

DPP: DS550 Storage of Radioactive Waste

Country					RESOLUTION			
	Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
UK (WASSC) {1}	1	General		The UK welcomes the revision of this document to bring it in line with relevant safety standards published after 2006.	Accepted and appreciated			
Pakistan (WASSC) {1}	<u>2</u>	1. Identfctn. Para 1/line 5	Proposed Title: Storage of Radioactive Waste, ...Guide Number...Rev. 1)	Please include guide number like it had already WS-G-6.1 and also revision number like (Rev. 1) with proposed title.	Rejected. This Safety Guide will have the codification different from WS-G-6.1 and can't be named as Rev. 1			
Germany (NUSSC) {1}	<u>3</u>	Page 1 Background Line 10	IAEA Safety Standards Series No. WS-G-6.1 was published in 2006, with the objective to provide regulatory bodies and operating organizations that generate and manage radioactive waste with recommendations on how to meet the safety requirements established in IAEA Safety Standards Series No. WS-R-2, Predisposal Management of Radioactive Waste, Including Decommissioning, for the safe storage of radioactive waste. The Safety Guide is applicable to all storage facilities, with separate sections covering small and large storage facilities, <i>commensurate with potential hazard associated with them.</i> The storage of radioactive waste means the holding of radioactive waste in a facility that provides for its containment, with the intention of retrieval.	“Small and large” commensurate with potential hazards associated with the facility.	Rejected. While the comment is reasonable, this is description of WS-G-6.1 for background and the text is taken from its para 1.7 ‘as is’ and has no reasons to be changed. The words proposed to be included are e.g., in 3.7 but just recommend application of graded approach by the regulatory body for authorization and licensing but do not indicate that ‘small’ and ‘large’ storage facilities as the terms in WS-G-6.1 are associated with potential hazard. We do not intend correcting the text from past publication.			

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Russia (WASSC) {1}	4	2. Background	An increase in the number of nuclear and <i>non-nuclear</i> applications, nuclear power plants and research reactors undergoing decommissioning or having completed decommissioning has led to an increase in the volume of radioactive waste to be stored.	Non-nuclear applications where RW are generated proposes to add.	Accepted			
Germany (NUSSC) {2}	<u>5</u>	Page 1 Justification Line 1	Since 2006, several Safety Standards Series publications have been revised and new safety standards have been published and that affect the contents of WS-G-6.1. The recommendations on how to meet the safety requirements as presented in WS-G-6.1, do not incorporate the new information, approaches and practical experiences contained in Safety Requirements published after 2006 such as IAEA Safety Standards Series Nos GSR Part 3, GSR Part 5, GSR Part 6, GSR Part 7. WS-G-6.1 also needs to be aligned with the other Safety Guides on predisposal management of radioactive waste published after 2006, such as IAEA Safety Standards Series Nos. SSG-40, SSG-41, SSG-45, GSG-1 <i>and with the IAEA Nuclear Safety and Security Glossary.</i>	Typo It is also advisable to check whether the guide is consistent with the IAEA Nuclear Safety and Security Glossary.	Accepted: Typo to be corrected. The terminology will be checked against the latest publication of the Glossary(s), but there is no reason to mention the publications that don't belong to the Safety Standards in Justification. It seems to be better to add it to section 6 as: INTERNATIONAL ATOMIC ENERGY AGENCY, IAEA Nuclear Safety and Security Glossary, Non-serial Publications, IAEA, Vienna (2022)			
Germany (NUSSC) {3}	6	Page 2 Justification Line 5	The proposed publication will elaborate on the place and <i>on the</i> links of radioactive waste storage in the national radioactive waste	Wording, for better understanding	Accepted	Also, to be addressed on the editorial stage		

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			management programme.					
Germany (NUSSC) {4}	7	Page 2 Justification Line 20	The proposed publication will differentiate storage facilities not only according to the scale <u>and potential hazard</u> (small and large), but also according to the purpose and intended time of storing waste (decay storage, hold -short term storage, long term storage).	To our understanding, Facilities are differentiated as small and large not only due to their scale, but also due to their potential hazard. We were not able to find a definition of “hold storage” and would thus like to suggest to use “short term storage” or “interim storage” instead.				Rejected: This text addresses the former structure of WS-G-6.1 where no explicit link between the scale and hazard is highlighted. We proposed using “hold” because the Glossary defines ‘Storage’ as “The <u>holding</u> of radioactive sources, radioactive material, spent fuel or radioactive waste in a facility that provides for their/its containment, with the intention of retrieval” and doesn’t include definition neither for ‘short-term’ nor for others. Replacement of ‘hold’ with ‘short-term’ might be accepted but need to be discussed to avoid misunderstanding, because often it is associated with ‘shorter than usual’ storage period and sometimes is used even like a synonym for decay storage.
Russia (WASSC) {2}	48	3. Justification for the production of the publication	The recommendations on how to meet the safety requirements as presented in WS-G-6.1, do not consider <u>new safety requirements established as well as</u> incorporate the information, approaches and practical experiences contained in Safety Requirements published after 2006 such as IAEA Safety Standards Series Nos GSR Part 3, GSR Part 5, GSR Part 6, GSR Part 7.	It is important to consider new safety requirements established by the IAEA SSs during the safety guide revising.	Accepted			The wording is supposed to be a subject for editing
Japan (WASSC) {1}	9	4. Objective Para1/ Line2 (p.2)	Although the objective of this document refers to “in order to meet current safety requirements”, it is unclear whether ‘current’ refers to the existing edition or the edition to be revised concurrently. It should be clearly stated here that it corresponds to the edition to be revised, i.e. DS548. <u>Section 3 should</u>	Clarification.				Clarification proposed and might be improved later: “...requirements including those of them that are under revision in parallel”. <u>DS548 to be added to 6.</u>

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			<u>also state that this document will be developed in parallel with DS548 to ensure consistency.</u>					
Pakistan (WASSC) {2}	10	Section 4/para 1/line1	The objective of the proposed publication is to provide recommendations and guidance to on how to assess and ensure the safety of radioactive waste storage in order to meet current safety requirements.	The objective of IAEA safety guides is to provide both recommendations and guidance that how the safety requirements are met. Deleted words were confusing the objective as it is not limited to <u>assess and ensure the safety of radioactive waste storage.</u>	Accepted, but modified as follows: “The objective of the proposed publication is to provide recommendations and guidance on how to comply with current safety requirements for storage of radioactive waste.” Is supposed to be a subject for editorial process.			
Pakistan (WASSC) {3}	11	Section 4, para 2	The revised Safety Guide is intended for regulatory bodies, technical support organizations and operating organizations that generate and manage radioactive waste.	Please move this para “The revised Safety Guide is intended for regulatory bodies, technical support organizations and operating organizations that generate and manage radioactive waste.” to section 5 as it is part of scope instead of objective.	Rejected: According to SPSS F, the Objective in DPP should describe the objective of the publication in terms of what it is expected to achieve and <u>what the target audience</u> is.			
Russia (WASSC) {3}	<u>12</u>	5. Scope	The proposed publication will apply to the storage of <i>solid, liquid and gaseous</i> radioactive wastes in a wide range of facilities, including those at which waste is generated, treated, and conditioned.	It is recommended to add for clarification (as stated in para 1.8 of WS-G-6.1).	Rejected: The term ‘radioactive waste’ “as is” <u>doesn’t exclude solid, liquid or gaseous radioactive waste</u> as a more general one. E.g., when using ‘waste management’ ALL administrative and operational activities are never listed. Indication of solid, liquid and gaseous radioactive waste might give an expectation of equal addressing each of them in this publication, that is not correct. It might also give an expectation that this list is not complete, and other entities like wet-solid waste (spent ion exchange materials, precipitation of solids in storage tanks for liquid waste, ponds, or lagoons etc.) exist.			
Iran	13	5. Scope,	“Physical protection of storage	The accounting shall not be	Accepted			

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(RASSC) {1}		Para 3	facilities and considerations for control and accounting of <u>radioactive waste and</u> nuclear material, ...”,	limited to nuclear material. Also, in the table of contents of the document, in section 5 (subsection 5.5) the system of accounting is mentioned which is relevant to waste.				
Australia (WASSC) {1}	14	Page 3 Section 5	Consider including storage of disused sealed radioactive sources declared as waste in the scope of this document, or include a reference to which document this is covered by (as is done for wet or dry storage of spent nuclear fuel)	Storage of disused sealed sources is currently addressed in WS-G-6.1.	Accepted			DSRS will <u>not</u> be excluded but addressed in general only.
France (WASSC/ NUSSC) {1}	15	5. Scope	It is indicated in the “justification for the production of the publication” that the revision of the WS-G-6.1 should incorporate new information, approaches and practical experiences contained in particular among others in GSR Part 5. In the DPP DS 550, it is indicated in the scope that the publication will not address the storage of disused sealed radioactive sources declared as radioactive waste. <u>It should be considered to include the storage of disused sealed radioactive sources declared as radioactive waste in the scope of the DPP.</u>	In the DPP DS 5548 about the revision of the GSR Part 5, it is indicated that disused sealed radioactive sources declared as radioactive waste will be included in the scope of the new version of the GSR Part 5. If the management of disused sealed radioactive sources declared as radioactive waste is part of the DPP DS 548 (GSR Part 5), then it should be also in the scope of the DS 550 (WS-G-6.1) for consistency.	Accepted.			DSRS will <u>not</u> be excluded but addressed in general only. Consistency between DS548 (GSR Part 5) and DS 550 (WS-G-6.1) will be kept throughout all revision process.
Japan (WASSC) {3}	16	5. Scope Para 5 (p.3)	The scope of this proposed publication will not cover “the storage of disused sealed radioactive sources declared as radioactive waste.” Could you clarify the reason?	WS-G-6.1 addresses the storage of disused sealed radioactive sources. In addition, DS512 “Borehole Disposal Facilities for Disused Sealed Radioactive Sources” refers	Accepted			DSRS will <u>not</u> be excluded but addressed in general only.

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				to WS-G-6.1.				
USA (WASSC) {1}	17	Page 2 Section 5	Provide a reason that the storage of disused sealed radioactive sources declared as radioactive waste is beyond the scope of the current document or consider including the topic in scope.	The current version of WS-G-6.1 addresses storage of sealed radioactive sources. Section 5 of the DPP does not provide a reason why the topic is beyond the scope of the revision.	Accepted	DSRS will <i>not</i> be excluded but addressed in general only.		
Israel (WASSC)	18	Page 3, section 5 – Scope, sub section b)	The storage of disused sealed radioactive sources declared as radioactive waste should be addressed in this publication. Otherwise, please provide an explanation why it is excluded and which IAEA publication does refer to the storage of sealed sources.		Accepted	DSRS will <i>not</i> be excluded but addressed in general only.		
USA (WASSC) {4}	19		A general comment, since this document does not address the storage of sealed sources, it might be worthwhile to state which documents addresses sealed sources. This might help Member States and provide additional clarity and direction	There isn't any explanation why sealed sources are not addressed in this publication.	Accepted	DSRS will <i>not</i> be excluded but addressed in general only.		
France (WASSC/ NUSSC) {2}	20	5. Scope	The storage of orphan and/or disused radioactive sources is not in the scope of the proposed DPP DS550 because the DSRS are not declared as radioactive waste. <i>Nevertheless, it could be indicated that the requirements of the revised version of the WS-G-6.1 could be also applicable to the storage of orphan and/or disused</i>	There is no basis in IAEA safety standards for the storage of orphan and/or disused radioactive sources. Including the storage of orphan and/or disused radioactive sources into the scope of the DPP DS550 could solved this gap, which is critical when performing peer reviews for MS which don't have	Accepted	DSRS will not be excluded but addressed in general only. Safety Guide doesn't contain 'requirements', but 'recommendations'.		

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			<u>radioactive sources (even if not declared as radioactive waste).</u>	nuclear fuel cycle.				
UK (WASSC) {2}	21	Section 5 – Scope – exclusion of disused sealed sources		It is not clear why this document will exclude disused sealed sources <u>declared as radioactive waste</u> ; if they are designated as radioactive waste the UK considers they should be treated as such, noting that the detail of how these items are stored and recorded will be related to the relevant hazards. From a regulatory perspective it is also clearer that once any radioactive material is declared as waste it is treated as such.	Accepted			
Argentina (WASSC) {1}	22	Page 3, section 5 – Scope, sub section b)	The storage of disused sealed radioactive sources should be addressed in this publication.	Countries may store disused sealed radioactive sources with radioactive wastes originated from different activities in the same storage facility. It is important to address the specific aspects for the storage of sources in this publication.	Accepted	DSRS will <i>not</i> be excluded but addressed in general only. Specific aspects of DSRS storage are not intended to be considered in this general publication.		
Pakistan (WASSC) {4}	23	Section 5/ para 5	The proposed publication will not address: a) The wet or dry storage of spent nuclear fuel declared as radioactive waste, <u>which is addressed in IAEA Safety Standards Series No. SSG-15 (Rev 1)</u> ; b) The storage of disused sealed	At bullet ‘a’ it is mentioned that <u>which is addressed in IAEA Safety Standards Series No. SSG-15 (Rev 1)</u> however, such information is not mentioned at bullet ‘b’ to bullet ‘d’. Please include the same to make the DPP more informative and clarity.	DSRS will <i>not</i> be excluded but addressed in general only. Bullet b) is deleted. For bullets c) and d) – they were out of scope in WS-G-6.1 without clear ref. to other safety standards as well. There are no safety standards to be referred to for c) and d) and it seems unreasonable to address all of them in one publication. The difference between ‘usual’ mid-term storage of solid			

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			<p>radioactive sources declared as radioactive waste;</p> <p>c) The storage of waste from the mining and processing of uranium and thorium ores and minerals;</p> <p>d) The storage of other waste containing elevated concentrations of naturally occurring radionuclides and waste from mineral processing activities.</p>					<p>RAW and e.g., dumps and tailings seems to be significant to be covered by ‘common’ recommendations.</p> <p>If the waste containing naturally occurring radionuclides is processed (including waste characterisation and conditioning) for storage in specially sited, designed, constructed, and authorised engineered storage facility than the origin of the waste doesn’t matter.</p> <p>It is supposed to find better words to be used in the text of proposed publication, but not in DPP.</p>
Pakistan (WASSC) {5}	24	Section 6/bullet 5	INTERNATIONAL ATOMIC ENERGY AGENCY, Predisposal Management of Radioactive Waste, IAEA Safety Standards Series No. GSR Part 5 , IAEA, Vienna (2009)	The reference of GSR Part 5 has been included in the subject DPP as interface document. However, GSR Part 5 is under revision and at DPP stage (same stage as of WS-G-6.1). Therefore, it is suggested that “ <u>GSR Part 5 (Rev. 1) under revision</u> ” may be mentioned please.	Accepted			<p>We can’t refer to the document that doesn’t exist yet. The <u>publication</u> - not DPP, will refer the revised version.</p> <p>It will be indicated in section 6 that GSR Part 5 is under revision (DS548).</p>
Korea (WASSC) {1}	25	Section 6. p.5 / 8	<p>The following references should be added in the section 6:</p> <ul style="list-style-type: none"> - IAEA, Management of low and intermediate level radioactive wastes with regard to their chemical toxicity, TECDOC-1325, Vienna (2002). - IAEA, License Applications for Low and Intermediate Level Waste Predisposal Facilities: A Manual for Operators, TECDOC-1619, Vienna (2009). 	<p>The mixed waste could be generated from nuclear installations. Thus, it should be managed properly during the storage period.</p> <p>The storage facility is one of the nuclear installations. It is required to get license from the regulators.</p> <p>These references would help to deal with the subjects.</p>	Accepted			<p>and to be added to section 6.</p> <p>GSG-1 distinguishes between LLW and ILW and both TECDOCS might be considered as outdated. Licensing itself is out of focus in proposed.</p> <p>INTERNATIONAL ATOMIC ENERGY AGENCY, Licensing Process for Nuclear Installations, IAEA Safety Standards Series No. SSG-12, IAEA, Vienna (2010).</p> <p>INTERNATIONAL ATOMIC ENERGY AGENCY, Licence Applications for Low and Intermediate Level Waste Predisposal Facilities: A Manual for Operators, IAEA-TECDOC-1619, IAEA, Vienna (2009)</p> <p>INTERNATIONAL ATOMIC ENERGY AGENCY,</p>

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			- IAEA, Licensing Process for Nuclear Installations, SSG-12, Vienna (2010).		Management of Low and Intermediate Level Radioactive Wastes with Regard to their Chemical Toxicity, IAEA-TECDOC-1325, IAEA, Vienna (2002)			
France (WASSC/NUSSC) {3}	26	7. Overview	Long term storage: it is indicated in the DPP DS550 that “ <i>The proposed publication will differentiate storage facilities not only according to the scale (small and large), but also according to the purpose and intended time of storing waste (decay storage, hold storage, long term storage)</i> ”. The aspects related to the long-term storage of radioactive waste should be better explained and justified in the DPP DS550.	Long term storage is a specific issue that need careful consideration. IAEA has published a position paper about “the long term storage of radioactive waste: safety and sustainability” (https://www-pub.iaea.org/MTCD/Publications/PDF/LTS-RW_web.pdf) which concludes that “ <i>perpetual storage is not considered to be either feasible or acceptable</i> ”.	There is no need to repeat again the key statements from the mentioned publication in DPP. It isn't supposed or proposed to use long-term storage or 'perpetual storage' as a final solution. The aspects related to the long-term storage are now proposed to be addressed in 7.3 (new) instead of 'Large storage facilities' and in Annex II. Other clarifications in the text might be added during drafting, discussing, and editing the safety guide – not DPP.			
Hungary (EPRESC) {1}	27	page 5, section 7	We propose to change section title and content 2.3 from “Off-site emergency preparedness and response” to “Emergency preparedness and response”.	The title of section 2 is “Protection of human health and the environment in relation to the storage of radioactive waste”. In this topic both on-site and off-site EPR could be relevant.	It is now suggested to combine 2.3 and 5.6 and move it to 7. Other considerations... The initial proposal “as is” was to addresses different responsibilities for planning: <i>While the responsibility for on-site emergency preparedness and response remains with the operating organization, the responsibility for off-site emergency arrangements, including the development and implementation of emergency plans and procedures and the provision of emergency services, will be with the relevant off-site response organizations.</i>			
Hungary (EPRESC) {2}	28	page 5, section 7	We propose to change section title and content 5.6 from “On-site emergency preparedness and response” to “Emergency preparedness and response”.	The title of section 5 is “Development of storage facility for radioactive waste”. In this topic both on-site and off-site EPR could be relevant.	It is now suggested to combine 2.3 and 5.6 and move it to 7. Other considerations.			
Russia (WASSC) {4}	29	7. Overview	4. Management system for the storage of radioactive waste 4.1 Waste management	Waste management is not considered as a part of management for safety as	Accepted			

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				accordance to the definition (The component parts of the management system include the organizational structure, resources and organizational processes. IAEA Safety Glossary, 2022).				
Russia (WASSC) {5}	30	7. Overview	'5. Development of storage facility for radioactive waste' should be specified	The title of the chapter needs to be specified because the term 'development' in this context is indefinite and unclear.	Accepted	<i>"Lifetime of storage facility..."</i>		
Russia (WASSC) {6}	31	7. Overview	5.1 <u>Siting</u> Location and design	'Siting' is more appropriate term as applied to lifetime stage of a nuclear facility.	Accepted	For facilities where 'siting' might not be applicable, it will be addressed in Chapter 7		
UK (WASSC) {3}	32	General comment on scope (more related to 7)		The UK considers that the application of a graded approach to storage of radioactive wastes should be explicitly discussed.	Accepted	See Appendix II. To address wide range of storage facilities and different stages of their lifetime a graded approach is intended to be applied throughout the text of proposed publication both in terms of implementation of safety requirements and for development of the safety case with supporting safety assessments. As soon as application of a graded approach is multidimensional, it might also be addressed in 7 as a 'general' text, but also as one of separate subchapters in 7 if needed.		
UK (WASSC) {4}	33	General comment on scope (more related to 7)		We see no mention of waste characterization requirements to support the Waste Acceptance criteria. The UK considers this is an omission.		All indicated aspects <u>are supposed to be addressed in the text of publication where appropriate.</u> Storage as 'collection point' or storage of waste FOR characterization, might don't need WAC and detailed waste characterization.		

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				The UK consider that characterization of waste should be explicitly discussed – again in the context of a graded approach. In particular, advice on how to deal with wastes that are characterized, treated, passivated, and packaged awaiting final disposal that need to be stored over many decades during which standards and information requirements change. Storage of unconditioned waste also needs to be discussed. The use of a graded and pragmatic approach to dealing with legacy wastes should be discussed.		Waste characterization is an important part of waste management but not of the storage only, which is the subject of this publication. The link between WAC and waste characterization is to be mentioned in 7.3 (new in updated version of DPP) for Waste acceptance criteria.		
UK (WASSC) {5}	34	section 3, para 4 (more related to 7)		The UK notes that the DPP states that recommendations on ageing management for long-term storage and extended storage beyond design lifetime will be included, however we can find no specific mention of this in section 5 (scope) or section 7.		Ageing to be addressed in Chapter 7 e.g., as 7.2 (new) which now is proposed to be a ‘Long-term storage’		
UK (WASSC) {6}	35	Section 7 Table of contents		The UK considers that under section 7.1 Waste Acceptance Criteria (WAC) that this should	Accepted	This will be addressed mainly in 7.3 (new version of DPP) on WAC and also mentioned in 3.3		

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				provide advice on concessions to the WAC to allow acceptance of packages potentially outside the strict interpretation – this is in order to allow pragmatic decisions on acceptance to be made to avoid the creation of orphans wastes already packaged and to avoid unnecessary double handling.				
UK (WASSC) {78}	36	Section 7 Other Considerations		In addition to the comments above the UK consider that condition monitoring and inspection requirements should also be considered in their own right. Again, a graded approach needs to be applied – the requirements for these items will very much depend on how long anticipated storage is – the requirements will be very different for short term buffer or decay storage against many decades for high level wastes prior to disposal.	Rejected:	The Safety Guide can't specify any regulatory 'requirements' but only their implementation for storage of radioactive waste. Condition monitoring in general will be addressed in 3.3, partly in chapter 4 on "Management System", and more specifically when considering long-term storage in 7.2 and probably in Appendix II as well. For graded approach see proposed resolution for comment 32.		
UK (WASSC) {8}	37	Section 7 items 7	We would suggest "Buffer, transit & Decay Storage Facilities and Long term storage Facilities	The UK consider that the use of "small" and large storage facilities is confusing – it is generally the inventory that matters not the size in volume		To be addressed in work. 'Small' and 'Large' were used in the previous version and need to be replaced. As soon as no type of storage facilities are clearly defined in the IAEA Glossary, and storage facilities might be categorized based on different criteria, such		

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				of the facility. How is the hazard/risks from radioactive waste inventory reflected in this and also storage timescales i.e. short-term/transit storage, decay storage, longer term interim storage Note comment above.	<p>as:</p> <ul style="list-style-type: none"> - Scale and colocation with other facilities; - Waste class; - Physical waste type (solid, liquid, gaseous); - Time for holding the waste and purpose of storage, etc. <p>we don't want to limit ourselves in advance and keep this open for looking for consensus.</p>			
UK (WASSC) {9}	38	7. Overview. 7. Other considerations		The UK considers that Safeguards issues need to be addressed here.		Interface between safeguard and safety issues is intended to be addressed in Chapter 2 and where appropriate in Chapter 7.		
Argentina (WASSC) {2}	39	Page 5, Section 7, Overview.	Characterization and waste form and packaging are not mentioned in the tentative table of contents for the proposed publication	These topics were addressed in publication WS-G-6.1 and should also be mentioned in the superseding publication. Characterization and waste packaging are key aspects of the pre-treatment of radioactive waste management and relevant in safety of storage facilities. In addition, this information is needed for development the safety case of the storage facility.	Rejected: Pre-treatment like other processing activities is out of the scope.			
Argentina (WASSC) {3}	40	Page 6, Section 7, Overview, ANNEX	An Annex including the storage of <u>[inter]medium and high level waste</u> could be incorporated	Countries with NPP programs generate medium and high level waste which have specific requirements for storage.	They could be incorporated or addressed in Annex II. We plan to address these challenges in ANNEX II for Long-term storage and in 7.3 which now is proposed to be renamed from 'Large...' to 'Long-			

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				It could be useful to provide guidance to Members States related to the storage of these wastes, taking into account the challenges that long term storage imposes.	term...'			
Russia (RASSC)	41	7. Overview	... 3. ROLES AND RESPONSIBILITIES FOR THE STORAGE OF RADIOACTIVE WASTE 3.1 Responsibilities of the government 3.2 Responsibilities of the regulatory body 3.3 Responsibilities of operators of licensees and operating organizations ...	This correction is needed: - because current safety guide WS-G-6.1 consist design requirements. According to the IAEA glossary design activities are classified as licensed activities; - for harmonization of structures DS548 «Predisposal Management of Radioactive Waste, GSR Part 5 (Rev.1)» and DS550 «Storage of radioactive waste».	According to the Glossary, the 'operator' is "any person or organization <i>applying for authorization or authorized</i> and/or <i>responsible</i> for safety when undertaking activities or in relation to any nuclear facilities or sources of ionizing radiation." It includes 'design'. The Glossary also includes the text addressing 'licensee' or 'operator' like synonymous. Publication will be <u>harmonized with DS548</u>			
Japan (WASSC) {2}	42	5. Scope Para4 (p.2) (more related to 7)	Since existing storage facilities are expected to be in various states, such as storing high dose waste , the recommendation on how to apply for existing storage facilities should be clarified in the draft publication.	Comment.	To be addressed in 5.7 'Existing facilities' as appropriate			
Japan (WASSC) {4}	43	7. Overview 2.3 5.6 (p.5)	Item 2.3 should be merged with Item 5.6. So, the title of Item 5.6 should be changed to "emergency preparedness and response."	Clarification. Section 2 of this document will address the protection of human health and the environment. Although this section will also specifically address off-site emergency preparedness and response, this topic would be better	It is now suggested to combine 2.3 and 5.6 and move it to 7 - Other consideration (see reasons for 27 and 28).			

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				to merge with item 5.6. In addition, the current facility specific Safety Guides, i.e. SSG-40, 41 and 45, provide guidance of the protection of human health and the environment in Section 2, however off-site emergency preparedness and response is not addressed in it.				
Korea (WASSC) {2}	44	7. Overview p.5 / 29	In the section 5, the following subsection should be added. - Licensing process and applications	In order to develop the storage facility, license is required for its construction and operation. It would be helpful for this subsection to be introduced briefly.	In general licensing will be addressed in 3.2. Licencing will be required at several stages of storage facility lifetime including decommissioning and this process itself is to be much more linked to safety case and safety assessment at different stages of storage facility lifetime, and to the national regulation on authorization processes and procedures. It seems to be better to address it e.g., in upcoming revision of GSG-3 on safety case and safety assessment for predisposal.			
Pakistan (WASSC) {6}	45	Section 7	Removal from Regulatory Control	Please add new subsection after 5.4 Shutdown and decommissioning.	Accepted	5.5. Release from Regulatory Control		
Pakistan (WASSC) {7}	46	Section 7	Ageing Management of Packages and Facilities	Please add new subsection to address the issues highlighted at Section 2 (Background) of DPP.	Rejected: These aspects will be addressed in new 7.2 on long-term storage, because it is one of the most critical issues for the long term safety. No new subsection is envisaged. Detailed technical aspect are not a subject for this safety guide.			
Pakistan (WASSC) {8}	47	Section 7/Subsection 5(5.5)	5.5 System of accounting and control	The proposed deletion normally addresses the nuclear material which is under safeguard control (spent nuclear fuel), however, this is not the scope of this publication as mentioned at Section 5(a).	Rejected but not ignored: Potential change of subtitle possible to better indicate that not the system of accounting and control but its <i>interface</i> with safety is the subject of this publication. We also distinguish between accounting and control of nuclear materials (that might be contained in HLW) and accounting and control of radioactive waste, and intend to address the interface issues in this publication (see also			

Country					RESOLUTION			
	Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
					comment 13)			
USA (WASSC) {2}	48	Page 5 Section 7 (contents) proposed Section 4	Add a section for extended storage and ageing management in the proposed Section 5 – Management Systems	Section 3 of the DPP lists the need for guidance on extended storage and ageing management as a key justification for the revision; however, it is not clear where the topics are addressed in the proposed table of contents. The recommended addition would provide a clear location for the reader to find the new guidance.	Rejected	but not ignored:	It isn't relevant to all storage facilities. <u>Ageing management to be addressed</u> in renamed 7.3 <i>Long-term storage facilities</i> , while extended storage to be addressed in 5.7 <i>Existing facilities</i>	
USA (WASSC) {3}	49	Page 5 Section 7 (contents) proposed Section 7	Replace 7.2 and 7.3 (“small” and “large” facilities) with three subsections (i.e., 7.2 through 7.4) reflecting decay storage, hold storage, and long term storage.	The justification for production of the document in Section 3.0 of the DPP indicates the document is needed to address both the scale and the intended time frame of the storage. However, the proposed Section 7 appears to equate “small” with “decay” storage, and to leave “hold” and “extended” storage addressed only implicitly as “large”. Although that alignment of size and intended purpose may be typical, it is not necessarily universal. An organization based on the intended purpose may be better aligned with the	Partly it is already addressed in updated tentative table of content, keeping in mind that the main text is going to address the general aspects very close to an average storage facility, while specific considerations like ageing management for long-term storage facilities or significant impact of graded approach to small and decay facilities are intended to be addressed in chapter 7. Correspondently, it is now proposed to keep only two subchapters in this regard for 7: “small and decay” and “long-term” storage facilities. While the “average” one is supposed to be covered in the main text of chapters 2-6.			

Country					RESOLUTION			
	Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
				safety considerations.				
USA/DOE (NSGC)	50	Sections 5 and 6 (and 7)	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/overview (7).	Security measures and the interface with security is relevant to the scope of this proposed safety document.	Accepted	Security measures are not going to be considered in this safety publication, but the interface between safety and security to be addressed in chapter 7 as a subchapter or as appropriate. Indicated publications to be added to 6 of DPP: INTERNATIONAL ATOMIC ENERGY AGENCY, Nuclear Security Recommendations on Physical Protection of Nuclear Material and Nuclear Facilities (INFCIRC/225/Revision 5), IAEA Nuclear Security Series No. 13, IAEA, Vienna (2011) INTERNATIONAL ATOMIC ENERGY AGENCY, Security of Radioactive Material in Use and Storage and of Associated Facilities, IAEA Nuclear Security Series No. 11-G (Rev.1), IAEA, Vienna (2019)		
Switzerland (NSGC)	51	7. Overview		According to Para 5. SCOPE/Line 7 it is intended that the publication will highlight the physical protection of storage facilities. This intention is not reflected in Para 7 OVERVIEW in the tentative table of content and should be included or physical protection should be removed from the scope in Para 5. SCOPE to be consistent.	Accepted	To be addressed in Other Considerations (Chapter 7) as 7.6. Initially it was supposed to touch this aspect where appropriate in the text of proposed publication.		
Belgium (NUSSC)	52	ANNEX 2nd Para Lines 7-10	“Preference for centralized storage of waste... elaborate on...”: to nuance this general statement in function of	The safety guide will cover all kind of storages, including decay storage. In this case a site for		Addressed, but other wording is proposed: “This guidance could sensibly be elaborated on and could elucidate the advantages and disadvantages of such a		

Country					RESOLUTION			
	Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
			type of storage.	centralized storage could be questioned (unnecessary transports to centralized facility when decay storage can be safely done on the production site itself)		strategy and related matters, such as type of storage facility e.g., decay storage, or such as site selection for a centralized facility for the storage of waste ". To be considered during drafting proposed publication and editorial procedures.		
Pakistan (WASSC)	53	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.		Rejected. SPESS B states that the technical officer uses as a basis the gap analysis report for a new publication . This publication isn't the new one but revision of a publication from 2006 "Storage of Radioactive Waste" WS-G-6.1 The new versions of SPESS B and SPESS F after all approvals became applicable on <u>May 26</u> only i.e., after receiving and addressing this comment.		
Germany (NUSSC)	54	Page 2 Scope	<u>Requirements of</u> The proposed publication is <u>are</u> intended to apply to new storage facilities for radioactive waste, and <u>The publication</u> will include recommendations on how to apply it for existing storage facilities <u>as well</u> .	Please check the wording		Rejected Proposed publication is the safety guide and doesn't provide 'requirements' but 'recommendations' only. Editorial check will be done on the later stages.		
Germany (NUSSC)	55	Page 5 Overview	5. DEVELOPMENT OF STORAGE FACILITIES FOR RADIOACTIVE WASTE 5.1 Location and design	The subordination of recommendations for existing facilities to the chapter of recommendations for the		Chapter 5 is proposed to be renamed as "Lifetime of storage facility for radioactive waste" (See updated DPP). Subchapter "Existing facilities" is proposed to be		

Country					RESOLUTION			
	Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
			5.2 Construction and commissioning 5.3 Storage facility operation 5.4 Shutdown and decommissioning 5.5 System of accounting and control 5.6 On-site emergency preparedness and response 5.7 Existing facilities <u>Application of recommendations to the existing facilities</u>	development of storage facilities is confusing. What exactly is meant here? Application of recommendations to the existing facilities?		moved to Chapter 7 and its title might be changed during working in this publication. But it is supposed to include not only recommendations for application of safety requirements for predisposal (under revision in parallel), but also address extended storage period, ageing management, and other relevant considerations.		
Germany (NUSSC)	56	Page 6 Overview	ANNEX <u>Appendix I:</u> POSTULATED INITIATING EVENTS FOR CONSIDERATION IN A SAFETY ASSESSMENT FOR THE STORAGE OF RADIOACTIVE WASTE ANNEX <u>Appendix II:</u> APPLICATION OF A GRADED APPROACH TO THE STORAGE OF RADIOACTIVE WASTE (very short lived waste – high level waste; decay storage – long term storage)	We suggest to replace “annex” into “appendix” because of the importance of the issues: according to SPESS A, page 119 “An appendix, if included, is considered to form an integral part of the safety standard. Material in an appendix has the same status as the main text... Annexes and footnotes are not integral parts of the main text.”	Accepted			