USA Comments on IAEA Draft Safety Guide DS442:
"Regulatory Control of Radioactive Discharges to the Environment"

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Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/ rejection
1	General	We recommend the current draft version be enhanced in format, structure, and content as well as additional improvement through edit.	See our comments below regarding our suggested quality enhancement of the document.	Yes			
2	General	The document should address the concept of integration of environmental data (e.g.; location of environmental monitoring samples or monitoring wells, quantity of sampling, variability of temporal sampling, and data quality) with record of discharges to assess potential doses to a receptor and potential impact on the environment. This information gap can be addressed by adding a few Paras in the sub-section on "Characterization of Discharges and Exposure Scenarios."	Completeness: Characterization of discharges and subsequent impacts need to be linked environmental monitoring sampling and data, as well as assessment of quality and uncertainty of data used to assess dose or environmental risk. Such information could be crucial to establish adequate assessment of potential dose impact to a receptor, particularly after transport of radionuclides into environmental media.	Yes			
3	General	The document needs to provide more elaboration on establishing background data and associated uncertainties. Such	Completeness to discuss background uncertainties in order to evaluate effluent	Yes	The topic wil be discussed, However,		

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		information is necessary especially for NORM facilities as background uncertainty could be relatively large corresponding to the discharge regulatory dose limits; this is particularly important for cases involving emanation of radon and thorn.	discharges particularly those containing “U” and “Th” series.		detailed discussion on background data seems more appropriate in guidance for site evaluation and early preoperational stages. Close to authorizing releases (discharges), this data should be already available. NORM is a particular case.		

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4	General	The document lacks discussions about the physical/chemical properties of radioactive materials that can be discharged into environmental media. For example, the document should address solubility characteristics of discharges in order to avoid sequestering and subsequent concentration of discharged radionuclides. In this context, the guidance may propose that all discharges of radioactive materials need to be readily soluble. We also note that physical and chemical properties of discharges could impact dose calculations to the receptor.	Completeness: Physical/chemical properties of discharges radioactive materials need to be addressed.	Yes	The topic will be included, yet at a general level		
5	General	The document is unclear regarding the compliance point for discharges. We assume the compliance point is at the pint of effluent releases at the boundary of the facility or the site. However, it is unclear how to derive radionuclide concentrations corresponding to the proposed range of 10µSv -1mSv for the discharges into the sewerage particularly for R&D laboratories.	The document needs to clarify the compliance point for the authorized facility and for the specific activity.	Yes			

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6	1.4	Define "discharge" and "release" The US NRC defines effluent "releases" and "discharges" differently than proposed in the IAEA DS 442 document. The reason for the precise definitions is due to the fact that NRC and USA licensees have had experiences with unplanned leaks and spills to ground water. In most cases, the unplanned leak or spill is classified as an "abnormal release" that is "released" from the plant to ground surfaces and ground water underneath the nuclear plants, but has not departed from the site boundary. Since some of the effluent may be contained onsite for a period of time, the length of time for a "discharge" from the site may take several months or years to leave the site boundary. In some cases, the leak or spill can be remediated by extraction from ground surfaces, and then properly monitored, processed, and discharged as a normal radioactive effluent. By regulation, licensees must report abnormal "releases" from the plant, and also report effluent "discharges" from the site	Harmony and Clarity in definition of "discharge" and "release."	Yes			

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7	2.7	Insert footnote on representative person The concept of a "representative person" is introduced without clarification. A cross reference to reference [6] and [16] should be noted as delineated in Section 5.68. Note: Later in the document, on page 8, section 2.17(c) there is a footnote to explain the representative person. Also, the representative person is later described in Section 5.62. At this point, the reader wonders "what are the characteristics of a representative person?" Is this a maximally exposed representative person, an average representative person, what are the age and gender considerations, etc.	Clarity	Yes	More guidance will be considered. However, the definition of representative person could be different accordingly to the characteristics of the installation, the environmental situation and the national approaches.		
8	3.4(b)	ICRP statement on dose to lens of the eye should be reviewed and considered.	The ICRP has recently issued a statement on dose to the lens of the eye recommending a reduction for occupational exposure from 150 mSv to 20 mSv. Assuming the IAEA adopts the ICRP recommendations, the corresponding dose to the lens of the eye for public		To be considered		

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			exposure may need to be reduced to 2 mSv (instead of 15 mSv).				
9	Figure 1 4.5	Figure 1	Notification process appears to fall between authorization and exemption, and is an unauthorized activity that relies on the discharging entity to notify the regulatory body. It is not clear how notification fits into Figure 1.		To be considered		
10	5.4 Figure 2	Delete "pre-decommissioning" and replace with "Decommissioning".	These limits will apply during the decommissioning stage as well as pre-decommissioning stage.	Yes			
11	. Para 5.7	We question the approach presented for reviewing the discharge authorization as only part of the periodic safety assessment (PSA). An alternative language should be used such that discharges exceeding regulatory limits should be reported to the regulatory authorities and should be noted during inspections and periodic safety review. We note that actions can be undertaken	Clarity	Yes	This will be mentioned here. Exceeding limits can be discussed in more details in the section on Compliance.		

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		by the operator to address occasional exceedance over operating limits (e.g.; limits usually below allowed regulatory discharge limits).					
12	5.10, line 3	Remove the statement *"e.g.; the releases to the environment after decommissioning are effectively zero."* It is well known that there will be certain releases to environmental media from residual radioactivity after decommissioning; however such releases should have been assessed to be lower than the decommissioning site release criteria.	Accuracy and correctness	Yes	We consider that residual releases after decommissioning could exist, but (controlled) discharges probably not. But there could be particular situations. This will be more discussed.		
13	5.6 Figure 3	Figure 3: add blocks or text in Figure 3 as described below: (a) "characterize background or current radiological status," (b) assess potential transport of discharges to a receptor location," (c) assess uncertainties, and (d) compare with existing regulatory discharge limits.	Completeness: The proposed steps to authorize discharges are crucial for regulatory decision-making.	No			We will add in the text what is the important background information but not giving a procedure.

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							The procedure is to set discharge limits, not to perform the assessment.
14	5.22	Dose constraints should be on a shorter time frame to allow time for corrective actions without exceeding the constraint on annual basis.	A dose constraint should be established on a relatively short time frame (such as a month or a quarter time period) such that relatively excessive releases can be identified and corrected before annual constraints or limits are exceeded	No			Short term operational limits should be used and will be explained. But we will not call these 'constraint' to avoid confusion with 'dose constraint'.
15	Para 5.49	Might it be useful to make reference in this Para to stakeholder viewpoints as part of multi-criteria methods?	Consideration of stakeholders' inputs.		To be considered		
16	Para 5.29	The para states "Based on the experience in States this range for the dose constraint for nuclear fuel cycle facilities	Please provide clarification and verification of the dose limits range.	Yes	This range will be discussed at next		

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		(including reactors) could be of annual doses of between 100 and 800 µSv. " Such range of dose limits needs to be clarified and verified.			WASSC/RASSC meetings.		
17	Para 5.53	Consistent with ICRP 103, the paragraph should contain a statement that collective dose is not to be used to attribute specific collective risk or detriment to a population. Its use is only for purposes of comparing options in the optimization process.	Clarity and completeness	Yes			
18	Para 5.75 & 5.92	The fifth sentence says that simple installations like hospitals… Not all hospitals may be simple, particularly if they are broad scope in nature and have R& D facilities. Suggest adding "some" in front of hospitals to avoid perception that all hospitals fall in this category.	Accuracy	Yes			
19	Para 5.71c	Replace "plant" with "facility"	Broaden application of guide to multiple and diversified users.	Yes			
20	5.22	Dose constraints should be on a shorter time frame to allow time for corrective	A dose constraint should be established on a relatively	No			See Resolution to

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		actions without exceeding the constraint on annual basis.	short time frame (such as a month or a quarter time period) such that relatively excessive releases can be identified and corrected before annual constraints or limits are exceeded				Comment No 14.
21	5.37	"Pre-operational studies should also be carried out to determine the existing levels of radiation …"	Editorial – added "of" between "existing levels" and "radiation"	Yes			
22	5.48	"…(for instance, for nuclear power plants or similar installations)."	Editorial – replaced "NPPs" with "nuclear power plants" for consistency with rest of document	Yes			
23	5.52	Truncate the collective dose at small doses in accordance with ICRP recommendations.	The concept of collective dose should include calculational methods that make use of truncation of very small doses.	Yes			
24	5.77	Establish design criteria and numerical guides.	Section 5.77 may be improved by establishing design criteria and numerical guides. During the initial licensing phase/period, the licensee should provide a	Yes	Clarification will be added. It is mentioned that during the initial licensing phases there are		

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			safety analysis of its planned operations, maintenance activities, and abnormal operations. The regulatory authority should establish design criteria that include numerical guides on effluent discharges for use in the licensee's design and construction period. The regulatory authority should review the safety analysis and approve discharge limits that are reasonable under the circumstances, allowing the licensee to operate within the established ALARA design criteria. The regulatory authority should begin to take regulatory action when the licensee exceeds the discharge limits.		discussions on effluent releases (and the associated radiological impact) but we want to make a clear distinction between this desing/construction phases discussions and the regulatory act to establish a discharge limit. Of course there is a relation, but it's not the same thing and even the numbers can be different.		
25	5.77(g)	Delete the "period of validity" concept.	Section 5.77(g) Period of validity should be eliminated and replaced with the period	Yes			

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			of the operating license for the facility.				
26	5.78	Consider both normal operating events and abnormal operating events.	Section 5.78 states that the "discharge limits should include a margin for flexibility anticipated under normal operating events." Suggest that the sentence state that the margin of flexibility should include both anticipated normal and "abnormal" operating events.	Yes	The IAEA terminology will be used (e.g. ,anticipated operational occurrences)		
	5.78	Nuclear power plants normally have decreased effluents during maintenance activities.	Section 5.78 Note: In most cases, nuclear power plants effluent discharges "decrease" during maintenance, and therefore, the example given should be changed to "for example, an increase in the throughput of patients in a nuclear medicine department or an increase in atmospheric discharges from a nuclear power plant during		Text will be expanded. It could be the case that during maintenance or refueling the rate of releases increases temporarily in a NPP.		

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			~~maintenance~~ (delete the word "maintenance" and insert "abnormal operations such as fuel failure.""				
27	5.80	Include C-14	Section 5.80 should include reporting and dose assessment for carbon-14. The use of scaling factors should be recommended for radionuclides that cannot be promptly analyzed at nuclear facilities (e.g., difficult-to-detect radionuclides such as Ni-63, Fe-55, Sr-90) and transuranic radionuclides. The licensee should be required to perform and periodically update scaling factors.	Yes	Will be expanded, but still keeping general.		
28	5.81	Use of "effective" measurement values instead of most limiting radionuclide	Section 5.81 should provide for licensees to use an effective gross measurement value (instead of the most	Yes	Will be clarified		

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			limiting) if the licensee has determined the relative mix of the alpha and / or beta radionuclides and established an effective gross value.				
29	5.93	Clarify intent as to “effluent” monitoring or “environmental” monitoring	Section 5.93 – “The requirements for monitoring should be specified in the discharge authorization by the regulatory body.” The sentence should specify the type of monitoring required; i.e., effluent discharge monitoring or environmental monitoring.	Yes	Source (e.g effluent) and environmental monitoring will be added.		
30	5.98	Include meteorological monitoring.	Section 5.98 should include meteorological monitoring for licensees that discharge significant quantities of radioactive effluents. The use of average meteorological conditions (rather than real-time	Yes	Will be considered		

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			measurements) should be authorized whenever the effluent discharges are within permitted effluent discharge limits.				
31	5.99	Provide a cross reference to IAEA standard for environmental monitoring.	Section 5.99 should refer to the IAEA safety standard for environmental monitoring.	Yes			
32	5.101	Require additional monitoring only when abnormal discharges exceeding effluent discharge limits	Section 5.101 should only require independent monitoring when licensees have abnormal discharges that routinely exceed effluent discharge limits. Operational experience in the USA has shown that independent monitoring is not a beneficial or cost effective practice unless licensees are routinely exceeding effluent discharge limits.	No			Despite graded approach should be applied (and some practices would not need periodic independent monitoring), independent monitoring should be done always for certain

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							types of installations. An independent monitoring can be much more limited than the monitoring program by the operator and is only for verification of the operators program (ej. A few radionuclides , a few/one location, a few times/once per year).
33	5.87	"This could also considering uncertainty."	Editorial – sentence fragment				

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34	5.95	"Firstly monitoring of the source, which implies measuring activity concentration or dose rates at the discharge point or within the activity and facility and, secondly, monitoring of the environment, which involves the measurement of radionuclide concentrations in environmental media (including foodstuffs and drinking water) and dose/dose rates due to sources in the environment."	Editorial – sentence fragment	Yes			
35	6.1	There is a missing word "be."	Section 6.1 The word "be" is missing. The sentence should read "…the discharges should "be" controlled"	Yes			
36	6.2	Incomplete first sentence	Section 6.2 The first sentence is incomplete. "In principle, the procedures for the control of discharges from NORM facilities are the same as those for practices ????."	Yes			
37	7.1	Effluent monitoring during	Section 7.1 The conduct of a	No			Decommissi

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		decommissioning should not be a different process than during operations.	decommissioning "project" is a post-operational situation that should not be considered a different practice subject to authorization requiring specific regulatory provisions.				oning activities can overlap operation. But at some point it could be a totally different practice (with new operator, new operational conditions, new license, new discharge limits)
38	7.4	Clarify the two main options.	Section 7.4 "Whichever of the two main options is chosen." What are the two options (prompt dismantling or delayed dismantling?)	Yes			
	7.4(f)	Reduce the frequency of inspections during decommissioning.	Section 7.4(f) The need for regulatory inspections of	No			Decommissi oning

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			effluent discharges during decommissioning is normally a reduced frequency instead of an increased frequency.				activities could lead to higher releases in short periods.
39	Section 7.5	Increased regulatory control of effluent monitoring is not necessary during decommissioning	Section 7.5 states that "Because unexpected difficulty may arise during each step (of decommissioning), regulatory control of the discharges should follow each step. This is an unnecessary increased regulatory control, since normally effluent discharges during decommissioning are lower than during operational periods.	No			See previous Resolution
40	Section 8.5	This is too broad a recommendation, delete the "in all cases"	Section 8.5 states that "In all cases, the operator should be required to demonstrate that the dose to the representative person is below the effective dose limit of 1 mSv in a year." While all effluent	Yes			

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			discharges should be strictly limited to less than 1 mSv in a year, this statement is too broad, and would require "all" facilities to demonstrate compliance, even for those licensed facilities with extremely low or no effluent discharges.				
41	A-16	Make an explicit statement that limits should be in terms of "dose" and not of "risk".	A-16 A statement should be added that effluent discharge limits should be expressed in terms of a quantity that can be readily measured, such as activity or dose, and should not be expressed in terms of cancer morbidity or cancer mortality.	Yes	Despite dose (to public) is not measured. In the case of using dose (a practice in some countries) this dose is estimated with models.		
42	A-18	Include C-14	A-18 The recommendation should include carbon-14.	Yes			
43	A-23	Establish a one year limit for effluent discharges with a requirement for	Section A-23 should include a recommendation that	Yes	Will be expanded		

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		licensees to cumulate dose on a monthly or quarterly basis and project annual doses such as to meet the annual discharge limit.	licensees perform "cumulative" dose assessments on a time period shorter than an annual period; e.g., on a monthly or quarterly basis.				
44	A-24	Only require the use of real-time meteorology when effluent discharges exceed normal operational levels.	A-24 The use of real-time meteorology should only be required for effluent discharges that exceed normal operational levels and exceed acceptable levels established by the regulatory authority.	Yes	Something on meteorological measurements will be added.		
45	A-25	Require increased licensee action (instead of increased regulatory action) when limits are temporarily exceeded.	A-25 states that "Based on the optimized discharge levels or operational experience the regulatory body will set authorized discharge limits. Exceeding limits will normally initiate regulatory action." This second sentence should be	Yes	It will be clarifies. However a regulatory action means, for example: to require an investigation and corrective		

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			revised as follows: "Exceeding limits will normally initiate a required licensee action to take corrective actions and possibly include regulatory action based on a review of the licensee's Special Report to the regulatory agency."		actions if necessary, to impose sanctions if appropriate, etc. It is related to enforcement.		
46	A-26	Delete the term "head-room".	A-26 The use of the term "head room" should be discontinued, since the term is not an internationally common terminology.	Yes			
47	A-28	The time period for the authorization of effluent discharges should be the same as the time period of the license.	A-28 The "period of validity" of the discharge limits should be the same as the license duration, and should not be a short term period that requires review and renewal when the licensees are routinely meeting authorized effluent discharge limits.	Yes	But subject to periodical review and, if justified, the discharge limits may be changed.		

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48	A-30	Change in “most” cases to in “some” cases.	A-30. The sentence should say “In most cases…” instead of “In some cases…” Also, the period of the effluent discharge limits should coincide with the period of the “facility license” so that the discharge limits are also applicable during decommissioning.	No			See previous comments on time validity of discharge limits and discharge limits during decommissio ning.