperation

6.1 General organisation

The Workshop is organised with specialised technical groups, so-called "Prospective Groups (PG)", in charge of elaborating recommendation proposals in the scope of the corresponding AFCEN code(s). At least once a year, a plenary meeting takes place to evaluate and endorse the proposals made by the PGs. For the first year, only a kick-off meeting will be organised. A virtual meeting at the end of the year will be set up.

The Workshop appoints a Secretariat that manages the logistics and documentary aspects of the work.

The Workshop is run by a Chairman, assisted by a Vice-Chairman. Each PG has a convener who leads its works.



• Workshop plenary meetings

During these meetings, the Workshop endorses the recommendations from the prospective groups dealing with the proposed code evolutions and R&D programmes. The Workshop notifies AFCEN of the recommendations dealing with the code contents. Additionally, it will assess how the recommendations are taken into account by AFCEN and give its feedback to it.

The R&D programme proposals are presented to the appropriate European structures in charge of R&D management, among which the EC Directorate-General "Research and Innovation".

Plenary meetings may also intervene in case of problems with the functioning of the Workshop or if a decision concerning its work has to be taken.

Prospective groups

There is no a priori limitation for the number of groups or for the topics to be considered. On the practical point of view, it is proposed to create prospective groups corresponding to the codes dealing with mechanical equipments for GEN II and GEN III reactors (RCC-M), for GEN IV installations, research reactors and fusion reactors (RCC-MRx), with the electrical equipment (RCC-E) and with the civil works (RCC-CW) for reactors. In-Service Inspection may be addressed by the PGs.

Their objectives are:

- To recommend medium-long term orientations concerning the evolutions of the codes
- To identify the related R&D actions

To this end, AFCEN will provide, free of charge, participant organizations with one copy of the relevant AFCEN Code(s) current version for the restrictive use of the prospective groups.

To support the identification of R&D needs and the recommendation of medium-long term code orientations, it may be useful to get access to some research and background information that constitutes the basis of current AFCEN Codes. AFCEN will supply such information to the Prospective Groups to the extent possible in consideration of copyright and industrial property aspects.

Meetings will be organized face-to-face while maintaining the possibility of participating remotely

6.2 Prospective Groups Conveners

Each prospective group has a convener, in charge of:

- planning the Prospective Group meetings so that they deliver in line with the Workshop Project Plan;
- convening the Prospective Group meetings and chairing them;
- managing the consensus building process;
- interfacing with the Workshop Chairman regarding strategic directions, problems arising, external relationships, etc;
- writing the recommendations or delegating this task to the Prospective Group experts.

The Prospective Group Conveners are appointed by the participants during the Workshop kick-off meeting.

Prospective Group experts shall comprise representatives of the Workshop registered participants. However, experts coming from other organizations may be invited to join a Prospective Group meeting on the invitation of the Convener, and with the agreement of the Prospective Group experts.

6.3 Participation in the Workshop

The Workshop will be constituted during the course of the kick-off meeting. By approving this project plan, the interested parties declare their willingness to participate in the Workshop and will be formally named as Workshop participants, with the associated rights and duties. Participants at the kick-off meeting who do not approve the project plan are not given the status of a Workshop participant and are thus excluded from further decisions made during the kick-off meeting and from any other decisions regarding the Workshop.

As a rule, the request to participate in the Workshop is closed once it is constituted. The current Workshop participants shall decide whether any additional members will be accepted or not.

Any new participant in the Workshop at a later date is decided on by the participants making up the Workshop at that time. It is particularly important to consider these aspects:

- a. expansion would be conducive to shortening the duration of the Workshop or to avoiding or averting an impending delay in the planned duration of the Workshop;
- b. the expansion would not result in the Workshop taking longer to complete;
- c. the new Workshop participant would not address any new or complementary issues beyond the scope defined and approved in the project plan;

- d. the new Workshop participant would bring complementary expertise into the Workshop in order to incorporate the latest scientific findings and state-of-the-art knowledge;
- e. the new Workshop participant would actively participate in the drafting of the manuscript by submitting concrete, not abstract, proposals and contributions;
- f. the new Workshop participant would ensure wider application of the CWA.

All Workshop participants who voted for the publication of the CWA or its draft will be named as authors in the European Foreword, including the organisations which they represent. All Workshop participants who voted against the publication of the CWA, or who have abstained, will not be named in the European Foreword.

For phase 4, in addition to the pursuit of existing topics it is envisaged to focus on that topics dealing with innovative reactors such as SMR and MSR reactors and advanced manufacturing processes will be also investigated.

The Harmonise project, which starts at the end of 2022 and lasts for three years, deals with the harmonization of approval processes for innovative reactors at European level. A close link between this project and WS64 will be established. Indeed, WS64 is the only European instance that can provide a solution to the identified unprocessed codification needs that constitute the output of the HARMONISE project.

6.4 Workshop responsibilities

The Workshop Chair is responsible for content management and any decision-making and voting procedures. The Workshop Chair is supported by the Workshop Vice-Chair and the responsible Workshop secretariat, whereby the Workshop secretariat will always remain neutral regarding the content of the CWA(s). Furthermore, the Workshop secretariat shall ensure that CEN-CENELEC's rules of procedure, rules of presentation, and the principles governing the publication of CWA(s) have been observed. Should a Workshop Chair no longer be able to carry out her/his duties, the Workshop secretariat shall initiate the election of a new Workshop Chair. The list below covers the main tasks of the Workshop Chair. It is not intended to be exhaustive.

- Content related contact point for the Workshop
- Presides at Workshop meetings
- Ensures that the development of the CWA respects the principles and content of the adopted project plan
- Manages the consensus building process, decides when the Workshop participants have reached agreement on the final CWA, on the basis of the comments received
- Ensures due information exchange with the Workshop secretariat
- Represents the Workshop and its results to exterior

The Workshop secretariat, provided by a CEN/CENELEC national member, is responsible for organising and leading the kick-off meeting, in consultation with the Workshop proposer. Further Workshop meetings and/or web conferences shall be organised by the Workshop secretariat in consultation with the Workshop Chair. The list below covers the main tasks of the Workshop secretariat. It is not intended to be exhaustive.

- Administrative and organisational contact point for the Workshop
- Ensures that the development of the CWA respects the principles and content of the adopted project plan and of the requirements of the CEN-CENELEC Guide 29
- Formally registers Workshop participants and maintains record of participating organisations and individuals
- Offers infrastructure and manage documents and their distribution through an electronic platform
- Prepares agenda and distribute information on meetings and meeting minutes as well as follow-up actions of the Workshop
- Initiates and manage CWA approval process upon decision by the Workshop Chair
- Interface with CEN-CENELEC Management Centre (CCMC) and Workshop Chair regarding strategic directions, problems arising, and external relationships
- Advises on CEN-CENELEC rules and bring any major problems encountered (if any) in the development of the CWA to the attention of CEN-CENELEC Management Centre (CCMC)
- Administrates the connection with relevant CEN or CENELEC/TCs

6.5 Decision making process

Each Workshop participant is entitled to vote and has one vote. If an organisation sends several experts to the Workshop, that organisation has only one vote, regardless of how many Workshop participants it sends. Transferring voting rights to other Workshop participants is not permitted. During voting procedures, decisions are passed by simple majority; abstentions do not count.

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If Workshop participants cannot be present in the meetings when the CWA or its draft is adopted, an alternative means of including them in the voting procedure shall be used.

7 Dissemination and participation strategy

At the beginning of the CWA, a dissemination and communication will be implemented. The objectives of this strategy is to:

- Enlarge the numbers of the stakeholders participating to the workshop;
- Gather the best expertise available in Europe on Design and Construction code;
- Communicate on the works undertaken within the Workshop

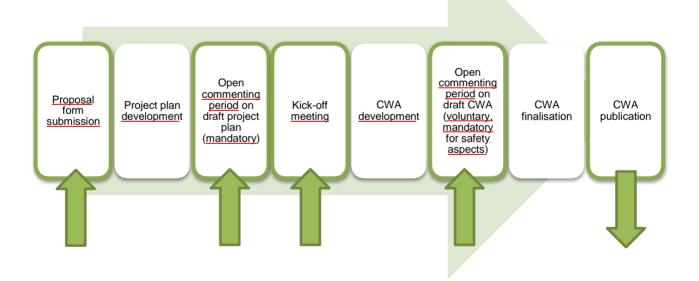
The main target of this dissemination and communication strategy will be: <u>Technical safety Operators, Safety</u> <u>authorities, Manufacturers, Utilities, Standards Developing Organizations , Research centers Design offices.</u>

The following dissemination actions will be implemented:

- Participation to conferences and meetings dedicated to nuclear design and construction codes by the workshop members;
- Information of the progress of the workshop by social media (for example: Linked In, Twitter, Instagram, Twitter...);
- Creation of an advertising flyer
- Cooperation with Harmonise Euratom project which deals with the harmonization of approval processes for innovative reactors at European level.

This strategy will be carried on during all the Workshop long-life. A specific effort will be done on the launching of the Workshop to attract more stakeholders.

This action will be undertaken on the own funds of the workshop participants.





Proposal form submission

The Workshop proposal will be disseminated to the following relevant stakeholders and bodies for consultation:

- standards committee, working group etc.
- publisher of technical rules
- others

Open commenting period on draft project plan

The project plan will be disseminated to the following relevant stakeholders and bodies for commenting:

- standards committee, working group etc.
- publisher of technical rules
- others

In addition to the CCMC website, the project plan and the date of the kick-off meeting will be advertised on <XYZ> to raise awareness. Interested parties are requested to contribute either through commenting of the project plan (short term) or through Workshop participation (long term).

Open commenting period on draft CWA

The draft CWA will be disseminated to the following relevant stakeholders and bodies for commenting:

- standards committee, working group etc.
- publisher of technical rules
- others

In addition to the CCMC website, the draft CWA will be advertised on <XYZ> to raise awareness. Interested parties are requested to contribute through commenting of the draft CWA (short term).

CWA publication

The final CWA will be disseminated to the following relevant stakeholders and bodies:

- standards committee, working group etc.
- publisher of technical rules
- others

In addition to the CCMC website, the final CWA will be advertised on:

- sector specific newsletter
- social media, such as
 - Facebook
 - o Instagram
 - o LinkedIn
 - Twitter
 - Research Gate
- EC Newsroom
- others

DRAFT CEN/CENELEC WS project plan (E)

8 Contacts

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