

**TITLE DPP Regulatory Control of the Releases of Radioactive Material from  
Facilities and Activities**

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: Currti Adriana Country/Organization: Argentina/Autoridad Regulatoria Nuclear Date: June 2010							
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
	<b>General Comment 1</b>	<p>We address the revision of the Safety Guide WS-G-2.3 considering the important documents on Radiation Protection developed after the publication of this Safety Guide.</p> <p>We have no comments on the proposed structure and content of the new Safety Guide, and we mainly address the valuable input of different experiences of Member States, included in the IAEA-TECDOC-1638 "Setting Authorized Limits for Radioactive Discharges: Practical Issues to Consider".</p> <p>We consider that it will help countries to apply public radiation protection criteria and will give additional guidance on practical aspects of setting authorized limits for radioactive releases, mainly in this period of resurgence of the nuclear electric energy production.</p>					

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DPP DS42, Regulatory Control of the Releases of Radioactive Material from Facilities and Activities

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: Steven Sholly Country/Organization: Austria		Page 1 of 1 Date: 7 June 2010					
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1	General	<p>This Draft Standard would provide guidance on how to implement the new BSS. However, it has to be noted that the version of the BSS has just received Member State comments, and there is no certainty regarding the content of the final version of the BSS. This, it is considered to be premature to proceed with this DPP. Assuming that the Member State comments on the BSS can be rapidly turned around (which remains to be seen), the earliest NUSSC might expect to see it is in the 30<sup>th</sup> meeting (end of November 2010). Final publication approval from the Board of Governors can hardly be expected before the end of 2011. Only then could one adequately scope DPP DS422. Yet the schedule in DPP DS442 has NUSSC receiving the actual draft of DS442 for approval to go out for Member State comments in the 4<sup>th</sup> quarter of 2011 – at about the same time the BSS is finally approved. Working on this safety guide before the BSS is final is speculative, and will lead to a waste of scarce Secretariat and NUSSC member resources, and could lead to considerable confusion. I recommend that the DPP be revised after the BSS is approved by the Board of Governors, and only then presented to NUSSC (and the other committees) for approval.</p>					

**Title: DS 442 DPP- Regulatory Control of the Release of Radioactive Material from Facilities and Activities**

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: Anwar Habib		Page..1.. of...1.					
Country/Organization: Pakistan /PNRA		Date:31-05-2010					
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/r ejection
1.	<b>Annex-I</b> Section 3.1	<p>Comment</p> <p><b>2<sup>nd</sup> bullet</b></p> <ul style="list-style-type: none"> <li>• <del>Responsibilities of Relevant Parties</del></li> </ul> <p><b>May be deleted from section 3.1</b></p>	<p>“Responsibilities of relevant parties” has been discussed separately in section 3.2, so it may not be included in section 3.1.</p>				

**USA Comments on DS 442 DPP “Regulatory Control of the Releases of Radioactive Material from Facilities and Activities”**

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: USA/US NRC (Contact: Boby Abu-Eid)							
Page..1. of.2.							
Country/Organization: USA/NRC				Date: 05/17/2010			
Comment No.	Para/Line No.	Comments/Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1	General	Consideration of post-operational releases.	The scope of the DPP seems to focus on facilities which are operating. However, after operations have completed, but before decommissioning has commenced, there is likely to be a period of time during which discharges are still taking place. This DPP may specifically want to address post-operational discharges while the license is still intact, but activities are reduced.				
2	Overview	Guidance on consideration of Environmental Assessment should take into account the possibility that and Environmental Assessment may not be required at all, or might not be required by the national law or regulatory body that oversees the discharge of radioactive material.	Member State governments will vary in the structure of their regulatory bodies overseeing radioactive materials and the environment. An environmental assessment may or may not contain information				

			specifically relevant to authorized discharges. The document should also include guidance in the event that there is no Environmental Assessment available.				
	Overview	Consideration of the Cumulative Impacts from Discharges of Adjacent Facilities/Operations	The most recent revision of the BSS contains exemption and clearance levels for radioactive material. This guidance document should discuss how cumulative impacts of discharges from adjacent facilities and the facility of interest should be handled, including the case of discharges below clearance reporting levels.				
	Proposed Structure	Section 4.2, Quality Management Systems should be bulleted	Quality				