April 13, 2011

ATTACHED ARE COMMENTS

FOR A NOVEMBER 20, 2010

MEETING WITH IAEA

TITLE: U.S. Comments on DS452 (DPP) "Decommissioning of Nuclear Installations"

COMMENTS BY REVIEWER Reviewer: US NRC (Contact: Boby Abu Eid) Page 1 of 3 Country/Organization: US NRC/USA Date:11/05/2010				RESOLUTION			
Comment No.	Para/Line No.	Comments/Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/ rejection
1	General *(Scope & Table of Contents)*	The main objective **DS452 Safety Guide** is to provide guidance on implementation of **DS450 General Safety Requirements** listed under (DPP under review) on ***"Decommissioning and Termination of Activities."*** In this context, the Table of contents of DS452 presented on page 3, is exactly the same copy as the Table of contents of DS450 (page 5). We recognize that the main topics could be similar; however, the Table of Contents for the safety guide should be more detailed and specific to address methodologies and approaches of the different categories of nuclear installations (see also other comments below). Therefore, we suggest the DS452 DPP provides more specifics titles/topics (e.g., sections or subsections) on approaches and methodologies and specifics on decommissioning applications for the different categories of nuclear installations.	Scope, completeness, clarity and minimization of redundancy and repetition with DS450. We believe the safety guide should be kept specific for the actual conditions expected, OR to be organized to provide guidance for the types of facility in separate appendices (thus forming integral parts of the Safety Standard (see the IAEA SPESS).				
2	General *(Organization)*	We do endorse development of DS452 in order to combine and consolidate the two safety guides WS-G-2.1 & WS-G-2.4 (e.g. corresponding to DS402 & DS404). However, we believe DS452 should recognize and address the safety-related and technological differences in the decommissioning activities for reactors versus	Relevance, usefulness, scope, completeness, quality and clarity. The safety guide should be organized to consist of common areas with specific guidance for the				

		other nuclear fuel cycle facilities. For example, areas of differences to be addressed may include: (a) occurrence of activation products; (b) contamination and cleanup of α-emitters; (c) airborne suspension of contaminants (e.g.; Pu) resulting from cutting operations; and (d) criticality issues. Such differences would necessitate addressing specific safety issues and suing different approaches and methodologies to comply with safety requirements during decommissioning. Therefore, we recommend the guidance address specific decommissioning aspects applicable to different categories of nuclear installations and activities.	types of facility either in the man text or in separate appendices as an integral part of the safety standard.				
3	General *(Schedule)*	The production schedule presented on Page 4 is exactly the same copy (e.g.; same time) as the schedule presented for DS450. We recognize that DS452 and DS450 can developed in parallel; however, we recommend that the schedule for DS452 be moved 6-months behind to allow for the decommissioning safety requirements under DS450 be fully developed.	Harmony and coordination with development of decommissioning safety requirements (Ds450) which is an essential key document.				
4	General	We recommend the document includes two Sections on: (a) approaches/methods for demonstration of compliance with decommissioning and license termination criteria; and (b) inventories of waste generated from the decommissioning process and plans for transport and disposal of waste; and (c) waste minimization during decommissioning.	Completeness: These topical areas are important to the decommissioning guidance				
5	Section 2, Para 2,	Modify Para 2 to read: "On the basis of the Berlin conference, new Safety Requirements, "Decommissioning of Facilities Using Radioactive Material" (WS-R-5) were developed	Completeness: Referring to the GSRs, especially to the BSS under development, and				

		and published in November 2006. It should be noted that WS-R-5 is currently under further review and update (DS450). In addition, new Safety Fundamentals, SF-1, the General Safety Requirements (e.g.; the Basic Safety Standards (BSS, DS379, Rev. 4.0), the Specific Safety Requirements, and other relevant safety guides including those related to exclusion, exemption and clearance (RS-G-1.7), termination of practices (WS-G-5.1), safety assessment (WS-G-5.2) and management system (GS-R-3, GS-G-3.1, andGS-G-3.5) have been published.	the SSRs is important to consider when developing this document. It should be noted that DS 379 Rev. 4.0 includes in Schedule I, tables of exemption and clearance levels.				
6	Referencing & Reference List	We recommend the DPP refers to the U.S. NRC decommissioning lessons learned, as well as NEA publications on decommissioning good practices, cots-estimates, and lessons learned. We also recommend the DPP to include a list of references.	Completeness				