

Development of the regulatory guidance documents within the Regulatory Lapse Project

The Regulatory Lapse Project is a parallel activity to the Industry Lapse Project. While the Industry project supports the implementation of activities to remove spent fuel from the Lapse storage vessel, the Regulatory project is intended to help Gosatomnadzor of Russia to be in a better position to deal with the licensing process. Thus, the objective of the Regulatory Lapse Project is:

To help Gosatomnadzor develop and justify a set of documents in the form of a procedure or sequence of activities to place before Lapse operators, such that the operators are aware of the practical steps they have to take and the information they have to supply to Gosatomnadzor in order to obtain a licence.

A workshop within the Regulatory Lapse Project was held in Moscow 26-27 April 2000. The main purpose of the workshop was to develop understanding between operators and regulators of regulatory requirements, and to discuss and comment on three draft regulatory guidance documents prepared by Gosatomnadzor.

The participants in the workshop represented different responsible organisations in Russia: Gosatomnadzor, Goscomecology, the Ministry of Health, other scientific organisations including the Scientific and Engineering Centre (SEC NRS) of Gosatomnadzor, VNIPIET, and the Murmansk Shipping Company (MSCo). The Western participation included national authorities: the Swedish Radiation Protection Institute (SSI), the Swedish Nuclear Power Inspectorate (SKI), and the Norwegian Radiation Protection Authority (NRPA); as well as experts from the International Atomic Energy Agency (IAEA) and Babcock Rosyth Defence Ltd (BRDL) and QuantiSci Ltd.

Presentations were made of the current situation regarding operational and regulatory development by representatives of Russian authorities and by relevant operator organisations. Presentations made by western participants explained the licensing process in different countries. After special presentations of the three drafts of guidance documents, detailed discussion was held on each one. Many comments

were raised and discussed. These are recorded in the Strålevernrapport 2000:9.

Strategy

The licensing activities in different countries can be different depending on the legislation in these countries. Western industrial support to Russia in solving specific problems can meet difficulties during the implementation phase because of the licensing process. Such problems can include delays in implementation of the industry project schedule because licences may not be granted on the anticipated time-frame. This in turn may arise because of misunderstanding of the requirements of the corresponding regulatory bodies. The Regulatory Lapse Project is intended to facilitate the regulatory process in three phases; see Figure 1.

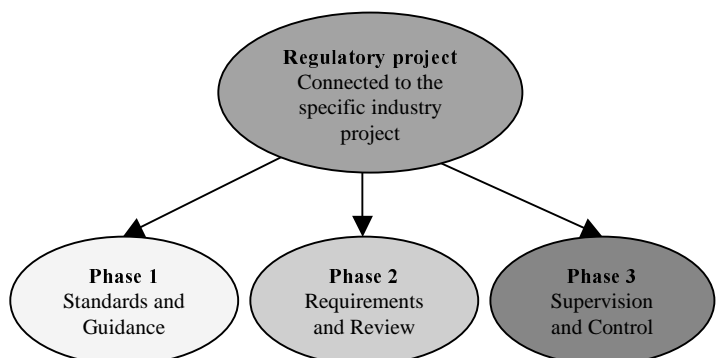


Figure 1. Overview of the different phases in the licensing process.

In order to avoid these problems and build up the understanding between operator and regulator, co-operation between Western and Russian regulators has been established. The main steps of our co-operation, have been identified as follows:

- Gathering and analysis of current legal and regulatory basis.
- Development of regulatory guidance documents on nuclear safety and radiation protection that are needed in relation to licensing of the Industry Lapse Project.
- Review of the licence applications from the operators, taking account of the contents of the guidance documents.
- After any licence has been given, Gosatomnadzor must inspect that the work is done according to the conditions of the licence.

Documents that should be provided to Gosatomnadzor in a licence application are:

1. Technical project description
2. Safety Analysis Report (SAR)
3. Environmental Impact Assessment (EIA)

The regulatory guidance documents being prepared by Gosatomnadzor within the Regulatory Lapse Project are:

1. Guidance on the set of documents required in licence application
2. Guidance on Quality Assurance
3. Guidance on a Safety Analysis Report

The EIA and SAR are needed for separate regulatory and other purposes, but are interconnected and would better be produced in coherence with each other, taking account of common terminology and common information. Aspects of these connections are discussed in a report prepared within the current co-operation and which is due to be published shortly by the SSI.

Responsibility

The radiation protection and nuclear safety authorities co-operate in developing legislative documents for the licensing procedure. The industry has the responsibilities for developing the technology for removal of damaged fuel from Lapse.

Apart from guidance document development, the Regulatory Lapse Project is intended to help Gosatomnadzor in the following activities:

- To evaluate the submitted documents with reference to laws, earlier provided guides and requirements.
- To co-operate within the licensing process with other authorities and organisations such as Goscomecology, the Ministry of Health, and VNIPIET, etc.
- To establish joint understanding and responsibilities with the operators, here Murmansk Shipping Company and Atomflot.
- To give the possibilities for independent experts to review draft materials and exchange information and experience.

Co-operation

In order to make the licensing process go smoothly, it is necessary to have close co-operation between responsible parts and information exchange.

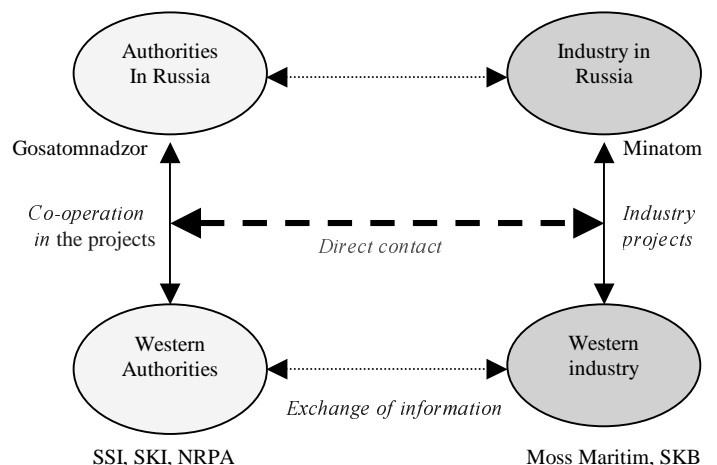


Figure 2. Working model for co-operation between authorities and industry.

As Figure 2 illustrates, there are contacts between authorities in Russia (Gosatomnadzor) and Western regulatory organisations (SSI, SKI, NRPA), and between industry in Russia (Minatom) and Western companies (Moss Maritime, Svensk kärnbränslehantering (SKB)). It is hoped to develop and improve the contacts between authorities and industry within Russia.