

TITLE: USA Comments on DS477 DPP Version 1 “The Management System for the Predisposal and Disposal of Radioactive Waste”

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: Contact: Bobby Eid (301-415-5811; boby.abu-eid@nrc.gov) Page..1.. of .3.. Country/Organization: USA/US Nuclear Regulatory Commission Date: June 7, 2013							
Comment No.	Para/Line No.	Proposed new text/Comments	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1.	General	<p>DS477 (e.g.; <i>The Management System for the Predisposal and Disposal of Radioactive Waste, RW</i>) lacks discussion of integration between predisposal and disposal systems from one side and integration with other closely related safety guides under development such as: DS447 “<i>Predisposal Management of RW from Fuel Cycle Facilities</i>,” DS448 “<i>Predisposal Management of RW from Reactors</i>.”</p> <p>It seems these three guides deal with similar topic (e.g.; predisposal management of RW). We recognize that DS477 deals with “<i>Systems</i>,” however, significant overlap would be anticipated with DS447 and Ds448. Therefore, DS477 should address in the background and Scope Sections and include in the Table of content integration issues and potential areas of overlap with other standards in order to minimize redundancies during development of DS477 guidance document.</p>	Addressing integration of predisposal and disposal management system in DS477 with guidance provided in DS447 & DS448. This is suggested to avoid redundancies in scope and implementation of requirements.		X Relationship with other Safety Standards will be discussed during the development of DS477.		

2.	General	<p>It is unclear if DS477 is intended to deal with one system associated with predisposal of RW as perceived from the title “The Management System.” However, Section 4, first Para, states “<i>The objective of the Safety Guide on the Predisposal and Disposal of Radioactive Waste is to provide updated guidance on developing and implementing management systems for both pre-disposal and disposal of radioactive waste (RW). It is intended to be applied to the processing, handling, long term periods of storage, and also to the lifecycle of radioactive waste disposal facilities.</i>”</p> <p>The scope should clarify that the intent of the guide is to integrate management systems into one system.</p>	Consistency and harmony between the title and text and to clarify how the two systems for predisposal and disposal of RW would be integrated into one system.	x			
3.	General	<p>The Table of content appears to have a generic system for predisposal and disposal of RW. As indicated above the management system for disposal of RW through its lifecycle could be different due to issues related to surveillance and monitoring after closure, maintenance, and institutional controls. In this context, responsibilities for safety within the management system need to be addressed.</p>	Clarity and completeness to address long-term management systems particularly after site closure and during institutional controls.	x			
4.	General	<p>It is noted that GSR Part 2 deals with “Leadership,” and “Management for <u>Safety</u>.” The</p>	Completeness & Consistency with GSR Part 2.		X Consistency with GSR Part 2 will		

		current Table of content appears to deal only with management. Therefore, Section Titles should include “Safety” similar to GSR Part 2.			be taken into account and table of contents will be discussed during the development of DS477.		
5.	Page 2, Para 3.	Modify last sentence to read: “..will be published as a new General Safety Requirement, GSR Part 2 (Leadership and Management for Safety), currently designated DS456.	Completeness and consistency with Para 2, page 2.	x			
6.	Page 4, Section 3	Section 3 MANAGEMENT RESPONSIBILITY: After the first bullet add a new bullet: Leadership	Completeness and consistency with GSR Part 2		X Consistency with GSR Part 2 will be taken into account and table of contents will be discussed during the development of DS477		
7.	Page 4, Table of Content	Section 5. “PROCESS IMPLEMENTATION” Add after the first bullets: <ul style="list-style-type: none"> • Integration of management systems for predisposal and disposal of RW. • Graded Approach to Safety • Interested Parties and Stakeholders Involvement 	To establish consistency with GSR Part 2 addressing these topical areas (e.g.; Requirements 3, 4, and 10 respectively).		X Consistency with GSR Part 2 will be taken into account during the development of DS477.		