

**The PRR-1 Situation**  
***Safety-Related Documentation***

- National Requirements
  - The PRR-1 nuclear regulatory situation is discussed under the presentation on Regulatory Requirements.
  - The PNRI follows IAEA safety standards and guides whenever possible. This is of course one reason the PRR-1 is in the R2D2P.
  - There are existing Philippine laws on hazardous waste, solid waste, air quality and environmental impact assessment. It is presumed that the PNRI will have to comply with regulations that apply to non-nuclear waste.

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- Site Policies, Programs and Procedures
  - Policies will have to be set by top-level PNRI management (the Director and the Senior Staff), with the agreement of the site owner (the University of the Philippines).
  - It is expected that programs will be drafted by the PRR-1 decommissioning project team, and approved by top-level PNRI management.
  - Procedures and work instructions will be created by the PRR-1 decommissioning project team.

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- Decommissioning Plan
  - The PRR-1, probably in common with many research reactors of its age, did not have an initial decommissioning plan during design, construction and operation.
  - The PRR-1 has been forced by circumstance into the Deferred Dismantling strategy without a proper Safe Enclosure Plan and a proper Shutdown Plan, nor a proper Surveillance and Maintenance Plan. It is expected that this will now be remedied, especially as those plans may be required under the PNRI internal regulatory system.

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- The PRR-1 will need to have one authorization (license) for its present shutdown state, and another authorization for decommissioning. The decommissioning plan will support the latter.
- The PNRI management is realizing that the preparation of the decommissioning plan is a massive undertaking, and that it should be prepared to put manpower and other resources into it.
- The creation of decommissioning regulations and the review of the decommissioning plan appear not to be light undertakings either, and will need manpower and resources too.
- The PNRI has an IAEA TC project for assistance in creating the decommissioning plan.

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- Safety Report
  - It is not certain that the Safety Report will be prepared as a separate document, but it will be an essential part of the PRR-1 Decommissioning Plan, by direct inclusion or by reference.
- Environmental Impact Assessment Report
  - It is expected that the environmental impact of PRR-1 decommissioning will be small and the Environmental Impact Assessment Report will be simple.

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- Historical Site Assessment
  - Original drawings of the PRR-1 are available, but have not always been updated to show modifications and additions.
  - Beyond reactor console records, operational records are poor. Records of irradiations performed and work done in the radioisotope laboratories are incomplete.
  - In the absence of good written records, the memory of the reactor staff who remain in the PNRI and of those who have retired but are still available to be interviewed become more important. Unfortunately, much information has already been lost with the people who knew them.

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- Radiological Survey Plans and Reports
  - PRR-1 radiological surveys will be discussed under the presentation on Radiological Monitoring During Decommissioning.
  - The Characterization Survey Report will be an essential reference of the Decommissioning Plan that will be submitted to the NRLSD under the PNRI internal regulatory system.
  - The Final Radiological Survey Report will be submitted to the NRLSD at the conclusion of PRR-1 decommissioning.

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- Public Relations Plan
  - The PNRI has a Public Information Unit that is probably the most qualified to write and implement the Public Relations Plan, but the PNRI has probably not yet fully realized that this unit will have to be an active member of the PRR-1 decommissioning project team.
  - The PNRI management will have to define a clear policy on public relations, on which the Public Relations Plan will be based.