

Member State Comments on draft Safety Standards on

[DS427–A General Framework for Prospective Radiological Environmental Impact Assessment and Protection of the Public – Master Copy]

COMMENTS BY REVIEWER					RESOLUTION		
Reviewer		Country Organisation: Office for Nuclear Regulation, United Kingdom		Date: 7 July 2015	Note by IAEA Secretariat: for some unexpected reason this resolutions were not processed with the rest. We provide here the resolutions, considering Draft 8 text. My apologies, Diego Telleria		
Comment Nr	Para Nr. & Line	Proposed new text	Reason	Accepted	Accepted modified as follows	Rejected	Reason if modified/rejected
1	1.2	I-2. As discussed in Section 5 of this Safety Guide, the assessment of the level of protection of members of the public is, in many instances, sufficient	See comment 5.73.– any claim made to suggest that the assessment for protection of members of the public is sufficient for this purpose should be justified by appropriate arguments and evidence.			X	See reply to comment 11 below.
2	1.8	Clarity is required on the use of either References 422 and/or 479 as these have different transfer factors although 479 is stated for environmental purposes only, its scientific data is much more robust than that in 422.			Note by the Secretariat: in Draft 8 paragraph is 1.7	X	Both Technical Reports (TRS 422 and TRS 479) are considered valid references. 422 refers to transfer to edible parts of biota (used to assess dose to humans). 479 refers to transfer to biota (used to assess dose to the biota)

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3	1.19	It would be useful if the section could include references to the need or otherwise for monitoring programmes when the assessed doses have been assessed as negligible.		X	The comment is noted. The need of monitoring for compliance (at least once before authorization for some installations with predicted negligible environmental impact but for reassurance) is discussed in DS442. Reference will be added in next draft. The Safety Guide on Environmental and Source Monitoring has started the process of review and the new version should address in more detail this issue.		
4	1.11	It is noted this guidance only applies to facilities nominated by the UK regulators. The affected facilities will be mainly nuclear licensed sites and other significant facilities. This approach is supported		X			

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5	1.15	"it is reasonable to assume that the highest activity concentrations could be detected in any direction within a radius of up to 10 km"	See comment 5.73 – any claim made to suggest that the assessment for protection of members of the public is sufficient for this purpose should be justified by appropriate arguments and evidence.		Note by the Secretariat: in Draft 8 paragraph is I.15 in Annex 15.	X	This Annex I is out of the guidance. Here we discuss an example on assessment of exposure to flora and fauna. Here is valid to justify the methodology with the assumptions like 'in the first 10 km' you may find the highest concentrations' This could be used by national authorities, or other justification could be required.
6	4.1	Delete "medicine departments	While smaller medical departments may be excluded, some of the larger oncology departments can discharge significant levels of radioactive waste into the environment and so should be within the framework.	X	In draft 8 text is: 4.1. The government or the regulatory body should identify in advance the types of facilities and activities for which a radiological environmental impact assessment is required or the criteria to decide, on a case-by-case basis, the need (or no-need) of such an assessment. In general, X-Ray generators, small laboratories, applications in medicine for diagnostic or industrial applications using sealed sources, and any other facilities or activities where radiation sources or generators are used, processed or stored in a form and at a scale that impact to the public and the environment is not expected during normal and accidental situations, should be excluded from the need of such an assessment.		

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7	4.13	It would aid clarify if a definition of 'significant effects' could be provided in this paragraph.		X	On Draft 8 paragraph is 4.16. Text modified ('significant effects' changed to 'radiation doses to the public')		
8	5.21	It would be useful if this paragraph also included references to the ingrowth of daughter radionuclides from the discharged parent e.g. Am from Pu		X	On Draft 8 paragraph is 5.24. It now mentions Am to Pu.		
9	5.23	We note that referenced documents have differing transfer factors which could lead to differences in the result of an assessment by two different parties		X	On Draft 8 paragraph is 5.25. The proper references will be corrected in next version (Ref 14 is not correct for this paragraph, because parameters in that reference are for full body of wildlife and not for edible parts of biota).		

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10	5.33	This section should be supplemented with information regarding the assessment of external dose rates etc. doses to the skin.				X	This safety guide is intended to provide a general framework for radiological assessment. The exposure pathways are discussed at the general level too. For dosimetric calculations (external and internal) proper references are indicated.

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11	5.73	<p>5.73. As set out in GSR Part 3 (see paras 4.1-4.5) there is a presumption that a radiological environmental impact assessment is required for most types of facility. However, some States may consider that the assessment of the protection to members of the public during the operation of facilities or the conduct of activities would be sufficient to demonstrate protection of the environment. This position is based on the assumption that the assessment and control of exposure of humans to radiation provides appropriate protection of the other elements in the environment. In that case the applicant must justify with appropriate evidence, to the regulatory body why it believes that a separate assessment is not necessary</p>	Para not in accordance with GSR part 3		<p>Note by Secretariat: in current Daft 8, paragraph is 5.75, which says: 5.75. States may consider that the assessment of the protection to members of the public during the normal operation of facilities or conduct of activities is sufficient to demonstrate protection of the environment as well. This position is based on the assumption that the assessment and control of the exposure to radiation of humans, leading to very low and localized increments of radiation levels in air, water, sediments and soils, provides appropriated protection of the environment. In these cases the radiological environmental impact assessment does not need to include explicit consideration of additional specific components of the environment.</p>	X	<p>According to the discussions during WASSC/RASSC/NUSSC meetings, and many comments received from MS, the general consensus is that the Requirements in the BSS only refers to exposures to representative person (humans), as a mechanism to define the level of protection for public and the environment. It was acknowledged in the introduction of BSS (not in a requirement) that some states may consider the need to assess exposures to flora and fauna. The decision was that DS427 will i) guide only on assessment of exposures to human and ii) acknowledge that some states may consider flora and fauna, and this is let to national authorities decision (and the way to do it or if any justification is needed is also a national decision). For that authorities who so decide, DS427 provide <u>an example</u> in <u>an Annex</u>.</p>

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12	Annex 1	From the layout and wording of the document it is uncertain whether Annex I should be present or not This is a reflection of the confused scope and function of the document noted at General comment				X	The comment is noted but it is to general.

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13	Annex 111	Should also include approaches for <u>normal operation</u> in the UK i.e. from discharges of effluents and disposals of solid wastes	<p>The environment agencies in the UK regulate public and environmental exposures from planned radioactive waste disposals/discharges. See sections 2.4 and 2.5 in link below:</p> <p>https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/296390/geho1202bklh-e-e.pdf</p> <p>Office for Nuclear Regulation regulates any other off-site public doses.</p>	X	<p>The inclusion of examples in and Annex II is being discussed (some proposals mention that the Annex is more for a TECDOC on applications, which is planned. This will be discussed during next meeting.</p> <p>If Annex II will remain, UK approaches will be included</p>		