

The Management System for Predisposal and Disposal of Radioactive Waste, Draft Safety Guide DS477, Step 7

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: Laura Dixon/Denise Varley Page. 1 of 3 Country/Organization: UK, Office For Nuclear Regulation				Date: 27 Oct 2017			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection

001	General	Consideration of conventional health and safety aspects	The capturing of conventional health and safety aspects should be reviewed throughout the guide.	Yes see para. 4.19			
002	1.7	‘The system will describe all the arrangements made for the management for safety, ensuring that safety is not compromised and is taken into account in all decision-making processes.’	Improves readability of sentence				
003	1.14 (j) and general	‘Whatever the arrangements, safety, human health and environmental protection should always be paramount.’	There are inconsistent references (or lack of references) to human health at various points throughout the document. For example Para 3.2 does include protection of human health. There are further examples which require the inclusion of ‘health’. The document should be reviewed with respect to references to “health and “human health”	Yes			

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005	4.77(a) and 4.78(e)	‘Use of control measures for protection’	Leading with ‘protective clothing’ and including ‘shielding equipment for radiation’ does not encompass the ‘hierarchy of control measures’ principles for radiological and conventional hazards. Examples could be given.	Yes new para 4.77			
006	4.94	‘In such planning, consideration should be given to the continuing need for support services, for spare parts for equipment that may eventually no longer be manufactured during the long operational period of the facility, for equipment upgrades to meet new regulations and make operational improvements, and for the evolution <i>and obsolescence of computational hardware and software.</i> ’	Previously ‘...and for the evolution and inevitable obsolescence of software.’ This is too specific; the intention of the proposed new text is to encompass wider aspects.		“...and for the evolution and obsolescence of computer hardware and software.”		

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007	4.139 / 'Construction of facilities' Section	'The management system should include a process and procedures to ensure that facilities are constructed in accordance with the conditions of the Licence, the assumptions and designs included in the safety case, <i>including environmental protection requirements, as reviewed by the regulatory body.</i> '	There can be environmental permissions as well as safety case requirements prior to conducting construction activities.		"...the conditions of the Licence, the assumptions and the designs included in the safety case reviewed by the regulatory bodies, and any other relevant requirements (e.g. for environmental protection during site characterization)."		
008	4.157 (d) and 4.158 (d)	'All necessary processes for waste treatment and conditioning have been undertaken <i>and</i> completed satisfactorily'	Improves the readability of the sentence.	Yes			

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009	6.18(a)	‘for the production of waste packages: <i>provide guidance and training to</i> waste producers in the acceptance criteria at the waste disposal facility as early as possible;	Guidance and training will provide more flexibility to member states in meeting the IAEA guidance.	Yes			
010	Appendix II, II.7(b)	‘continued availability of <i>competent, suitably</i> qualified <i>and experienced</i> personnel over the entire period of time’	This reflects the type of approach taken in the UK where there is consideration of factors other than qualifications.	Yes			