

Comment on The Management System for the Predisposal and Disposal of Radioactive Waste (DS477)

COMMENTS BY REVIEWER					RESOLUTION		
Reviewer: Page 3 Country/Organization: Secretariat of Nuclear Regulation Authority, Japan Date: 19 th June							
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1	General/ Attachment	<u>Comment</u>	1. This guide should be consistency with DS456 which is under consideration. 2. It would be premature to develop this guide despite pre-approval for DS456. 3. There is a common issue that the definition of "assessment" should be clarified with those documents (this guide and DS456). Is the aspect of "assessment" addressed in those documents consistency with ISO9001 etc.?		X Consistency with DS456 will be taken into account during the development of DS477. Since DS456 has already been sent to review committees for the first review of the draft publication (SPESS Step 7), it is considered to be appropriate to initiate drafting process of DS477. Definition of "assessment" will be discussed during the development of DS477.		
2	General	<u>Comment</u>	1. It seems that this DPP is mentioned only the combine GS-G-3.3 and GS-G-3.4. The DPP should be added some description of the specific issues on the management systems for predisposal and disposal of radioactive waste. It might be not to need the revised guide because the issues on "management systems of facilities and activities" were addressed in		X DS477 will be developed taking into account specific aspects on predisposal waste management and disposal of radioactive waste, such as consideration for institutional control in the post-closure phase of disposal facilities, which are not specifically covered by GS-G-3.1.		

			<p>GS-G-3.1.</p> <p>2. The guide should be developed to provide enhancement measures mentioned above.</p> <p>For example, the following matters should be discussed in this guide.</p> <p>I Critical elements of management system relating to “disposal”</p> <ul style="list-style-type: none"> • Information sharing among multi-disciplinary field (e.g. site characterization, facility design and safety assessment as supporting safety case) • The long-term record preservation for the post-closure period <p>II Critical elements of interrelationship between the predisposal and disposal phase</p> <ul style="list-style-type: none"> • The Management approach to keep information through steps of process management in waste management • Predisposal management relating to the quality assurance of waste required for disposal 				
3	Section 4	<u>Comment</u>	<p>1. If this Safety Guide covers “transport” of radioactive waste, this topic should be mentioned in this section.</p>		<p>X</p> <p>Management system for the transport of radioactive material is covered by TS-G-1.4. DS477 addresses transport to ensure that</p>		

			2. If this guide does not cover “transport”, some description should be added in order to explain it.		the management system for predisposal management takes into account interdependencies with the subsequent transportation and disposal.		
4	Section 4 Line 3	..., long term periods of storage, ...	Although the intent is understandable, the scope of GS-G-3.3 refers to only “storage” in para.1.11.	X			
5	Section 5	Add list of relevant documents such as; GSR Part2 (DS456) GSR Part5 GSR Part6 (If transport is covered) SSR-5 GS-G-3.2 GS-G-3.1 WS-G-6.1 GSG-3 SSG-1, 14, 23 DS356, 357 (to be published) DS442, 447, 448, 454, 459 DS425(If transport is covered)	List of specific documents is helpful to promote better understanding of this Safety Guide for readers as well as technical officer.	X			
6	ATTACHME NT APPENDIX I and II	<u>Comment</u>	It would be preferable to be provided appendices as improved appendices of GS-G-3.3 and GS-G-3.4.	X			