

DPP DS447, Predisposal Management of Radioactive Waste from Fuel Cycle Facilities  
DPP DS448, Predisposal Management of Radioactive Waste from Reactors

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: Steven Sholly Country/Organization: Austria		Page 1 of 1 Date: 07 June 2010					
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1	General	These two DPPs should be combined to produce a single draft standard. Much of the text of DPP DS447 and DPP DS448 is identical or nearly so. If the justification is the same, why not produce a single standard? It seems to me that producing two standards on the same basis will only lead to duplication of much of the text, and the production of two standards where evidently one will do quite nicely.					

**Predisposal Management of Radioactive Waste from Fuel Cycle Facilities (DS447)**  
**Predisposal Management of Radioactive Waste from Reactors (DS448)**

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: Page 1 of 1 Country/Organization: Japan / Nuclear and Industrial Safety Agency (NISA) Date: June 18, 2010							
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1	General	DS448 and DS447 should be unified.	<ul style="list-style-type: none"> <li>- Regarding DS447 and DS448, there are several overlapping parts. Is it really necessary to provide them individually? Making it even more complicated.</li> <li>- To harmonize the guides of predisposal management of radioactive wastes generated from reactor and fuel cycle facilities, unified guide is preferable.</li> </ul>				

**PREDISPOSAL MANAGEMENT OF RADIOACTIVE WASTE FROM FUEL CYCLE FACILITIES (DPP FOR DS 447)  
PREDISPOSAL MANAGEMENT OF RADIOACTIVE WASTE FROM REACTORS (DPP FOR DS 448)**

<b>COMMENTS BY REVIEWER</b>							
<b>Reviewer:</b>							
<b>Country/Organization:</b> SPAIN/ Consejo de Seguridad Nuclear				<b>Date:</b> 09/06/10			
<b>Comment Nr.</b>	<b>Para/Line No.</b>	<b>Proposed new text</b>	<b>Reason</b>	<b>Accepted</b>	<b>Accepted, but modified as follows</b>	<b>Rejected</b>	<b>Reason for modification/rejection</b>
1	General comment to both DPPs	There is no need to split the previously foreseen guide "Predisposal Management of Radioactive Waste and Safety of Associated Facilities" in two different guides: one related to reactors and the other to fuel cycle and other facilities.	In the reference list of SGs discussed in 2008 there was a single guide for all the installations. Recommendations should not be very different in both cases and the few differences could be adequately covered in one guide. The number of guides should not be enlarged unnecessarily. The proposed contents of the guides are identical except for sections 7 and 8, which can be included in a single guide.				
2	4. Justification	Comment for both DPPs	This section do not justify the elaboration of two different guides				

**DS447 DPP for Predisposal Management of Radioactive Waste from Fuel Cycle Facilities**

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: U.S NRC/USA (Contact: Boby Abu-Eid) Page...1 of...3 Country/Organization: U.S.A.				Date:06/10/2010			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1	General	Suggest careful and deliberate coordination with DS448.	<p>The rationale for the document is a need for a holistic approach and consideration of the interdependencies inherent in the management of waste from generation to disposal. However, this document is limited to fuel cycle facilities excluding reactors, mining, and spent fuel storage facilities.</p> <p>The actions at these other facilities will influence the management of waste at fuel cycle facilities as stated in the DPP, “the approach to clearance and recycling influences the amount of waste for storage and disposal, with a large influence”. Consideration should be given before excluding</p>				

			all these other facilities in this guide.				
2	Background/ Rationale	Remove language naming a “most important” waste stream.  <del>While the most important waste stream from</del> <b>The nuclear fuel cycle produces wastes with a range of hazards:</b> high-level waste (HLW) (e.g., vitrified waste from spent fuel reprocessing, including mixed oxide [MOX] fuel), intermediate-level waste (ILW) which typically contain longer lived radionuclides, and low-level waste (LLW).	‘Important’ is ill-defined in this statement and naming a most important waste stream does not serve the purpose of emphasizing a holistic approach.  Also, spent fuel is not mentioned as part of the waste that needs to be managed at fuel cycle facilities. Why exclude it from this list?				
3	Background/ Rationale 3 <sup>rd</sup> paragraph 7 <sup>th</sup> line	This is in turn...	Quality.				
	Objective / Justification	In the Objective states, “...fuel cycle facilities, both within larger facilities and at separate, dedicated waste management facilities (including centralized waste management facilities).  In the Justification the DPP States, “...managed by fuel cycle facilities within a single guidance document	The objective includes centralized waste management facilities. A centralized facility could likely also serve as a spent fuel storage facilities (for example, a reprocessing facility). Why should, then the Justification of this document exclude spent				

		(excluding reactors, mining, and spent fuel storage facilities which are address under separate guidance documentation”.	fuel storage facilities? More consideration should be given to the interdependencies before excluding certain facilities such as storage facilities.				
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