DS442 Regulatory control of Radioactive Discharges to the Environment

COMMENTS BY REVIEWER Reviewer Country/Organization: Sweden, Swedish Radiation Safety Authority Date: October 31, 2014				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1	1.1	However, some facilities and activities may generate a variety of gaseous and liquid effluents during their normal operation, containing minor amounts of radioactive residues that, owing to the low activity concentrations and high volumes, would be technically difficult and or extremely costly to avoid. The optimization of radiation protection may lead to the conclusion that such releases are deemed to be justified from a radiological point of view considering the low doses and high costs involved	This para. refers to the optimization of radiation protection. We prefer that this is more clearly pointed out.	Yes			
2	1.5	"Accordingly" change to "According"	Editorial	Yes			
3	1.11	The scope of this Safety Guide is limited to discharges to the atmosphere of airborne effluents (gases and aerosols) or discharges to surface waters of liquid effluents from activities and facilities during normal operations in planned exposure situations[5].	Editorial	Yes			
4	2.2 & 2.5	Remove from one of the paras; the reference to [1] about the fundamental safety objective is to protect people and the environment from harmful effects of ionizing radiation	The text is almost the same	Yes			
5	2.6	...generally aims to provide for appropriate protection	Editorial	Yes			
6	2.8	Proposed new text. The system of justification, optimization and dose limitation is applied in accordance with the BSS.	It is not necessary to copy text from the BSS it is better just to make a reference.	Yes			
7	2.9-2.16 and	Consider to delete all para.	Just a reference to the BSS - unnecessary	Yes			

8	2.17-2.18	Delete para.	Just a reference to the BSS - unnecessary	Yes			
9	2.19-2.25	Delete para.	Just a reference to the BSS – unnecessary (and for 2.25 GSR Part 4.)	Yes			
10	3.1	Last sentence: … are described in the BSS	See comment 6	Yes			
11	3.4	remove "relevant"…dose limits for members... These dose limits represent the maximum dose to members of the public from all planned exposure situations. The discharge limits for a certain planned exposure situation should be set accordingly.	Partly editorial and partly a clarification.	Yes			
12	Figure 1	Conduct an authorization process	Editorial	Yes			
13	4.3	"representative person"	Para. Is a reference to BSS – if this para is not deleted "representative person" has to be explained.	Yes			
14	5.3	"simple facilities or activities, like hospitals…" Remove "hospitals"	Hospitals are not always to be seen as "simple" facilities and the authorization process are not always straight forward. Not to be compared will small laboratories.	Yes			
15	5.21	Delete the second sentence.	The concept of *representative person* is used to show compliance with the dose constraint or dose limit. It is a part of a methodology.	Yes			
16	5.23(d)	Delete (d)	The choice of dose constraint is based on the need for protection of members of the public not on the opinion of the applicant.	Yes			
17	5.24-5.25	Delete alternatively rewrite so it refers to the optimization below a set dose constraint.	Misleading. The para. seem to mix the optimization process which starts below the dose constraint, with the actual establishment of the dose constraint itself.	Yes	Will be revised		
18	5.26	Consider delete the two last to sentences.	See comment 13 on para5.21	Yes			
19	5.27	Remove the end of para. Starting with "., with optimization used to ensure doses…"	See comment 15 on 5.24-5.25	Yes			

20	5.28	Remove “ representative person”	See comment 13	Yes			
21	5.30	Replace “ representative person” with “ to members of the public”	See comment 13	Yes			
22	5.32	Replace “ representative person” with “ to members of the public”	See comment 13	Yes			
23	5.52	Proposed new text “ Collective dose is the average dose in a specific group of people multiplied with the number of people in that group”	The definition was not correct.		Will be considered		
24	5.59	Delate para. or delete “hospitals”	Using a generic assessment the doses to the public (e.g. sewage workers) as a result from discharges from hospitals may be high (20 mSv/year)	Yes	Hospitals will be deleted.		
25	5.92	Delate “hospitals”	See e.g. comment 24 on 5.59.	Yes			