Joint Session of the 45th Meeting of the Radiation Safety Standards Committee (RASSC) 46th Meeting of the Waste Safety Standards Committee (WASSC)

21 November 2018 (Agenda Item RW 5.1)

Safety Guide – DS499
(Application of the Concept of Exemption)

For information/discussion

Haridasan Pappinisseri
Radiation Protection Unit - Division of Radiation, Transport and Waste Safety
Revision of RS-G-1.7

IAEA

SAFETY STANDARDS SERIES

Application of the Concepts of Exclusion, Exemption and Clearance

SAFETY GUIDE
No. RS-G-1.7

IAEA International Atomic Energy Agency

New Safety Guide
Application of the Concept of Exemption – DS499
RASSC (lead), WASSC
Sc. Sec: P.P. Haridasan

New Safety Guide
Application of the Concept of Clearance – DS500
WASSC (lead), RASSC, TRANSSC
Sc. Sec: V. Ljubenov

New Safety Report
International trade in commodities containing radionuclides
DS499
Application of the Concept of Exemption

• INTRODUCTION
• THE CONCEPTS
• ROLES AND RESPONSIBILITIES
• GENERIC EXEMPTION
• OTHER EXEMPTION ISSUES
• ANNEX I
• ANNEX II
Previous approvals and current status

• Following CSS endorsement of the DPP in its 42\textsuperscript{nd} meeting, drafting work started in 2018.
  
  – First consultancy meeting held in Feb.2018 with 4 experts and a summary was presented to the previous RASSC/WASSC meeting.

  – Second consultancy meeting was held in July 2018.
Previous discussion RASSC/WASSC

- In general, RASSC/WASSC agreed with the approaches.
- Exemption – concept is for planned exposure situations and agreed not to mix with existing exposure situations.

- **Japan**: Consider uncertainties in measurements (ISO11929)

- **Argentina**: Need for a more harmonized approach for consumer products/commodities/food and drinking water

- **Czech Republic**
  - Both safety guides should progress through the various approval steps at the same time.
  - The difference between the concept of clearance in existing exposure situations and release from regulatory control needs to be clarified.
  - Guidance on trade of contaminated commodities may not be addressed in the safety guides, but in a separate document.
Previous discussion RASSC/WASSC

- **Ukraine**: Opined that remediation in post-accident situations (large volumes) can be managed as planned exposure situations, however, cautioned the use of trivial dose concept (10μSv/1mSv criteria).

- **Australia**: Asked to check the transport values for surface contamination and potential use of those values for exemption purposes in case of surface contaminated objects.

- **USA**: Suggested if new numbers of contamination are recommended, adequate guidance on measurement and verification needed. Exemption for landfills to consider in case by case exemption? Clearance, release, discharge – to clarify and not to confuse.

- **USA**: Consider trans-boundary issues.

- **UK**: Interested in clearance of liquids and gases and also legacy sites. Do not deviate from GSR Part 3 – in principles, numbers (Schedule I and II) and approaches.
Second CS meeting...

- Drafted Section 1 background, objective and scope.
- A diagram showing the whole concepts of exemption and clearance in the context of planned and existing exposure situations is being prepared.
- Developed draft on generic exemption for equipment (BSS Paragraph I.3).
- Developed draft on sealed sources, unsealed sources, type approved (BSS para.I.6)
- Identified one Appendix and two Annexes in the draft.
- Need to develop Annex I: Dosimetric modelling of surface contamination
- Preliminary draft of Annex II prepared with the support of Japan dealing with the screening levels used in post-Fukushima situation.
- Held preliminary discussion on the content of a proposed Safety Report on contaminated non-food commodities and trade that could support the safety guide.
- Discussed with the Technical officer for DS500 regarding approaches to the concepts of clearance and consistency with the DS499. Further discussion needed in a joint meeting.
- Prepared a working draft – Version 3.
For discussion

- Artificial radionuclides in existing exposure situation such as post-Fukushima case
- Can we use “Exemption-like process”? 
- Screening levels are used for exemption-like process.
- Non-Action Level?
Next steps

- **Organise third consultancy meeting:**
  - Review the working draft;
  - Address any comments from RASSC/WASSC on the information provided in November meeting;
  - Develop Annex 1 on dosimetric modelling of surface contamination;
  - Develop a preliminary draft content for the proposed Safety Report related to exemption issues on contaminated non-food commodities and trade
  - Review and agree the Annex 2 prepared in consultation with Japan.
  - Prepare a revised draft version.
Next steps

- Organize a Joint Technical Meeting
  March 19-23, 2019:
  - To obtain Member States experience/suggestions
  - Discuss key issues relevant to exemption and clearance
  - Obtain the national approaches in cases of existing exposure situations
  - Discuss and agree specific issues
Action Requested

For Information
Thank you!