TITLE DPP on DS 442 "Regulatory Control of Radioactive Discharges to the Environment".

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: Page.1 of 5 Country/Organization: Alvarez D, Curti A; Lee Gonzales H. Argentina/Nuclear Regulatory Authority Date: November 2014							
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1	2.22. "Para. 3.132 of the BSS [2] require registrants and licensees in applying, for and authorization for discharges…etc."	Delete	Wording. Redundant with previous paragraph 2.17	Yes			
2	5.5 This information should be sufficient to allow the regulatory body to form an opinion ~~on the acceptability of the practice~~ *about the suitability of the optimization criteria, including dose constraint compliance.*	5.5 This information should be sufficient to allow the regulatory body to form an opinion *about the suitability of the optimization criteria, including dose constraint compliance.*	The regulatory body has to have an opinion about the acceptability of the practice before the beginning of the construction.	Yes			
3	5.16 Page 18 *Figure 3: Steps to authorize radioactive discharge limit, indicating those responsible.*	The legend in the last part of the diagram should be ¿are models and assumption valid and doses below ~~optimized levels~~ constraints?	The optimized discharged should be traduced in optimized doses which in turn shall be below the dose constraint		To be considered		

4	5.23 Page 20 (c) Dose contributions from other authorized practices or from possible future authorized practices; ~~for example, account should be taken of doses from possible future sources and practices,~~ for example, in the case of a nuclear reactor, other nuclear reactors to be possible built on the same site.	5.23 Page 20 (c) Dose contributions from other authorized practices or from possible future authorized practices; for example, in the case of a nuclear reactor, other nuclear reactors to be possible built on the same site.	Wording (avoid redundancy)	Yes			
5	5.28. *When* there are several facilities on one site (e.g. in the case of multiple nuclear power plants) or along a river, each with its separate gaseous and liquid discharge outlets, the government or regulatory body should decide whether a dose constraint should be applied to the total dose to the most exposed representative or a (lower) dose constraint should be applied to any particular facility.	5.28. *When* there are several facilities on one site (e.g. in the case of multiple nuclear power plants in one site~~)~~ or along a river), each with its separate gaseous and liquid discharge outlets, the government or regulatory body should decide whether a dose constraint should be applied to the total dose to the most exposed representative and or a (lower) dose constraint should be applied to any particular facility during the design stage.	- Suggestion: Include the mention of "along a river" in the examples, because is just a particularly case among other possibilities, for instance a lake. - Include "and" ("and/or a (lower) dose constraint…."), because in same countries, including Argentina, both kind of dose constraints are applied together. - It is important to highlight the prospective use of constraint, associated to optimization <u>in the design stage</u> of the radioactive discharge system of a particular facility.		To be considered		

6	5.48 …… Nevertheless, the regulatory body should determine the type of installation that, despite the doses to the public due to releases during normal operation are very low, would require that an optimization process is conducted (for instance, for NPPs or similar installations).	5.48 …. Nevertheless, the regulatory body should determine the type of installation and/or conditions that, despite the doses to the public due to releases during normal operation are very low, would require that an optimization process is conducted (for instance, for NPPs or similar installations, where relevant values of collective doses and/or occupational exposures could be expected to occur).	To consider other than the public dose factors that could be relevant for the need of a formal optimization process.		To be considered		
7	5.57. In order to make and effective use of assessment resources, a structured iterative approach should be used for assessing doses to the representative person group.	5.57. In order to make and effective use of assessment resources, a structured iterative approach should be used for assessing doses to the representative person ~~group~~.	Delete “group”, because is appropriate refers to representative person, but not to representative person group.	Yes			
8	5.63. The estimated effective doses for the representative person should be based on the reference person model [17, 18]. However, the habits (e.g., consumption of foodstuffs, location,	5.63. The estimated effective doses for the representative person should be based on the reference person model [17, 18]. However, the habits (e.g., consumption of foodstuffs, ~~location~~, usage of local resources) adopted	Delete “location”, because the location of the (hypothetical) representative person or critical group is not a habit and to be consistent with 5.70, where location and lifestyle habits are separate.	Yes			

	usage of local resources) adopted to characterize the representative person should be typical habits or characteristics of a small number of individuals representative of those most highly exposed.	to characterize the representative person should be typical habits or characteristics of a small number of individuals representative of those most highly exposed.					
9	5.88. From the specific dose constraint a process of optimization as describe in Section CONSIDERATION OF OPTIMIZATION OF PROTECTION above should be applied by the applicant and reviewed by the regulatory body, in order to define the level of dose corresponding to a discharge level optimized from the protection of the public point of view. This level should be below or equal to the specific constraint, depending on the results of the	5.88. From the specific dose constraint a process of optimization as describe in Section CONSIDERATION OF OPTIMIZATION OF PROTECTION above should be applied by the applicant and reviewed by the regulatory body, in order to define the level of dose corresponding to a discharge level optimized from the protection of the public point of view. This level should be below or equal to the specific constraint~~, depending on the results of the optimization~~.	The optimized level of discharge should be below or equal to the specific constraint. If not the process of optimization should to be reviewed.	Yes			

	optimization.						
10	Page 52, A-18 For larger facilities that may discharge a variety of radionuclides, limits are generally imposed on groups of nuclides that share relevant characteristics, although limits may also be imposed on specific radionuclides that are deemed to be of special significance.	Page 52, A-18 For larger facilities that may discharge a variety of radionuclides, limits are generally imposed on groups of nuclides that share relevant characteristics, although limits may also be imposed on specific radionuclides that are deemed to be of special significance (for instance tritium in HWR reactors).	To reflect the relevance of tritium in term of doses, especially for HWR reactors discharges.	Yes			