

TITLE : DS452 Decommissioning of Nuclear Installations safety guide

| COMMENTS BY REVIEWER | | | | RESOLUTION | | | |
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| Country/Organization: FRANCE | | | Date: 2015-10-2 | | | | |
| Pages | | | | | | | |
| Comment No. | Para/Line No. | Proposed new text | Reason | Accepted | Accepted, but modified as follows | Rejected | Reason for modification/rejection |
| 1 | 1.6 | 1.6. Decommissioning of facilities is usually conducted as a project. A decommissioning project is a collaborative initiative, involving supporting analyses and studies, which is carefully planned to ensure safety of planned actions, and to achieve partial or complete removal of regulatory controls from a facility. A decommissioning project usually starts when preparation of the final decommissioning plan is initiated or, in some cases, when a decommissioning licence is granted. | End of the sentence should be deleted “when a ... “ Decommissioning actions cannot start if the decommissioning license has not been granted. A decommissioning project generally starts when a project manager is named, very often before the license is granted by the regulatory body. This situation is not linked to the availability of funds but may be linked to the need to perform cost estimates. | | | X | Decommissioning project is financed from the decommissioning fund. In some Member States the decommissioning funds can be used only once the license is granted. |
| 2 | 2.17 | The licensee should adequately control the work of any subcontractors involved in development of the safety assessment. The results of the safety assessment or part of the safety assessment, which may be developed by subcontractors, based on their relevant knowledge and experience in specific decommissioning techniques, should be reviewed, approved or accepted and implemented by the licensee, in accordance with the integrated management system. The results should also be reviewed and approved by the regulatory body, in accordance with the requirements of the national regulatory framework. to ensure overall safety during decommissioning. | The previous version should be kept to ensure that the regulatory review is done considering not only national requirements but also good practice to ensure safety during decommissioning. It seems obvious that the review should be performed in accordance with national requirements. | X | | | |

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| 3 | 5.24 | When selecting a decommissioning strategy where more than one facility is located on a site, it may be beneficial to define an overall site decommissioning strategy. This might include placing the facilities already permanently shut down into a safe enclosure status until the remaining facilities are permanently shut down. This may include managing priorities between facilities already permanently shutdown or to be permanently shutdown soon. Then the decommissioning of all facilities could be performed in a single campaign, avoiding any negative impact to the operating facilities and allowing better utilization of personnel. | Safe enclosure is not the better alternative. Managing priorities may be necessary to define an optimal order to perform decommissioning actions. | | X | | Alternative wording proposed. |
| 4 | 5.25 | There may be a request for the reuse of the part of the site or the entire site, or for reuse of existing building structures after completion of decommissioning. The timeframe for such a reuse of the site, either restricted or unrestricted, is an important consideration for the selection of a decommissioning strategy. If the site is needed for siting and construction of new facilities in the near future, such a request will lead to a preference for selection of the immediate dismantling strategy may influence the choice of the dismantling strategy to reduce as much as possible the decommissioning planning and to start decommissioning actions as soon as possible after permanent shutdown. | Such a request (reuse) should not determinate the choice of the preferred decommissioning strategy. Moreover, in practice, the licensee often thinks to reuse but finally destroys the building structures Proposed new text. A modification of the paragraph is proposed to explain that such situation may accelerate the decommissioning planning.. | | X | | Unclear what is the meaning of “dismantling strategy” (not used in the Standards) and “to reduce as much as possible the decommissioning planning”. That is why we propose an alternative wording. But still, it is our understanding that in such case we speak about an immediate dismantling. |

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| 5 | 5.42 | If on-site or external waste processing and storage facilities are available, then either immediate dismantling or deferred dismantling is a viable decommissioning strategy. If the waste management infrastructure is available, including waste disposal capacities, then immediate dismantling would be the preferred strategy. In the absence of facilities and infrastructure for processing of radioactive waste, or when the storage or disposal capacities are not available, the preferred decommissioning strategy is likely to be deferred dismantling may include a waiting period until waste management infrastructures are available. | The absence of facilities and infrastructure for processing radioactive waste etc. should not be the only argument that determines the decommissioning strategy. | X | | | |
| 6 | 7.29 | When preparing the final decommissioning plans , experiences from ongoing or completed decommissioning projects of similar facilities should be utilized. | Experience feedback should be considered at any time of the development of decommissioning plans, not only for the final one. | X | | | |
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