

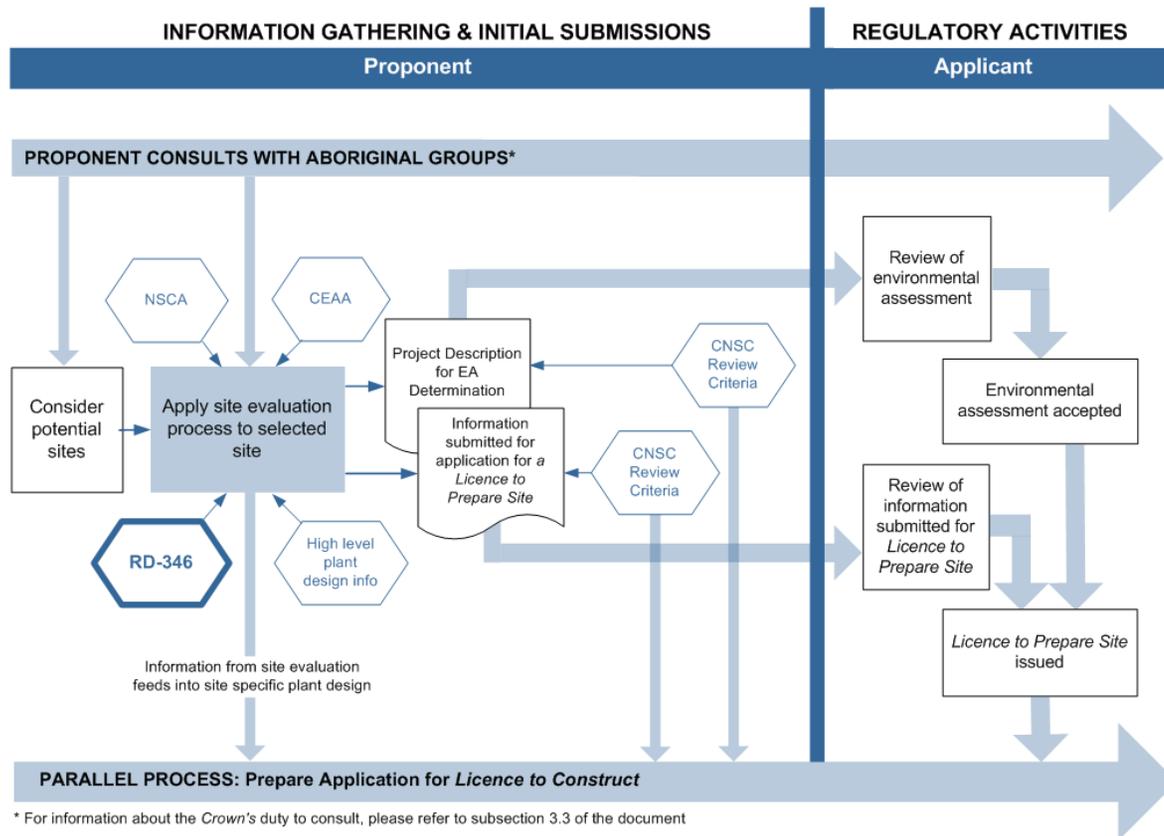
DSS433 DOCUMENT PROFILE SITE SURVEY AND SITE SELECTION FOR NUCLEAR INSTALLATIONS

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: Marcel de Vos		Page.... of....					
Country/Organization: Canada - Canadian Nuclear Safety Commission							
Date: 11 Aug. 2009							
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1	All	Consider that document may not be necessary. NS-R-3 can simply be applied at a higher level to determine candidate sites.	Canada modeled RD-346 “Site Evaluation for New Nuclear Power Plants” after NS-R-3, however early site surveys in Canada are unregulated. Any site can be chosen by a proponent (government or private), but the onus is on the applicant for the site preparation licence to build a “siting case” sufficient to defend the choice of site using RD-346 and an Environmental Assessment Process. (see page 4 of this form for a diagram) Generally, a proponent would use RD-346 (equivalent to NS-R-3) information at a higher level to establish a list of candidate sites, then select a site based on internal business needs before performing full site evaluation in more depth.			X	Countries newly embarking on a nuclear power program have expressed urgent need for a more detailed guidance than NS-R-3.
2	All	Clarify “Site Evaluation” versus “Site Selection”	The terms appear to be used interchangeably but have vastly different meanings. The objective of the document is not to explain to member states how to select a site, but rather how to evaluate possible	YES	The approach and terminology which has been integrated into		

			<p>candidate sites for suitability and more in-depth investigation using NS-R-3. Once suitable sites have been chosen, the final sites are selected based on a combination of politics, economics and socio-economic factors that are arguably unique to each member state's governmental structure and legislation.</p>		<p>DS 424 will be the basis for this document.</p>		
3	Section 5	<p>Move Table of Contents Section 2 to after Table of Contents Section 4 OR eliminate Table of Contents Section 2 from the document.</p>	<p>As currently structured, the layout gives the impression that sites are selected before the site survey is completed. The document is primarily about performing the survey so as to create a list of candidate sites for more in depth investigation using NS-R-3. As a result, discussion about site selection should be at the end of the document or arguably not in the document at all until full siting cases have been developed using NS-R-3. Consideration should be given in the document that some countries require full site investigations to be done on candidate sites before the final sites are selected.</p>	YES	<p>The approach and terminology which has been integrated into DS 424 will be the basis for this document.</p>		

Additional information for Comment #1

Source: Figure 4-1: RD-346 Site Evaluation For New Nuclear Power Plants, November 2008, Canadian Nuclear Safety Commission.



Comments on IAEA Document Preparation Profile “Site Survey and Site Selection for Nuclear Installations” (DPP DS433)

COMMENTS BY REVIEWER				RESOLUTION			
Date: September 21, 2009 Country/Organization: EC							
Comment No. / Reviewer	Page / Section / Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1	General	<p>a) Site Survey and Site selection for nuclear facilities is an important task, however in view of the high number of IAEA safety standards was the option to include this subject in an other guide, e.g on “ Site evaluation...” considered? Is it not feasible?</p> <p>b) Will the guide address the issues related to the public acceptance/ public involvement in the site selection?</p>	<u>Clarification:</u>			X	<p>a) Countries newly embarking on a nuclear power program have expressed urgent need for a more detailed guidance than NS-R-3.</p> <p>b) This is mostly covered in the sister document being developed jointly by NE+NS under NE lead.</p>
2	p.3	What are the other criteria which will be addressed under 3.2& 4.2 of the Guide Table of Contents?	<u>Clarification.</u>	X			Here non-safety criteria will be summarized with an explicit link to the sister document under development by NE+NS under NE lead.

TITLE : DS 433 DPP Site survey and site selection for nuclear installations

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: F. Féron		Page					
Country/Organization: France/ASN		Date: 4 sept 2009					
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1.	3/1 st bullet	Delete “Especially with... high priority”	Superfluous			X	Some MS are questioning the need for this SG. The emphasis is needed to justify this need.
2.	3/4 th bullet	After “site selection of nuclear installations other than NPP”, add “including radioactive waste repositories”	Clarification Rad waste repositories, especially, for high level/long-lived waste, do have unique issues related to their operating and post-operating life.			X	Radioactive waste repositories are not considered to be NI in IAEA terminology. No NI safety standard addresses waste issues.
3.	5/3.1		Is 3.7 relevant for site survey of NPP?		X		For safety criteria, yes.
4.	5/4		Would it be relevant to subdivide 4 according to the type of nuclear installation ?		X		This will be done in the text. It is too detailed to be considered in the DPP.

Document Preparation Profile for Draft Safety Guide „Site Survey and Site Selection for Nuclear Installations“ (DS433)

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: Federal Ministry for the Environment, Nature Conservation and Nuclear Safety (BMU) Country/Organization: Germany				Page 1 of 1 Date: September 18, 2009			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1	General	<p>An actualization of the Guide 50-SG-S9 from 1984 seems to be advisable, since there will be made many site decisions in the foreseeable future by building new nuclear facilities. With it a lot of countries will resort to the assistance of IAEA, so that an adequate Guide at the state-of-the-art of science and technology should be available. Also the expansion to other nuclear facilities as nuclear power plants makes sense. Overall the revision of 50-SG-S9 (as DS433) is accordingly to endorse.</p> <p>There are no objections for the principle classification in “General Considerations...”, “Site Survey for Nuclear Power Plants” and “Site Survey for Nuclear Installations...”.</p> <p>The formation of the present Guide 50-SG-S9 was usefull. Therefore it would be approvable to orientate the new guide on this structure, at least the sections beneath the chapter titles.</p> <p>Totally the revision DS433 of the Guide 50-SG-S9 in the proposed form is to evaluate positively.</p>			Positive MS comment. No action needed.		

TITLE: DS433: Site Survey and Site Selection for Nuclear Installations

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: PNRA		Page.... of....					
Country/Organization: Pakistan		Date:					
Comment No.	Para/Line/page No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1		Comment: Non safety factors like topography, socio-economics, distribution network considerations and transport routs etc. should be included in sub section namely other criteria..	These factors play vital role for selecting or rejection of site in initial phases. These factors are indirectly safety related, but in some cases non-safety aspects may have bearing on safety- related aspects also.		X		As much as they have impact on safety they will be included. Others will be treated in the sister document being developed by NE+NS under NE lead.
2	3/BULLET 2nd	In 3.0 objective and justification, it is mentioned that “the second objective is to provide the necessary links of this document with concepts such as safety, environment protection, management system considerations and the demonstration of feasibility of emergency planning.” While in the contents “feasibility of emergency planning” is not reflecting.	Emergency planning plays very important role in case of accident at the site to protect the people and environment therefore it should be included at the time of initial site survey.	X			

TITLE: DS433 “Site Survey and Site Selection for Nuclear Installations”

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: Antonio Jiménez Country/Organization: (SPAIN) Consejo de Seguridad Nuclear -CSN Date: August/2009							
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1	General (DPP text)	No new text. It's necessary to review, update and extend the content and scope of existing 50-SG-S9 (more than 25 years old). Guidelines for nuclear facilities other than NPPs must be considered, as remarked on DPP objectives.	Total agreement with the proposal and basic content of just new Safety Guide.	YES			
2	General (participate)	If possible, we have the purpose of contributing from the beginning to work out the SG with a siting expert of CSN staff (A. Vela Guzmán).	Our collaboration interest on developing the SG proposed.	YES			

Comments on IAEA Document Preparation Profile “Site Survey and Site Selection for Nuclear Installations” (DPP DS433)

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: NUSSC, RASSC, WASSC		Date: September 21, 2009					
Country/Organization: United States of America / NUSSC, RASSC, WASSC							
Comment No. / Reviewer	Page / Section / Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1	General	<p>DS433 (DPP) scope needs clarification, specifically what other nuclear installations are included in this guide.</p> <p>For example: Will the following nuclear fuel cycle related facilities and nuclear power plants designs be included:</p> <ol style="list-style-type: none"> 1. Mining, milling, refining, conversion, enrichment, fuel fabrication, spent fuel storage, MOX, ISFI, reprocessing, waste storage, treatment and disposal and associated research facilities 2. Heavy water, Passive, modular, multi unit and test nuclear power reactor installations. 3. Hot Cells, Accelerators and irradiators <p>As a minimum the guide should include exclusions.</p>	<p><u>Clarification:</u></p> <p>A phased site selection and licensing process may not apply to Nuclear Fuel cycle facilities.</p> <p>Mining and deep permanent disposal facilities or spent fuel and radio active waste facilities site selection process is unique and may be impacted and influenced by public inputs and other regulatory authorities.</p> <p>Site selection for certain installations may not follow strictly a screening, ranking, and safety related criteria for site selection. Public acceptance and other local and general governances may have significant influence on the site selection</p>		X		<p>The scope is nuclear installations as defined by the IAEA. This includes all types of NPPs, RRs and also fuel cycle facilities, reprocessing plants and fuel fabrication facilities.</p>

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: NUSSC, RASSC, WASSC		Date: September 21, 2009					
Country/Organization: United States of America / NUSSC, RASSC, WASSC							
Comment No. / Reviewer	Page / Section / Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
			decision process.				
2	General	Considering the world political environment the guide will benefit and facilitate a comprehensive site evaluation by including a subparagraph on the need of security for nuclear installations.	<u>Comprehensive Site Evaluation:</u> Current guide text makes no direct reference to security. Security and safety should be viewed as complementary. It is important to note that safety and security elements should be considered and implemented in an integrated manner so that they do not compromise each other.	X			
3	General	The guide's text essentially remains embedded and dedicated to nuclear power reactors.	<u>Provide Balance:</u> With the passage of time installation of nuclear fuel cycle facility has and will continue to increase and criticality is associated with some of this type of installations. Therefore, to impart balance to guide it would be beneficial to specifically acknowledge these type of nuclear installations		X		This is true because a graded approach will be used (see e.g. DS 422) in which the grading starts with NPP requirements and the graded is performed downwards.

COMMENTS BY REVIEWER Reviewer: NUSSC, RASSC, WASSC Country/Organization: United States of America / NUSSC, RASSC, WASSC				Date: September 21, 2009 RESOLUTION			
Comment No. / Reviewer	Page / Section / Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
4	General	The document did not include a step in the process for public participation and involvement in the site survey and site selection processes. Therefore, the document should include a subsection dealing with this issue.	<u>Completeness</u> : The current outline lacks public involvement in the site selection process.		X		This is mostly covered in the sister document being developed jointly by NE+NS under NE lead.
5	General	The document needs to provide analysis of the need for the proposed nuclear installation with potential alternate options.	<u>Completeness</u> : The document outline lacks a subsection on analysis of the need for the installation with alternate options.			X	This is part of feasibility and outside of the scope for a document on siting.
6	General	The document would benefit from having a "Gap Analysis" Section.	Completeness		X		A gap analysis would be applicable for sites where there are already other units under construction or operation.
7	3 / 6 / 3	Need to include WASSC/RASSC review and approval the DPP (November 2009). This is needed to be consistent with Item #7 (Approval of Draft document by NUSSC/WASSC)	Consistency and need for WASSC/RASSC approval as other installations may fall under these Committees lead reviews.	X			