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THE PERMANENT MISSION OF THE PEOPLE'S REPUBLIC OF CHINA
TO THE INTERNATIONAL ATOMIC ENERGY AGENCY

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CPM-TP-2015-028

13 April 2015


REF. No.: J5.05

Subject: Decommissioning of Nuclear Power Plants, Research Reactors and Other Nuclear Fuel Cycle Facilities (DS452)

Dear Mr. Vladan Ljubenov,

I am pleased to send you the attached relevant document, as the feedback of China to the draft of Decommissioning of Nuclear Power Plants, Research Reactors and Other Nuclear Fuel Cycle Facilities (DS452).

Please, sir, accept my highest considerations.

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Mr. Vladan Ljubenov,
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Forms for Comments Decommissioning of Nuclear Power Plants, Research Reactors and Other Nuclear Fuel Cycle Facilities (DS452)

COMMENTS BY REVIEWER

Reviewer:				RESOLUTION			
Country/Organization: China / CAEA				Date: April 10, 2015			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification /rejection
1	Page 7 Para 2 Line 1-3	Revising to be "Exposure during decommissioning shall be considered to be a planned exposure situation, <u>existing exposure</u> and the relevant requirements of the Basic Safety Standards shall be applied accordingly during decommissioning"	Some exposure belong to existing exposure, for example, exposure due to contamination of areas by residual radioactive material arising from a nuclear or radiation emergency after has been declared ended, these exposure may be not ignored and should be considered during decommissioning				
2	Page 9 Para 2.10 Line 1 Para 2.11 Line 1	Example of the content of the graded approach had better be given.	Some references should be provided, because nuclear power plants, research reactors and other nuclear fuel cycle facilities are different.				
3	Page 7 Para 2.3 Line 5-6	Revising to be "During decommissioning actions, the principal focus of radiation protection is the protection of workers against occupational radiation exposure from planned and <u>emergency situations</u> ."	For radiation protection, there are three types of exposure situations, i.e. planned, emergency, and existing exposure situations, so we should use "emergency" instead of "unplanned".				
4	Page 10 Para 2.14 Line 8	Revising to be "Construction, commissioning, and operation of supporting facilities for management of radioactive waste,"	For some decommissioning projects, new facilities for management of radioactive waste should be built.				
5	Page 11 Para 2.20 Line 2-3	Revising to be "The results of the safety assessment or part of the safety assessment, which may be developed by subcontractors, based on their relevant knowledge and experience in specific decommissioning techniques, should be reviewed, approved and implemented by the	The safety assessment developed either by the subcontractors or by the licensee, is one important part of the integrated safety assessment.				

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6	Page 25 Para 5.7 Line 3	licensee, in accordance with the integrated management system, should also be reviewed and approved not only by the licensee, but also by the regulatory body, to ensure overall safety during decommissioning."	Revising to be "as short as possible, such as 1 to 5 years"					
7	Page 36 Para 7.4 Line 3 Page 50 Para 8.3 Line 1	Revising to be "as early as possible, such as 1 to 3 years"	A period of time should be provided, such as 1 to 5 years					
8	Page 39 Para 7.10 Line 1-3	7.10 should be cancelled.	A period of time should be provided, such as 1 to 3 years					
9	Page 40 Para 7.11	We propose to review and update the initial decommissioning plan every ten years.	The details in 7.10 do not conform to the requirements of the license application documents.					
10	Page 40 Para 7.11 Line 7-8	Revising to be "Changes to relevant important regulatory or safety requirements and criteria, e.g., radiation protection standards."	According to the PSR, we propose to review and update the initial decommissioning plan every ten years.					
11	Page 42 Para 7.18 Line 3-4	Revising to be "such as the removal of radioactive waste or spent nuclear fuel from the facility, which is also subject to authorization."	Some activities like these should be reviewed and approved by the regulatory body.					
12	Page 42 Para 7.20	Evaluate existing decommissioning technical need to be researched.						
13	Page 43	these and other selected supporting	Add some illustrations.					

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14	Para 7.23 Line 2-3	documents, e.g.,... should be subject to an internal independent review performed by the licensee.						
	Page 52 Para 8.10 Line 1-2	Revising to be "However, in some cases special tools and equipment as well as general tools and equipment which would be used in special conditions may be needed, and they all should be tested in simulated conditions before their use, from both a safe operability and maintainability aspect.	Some mature tools and equipment being used in a special conditions also should be tested.					
15	Page 56 Para 8.33	Example of the content of a waste management plan had better be given.	Readers can take it as reference.					