

COMMENT AND DISPOSITION SHEET



Add additional rows for comments as necessary to the form. Form content & requirements to remain unchanged.

Document Number and Revision DIS-16-03	Project No.	Date: 12-Sept-2016
Document Title Radioactive Waste Management and Decommissioning		Due Date: 12-Sept-2016

When the review is complete, author and reviewer to sign below	Number of comments:	Total number of pages:
Reviewer Kinectrics	Author CNSC Discussion Paper	
Name _____ Signature _____ Date _____	Name _____ Signature _____ Date _____	
Project Manager's signature only required if there are disagreements between the author and the reviewer. Project Manager signs after issues are resolved.	Project Manager	
Name _____ Signature _____ Date _____	Name _____ Signature _____ Date _____	

Reviewer's Comments				Disposition by Reviewer and Author	
Comment No. 1	Page No. 1	Section No. Executive Summary	Paragraph No. Bullet 1) – 1 st paragraph	<input type="checkbox"/> Incorporated	<input type="checkbox"/> Accepted by Reviewer
Description				<input type="checkbox"/> Resolved as	<input type="checkbox"/> Not Accepted by Reviewer
<p>The creation/ adoption of a fourth category of very low level waste (VLLW) would facilitate lower cost solutions for waste that is expected to have no or only slight contamination as in the case of construction type wastes associate with decommissioning.</p> <p>Distinction between short lived and long lived LILW would also be useful</p> <p>Both of these concepts are increasingly being adopted internationally</p>				Description	
Comment No. 2	Page No. 2	Section No. Executive Summary	Paragraph No. Bullet 2) – 1 st paragraph	<input type="checkbox"/> Incorporated	<input type="checkbox"/> Accepted by Reviewer
Description				<input type="checkbox"/> Resolved as	<input type="checkbox"/> Not Accepted by Reviewer
<p>This initiative should be examined in more detail through a number of examples or case studies where the implications for radioactivity control can be better understood. There are several well established practices in the industry that fit this, e.g. The melting of scrap steel, especially steam generators, AECL / CNL successfully employed this techniques shipping waste to the USA, and in the reuse of concrete waste in onsite roads. Making a requirement to consider the cost benefits of these processes would enable industry experience to be gained at minimal risk. An appropriate formulation might pair it with ALARA, where potential interaction between the two goals could be anticipated.</p>				Description	
Comment No. 3	Page No. 2	Section No. Executive Summary	Paragraph No. Bullet 3) – 1 st paragraph	<input type="checkbox"/> Incorporated	<input type="checkbox"/> Accepted by Reviewer
Description				<input type="checkbox"/> Resolved as	<input type="checkbox"/> Not Accepted by Reviewer
<p>Would retention of records following issuance of a "license to abandon" be a function considered for assignment to an agency designated for the management of any unresolved legacy issues which may evolve in the future?</p>				Description	

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Reviewer's Comments				Disposition by Reviewer and Author	
Comment No. 4	Page No. 2	Section No. Executive Summary	Paragraph No. Bullet 4) – 1 st paragraph	<input type="checkbox"/> Incorporated <input type="checkbox"/> Resolved as	<input type="checkbox"/> Accepted by Reviewer <input type="checkbox"/> Not Accepted by Reviewer
Description What is meant by "further codifying existing practices"? The intent of this should be clarified. A strength of the current system in Canada is the flexibility for practitioners to optimize protection based on specific circumstances. Promoting compilation and dissemination of examples should be considered in lieu of a prescriptive approach.				Description	
Comment No. 5	Page No. 4	Section No. 2.1.1	Paragraph No. Table of Proposed Categories of Radioactive Waste	<input type="checkbox"/> Incorporated <input type="checkbox"/> Resolved as	<input type="checkbox"/> Accepted by Reviewer <input type="checkbox"/> Not Accepted by Reviewer
Description It seems strange to refer to long lived beta-gamma without differentiating it from short lived. Suggest to clarify the definitions of long-lived and short lived, consistent with IAEA recommendations.				Description	
Comment No. 6	Page No. 5	Section No. 2.1.1	Paragraph No. Bullet 1) – 1 st paragraph – last sentence	<input type="checkbox"/> Incorporated <input type="checkbox"/> Resolved as	<input type="checkbox"/> Accepted by Reviewer <input type="checkbox"/> Not Accepted by Reviewer
Description What is meant by "designed for nuclear waste" - this seems to contradict the intent of this statement. May be clearer if stated as "using best practice from industrial landfill design and operational experience". This section appears to set the stage for a discussion of VLLW but does not follow through.				Description	
Comment No. 7	Page No. 5	Section No. 2.1.1	Paragraph No. Proposed Characterization – bullet points	<input type="checkbox"/> Incorporated <input type="checkbox"/> Resolved as	<input type="checkbox"/> Accepted by Reviewer <input type="checkbox"/> Not Accepted by Reviewer
Description A table comparing various national approaches and the IAEA's would provide context for this discussion				Description	
Comment No. 8	Page No. 7	Section No. 2.2	Paragraph No. 1 st paragraph, last sentence	<input type="checkbox"/> Incorporated <input type="checkbox"/> Resolved as	<input type="checkbox"/> Accepted by Reviewer <input type="checkbox"/> Not Accepted by Reviewer
Description As it is in EU Directive on WM See article 4, 3,a. The references listed in the paper do not draw on examples from national and international practice to support proposed initiatives. It would be beneficial for CNSC to include a section in subsequent discussion of the proposed changes in the context of other national and international practice.				Description	
Comment No. 9	Page No. 8	Section No. 2.3	Paragraph No. Questions to Stakeholders – bullet #1	<input type="checkbox"/> Incorporated <input type="checkbox"/> Resolved as	<input type="checkbox"/> Accepted by Reviewer <input type="checkbox"/> Not Accepted by Reviewer
Description				Description	

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<p>Description EU directive says preserve in longer term. ...not specific article 12, item 1c</p> <p>In establishing an Authority to assume residual responsibility after "abandonment" (see later) it would seem reasonable to require the operator surrendering its license to also transfer required records at that time in a standard format and media that would be amendable to indefinite retention. In this case the notion of a "minimum retention period" becomes moot.</p>	<p>Description</p>								
<table border="1" data-bbox="191 529 823 653"> <thead> <tr> <th>Comment No.</th> <th>Page No.</th> <th>Section No.</th> <th>Paragraph No.</th> </tr> </thead> <tbody> <tr> <td>10</td> <td>10</td> <td>2.4.3</td> <td>Questions to Stakeholders – bullet #2</td> </tr> </tbody> </table> <p>Description It can be argued that a single value for all activity without distinguishing between pathways and biological effects is not very meaningful. On the other hand, expending regulatory resources on detailed assessments for facilities with small quantities of radioactive materials may not be an effective use of these. This might be addressed, For example, by setting the threshold for other than Class I facilities a factor (10?) lower and requiring a simple screening assessment considering the practices, pathways and relative bio-effects for those expected to fall between this value and the current threshold.</p>	Comment No.	Page No.	Section No.	Paragraph No.	10	10	2.4.3	Questions to Stakeholders – bullet #2	<p> <input type="checkbox"/> Incorporated <input type="checkbox"/> Resolved as <input type="checkbox"/> Accepted by Reviewer <input type="checkbox"/> Not Accepted by Reviewer </p> <p>Description</p>
Comment No.	Page No.	Section No.	Paragraph No.						
10	10	2.4.3	Questions to Stakeholders – bullet #2						
<table border="1" data-bbox="191 938 823 1062"> <thead> <tr> <th>Comment No.</th> <th>Page No.</th> <th>Section No.</th> <th>Paragraph No.</th> </tr> </thead> <tbody> <tr> <td>11</td> <td>12</td> <td>2.6</td> <td>Questions to Stakeholders – bullet #1</td> </tr> </tbody> </table> <p>Description The IAEA has developed a framework for addressing remediation issues. See for example NW-G-3.1 (Glossary is on p29). It is suggested that efforts to standardize on internationally recognized concepts and definitions be part of the effort proposed here.</p>	Comment No.	Page No.	Section No.	Paragraph No.	11	12	2.6	Questions to Stakeholders – bullet #1	<p> <input type="checkbox"/> Incorporated <input type="checkbox"/> Resolved as <input type="checkbox"/> Accepted by Reviewer <input type="checkbox"/> Not Accepted by Reviewer </p> <p>Description</p>
Comment No.	Page No.	Section No.	Paragraph No.						
11	12	2.6	Questions to Stakeholders – bullet #1						
<table border="1" data-bbox="191 1205 823 1329"> <thead> <tr> <th>Comment No.</th> <th>Page No.</th> <th>Section No.</th> <th>Paragraph No.</th> </tr> </thead> <tbody> <tr> <td>12</td> <td>13</td> <td>2.7</td> <td>Questions to Stakeholders – bullet #1</td> </tr> </tbody> </table> <p>Description Yes, it is important to abandon the word "abandon" for the reasons stated in this document. Furthermore, the concept of "abandonment" presents a logical problem in that if an issue with an "abandoned" site subsequently arises, responsibility must be assigned/assignable. A measure such as that referred to in this document of transferring any residual responsibility to a named agency could address this "gap".</p>	Comment No.	Page No.	Section No.	Paragraph No.	12	13	2.7	Questions to Stakeholders – bullet #1	<p> <input type="checkbox"/> Incorporated <input type="checkbox"/> Resolved as <input type="checkbox"/> Accepted by Reviewer <input type="checkbox"/> Not Accepted by Reviewer </p> <p>Description</p>
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