
From: Gillin, Kristina <Kristina.Gillin@lr.org>
Sent: Sunday, June 30, 2019 6:21 AM
To: Consultation (CNSC/CCSN)
Cc: Deanna Mendolia
Subject: Comments on Draft REGDOC-2.11.1, Volume I, from the CSA N292 Technical Committee

Hi,

On behalf of the Canadian Standards Association's (CSA's) Technical Committee on Radioactive Waste Management (CSA N292), I would like to submit the following two comments to the CNSC on Draft REGDOC-2.11.1, Volume I, Management of Radioactive Waste:

Comment #1:

REGDOC-2.11.1, Volume I, will help in filling a current gap, as it contains a wide range of relevant requirements pertaining specifically to disposal facilities.

Comment #2:

The draft REGDOC-2.11.1, Volume I, refers to two different types of facilities:

- 1) Waste Management Storage Facility; and
- 2) Waste Management Disposal Facility

That terminology contains a confusing redundancy, as Storage and Disposal, respectively, are a subset of Management. This both according to how those three terms are used in the CSA N292 suite of standards, as well, among CNSC's own wording (see examples below). Within the CSA N292 standards, terms like "disposal facility" and "long-term storage facility" are used. For alignment, therefore, and to remove the potentially confusing redundancy in the two facility types referred to in REGDOC-2.11.1, Volume I, CSA N292 recommends that those two terms be changed to 1) Waste Storage Facility; and 2) Waste Disposal Facility, respectively. This has the further advantage of being shorter, without the term losing any meaning.

Examples from REGDOC-3.6, *Glossary of CNSC Terminology*:

long-term management of nuclear waste — The long-term management of radioactive nuclear waste by means of storage or disposal, including handling, treatment, conditioning or transport for the purpose of storage or disposal. Also called long-term waste management.

management — In relation to nuclear fuel waste, long-term management by means of storage or disposal, including handling, treatment, conditioning or transport for the purpose of storage or disposal. (Source: *Nuclear Fuel Waste Act*)

Examples from CSA N292.0-19, *General principles for the management of radioactive waste and irradiated fuel*:

Long-term management — a coherent set of activities required to ensure controlled containment and isolation of radioactive material while in long-term storage or in a disposal facility prior to closure. This would include all systematic processes to coordinate, direct, and control operations.

Waste management facility — a facility, including its associated land, buildings, and equipment, whose primary purpose is for the management of radioactive waste.

Note: Management can include processing, packaging, storage, or the activities associated with the operation of a repository until its closure.

Kind regards,

Kristina Gillin, Chair of the CSA Technical Committee on Radioactive Waste Management (N292)

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