

DPP DS526 “National Policies and Strategies for the Safety of Radioactive Waste and Spent Fuel Management, Decommissioning and Remediation”
(Draft dated 24 June 2020)
Status: STEP 4

| COMMENTS BY REVIEWER | | | | | RESOLUTION | | | |
|--|-------------|--|--|---|------------------------------|-----------------------------------|----------|-----------------------------------|
| Reviewer: Federal Ministry for the Environment, Nature Conservation and Nuclear Safety (BMU) (with comments of GRS) Country/Organization: Germany | | | | | Pages: 2 Date: 30.10.2020 | | | |
| Relevanz | Comment No. | Para/Line No. | Proposed new text | Reason | Accepted | Accepted, but modified as follows | Rejected | Reason for modification/rejection |
| 1 | 1. | Chap. 7, page 8, tentative structure, 3.2 New issue | <ul style="list-style-type: none"> • <u>Waste management routes for all waste streams</u> | We suggest to add this new issue. The national policies should contain the intended final destinations for the different waste streams. In this context the existing facilities and activities generating radioactive waste in the respective country should be considered. | Y | | | |
| 1 | 2. | Chap. 7, page 8, tentative structure, 3.2 New issue | <ul style="list-style-type: none"> • <u>Assessing, siting, and developing the range and types of waste management facilities required</u> | This aspect together with existing waste management facilities and other infrastructure is rather connected to the implementation of the national policy. We suggest to add an additional bullet point. | Y | | | |

Relevanz: 1 – Essentials 2 – Clarification 3 – Wording/Editorial

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| 1 | 3. | Chap. 7, page 9, tentative structure, 4.1 New issue | <ul style="list-style-type: none"> • <u>Identify and take into account interdependencies</u> | Interdependencies occur at different levels in the waste management and are also of importance in the development of national strategies and programmes. If e.g. there is no end solution for a waste stream yet, it will be necessary to develop an intermediate and long-term strategy for the waste management. | Y | | | |

Relevanz: 1 – Essentials 2 – Clarification 3 – Wording/Editorial

DPP DS526 “National Policies and Strategies for the Safety of Radioactive Waste and Spent Fuel Management, Decommissioning and Remediation”

Note: Blue parts are those to be added in the text. ~~Red parts~~ are those to be deleted in the text.

| COMMENTS BY REVIEWER | | | | RESOLUTION | | | |
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| Reviewer: AC RIGAIL (French Nuclear Safety Authority) | | Page 1 of 3 | | | | | |
| Country/Organization: France | | Date: 2020-11-06 | | | | | |
| Comment No. | Para/Line No. | Proposed new text | Reason | Accepted | Accepted, but modified as follows | Rejected | Reason for modification/rejection |
| 1 | General and §2 | Consider adding a paragraph stating that <u>the 4 four themes: waste, spent fuel, decommissioning and remediation may be treated either in one unified or in several specific national policies and strategies, provided those specific approaches are coordinated and consistent with each other.</u> | Depending on the State, the scope of the national policies and strategies may be more or less comprehensive. For example, decommissioning strategies or strategies for spent fuel management could be defined by operators whereas waste management and remediation would be the State’s responsibility. | A | | | |
| 2 | Title | National Policies and Strategies for the Safety of Radioactive <u>Substances</u> Waste and Spent Fuel Management, Decommissioning and Remediation | Management of radioactive materials, such as uranium (naturel, depleted, enriched and reprocessed), plutonium and thorium, also raises questions about safety. Hence, the French National Plan for the Management of Radioactive Materials and Waste (PNGMDR) also recommends actions about these materials. | | | R | This proposal would broaden the scope of the Safety Guide too far and would, for example, take it beyond the remit of the WASSC. The need for the guide was identified by the WASSC as summarized in the DPP. |

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| 3 | §4 | [...] for the safe management of all types of radioactive substances waste³- and radioactive residues (such as residues containing naturally occurring radioactive material, NORM) [...] | Precisions about the inventory of radioactive waste would be better placed in §5 which describes the scope of the guide. | | | R | See response to comment 2. |
| 5 | §5 | All steps in the management of radioactive waste and residues substances, including waste generation, waste minimization, clearance, predisposal management of radioactive waste and disposal of radioactive waste. | Residues are often considered as waste. Substance is wider and encompasses nuclear materials. | | | R | See response to comment 2. |
| 7 | §6 | The Safety Guide will interface with the following draft Safety Standards being in an advanced stage of development: <ul style="list-style-type: none"> • DS459 Management of Residues Containing Naturally Occurring Material from Uranium Production and Other Activities (Revision of Safety Guide WS-G-1.2) • DS468 Remediation Process for Areas Affected by Past Activities and Accidents (Revision of Safety Guide WS-G-3.1) • DS489 Storage of Spent Nuclear Fuel (Revision of Safety Guide SSG-15 by amendment) • DS499 • DS500 | DS499 and DS500 explain the concepts of exemption of clearance which, if they are authorized, are to be considered when it comes to establish national waste management policies. | A | | | |

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| COMMENTS BY REVIEWER | | | | RESOLUTION | | | |
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| Reviewer: National Nuclear Fund of Slovak Republic Page..1.. of....2 Country/Organization: | | | | Date:14 October 2020 | | | |
| Comment No. | Para/Line No. | Proposed new text | Reason | Accepted | Accepted, but modified as follows | Rejected | Reason for modification/rejection |
| 1 | General | Instead bullet point mark use the numbered or alphabetic bullets/items in the structured text | for better addressing the of feedback or response | A | We have added numbers for bullet points where this is appropriate. At this stage the details of the structure for the Safety Guide are tentative and will be decided during the development of the Safety Guide itself - for this reason, we have not given numbers to the bullet points in the draft contents list. | | |
| 2 | General | We propose use term stakeholders instead of interested parties | Term interested parties has specific meaning and definition in EIA regulation | | | R | The safety standards use the term ‘interested parties’ in preference to ‘stakeholders’ – this normal practice and is discussed in the Safety Glossary. |

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| 3 | 5, bullet 1 | <ul style="list-style-type: none"> National policies and strategies for safe management of radioactive waste and spent fuel and residues, including NORM residues, arising from activities and facility operations, emergency, decommissioning and remediation. | Next paragraph refers to : “as a result of a nuclear or radiological emergency” but there is no clear relation to previous bullets . | A | | | |
| 4 | 5, page 4 | Referring to the formulation “The Safety Guide will not address fuel cycle policy”, there must be a reference, where the entire cycle policy (including the back end) is included. | Need of complexity – back end of fuel cycle policy should be reflected in National RAW and SNF policy and strategy | A | On this point the Safety Guide as proposed is consistent with the scope of the Joint Convention and the remit of the WASSC (and the terminology used in the IAEA Safety Glossary) - the Safety Guide will not address reprocessing of fuel, but it will address what you describe as the ‘back end of the fuel cycle’. We have clarified the text. | | |

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| 5 | 7, page 7, line 2 | Add “and dissemination”, add “Establishment of key performance indicators” : <ul style="list-style-type: none"> Monitoring of the national programme <u>and establishment of key performance indicators</u> for the implementation..... | Advices for permanent/periodical evaluation by means of set indicators for progress are necessary | A | | | |
| 6 | 7, page 7, structure, item 3.1 7, page 8, item 3.2 | Add “Principles”: 3.1 Principles, objectives, approaches The items of the 4-th bullet to the last bullet should be better as a part of the Strategy – remove to 4.1 | Need for compatibility (e.g. with Joint Convention...) Interface between Policy and Strategy-to avoid the overlapping and duplicity | A | | R | These items may be seen at a higher level than only strategy, but in any case, at this stage the details of the structure of the Safety Guide are tentative and will be decided during the development of the Safety Guide itself. |
| 7 | 7, page 8, 3.2, | Reflect development of national policy regarding SNF | New bullet point: Relevant ideas on back end of SNF should be mentioned here, as not every county consider SNF as waste | A | In the IAEA Waste Classification radioactive waste includes spent fuel that has been declared waste. See also the response to comment number | | |

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| | | | | | 2 - the 'back end of the fuel cycle' will certainly be covered. | | |
| 8 | 7, page 9, item 4.2 | Add a new item: "Sub-objectives and Key Performance Indicators" | Well defined sub-objectives and KPI are key elements for monitoring of progress | A | | | |