

June 17, 2002

Tomihiro Taniguchi
Deputy Director General
Department of Nuclear Safety
International Atomic Energy Agency
P.O. Box 100
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A-1400 Vienna
Austria

Dear Mr. Taniguchi:

During our meeting on the margins of the Convention on Nuclear Safety Review Meeting in April, we discussed your request for U.S. Government comments on three draft documents: Division of Nuclear Installation Safety (NSNI) Strategy on Life Extension of Nuclear Facilities, Nuclear Safety Network in Asia, and Safety and Security of Sources in the IAEA Nuclear Security Plan of Action - Expenditure of the U.S. \$1 million Contribution. These comments are enclosed for your review. I hope that you and your staff will find them useful.

I look forward to our June 18, 2002 meeting in Paris so that we may continue discussions regarding these documents, if necessary, as well as other items of interest.

Sincerely,

/RA/

Richard A. Meserve

Enclosure:
As stated

cc: Ambassador Brill

COMMENTS ON IAEA DOCUMENTS

NSNI Strategy on Life Extension of Nuclear Facilities

This paper describes a high level overview of the programs and a listing of reference documents that can be used for managing the aging of nuclear power plants. This compilation of referenced programs and documents would be of benefit to a country wanting to establish or improve a program for managing aging. However, a knowledge of the referenced programs and documents would be needed to identify any areas needing improvement. The paper reflects the IAEA position that periodic safety reviews (PSRs) should be performed for nuclear power plants as part of aging management activities. However, it correctly acknowledges that some member states (specifically the U.S.) do not use PSRs, but instead use an alternative approach for managing the detrimental effects of aging.

The G-7 policy of not prolonging the operating life of higher risk Soviet designed reactors remains in place. More specifically, the U.S. Government does not believe that these reactors can be made safe and will continue to press for their shutdown. Therefore, the U.S. government policy is to restrict our direct involvement to helping to identify problems and licensing issues related to life extension and cannot assist in implementation of specific life extension activities. This restriction on U.S. and other G-7 country participation should be borne in mind as the IAEA moves forward with life extension activities for these reactors. This restriction will determine not only how much funding will be available from Member States, but also the extent to which certain Member States can participate in these activities. The IAEA should define its activities with full awareness of the limitation on G-7 involvement.

Nuclear Safety Network in Asia

This document is a good overview of the planned initiative. As you may be aware, the Department of Energy has tried to expand its International Nuclear Safety Centers, currently located in Chicago, Moscow, Kyiv, and Almaty into Asia, but, as yet, without success. The utilization of nuclear power continues to grow in Asia, particularly in China, which will be operating several new nuclear power plants of different designs. We share the IAEA's position that effective internal, regional and international communication and exchanges of information are essential tools to achieve a sustainable nuclear safety infrastructure. However, given the large volume of planned activities in the nuclear safety arena, and the new high priority nuclear security activities in which the Nuclear Safety Department is involved, it will be important to prioritize departmental work. Moreover, this activity should be considered in the context of the Asian Extrabudgetary Program.

Safety and Security of Sources in the IAEA Nuclear Security Plan of Action - Expenditure of the U.S. \$1 million Contribution

I would like to commend the efforts of Brian Dodd and Abel Gonzalez in creating a timely and responsive plan for expenditure of U.S. funds. As you are well aware, the issue of security of sources is one of great interest within many governments, including the U.S. Government. I look forward to continuing our discussions regarding these very important issues. Regarding the plan, the basic approach to dividing funds between recovering orphan sources and establishing ongoing controls is reasonable. However, implementation of a confidentiality regime within the Unit and the Division, currently placed in the section entitled "Other Activities," should be moved to the front of the plan and should serve as the context in which these activities are implemented. Without a complete confidentiality regime, it may be difficult to implement some of these activities.