

## DS452 Decommissioning of Nuclear Power Plants, Research Reactors and Other Nuclear Fuel Cycle Facilities

COMMENTS BY REVIEWER					RESOLUTION			
Reviewer: Page 1 of 2 Country/Organization: Japan, Nuclear Regulation Authority (NRA) Date: 2015-10-09								
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection	
1	General	Consolidation with DS403 should be considered for next time revision. There are so many similar paras. in DS452 and DS403. Any aspects that depend on specific facilities may be described in appendices if necessary.	Comment only.	X			No action required in this step. WASSC to discuss and decide.	
2	1.11/2 (p.3)	...the associated <del>safety environmental</del> and <del>environmental safety</del> aspects...	The sequence “safety and environmental” is more appropriate.	X				
3	2.8/9 (p.8)	Specific provisions required by the regulatory body based on the environmental impact assessment should be <del>overseen monitored</del> to ensure implementation by the licensee, depending on the end state described in the final decommissioning plan.	DS452 refers to regulatory oversight, hence the term “oversee” is appropriate to keep consistency.	X				
4	2.15/3 (p.11)	Clarify “summary safety assessment”. Is it summary of the safety assessment for each phase and stage?	Clarification.	X				
5	3.4/6-7 (p.12)	Replace “The regulatory bodies responsible for decommissioning should identify and resolve any gaps or overlaps of authority and responsibilities” with “The legislation should establish clear lines of authority and responsibility, so as to avoid gaps or overlaps”.	There needs to keep consistency with para. 3.4 in DS403.	X				
6	After 3.7 (p.13)	Add a new paragraph same as DS403 to after para.3.7. 3.8.The regulatory body is also responsible for establishing: ●requirements relating to the criteria for safety, protection of workers and the public and protection of the environment during decommissioning of facilities; ●requirements for conducting radiological surveys for determining levels of contamination at the facility. ●criteria for clearance of material from regulatory control in accordance with national policy; ●radiological criteria for the removal of buildings and sites from regulatory control, and to ensure that adequate systems are in place for managing properly the removal of controls and the release criteria (unrestricted release and restricted release), especially when facilities/sites are released with restrictions on their future use;	The contents of para. 3.8 in DS403 are considered to be common with any facilities. In the finalization processes of DS403 and DS452, common aspects and facility specific aspects should be reexamined.			X	This is repetition (rephrase) of the requirement 3.3 from the GSR Part 6. Should also be removed from the DS403.	
7	2.6/	Such issues are not addressed in this Safety Guide, as they are <del>well</del> addressed in other IAEA Safety Standards [3, 18, <del>27</del> ].	GSR Part7 is not a relevant document on remedial actions.		X		We consider the GSR Part 7 is relevant to the part “or to prevent	

							further spread of radioactive substances, for instance contaminated water”.
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8	5.6 (p.26)	Move this para. to appropriate location in Section 7 or 8.	As described in this para., this is independent with selection of strategies.			X	Your point is correct, but we consider it is important to emphasize in this section on strategy that decommissioning should start as soon as possible after the permanent shutdown, for both immediate and deferred dismantling strategy.
9	5.6/7 (p.26)	(such as removal of operational waste, removal of spent fuel, <b>refurbishment</b> <del>disposition</del> of <del>excess</del> equipment)	More appropriate examples.		X		Please see revised text, which also accommodates comment from the ENISS.
10	5.40/2 (p.83)	An example might be the change in <b>environmental conditions such as the increasing of</b> population distribution surrounding the facility <b>making deferred dismantling unfeasible.</b> <del>such that an analysis involving an accident during the transportation of decommissioning waste would have to be reconsidered.</del>	The example in the previous version of DS452 is appropriate because Section 5 discusses the selection of decommissioning strategy hence this paragraph should mention consequence of the environmental conditions for the selection of decommissioning strategy.	X			
11	6.9/6 (p.36)	The occurrence of <b>incidents leading to spillage or inadvertent release of radioactive material, a spill, leaks</b> or accident	Clarification.	X			
12	7.14(a) Last bullet (p.43)	Waste storage <b>and/or</b> disposal locations.	In some cases, both waste storage and disposal location are necessary for decommissioning projects.	X			

13	9.17/3 (p.64)	<p>Replace “On-site disposal of decommissioning waste is not a recommended practice, and is not addressed in this Safety Guide” with “There are no explicit descriptions regarding on-site disposal neither in this Safety Guide nor other relevant Safety Guides. However on-site disposal would be an option to dispose decommissioning waste if it meets safety requirements [14]”.</p> <p>Or</p> <p><del>On-site disposal of decommissioning waste is not a recommended practice, and is not addressed in this Safety Guide.</del></p>	<p>If this option meets safety requirements (SSR-5), there is no reason to exclude it. Bear in mind that this option will be considered to incorporate in revision of SSG-29.</p> <p>This issue would not need to necessarily be mentioned in DS452.</p>		X		<p>The IAEA position is that on site disposal is not a recommended practice for decommissioning of facilities after normal operation, as it would lead to creation of tens or hundreds of disposal facilities in a country. It may be considered as an option in case of a decommissioning after an accident. Clarification is provided in the revised text.</p>
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