

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

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: India Page 1 of 1							
Country/Organisation: India Date: 28/10/2016							
Com ment No.	Page/ Para/Line No.	Proposed new text	Reason	Acce pted	Accepted, but modified as follows	Rejected	Reason for modification / Rejection
1.	Annex I/80/8		Clarification required about whether 8.2 (on Radiation Protection Programme) includes the Proposed collective dose for occupational workers				

Draft Safety Guide DS452 “Decommissioning of Nuclear Power Plants, Research Reactors and Other Nuclear Fuel Cycle Facilities”
(Draft dated 22 July 2016)
Status: STEP 12

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: Mr. Eddie Singer ISRAEL, Nuclear Licensing and Safety Office Date: 29 October 2016		Country/Organization:					
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification rejection
1-General		Under the "Scope" section there are a few issues defined as not addressed in the document – see for example par. 1.15 and par. 1.20, however also in later parts of the document there are additional issues declared as not covered in the guide (see for example par. 9.7 and par. A12). It is suggested to consider combining under the "Scope" section all such issues (issues not covered in the guide), thus preventing the situation that such reservations are mentioned in different parts of the guide.	Definition accuracy				
2- General		It is suggested to consider using more "general statements" when trying to specify the "work procedures" and to exclude statements which are too specific. See for example par 8.13 which is expecting that the reservations of the workers will be addressed during the daily decommissioning-meetings and the much more general statement, in the same paragraph, saying that "new hazards should be addressed properly, so to maintain overall safety of the decommissioning actions undertaken".	Comprehensiveness				
3-General		It is suggested to consider more preciseness in decommissioning work-flow definitions in the various parts of the guide regarding the acceptance of prior approval of the regulatory body as an essential and formal	Definition preciseness				

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		part of the process.					
4	Par. 5.2	This paragraph defines the strategy of "no action" as "not acceptable". It is suggested to consider finding a more adequate definition for the "no action" strategy for situations in which such strategy may appear to be the only suitable one, and as such can't be simply defined as "not acceptable".	Clarity				
5	Par. 5.18	It is suggested to reconsider if actually the lack of "international consensus" is indeed a relevant consideration while the selection of entombment is discussed, while in the same paragraph such selection is described as the "only appropriate alternative".	Definition preciseness				
6	Par. 9.5	It is suggested to consider the phrasing in this paragraph so as to avoid the "feeling" that the only/main "purpose" of the final radiological report is expected to "prove" that the post decommissioning situation is in accordance with the initial planning.	Clarity				
7	Pars. 9.8 and 9.9	It is suggested to consider the phrasing in these paragraphs so as to make clear that the analysis of the gaps between the actual situation after the decommissioning and the original targets specified in the decommissioning plan is mainly under the mandate of the regulatory body.	Clarity				

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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			
Reviewer: Federal Ministry for the Environment, Nature Conservation, Building and Nuclear Safety (BMUB) (with comments of GRS) Country/Organization: Germany			Page 1 of 1 Date: 2016-10-18				
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1	4.9	<u>Complacency needs to be prevented</u> at any level about the need for continuous attention to safety.	Avoidance of complacency is neither a recommendation (“should”) nor a requirement (“shall”), but comprises a basic feature of a sound safety culture.				