

NS.09.1



Pakistan Atomic Energy Commission

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Dated: 19 Jan, 2015

**Subject: REVIEW OF IAEA DRAFT SAFETY STANDARDS
"DECOMMISSIONING OF NUCLEAR FACILITIES, RESEARCH
REACTORS AND OTHER NUCLEAR FUEL CYCLE FACILITIES
(DS452)"**

Please find enclosed comments from Pakistan Atomic Energy Commission (PAEC) after review of the above mentioned document.


(Syed Shaukat Hasan)
Director (D&S)

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INFORMATION	
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Form for Comments

Decommissioning of Nuclear Facilities, Research Reactors and other Nuclear Fuel Cycle Facilities (DS452)

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: BABAR GHIA, CE							
Country/Organization: Pakistan/PAEC				Date: 06-01-2015			
Comment No.	Para/page	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
01	1.1 Page 1	Other factors, such as national energy policies, changing energy markets or un-foreseen conditions may result in facilities permanently shutting down earlier than planned.	Further clarification and explanation				
02	1.2 Page 1	... aspects of decommissioning, such as designing for minimization of radioactive waste, decommissioning planning, record keeping and management of system SSCs that will support long term decommissioning activities are required to be considered throughout the lifetime of a facility.	Further clarification and explanation				
03	1.14 Page 3	Comment:- What about old plants that did not consider these aspects at the time of siting and design.	Query				
04	2.4 Page 7	Comment:- Concept of defense-in-depth is generally defined during plant operation. For decommissioning this concept need to be further clarified.	Query:-				

05	4.7 Page 19	Comment:- Role of Quality Assurance during decommissioning with authority to stop work etc. should be clearly mentioned.	Query				
06	4.13 Page 20	Comment:- For proper decommissioning one need complete commissioning documents and experience. Training should also cover this aspect.	Query				
07	4.17 Page 21	What is the meaning of "complex facility" ?	Explanation				
08	5.2 Page 24	The "No action" strategy (leaving the facility after operation as it is, and waiting for decay of radioactive inventory) should not be regarded as an acceptable decommissioning strategy <u>and the facility will remain as was under operational regulatory control.</u>	More elaboration				
09	5.2 Page 24	While discussing decommissioning strategies, it should be identified as planned strategy (immediate dismantling, Safe storage) and unplanned strategy (entombment)..... As discussed in page 27 section 5.18	More elaboration				
10	5.15 Page 27	What is the meaning of safe state.?	Explanation				
11	5.32 Page 30	If this cannot be accomplished <u>and further re-strengthening is not possible</u> , immediate dismantling actions should be undertaken.	Elaboration				