

Form for Comments
Committee Level Review – Step Three
DPP DS548 Predisposal Management of Radioactive Waste - Revision of GSR Part 5

COMMENTS BY Country/Organization: Canada / Canadian Nuclear Safety Commission						RESOLUTION			
Comment No.	Reviewer	Para/Line No.	Proposed new text	Reason	Project lead response	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1	CNSC	Section 7, Overview Tentative table of contents	The scope states: “The publication will establish safety requirements that apply to all facilities and activities related to radioactive waste management, covering all steps from waste generation up to disposal, including processing (pretreatment, treatment, and conditioning), storage, and transport.” In Section 7, Overview of the DPP, the proposed section 4 (steps in the predisposal management of radioactive waste) includes subsections on generating, processing, and storage but does not include a subsection on transport. Recommend including a subsection in proposed section 4 on the “Transport of radioactive waste”.	For completeness, to include a subsection on each of the steps in the management of radioactive waste.				X	the actual version of the publication does not have any sub section on :transport” which is specifically addressed in the corresponding relevant SR publication
2	CNSC	Section 7, Overview	The scope states: “The publication will cover the safety aspects relevant to the	For completeness, to include a			X		Handling is referred to in several places in the current version of GSR Part 5. Handling is not Per Se a step in the

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		Tentative table of contents	radioactive waste form itself, in respect of its subsequent handling, treatment, conditioning, and storage, the safety of the predisposal radioactive waste management facilities and activities in respect of protection of workers, the public and the environment, and the safety implications inherent in the selection of waste management options.” In Section 7, Overview of the DPP, the proposed section 4 (steps in the predisposal management of radioactive waste) includes subsections on generating, processing, and storage but does not include a subsection on handling. Recommend including a subsection in proposed section 4 on the “Handling of radioactive waste”.	subsection on each of the steps in the management of radioactive waste.					management of RW but a component in all the steps. At this point a dedicated subsection is not thought to be necessary (as in existing GSR Part 5) but the drafting might consider it though
	CNSC	Section 7, Overview Tentative table of	In Section 7, Overview of the DPP, the proposed section 4 (steps in the predisposal management of radioactive waste) includes subsections on generating, processing, and				X		Characterization is already in subsection 4.1 while WAC is in 4.4

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		contents	storage but does not include subsections on waste characterization, classification or waste acceptance criteria. Recommend including subsections in proposed section 4 on the “Characterization of radioactive waste, Characterization of radioactive waste, and Waste Acceptance Criteria”.						
3	CNSC	Section 6	Include IAEA SSR-4 in the list.	<p>1. SSR-5 is included.</p> <p>2. Many safety topics that are covered in both SSR-4 and SSR-5 are identical and applicable to the same nuclear facilities.</p> <p>3. Essential efforts are needed to improve inconsistency</p>	X				

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Country/Organization: Canada / Canadian Nuclear Safety Commission									
Comment No.	Reviewer	Para/Line No.	Proposed new text	Reason	Project lead response	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
				in treatment of the same safety topics in SSR-4 and SSR-5.					

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COMMENTS BY REVIEWER				RESOLUTION			
Country/Organization: FRANCE			Date:				
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1.		<p>SCOPE: it is indicated in the DPP that the scope will include spent nuclear fuel declared as radioactive waste and disused sealed radioactive sources declared as radioactive waste.</p> <p>It is satisfactory to include in the new development of GSR Part 5 the spent nuclear fuel declared as radioactive waste and disused sealed radioactive sources declared as radioactive waste.</p> <p><i>It could be envisaged also to include in the scope of GSR Part 5 the storage of orphan and/or disused sealed radioactive sources (even not declared as radioactive waste).</i></p> <p><i>At least, it could be mentioned that GSR Part 5 is also applicable to the storage of orphan and disused radioactive sources</i></p>	<p>There is still a gap in IAEA safety standards regarding the storage of orphan and/or disused radioactive sources not declared as radioactive waste.</p> <p>It may help to provide the basis for peer review for MS which don't have a nuclear fuel cycle which is currently missing in IAEA safety standards.</p>			X	<p>Although there might indeed be a gap in the safety standards, this publication clearly and only addresses Radioactive waste. any material not considered as RW do not fall in its scope. A broader discussion could take place at the SSC on where this should be addressed</p>
2.		<p>SCOPE: the management of radioactive materials which are candidate for clearance are not in the scope of the DPP DS 548.</p> <p>Nevertheless, these radioactive materials can be sorted, decontaminated and treated in dedicated nuclear facilities in order to be ready for being released from regulatory controls.</p> <p><i>It could be indicated in the DPP DS 548 that the publication is also applicable to the management of radioactive materials which are candidate for clearance until these materials are released from regulatory controls.</i></p>	<p>There is a gap in IAEA Safety Standards concerning the management of radioactive materials candidate for clearance (sorting and decontamination) which are intended to be decontaminated in dedicated nuclear facilities.</p>			X	<p>Same approach as previous comment. The title of the publication is "Predisposal management of RW"...</p>

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3.	Annex	<p>In 2022, the IAEA has completed an assessment of the applicability of the IAEA safety standards to non-water-cooled reactors (NWCRs) and small modular reactors (SMR)... The findings of the abovementioned assessment are presented in IAEA Safety Reports Series No. 123 and can be downloaded as a preprint version at the following link: SRS-123.</p> <p>It is important to enhance that the consideration of such finding need preliminary detailed analysis considering notably that:</p> <ul style="list-style-type: none"> • The notion of “passive” is still to be clarified, • Existing requirements should not be downgrading by postulating the allowance of lower level of supervision 	<p>It is of high importance to first define “passive” to ensure that the corresponding requirement is effective. The definition of “passive component “in the IAEA safety glossary is quite open and would not be sufficient in the current context.</p> <p>Tit shall be clear that the potential new requirement does not allow to downgrade other safety expectations. As mentioned by the SMR regulator forum, “<i>the Graded Approach means that the level of analysis... used to comply with a safety requirement should be commensurate with the potential hazard associated with the facility without adversely affecting safety</i>”: the requirement is not modified.</p>		X		<p>Comment is unclear. What is the request? It seems this is related to the technical content of the publication while it is still a DPP. This might be and will be considered during the drafting of the SR.</p>
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COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: SSTC NRS Country/Organization: Ukraine		Page 1 of 2 Date: 10 May 2023					
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1.	General	The tentative contents for the proposed publication is too brief. The list of issues that will be considered in each Chapter of GSR Part 5 needs to be detailed.	For better understanding the proposed scope of future requirements.			X	Too early. The revision concerns the whole publication. The DPP gives general points that will be addressed but this is not meant to be neither exhaustive nor comprehensive
2.	General	The objective of the proposed publication is to establish safety requirements for the predisposal management of all types of radioactive waste including spent nuclear fuel declared as radioactive waste, disused sealed radioactive sources declared as radioactive waste, and Radwaste from processing of materials containing naturally occurring radionuclides. It is desirable to establish requirements for these types of waste in separate SDS Sections,	For better understanding the proposed scope of future requirements.	X			

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COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: SSTC NRS Country/Organization: Ukraine		Page 1 of 2 Date: 10 May 2023					
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
		taking into account the specific features of the above types of waste.					
3.	Page 5, paras. 7, 2.1	<p>Section 2 “Protection of human health and the environmental in the predisposal management of radioactive waste” includes subsection 2.1 Radioactive waste management. It should be explained whether it is planned to establish the requirements for waste management system in this subsection?</p> <p>It is desirable to add after Section 2 a new Section “Management system for the predisposal management of radioactive waste” considering resource management and process implementation for small and large waste producers.</p>	Management system for the predisposal management of radioactive waste is missing.			X	The current version of GSR part 5 addresses Management system in section 3.5 under “integrated approach to safety”
4.	Page 5, para. 7, Section 4	It is proposed to include in Section 4 "Stages of predisposal radioactive waste management" a new subsection in which aspects of the integrated process of radioactive waste management should be	The objective is to provide more complete information			X	These elements are already addressed in section 4.1

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Reviewer: SSTC NRS Country/Organization: Ukraine		Page 1 of 2 Date: 10 May 2023					
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
		considered, including the issues of waste characterization and classification. Issues concerning documentation related to the radioactive waste management at various stages could also be addressed.					
5.	Page 5, para. 7, Section 5	The subsection needs to be added in the contents for the proposed publication in which the requirements concerning development of safety case of activities and facilities for predisposal radioactive waste management and performing a corresponding safety assessment should be established.	The issues of safety assessment and safety case should be considered in GSR Part 5, as they are of great importance for development and operation of facilities and activities. At that, the peculiarities of safety assessment and safety case for small and large waste producers should be considered.			X	Section is exclusively addressing the demonstration of safety through the “safety case and safety assessment” and periodic safety reviews

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COMMENTS BY REVIEWER					RESOLUTION			
Reviewer: Federal Ministry for the Environment, Nature Conservation, Nuclear Safety and Consumer Protection (BMUV) (with comments of GRS) Country/Organization: Germany					Page 1 of 1 Date: 17-04-2023			
Relevance	Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
2	1	2 Background List of safety standards	... - IAEA Safety Standards Series No. GS-R-1, Legal and Governmental Infrastructure for Nuclear, Radiation, Radioactive Waste and Transport Safety (superseded in 2010 and 2014 (<u>GSR Part 1</u>)) - IAEA Safety Standards Series No. GS-R-2, Preparedness and Response for a Nuclear or Radiological Emergency (superseded in 2015 (<u>GRS Part 7</u>)) ...	It would be helpful if the current names of the documents were mentioned, e.g. in the form of the proposed additions.			X	Usual template, according to the development process of safety standards, including DPPs (SPESS) has been followed and agreed by internal coordination committee review

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COMMENTS BY REVIEWER					RESOLUTION			
Reviewer: Federal Ministry for the Environment, Nature Conservation, Nuclear Safety and Consumer Protection (BMUV) (with comments of GRS) Country/Organization: Germany Pages: 1 Date: 12.05.2023								
Relevanz	Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
	1.	Page 3 5. Scope	The publication will establish safety requirements that apply to all facilities and activities related to radioactive waste management, covering all steps from waste generation up to disposal, including processing (pretreatment, treatment, and conditioning), storage, and transport <u>inside as well as transport outside the facility.</u>	As transport inside and outside the facilities is often regulated by different Requirements in various IAEA Safety Standards, we would like to suggest a clear statement related to this topic in the scope of this document as well.			X	Not really needed at this point. The DPP refers to “transport” in general which includes all aspects. Transport is addressed in specific dedicated publication. The publication will refer to the appropriate publication on transport

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COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: WASSC member Page.... of.... Country/Organization: Israel/NLSO Date: May 8, 2023							
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1	Page 5, section 5	In the proposed table of contents, section 5, Add sub sections (i.e. 5.4 etc.) for the topics: Location and design of the facility, Construction and commissioning, operation, Shutdown and decommissioning.	The safety requirements for the different steps in the lifecycle of the facility is missing.			X	It is in 5.2 already

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COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: WASSC member Page 1 of 1 Country/Organization: Republic of Korea/Korea Institute of Nuclear Safety Date: May 12, 2023							
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1	p.3 / 7	o The first sentence in the section 5 should be modified as follows; - The publication will establish ~~~ related to radioactive waste management, covering all steps~~. - The publication will establish ~~~ related to predisposal radioactive waste management, covering all steps~~~.	o It is necessary to clarify the scope of the publication.	X			

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COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: TRANSSC Member/Experts (M. Amir/M. Saqib)		Page 01 of 01					
Country/Organization: Pakistan/PNRA		Date:12-05-2023					
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
2	Section 3 Section 7	Justification provided need to be elaborated.	The justification provided gives no idea that what new requirements/ areas will be included in the revised version of GSR Part 5. Even if we see the proposed contents provided in section 7 of the DPP, no new area has been proposed (all are the same as in the existing version of the standard).			X	Too early, the drafting of the document has not started.
3	Section 4. OBJECTIVE / LAST LINE	... in accordance with a graded approach, for the protection <u>of</u> workers, the public and the environment.	Missing word	X			The text “in accordance with a graded approach, for the protection <u>of</u> workers, the public and the environment” is not in the DPP

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COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: WASSC, Japan Page.... of.... Total 2 pages Country/Organization: Japan/Nuclear Regulation Authority Date: 12 May 2023							
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1	General	A new overarching requirement on graded approach should be added to this proposed publication like Requirement 2 of GSR Part 6.	Overarching requirement on graded approach is included in GSR Part 1 (Rev.1), GSR Part 2, GSR Part 3, GSR Part 4 (Rev.1) and GSR Part 6. Graded approach is also important for GSR Part 5 due to wide scope of predisposal management.		X		This will be considered during the drafting process
2	5. Scope Para1/ Line3 (p.3)	From the definition of “predisposal management,” transport is covered as mentioned in the first paragraph of Section 5. So, could you clarify whether transport is addressed in this proposed publication and add the item to table of contents if necessary?	Clarification.			X	Transport is addressed in dedicated publications, the proposed publication will refer to the appropriate publication(s) on transport
3	6. (p.4 or 5)	Add GSG-16 “Leadership, management and culture for safety in radioactive waste management” to this list.	Clarification. GSG-16 is a related IAEA publication.	X			
4	7. Overview 4. (p.5)	Are characterization and segregation of radioactive waste addressed in 4.1?	Confirmation. Characterization and segregation are essential, however there is no explicit description of them in Section 4.	X			Yes it is addressed under 4.1 in the existing publication already
5	7. Overview 4. and 5. (p.5)	Add a "General" section to chapter 4. and 5.in the tentative table of contents in the DPP, respectively, to be described	Confirmation. Those descriptions are important and should be discussed here.	X			

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COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: WASSC, Japan Page.... of.... Total 2 pages Country/Organization: Japan/Nuclear Regulation Authority Date: 12 May 2023							
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
		the equivalent of 4.1-4.5 and 5.1-5.2 written in the previous version.					
6	7. Overview 4.4 (p.5)	The draft of this section should include the perspective of the systematic control of radioactive waste management (from generation to disposal) under a series of management systems (FIG. 1 of GSG-16).	Comment. It is important for predisposal management of radioactive waste to comply with waste acceptance criteria of a disposal facility.	X			
7	7. Overview 5.2 (p.5)	5.2 Development and operation of predisposal radioactive waste management facilities	More appropriate title. Consistency with Section title.	X			
8	ANNEX Para3/ Line5 from the bottom (p.7)	...predisposal management— (including storage) ...	Editorial. From the definition of “predisposal management.”	X			

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COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: Kuryndin Anton, Russia, Russia		Page 1 of 1					
Country/Organization: Russia/SEC NRS		Date: 12-05-2023					
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
4	Para 6	Add new safety guide IAEA INTERNATIONAL ATOMIC ENERGY AGENCY, Regulatory Control of Radioactive Discharges to the Environment, IAEA Safety Standards Series No. GSG-9, IAEA, Vienna	Adding GSG-9 is needed because the current version of GSR Part 5 includes paras related to discharges of effluents generated during predisposal management of radioactive waste. Removing this safety aspect from DS548 is not advisable.	X			

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COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: Several Reviewers Country/Organization: IRAN/ Environmental Protection, Radiation Emergency and Monitoring Department (EPREM)/ Iran Nuclear Regulatory Authority (INRA) Date: 2023-05-13				Page.... of....			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1	General Comment		This DPP is too general and the DPP template is not followed. DPP template (https://www-ns.iaea.org/committees/css/default.asp?fd=944&dt=0) states: “7. OVERVIEW <i>(Describe the expected general content of the publication, such as its structure, and any other points to take into account during drafting. Attach more detailed information, where available, e.g. outline of chapter heading, table of contents with details expected in each section</i> <u><i>For revision of, or addendum to, an existing publication or a batch of publications, the overview is expected to contain more details than for proposed new publications. In particular, it should highlight the relevant sections to be revised in each publication so as to cover in a</i></u>			X	Usual template, as indicated by SPESS process, X has been followed. Internal approval has been given

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Reviewer: Several Reviewers Country/Organization: IRAN/ Environmental Protection, Radiation Emergency and Monitoring Department (EPREM)/ Iran Nuclear Regulatory Authority (INRA) Date: 2023-05-13				Page.... of....			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
			<p><u>consistent manner the topical areas on which new information or feedback is available and support the justification for the revision.</u>”</p> <p>In this DPP, overview only includes the table of contents that is identical to GSR Part 5. It is not clear which sections to be revised.</p> <p>Also, DPP template states: “2. BACKGROUND <i>(For a proposed new publication, describe the background on the topic not yet addressed by existing publications, as identified through a gap analysis, and attach the gap analysis report as an annex to the DPP. For the revision of an existing publication or for revision by batch, describe briefly the previous publication(s) and provide a</i></p>				

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Reviewer: Several Reviewers Country/Organization: IRAN/ Environmental Protection, Radiation Emergency and Monitoring Department (EPREM)/ Iran Nuclear Regulatory Authority (INRA) Date: 2023-05-13				Page.... of....			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
			<p><u>summary of new information and the relevant gap and feedback analysis report, including feedback from Member States and IAEA services. Attach the feedback analysis report as an annex to the DPP.)”</u></p> <p>In this DPP, no summary of new information and the relevant gap and feedback analysis report are provided.</p> <p>In addition, according to the DPP template:</p> <p>“3. JUSTIFICATION FOR THE PRODUCTION OF THE PUBLICATION</p> <p><i>(The purpose here is to justify the production of a publication, not to justify the need to address a topic, already covered in section 2.</i></p>				

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Reviewer: Several Reviewers Country/Organization: IRAN/ Environmental Protection, Radiation Emergency and Monitoring Department (EPREM)/ Iran Nuclear Regulatory Authority (INRA) Date: 2023-05-13				Page.... of....			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
			<p><i>For a new publication, justify in particular that the topic could not be addressed through the revision of, or an addendum to, an existing publication.</i></p> <p><u><i>For a revision of an existing publication, an addendum to an existing publication or revision by batch, provide a justification in terms of timeliness for this action, considering the date of the previous publication(s) and the added value expected for, and impact on the target users of, the coverage of the additional topic</i></u></p> <p><u><i>For a revision of an existing publication or revision by batch, if the scope or objective of the proposed publication is different than in the existing publication,</i></u></p>				

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Reviewer: Several Reviewers Country/Organization: IRAN/ Environmental Protection, Radiation Emergency and Monitoring Department (EPREM)/ Iran Nuclear Regulatory Authority (INRA) Date: 2023-05-13				Page.... of....			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
			<p><u>provide an explanation to justify the changes).</u>”</p> <p>It seems that the scope is somehow different (e.g., “including spent nuclear fuel declared as radioactive waste and disused sealed radioactive sources declared as radioactive waste” is added. But no explanation to justify the changes is provided.</p> <p>Also it is mentioned: “However, areas of improvements were identified which would be taken into consideration when deciding on the revision of GSR Part 5. What are these areas?</p> <p>Please provide more necessary information and details that should be considered during revision of GSR Part 5.</p>				

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COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: L Thomas Page.... of.... Country/Organization: UK/Office for Nuclear Regulation Date: May 2023							
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1	General		The UK welcomes the revision of GSR Part 5 but suggest that revision is focused on areas that are missing from the document and bringing it into line with GSR 3 etc. rather than reworking of text already considered adequate.		X Revision process will confirm that or not. The whole text will be reviewed and revised in the parts that will be needed to		
2.	Overview Section 4	Inclusion of subsections on waste characterization requirement and requirements for adequate records.	The UK considers that many issues arise in radioactive waste management because of lack of clear and comprehensive advice on both the level of waste characterization required and records of the waste, noting that many wastes may be generated, treated, packaged and stored for many decades prior to a disposal route		X		What is the proposal? Text? The document addresses characterization and records already. The revision will address it as well

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Reviewer: L Thomas Page.... of.... Country/Organization: UK/Office for Nuclear Regulation Date: May 2023							
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
			becoming available. When providing this guidance the UK would welcome advice on how the graded approach could be adopted for these issues – noting that extensive characterization that is expensive may be disproportionate to the risk from that waste to future generations. The same advice is required related to the generation and keeping of records of all waste. Guidance related to both characterization and records is needed for instance where it is appropriate to conduct this on a homogeneous waste stream basis or a more heterogeneous				

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Reviewer: L Thomas Page.... of.... Country/Organization: UK/Office for Nuclear Regulation Date: May 2023							
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
			waste package basis. A proportionate or graded approach should be applied.				
3	Overview Section 4	In subsection 4.2 we would welcome the introduction of more advice around waste packaging standards within a graded approach.	The UK considers that advice on the waste packaging to ensure that future disposal is supported would be advantageous. Where standard packaging is unsuitable the use of standard sizes of stillages is helpful in terms of disposal density and lifting operations.	X			The approval is for the DPP not the document itself which has not been revised yet, but the point is noted for consideration during the forthcoming revision
4	Overview Section 4	Expansion of guidance on the use of Waste Acceptance Criteria (WAC)	The UK considers that the development of proportionate WAC is important for future safe disposal of radioactive waste but that this must be proportionate to the	X			The approval is for the DPP not the document itself which has not been revised yet, but the point is noted for consideration

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Reviewer: L Thomas Page.... of.... Country/Organization: UK/Office for Nuclear Regulation Date: May 2023							
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
			risks to future generations and the safety of the storage and disposal facilities, to support this advice on the use of concessions to the WAC would be helpful.				during the forthcoming revision. However, the publication s a General Safety Requirement publication not a safety guide
6	section 5, para 2		There is no mention of management of waste generated in accident conditions and the potentially challenges. The UK considers that this should be included.		X		Considered to be included

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COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: Australia - WASSC Page.... of.... Country/Organization: Australia Date: 15/05/2023							
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1	Page 5, proposed table of contents	2.3. Environmental concerns protection	The term ‘concerns’ can have negative connotation	X			
2	Page 5, proposed table of contents	3.5 Integrated Graded approach to safety	It is noted that there is no mention of the graded approach within this DPP. We recommend replacing the term ‘integrated approach’ with ‘graded approach’ in line with terminology used in GSR Part 3 and SSR-5.		X Approach to safety		The approach to safety could be both “integrated” and graded”

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	COMMENTS BY Country/Organization: Canada / Canadian Nuclear Safety Commission					RESOLUTION			
Comment No.	Reviewer	Para/Line No.	Proposed new text	Reason	Project lead response	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1	CNSC	Section 7, Overview Tentative table of contents	The scope states: “The publication will establish safety requirements that apply to all facilities and activities related to radioactive waste management, covering all steps from waste generation up to disposal, including processing (pretreatment, treatment, and conditioning), storage, and transport.” In Section 7, Overview of the DPP, the proposed section 4 (steps in the predisposal management of radioactive waste) includes subsections on generating, processing, and storage but does not include a subsection on transport. Recommend including a subsection in proposed section 4 on the “Transport of radioactive waste”.	For completeness, to include a subsection on each of the steps in the management of radioactive waste.				X	the actual version of the publication does not have any sub section on :transport” which is specifically addressed in the corresponding relevant SR publication
2	CNSC	Section 7, Overview	The scope states: “The publication will cover the safety aspects relevant to the	For completeness, to include a			X		Handling is referred to in several places in the current version of GSR Part 5. Handling is not Per Se a step in the

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COMMENTS BY Country/Organization: Canada / Canadian Nuclear Safety Commission						RESOLUTION			
Comment No.	Reviewer	Para/Line No.	Proposed new text	Reason	Project lead response	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
		Tentative table of contents	radioactive waste form itself, in respect of its subsequent handling, treatment, conditioning, and storage, the safety of the predisposal radioactive waste management facilities and activities in respect of protection of workers, the public and the environment, and the safety implications inherent in the selection of waste management options.” In Section 7, Overview of the DPP, the proposed section 4 (steps in the predisposal management of radioactive waste) includes subsections on generating, processing, and storage but does not include a subsection on handling. Recommend including a subsection in proposed section 4 on the “Handling of radioactive waste”.	subsection on each of the steps in the management of radioactive waste.					management of RW but a component in all the steps. At this point a dedicated sub section is not though to be necessary (as in existing GSR Part 5) but the drafting might consider it though
	CNSC	Section 7, Overview Tentative table of	In Section 7, Overview of the DPP, the proposed section 4 (steps in the predisposal management of radioactive waste) includes subsections on generating, processing, and						

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COMMENTS BY Country/Organization: Canada / Canadian Nuclear Safety Commission						RESOLUTION			
Comment No.	Reviewer	Para/Line No.	Proposed new text	Reason	Project lead response	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
		contents	storage but does not include subsections on waste characterization, classification or waste acceptance criteria. Recommend including subsections in proposed section 4 on the “Characterization of radioactive waste, Characterization of radioactive waste, and Waste Acceptance Criteria”.						
3	CNSC	Section 6	Include IAEA SSR-4 in the list.	<p>1. SSR-5 is included.</p> <p>2. Many safety topics that are covered in both SSR-4 and SSR-5 are identical and applicable to the same nuclear facilities.</p> <p>3. Essential efforts are needed to improve inconsistency</p>					

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COMMENTS BY Country/Organization: Canada / Canadian Nuclear Safety Commission						RESOLUTION			
Comment No.	Reviewer	Para/Line No.	Proposed new text	Reason	Project lead response	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
				in treatment of the same safety topics in SSR-4 and SSR-5.					

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: <div>Page.... of....</div> Country/Organization: Canada / Health Canada; Canadian Nuclear Safety CommissionDate: 2023-05-14							
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1	Section 5. Scope, 2 nd para	“The publication will address the predisposal management of all types of radioactive waste that may arise from the commissioning, operation and decommissioning of nuclear facilities, <u>radioactive waste generated in a nuclear or radiological emergency</u> , the use of radionuclides in medicine, industry, agriculture, research, and education, the processing of materials that contain naturally occurring radionuclides, and the remediation of contaminated areas – including spent nuclear fuel declared as radioactive waste and disused sealed radioactive sources declared as radioactive waste.”	Reference to waste generated in a nuclear emergency should be included in the scope of the document for consistency with the requirements of GSR Part 7.	X			

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COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: STUK Country/Organization: Finland/STUK May 2023			Page.... of.... Date:				
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1	3.5 integrated approach to safety	Would this section also cover safeguards?	What level of 3S integration intended?			x	safeguards (or rather “system of accounting for and control of nuclear materials” is addressed in the section “other provision” under requirement 21

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COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: M.C. Bossio Page...1. of....1 Country/Organization: Argentina /Nuclear Regulatory Date: May 15, 2023							
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1	Page 3, Scope	The scope of this new publication will address predisposal of disused sealed sources declared as radioactive waste as well as spent fuel declared as radioactive waste. In GSR part 5, 2009, these topics were out of scope.	Needs clarification and more information on how predisposal of spent fuel and disused sources declared as radioactive waste will be addressed.			X	The DPP define the scope of the document. All RW are concerned including SF and DSRS when declared as RW.
2	Page 5, section 7, item 4	Characterization of radioactive waste should be included in this section.	Characterization is key aspect of the pre-treatment of radioactive waste management.			X	As in the actual version of the document “characterization” sits in the section “Generation of RW” which contains 2 requirements: RW generation and control and characterization and classification of RW. The structure a priori remains the same at this point

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COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: WASSC, Russia Country/Organization: Russia/SEC NRS		Page 1 of 2 Date: 27-04-2023					
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
5	2. Background List of safety standards	It proposes to delete the List of SSs as non-informative (obsolete) or indicate the new title of the SSs which were superseded.	The List is not informative because almost all of the SSs were superseded and proposes to remove. If not, it would be helpful if the current title of the SSs is identified.			x	We follow the usual template. This should/could be discussed at SSC level. Not specific to this DPP
6	3. Justification for the production of the publication	Key areas and aspects for which revision was identified as necessary need to be defined.	It would be helpful to identify the areas and aspects subjected to revision			x	Not at this point , this is only the DPP,. Justification is given in the corresponding section, the whole document is a priori concerned , the drafting will consider them all.

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7	4. Objective	<p>The publication is intended for use by all entities including governments, regulatory bodies, operating organizations concerned with radioactive waste management and decision making related and other organizations, involved in radioactive waste management and development, operation, decommissioning and closure of any facilities where radioactive waste are generated, handled, processed, stored and transported.</p>	<p>1) Not only operating organisations are involved in RWM but also designers, manufactures, scientists etc.</p> <p>2) Adding of transportation is in accordance with the Section 5 of DPP.</p>		<p>X</p> <p>The publication is intended for use by all entities including governments, regulatory bodies, operating organizations concerned with radioactive waste management and decision making related to development, operation, decommissioning and closure of any facilities and where radioactive will be handled, processed, stored, as well as any other organizations, involved in radioactive waste management.</p>		<p>The list is not mean to be exhaustive , the text indicates “including”</p>
8	5. Scope	<p>The publication will establish the safety requirements that apply to all facilities and activities that are</p>	<p>It is reasonable to add the provision (para 1.13 of GSR Part 5) to identify the status of the Publication.</p>		<p>X</p> <p>The publication will establish safety requirements that</p>		

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COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: WASSC, Russia Country/Organization: Russia/SEC NRS		Page 1 of 2 Date: 27-04-2023					
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
		involved in the management of radioactive waste before disposal.			apply to all facilities and activities related to predisposal management of radioactive waste, covering all steps from waste generation up to disposal, including processing (pretreatment, treatment, and conditioning), storage, and transport.		
9	5. Scope	The publication will cover the safety aspects relevant to the radioactive waste form itself , in respect of its subsequent handling, treatment, conditioning, processing and storage, the safety of the predisposal radioactive waste management facilities and activities in respect of protection of workers, the public and the environment, and the safety implications inherent in the selection of waste management options.	1) Term ‘processing’ is more accurate and meets the terminology used in the DPP. 2) The last part seems to be unnecessary.	X			

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COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: United States Country/Organization: DOE		Page: 1 of 1 Date: 05 May 23					
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1	Sections 5 and 6	The DPP Scope (5) and relevant interfaces (6) should refer to the Nuclear Security Series, in particular #13 and #11-g. The authors should consider including a section on the interface between safety and security in the outline.	Security measures and the interface with security is relevant to the scope of this proposed document.		X All IAEA safety standards are addressing safety - security interface, but the scope don't necessarily need to include it , It will be one paragraph in the publication. In addition the document will be reviewed and approved by NSGC.		

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COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: Country/Organization: Belgium Date:				Page.... of....			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
	P1 point 2 It sets out the objectives, criteria and requirements for the protection of human health and the environment that apply to the siting, design, construction, commissioning, operation and shutdown of facilities for the predisposal management of radioactive waste, and the requirements to be met to ensure the safety of such facilities and activities.	P1 point 2 It sets out the objectives, criteria and requirements for the protection of human health and the environment that apply to the siting, design, construction, commissioning, operation, shutdown, decommissioning and closure of facilities for the predisposal management of radioactive waste, and the requirements to be met to ensure the safety of such facilities and activities.			P1 point 2 X It sets out the objectives, criteria and requirements for the protection of human health and the environment that apply to the siting, design, construction, commissioning, operation, shutdown and decommissioning of facilities for the predisposal management of radioactive waste, and the requirements to be met to ensure the safety of such facilities and activities.		Shutdown is already in the initial text, Closure is applicable for disposal facilities out of the scope of the document.

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Title: IAEA DPP DS-548; Predisposal Management of Radioactive Waste, GSR Part 5 (Rev.1)

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: Javed Iqbal, WASSC Member		Page 1 of 2					
Country/Organization: Pakistan/PNRA		Date: 11.06.2023					
No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1.	General	Provide gap analysis.	The gap analysis report or feedback analysis report highlights the changes to be incorporated in the revised document and according to the SPESS B it should be the part of DPP. Further, it was agreed during the consultancy meeting on the review process for developing Safety Standards and Nuclear Security Guidance - SPESS B, held in August 2022 that IAEA and review committees (and CSS) should ensure that these reports are included in the DPP and that these reports are well elaborated. However, such report is not included in the subject DPP. Please include the same.	X			
2.	Section 6/bullet 14	INTERNATIONAL ATOMIC ENERGY AGENCY, Storage of Radioactive Waste, IAEA Safety Standards Series No. <u>WS-G-6.1</u> , IAEA, Vienna (2006).	The reference of WS-G-6.1 has been included in the subject DPP as interface document. However, WS-G-6.1 is under revision and at DPP stage (same stage as of GSR Part 5). Therefore, it is suggested that <u>“revised guide number instead of WS-G-6.1 along with under revision”</u> may be			X	DPP for revision of WS-G-6.1 has not yet been approved. The reference will be updated in the course of

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			mentioned as also highlighted in the second last bullet “DS 526” please.				development of DS548
3.	Section 6	<ul style="list-style-type: none"> ▪ INTERNATIONAL ATOMIC ENERGY AGENCY, IAEA Safety Glossary: Terminology Used in Nuclear Safety, Nuclear Security, Radiation Protection and Emergency Preparedness and Response, 2022 (Interim) Edition, IAEA, Vienna (2022) 	Glossary may be included for referring of definition.	X			
		<ul style="list-style-type: none"> ▪ INTERNATIONAL ATOMIC ENERGY AGENCY, Code of Conduct on the Safety and Security of Radioactive Sources, IAEA, Vienna (2004) ▪ INTERNATIONAL ATOMIC ENERGY AGENCY, Guidance on the Management of Disused Radioactive Sources 2018 Edition, IAEA, Vienna 2018 	Code of Conduct and Guidance on the Management of Disused Radioactive Sources may be included to make in line with the scope as it states that “The publication will address the predisposal management of all types of radioactive waste and disused sealed radioactive sources declared as radioactive waste.	X			
4.	Section 7	<p>STEPS IN THE PREDISPOSAL MANAGEMENT OF RADIOACTIVE WASTE</p> <p>4.1 General</p>	Please include a new section named “General” highlighting various steps and associated approaches of Predisposal Management of Radioactive Waste.	X			

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5.	Section 7	<p>4. STEPS IN THE PREDISPOSAL MANAGEMENT OF RADIOACTIVE WASTE</p> <p>Generation of radioactive waste</p> <p>4.2 Processing of radioactive waste</p> <p>4.3 Storage of radioactive waste</p> <p>4.4 Radioactive waste acceptance criteria</p>	<p>Sections 4.1 Generation of radioactive waste and 4.4 Radioactive waste acceptance criteria are not the steps of Predisposal Management of Radioactive Waste as per definition of Predisposal Management referred in IAEA Glossary 2022. Although both the contents are very much important and should be the part of this standard however, these contents may be described separately. Further, content 4.4 Radioactive waste acceptance criteria can be addressed after “section 5.2 Development of predisposal radioactive waste management facilities”.</p>			X	<p>DS548 is a revision of GSR Part 5; it keeps so far the structure of the initial publication. It is too early at the DPP level to modify the structure while the drafting has not started.</p>
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