



Bucharest,  
No...989.../PC/...23.02.2015...

Dear Mr. LJUBENOV,

I would like to refer to the IAEA letter dated 18 December 2014 (J5.05) on the subject of revision of the **DS452** entitled **"Decommissioning of Nuclear Power Plants Research Reactors and Other Nuclear Fuel Cycle Facilities"**.

In this respect, please find attached the comments issued by the experts of the Romanian Regulatory Authority (CNCAN) on the above mentioned draft.

Looking forward to continuing our co-operation,

Yours sincerely,

Constantin POPESCU

CNCAN President



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Form for comments

**„Decommissioning of Nuclear Power Plants, Research Reactors and Other Nuclear Fuel Cycle Facilities” (DS 452)**

| COMMENTS BY REVIEWER  |   |  |  | RESOLUTION |                                 |                                 |                                     |                                     |
|---|---|--|--|------------|---------------------------------|---------------------------------|-------------------------------------|-------------------------------------|
| Reviewer: Daniel Bogdan<br>Contry: Romania<br>Organization: National Commission for Nuclear Activities Control<br>PAGE:<br>DATE: 19.02.2015 |   |  |  | Reason     | Accepted                        | Accepted by modified as follows | Rejected                            | Reason for modification / rejection |
| Comment No.   | Para / Line                             | Proposed new text  | Reason   | Accepted   | Accepted by modified as follows | Rejected                        | Reason for modification / rejection |                                     |
| 1.  | Paragraph 2.12. Lines 8.                | „Authorization process;”   | The term authorization shall be considered in the current safety guide as preferred term compared to licensing. The usual term used by the agency is „authorization” (see also section 9, par. 9.13) |            |                                 |                                 |                                     |                                     |
| 2.  | Paragraph 2.18, 2.21. Lines 3, resp. 5. | „Overall safety assessment, which covers the entire project and provides input and links to more detailed safety assessments that may be developed for each decommissioning phase or work plan.” | The term „Overarching” is not very common.   |            |                                 |                                 |                                     |                                     |

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| 3. | Paragraph 3.2, Line 2.      | Proposed new text: „...The government should approve the overall objectives of the decommissioning as part of its obligation to establish and maintain a governmental, legal and regulatory framework within all aspects of decommissioning including management of resulting radioactive waste.” | It is not common for the government to establish the objectives for a phase of a certain nuclear installation.”                                |  |  |  |  |
| 4. | Paragraph 3.14, Line 2 - 3. | Proposed new text: „... the regulatory body should verify or check the existence of the funding mechanisms that can be used to ensure that appropriate funds will be available when needed.”  | Reason: It is not common that the regulatory body for nuclear safety to define funding mechanism for certain phases of a nuclear installation. |  |  |  |  |
| 5. | Paragraph 4.7, Line 4.      | Proposed new text: „The safety policy of the licensee and the behaviour and attitudes of senior management should be committed to safety and should be visible to the organization and every level and extend to other organizations that ...”  | Reason: the term „exemplary” used here seems to be too subjective  |  |  |  |  |
| 6. | Paragraph 4.13, Line 2.     | Proposed new text: „ ...the licensee should develop and implement a comprehensive training program for decommissioning personnel,   | Reason: the term „robust” is not explanatory for a training program.   |  |  |  |  |

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|     |                             | no matter if former operation staff is involved, or the works are ..."  |   |  |  |  |  |  |  |
| 7.  | Paragraph 4.24. Line 1 - 2. | Proposed new text: "The administrative procedures should identify de decommissioning permanent and temporary records to be retained ...".                             | Reason: it is useful to specify that some of the records are permanent and the other are temporary for certain phases of the decommissioning. |  |  |  |  |  |  |
| 8.  | Paragraph 4.24. Line 1 - 2. | Proposed new text: "The selection of a decommissioning strategy follows a iterative process."   | Reason: the term iterative is more clear than progressive. It is not understandable what is an „progressive process“.                         |  |  |  |  |  |  |
| 9.  | Paragraph 5.12. Line 3.     | Proposed new text: "... in order to optimize resources, efforts, human resource, as well as ...".   | Reason: It is quite uncommon to <u>optimize</u> skills or other personal abilities.   |  |  |  |  |  |  |
| 10. | Paragraph 5.34. Line 2.     | Proposed new text: "...the licensee should consider the results of the periodic safety reviews performed during the operation of the facility, if the case may be..." | Reason: Not all types of facilities have to perform periodic safety reviews during their lifetime, perhaps just some sort of safety           |  |  |  |  |  |  |

