

Feedback Analysis Report

On

Revision and Consolidation of Existing Safety Guides related to Decommissioning

I. BACKGROUND:

The safety guides “Decommissioning of Nuclear Power Plants and Research Reactors” (WS-G-2.1) and “Decommissioning of Nuclear Fuel Cycle Facilities” (WS-G-2.4) were published in 1999 and 2001, respectively. These guides were consistent with the Safety Requirements, “Predisposal Management of Radioactive Waste, including Decommissioning” (WS-R-2), published in 2000. Since that time, extensive experience has been gained from the application of the IAEA Safety Standards and from decommissioning activities around the world. The experience of regulators and operators has been presented and broadly discussed during several appraisals and peer reviews applying the IAEA Safety Standards, in the course of completing IAEA international projects related to safe decommissioning, and at various workshops and conferences.

New Safety Requirements, “Decommissioning of Facilities Using Radioactive Material” (WS-R-5) were developed and published in November 2006. In addition, new Safety Fundamentals, SF-1, and other relevant safety guides including those related to exclusion, exemption and clearance, termination of practices, safety assessment and management system have been published since 2001. Following these developments and growing Member State (MS) experience in decommissioning, a review and revision of the existing safety guides was proposed in accordance with International Action Plan on Decommissioning of Nuclear Facilities (GOV/2004/40).

In November 2007, the Commission on Safety Standards approved the Document Preparation Profiles (DPPs) for revising WS-G-2.1 and WS-G-2.4, subsequently designated as DS402 and DS404, respectively. Several consultancies to review and revise these documents were held during the 2008 – 2010 period.

In April 2010, the “Strategies and Processes for the Establishment of IAEA Safety Standards (SPESS)” was issued, providing guidance on optimizing the structure of the IAEA Safety Standards. This document noted that the strategy for work on safety guides should be responsive to the needs of the Member State users while ensuring optimization on the number of safety guides. In addition, a document on the long term structure of the IAEA Safety Standards was discussed by the members of the Safety Standards Committees in 2008 and later, incorporated as an annex in the SPESS. In this document, it was envisioned that a safety guide titled, “Decommissioning of Nuclear Installation” would “consolidate and supersede Safety Guides DS402...and DS404.” However, because the Safety Standards Committees’ discussions and resolutions on the long term structure of the IAEA Safety Standards occurred in parallel with revising some of the IAEA Safety Standards including DS402 and DS404, it was decided to continue to revise and finalize DS402 and DS404 separately with the possibility to consolidate them in 2015. As a result of the consultancies, both documents were submitted for initial review at the June 2010 joint meeting of WASSC/NUSSC.

This feedback report is being prepared to assist in determining whether to revise and consolidate the safety guides. The affected sections of the safety guides; the alternative approaches to revising the safety guides and the recommended next steps from the IAEA Secretariat are described herein.

2. ISSUE AND BASIS FOR CHANGES:

During the June 2010 joint meeting of WASSC/NUSSC, the members strongly encouraged the Secretariat to consolidate both documents. Based on their review, the consolidation would avoid the establishment of safety guides addressing the same decommissioning issues for different types of facilities and activities. While the consolidation was anticipated to occur in 2015, WASSC/NUSSC noted it would be advantageous to begin the consolidation process now rather than later. This would reduce the number of safety guides, consistent with guidance in the SPESS.

3. AFFECTED SECTIONS OF THE SAFETY STANDARDS

The consolidation and revision of DS402 and DS404 would impact both documents in their entirety.

4. IDENTIFICATION AND ANALYSIS OF ALTERNATIVE APPROACHES:

This preliminary analysis presents the alternatives that the IAEA Secretariat considered to address the feedback just described. Option 1 would be to accept the comments provided by the members of WASSC/NUSSC. It would involve additional efforts to consolidate the documents. Option 2 would be to continue to maintain separate documents and to consolidate the two documents in 2015. Selecting option 2 would apply the recommendations in the SPESS for optimizing the number and quality of the safety guides at a later date.

5. RESOURCES IMPACTED:

The current schedule projected the issuance of the revised safety guides in 2013. However, if these safety guides should be consolidated, at least one additional consultancy would be needed which could impact the projected date of issuance.

6. RECOMMENDATIONS:

The IAEA Secretariat recommends the consolidation and revision of the existing safety guides, DS402 and DS404, into a single document titled, "Decommissioning of Nuclear Installations."