

NKS-B Workshop on Radioanalytical Chemistry in Nu-clear Decommissioning and Waste Management (RadWorkshop 2018)
8-12 October 2018, Roskilde, Denmark

IAEA Safety Standards on Decommissioning, Clearance of Materials and Release of Sites from Regulatory Control

Vladan Ljubenov (V.Ljubenov @iaea.org)
International Atomic Energy Agency
Division of Radiation, Transport and Waste Safety

Radiological surveys during facility lifetime

- Radiological surveys of different kind and for different purposes are almost continuous activity during all phases of lifecycle of a facility that produces, uses, possesses, stores radioactive material
- Some of those surveys are needed for decommissioning
- <u>Facility siting</u> radiological "baseline" survey, existing background prior to construction of a facility
- <u>Construction</u> presence of natural radioactivity in construction materials, trace elements that could get activated

Radiological surveys during facility lifetime

- Operation surveys for operational purposes, process control, working place monitoring, effluents control, cleanup of spills and consequences of incidents, radioactive waste management
- Transition from operation to decommissioning characterization campaign to support final decommissioning planning, detailed inventory of radioactive materials in the facility's premises and SSCs
- <u>Decommissioning conduct</u> radiation safety of workers during dismantling, effectiveness of decontamination, management of material and waste including clearance, effluents control
- <u>Decommissioning termination</u> final radiological survey, release of site

Radiological surveys during facility lifetime

IAE A

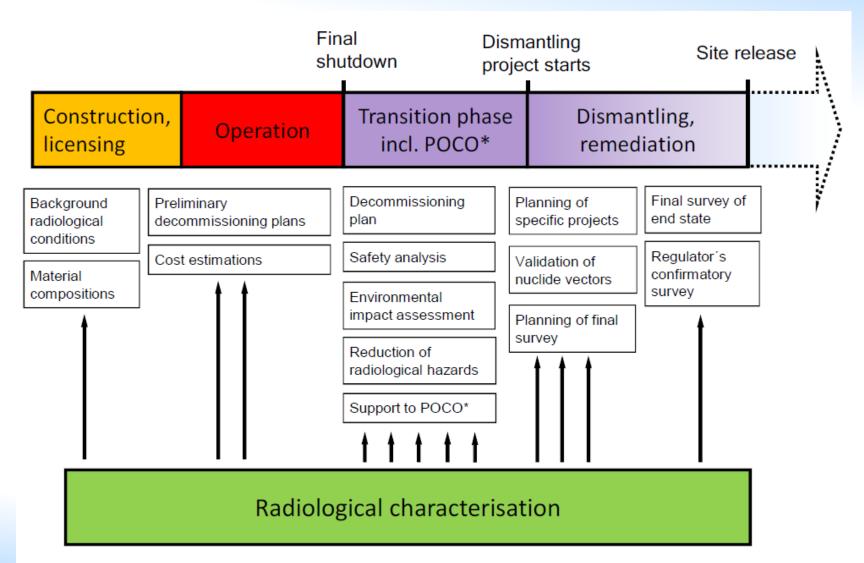


Fig. 2.1 from

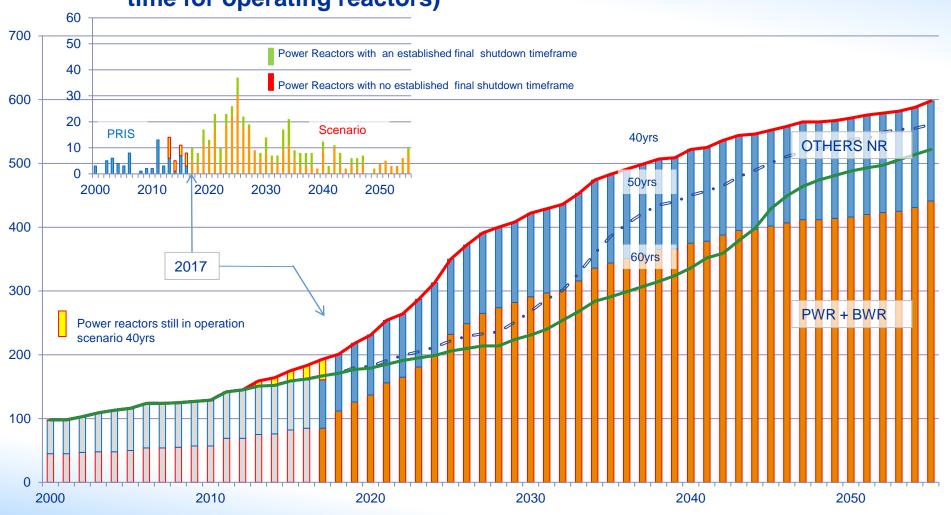
*POCO = post-operational clean-out removal of operational waste etc.



Decommissioning – growing industry



IAEA study 2017: Shutdown scenario (assumption of 40 years life time for operating reactors)



IAEA Power Reactor Information System (PRIS), https://www.iaea.org/pris/

Decommissioning and clearance



- Decommissioning administrative and technical actions taken to allow the removal of some or all of the regulatory controls from a facility (IAEA GSR Part 6)
- Objective make the site safe for reuse for other purposes (often release of site from regulatory control) and properly manage generated materials and waste
- Decommissioning typically generates large amounts of material (potential to be recycled and reused) and waste (no intention for reuse)
- Those amounts are larger than during operation and are generated in a relatively short period of time (several years)
- Most of that material and waste is expected to be radiologically clean or just slightly contaminated

Decommissioning and clearance



- It could be practical and economically viable to separate the part that has to be managed as radioactive waste or reused within the nuclear applications (under continual regulatory control), and the part that can be taken out of the regulatory control (through clearance) immediately, after decontamination or after a decay
- With no clearance provisions in place, alternatives are:
 - to keep all the decommissioning waste under regulatory control (store locally) for a long period of time, or
 - to dispose it as radioactive waste
- Increasing number of Member States requests for assistance in establishing provisions for clearance and in implementing clearance
- Existing guidance in the IAEA Safety Standards (RS-G-1.7) and in supporting publications does not satisfy needs of Member States

Concepts of Exclusion, Exemption and Clearance

Exclusion, exemption and clearance define the scope of regulatory control as it applies to planned exposure situations.

Exclusion applies to those planned exposures that are not deemed amenable to control, regardless of the magnitude of the exposures in question.

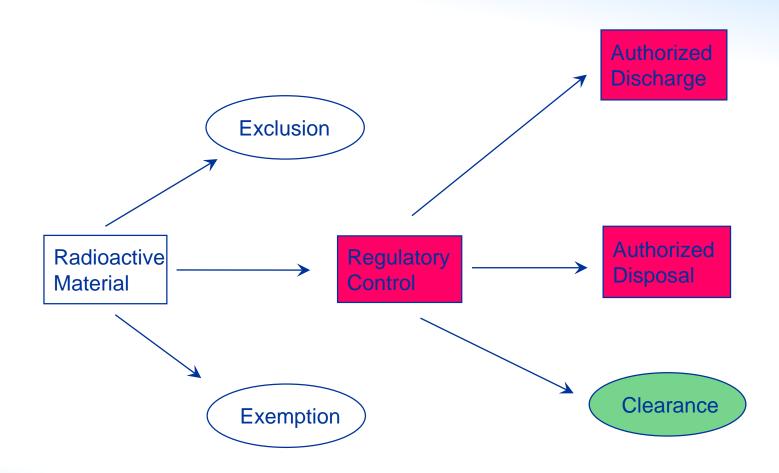
Exemption refers to the determination by a regulatory body that a source or practice need not be subject to some or all aspects of regulatory control.

Clearance is the removal of radiological regulatory control from radioactive material or radioactive objects within notified or authorized practices.

The process of clearance is a regulated activity and the clearance process is carried out in accordance with the regulatory regime for the practice.

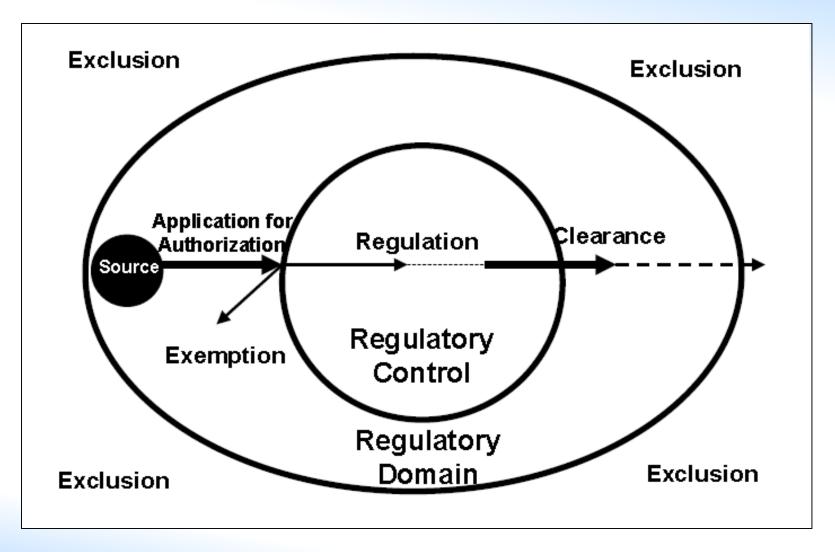


Options for control of radioactive material



Exemption vs. Clearance





Relevant IAEA publications



IAEA Safety Standards

for protecting people and the environment

Radiation Protection and Safety of Radiation Sources: International Basic Safety Standards

Jointly sponsored by EC, FAO, IAEA, ILO, OECD/NEA, PAHO, UNEP, WHO















General Safety Requirements Part 3
No. GSR Part 3



IAEA SAFETY STANDARDS SERIES

Application of the Concepts of Exclusion, Exemption and Clearance

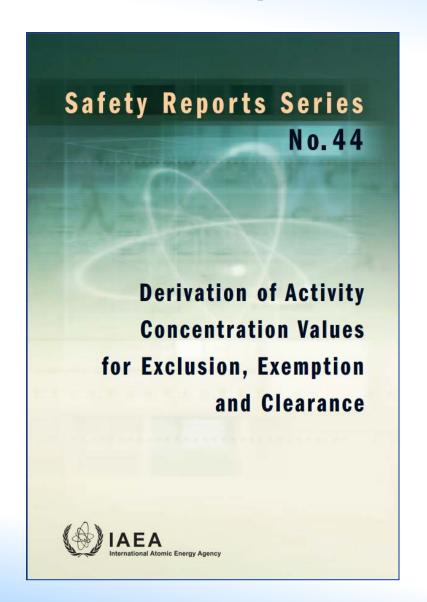
SAFETY GUIDE

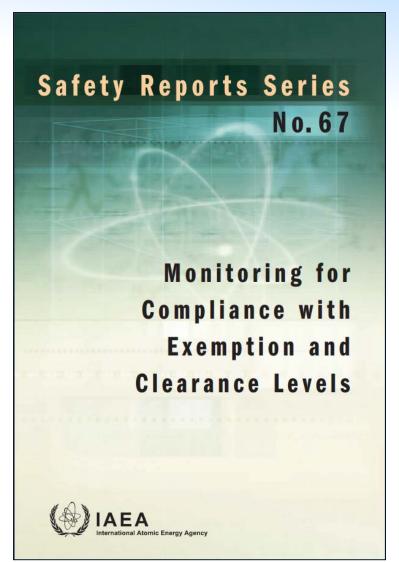
No. RS-G-1.7



Relevant IAEA publications

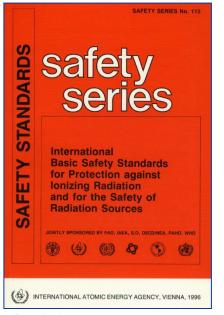






Relevant IAEA publications









Concepts of Exclusion, Exemption and Clearance

SAFETY GUIDE

No. RS-G-1.7



2004

IAEA Safety Standards for protecting people and the environment Radiation Protection and Safety of Radiation Sources: International Basic Safety Standards Jointly sponsored by EC, FAO, IAEA, ILO, OECD/NEA, PAHO, UNEP, WHO General Safety Requirements Part 3 No. GSR Part 3

1996



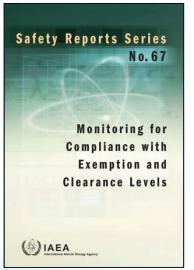
2014

Safety Reports Series No. 44 **Derivation of Activity Concentration Values** for Exclusion, Exemption and Clearance

(A) IAEA



2005



2012

A IAEA

Clearance / Exemption



GSR Part 3 (BSS)

Requirement 8: Exemption and clearance

- The government or the regulatory body shall determine which practices or sources within practices are to be exempted from some or all of the requirements of these Standards. The regulatory body shall approve which sources, including materials and objects, within notified practices or authorized practices may be cleared from regulatory control.
- Similar dose and risk criteria applied for both exemption and clearance.



Criteria for clearance (BSS Schedule I)

- I.10. The general criteria for clearance are that:
- a) Radiation risks arising from the cleared material are sufficiently low as not to warrant regulatory control, and there is no appreciable likelihood of occurrence for scenarios that could lead to a failure to meet the general criterion for clearance; or
- b) Continued regulatory control of the material would yield no net benefit, in that no reasonable control measures would achieve a worthwhile return in terms of reduction of individual doses or reduction of health risks.



Criteria for clearance (BSS Schedule I)

Clearance of material without further consideration if

- in reasonably foreseeable circumstances, effective dose for any individual from this material on the order of 10 μSv or less in a year
- and for low probability scenarios 1 mSv in a year

Clearance levels (CL) in the BSS:

- Table 1.2 for any quantity of solid material
- identical to exemption values for bulk amounts of solid material

Derivation of clearance and exemption levels

IAEA

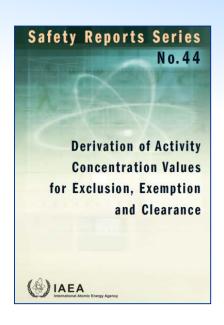
Clearance levels in the IAEA-BSS

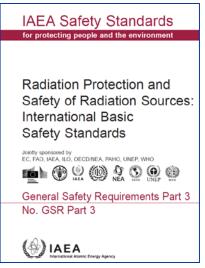
- Determined that the cleared material may be used without any further restrictions
- Based on IAEA SRS-44

IAEA-BSS - Footnote 65

... specific clearance levels may be developed for metals, rubble from buildings and waste for disposal in landfill sites:

"Conditional clearance levels"





Interdependence of clearance and exemption levels



- The concepts of clearance and exemption are different in nature
- Clearance levels are derived based on different assumptions / different purpose than exemption levels
- Using only one set of values for both concepts is not necessary in principle, but there are also advantages of having a single set of values
- If values are different, take the lower one
 - in some cases unnecessary conservativism
- Clearance levels shall not be higher than exemption levels

Current guidance in RS-G-1.7



IAEA SAFETY STANDARDS SERIES

Application of the Concepts of Exclusion, Exemption and Clearance

SAFETY GUIDE

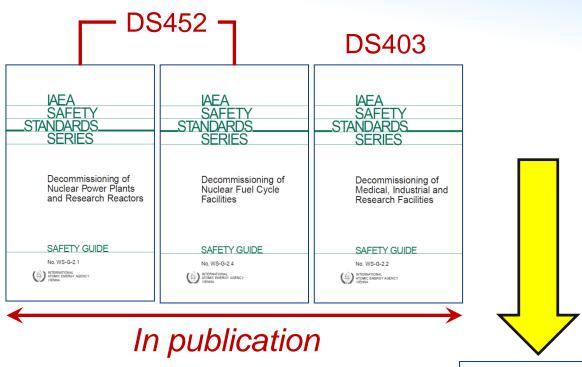
No. RS-G-1.7



- Provides mass specific values for exemption or clearance (unconditional) of bulk quantities of solid material.
- Values are provided for both natural and artificial radionuclides.
- The models used in the calculations of individual dose are described in SRS-44 (scenarios primarily relevant for clearance, more restrictive)
- These values now appear in GSR Part 3, together with the values for exemption of moderate amounts of material from SS-115
- Regarding natural radionuclides, the values were selected on the basis of consideration of the upper end of the worldwide distribution of activity concentrations in soil provided by UNSCEAR

IAEA Safety Guides for decommissioning





IAEA Safety Standards
for protecting people and the environment

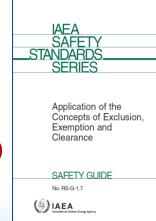
Decommissioning of
Facilities

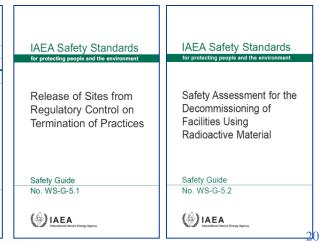
General Safety Requirements Part 6
No. GSR Part 6

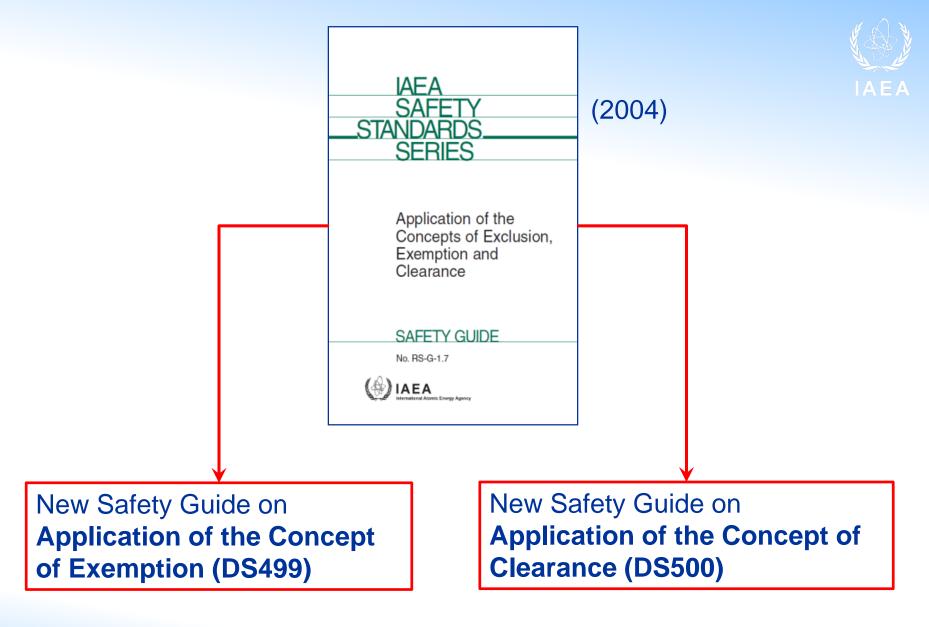
IAEA
International Atomic Energy Agency

Revision of RS-G-1.7 has just started.

DS499 and DS500







Being developed in parallel

New Safety Guide on Application of the Concept of Clearance – Objective and Scope



- The objective of the Safety Guide is to provide detailed guidance on the application of the concept of clearance for materials and buildings that are to be released from regulatory control.
- There is no intention to revise numerical values provided in GSR Part 3
- Clarification on the use of terminology, especially the use of terms clearance and release;
- Responsibilities of the licensee and the regulatory body;
- All relevant steps of the clearance process including characterization, <u>determination of the nuclide vector</u>, <u>measurement techniques</u>, sampling, management of the clearance process;
- Mass specific and surface specific clearance criteria for unconditional clearance;

New Safety Guide on Application of the Concept of Clearance – Objective and Scope



- Examples of derivation of mass specific and surface specific clearance criteria for conditional clearance (actual values would depend on specific conditions applied, so no universal set of values could be proposed);
- Case by case approach, which can be used for small quantities of material, or for other situations where the assumptions for the generic derivation of clearance levels do not apply;
- Provide explanations on needs for control of conditionally cleared materials (for example during transport), clarify at which point clearance act happens in case of conditional clearance;
- Clearance in an area affected by consequences of a nuclear or radiological accident;
- Considerations of clearance of liquids;
- Consideration of clearance of gases;

New Safety Guide on Application of the Concept of Clearance – Objective and Scope



- Additional considerations for building materials containing naturally occurring radionuclides;
- Considerations of averaging masses and averaging areas;
- Discussion of the degree of homogeneity that was assumed in the calculation of the clearance levels and the implications for application of the clearance levels to non-homogenous material;
- Involvement of interested parties.



IAEA Safety Standards

for protecting people and the environment

Release of Sites from Regulatory Control on Termination of Practices

2006

Safety Guide No. WS-G-5.1



Background



- WS-G-5.1 published in 2006 (the same year as the Safety Fundamentals SF-1, and prior to most of the current Safety Requirements in the waste safety and radiation safety areas)
- Covers aspects of relevance to decommissioning, protection of public and the environment, and management of radioactive waste
- Both the key related Safety Requirements documents, the BSS and the decommissioning requirements, have been revised in the meantime (GSR Part 3 and GSR Part 6 published in 2014)
 - New concepts and definitions introduced (such as exposure situations)
- Two new decommissioning Safety Guides DS452 and DS403 have been finalized and will be published soon. Consistency with them needs to be ensured
- Significant decommissioning experience and lessons learned accumulated since 2006 – revision of WS-G-5.1 is needed

The Process for the Release of Sites from Regulatory Control



- Identification of the site release criteria (generic or site specific)
- Site characterization
- Comparison of the site characterization results with the site release criteria
- If the site does not meet the release criteria, cleanup actions will be needed
- Evaluation of the cleanup options, selection of an optimal cleanup option and end-point
- Development of a Cleanup Plan by the operator (preferably as part of the overall decommissioning plan, should define restrictions, if any)
- Review/approval by the regulatory body
- Implementation of the cleanup actions (radiological monitoring during cleanup)
- Final radiological survey to demonstrate compliance with the site release criteria for restricted or unrestricted release
- Preparation of the Final Radiological Survey Report and submission to the RB
- Review of the Final Radiological Survey Report by the RB
- Independent confirmatory survey by the RB (optional)
- Decision by the regulator on release of site (with or without restrictions)
- Implementation of restrictions, institutional control and monitoring (if any), record keeping

Protection and Safety Aspects



- Objective to ensure proper protection of workers, the public and the environment during the cleanup and after the release of the site.
- The principles of justification, dose limitation and optimization of protection are applicable to cleanup and release of sites.
- Dose limit of 1 mSv in a year for a member of the public is an upper bound for the sum of all exposures arising from authorized activities.
- Optimization of protection should include:
 - evaluation of the exposure of workers during cleanup activities (i.e. including material characterization and radioactive waste management);
 - evaluation of long term exposure of the public arising from the residual site contamination after site release.
- This evaluation need to ensure that the protection of workers and the public is optimized below the dose constraints defined by the RB.

Protection and Safety Aspects



- This dose constraint should take into account multiple pathways of exposure and should not exceed 300 μSv in a year above background.
 - Prospective effective doses to members of the public above the background levels (before the commissioning of the facility) that would be received after the site has been released;
 - Summed effective doses arising from the site (considered as one source), including land and buildings and other structures;
 - The uncertainties associated with knowledge of the site and its potential uses after its release should be taken into account in the estimation of prospective doses.
- The applicable dose constraint for the public after the release of a site should be expected to be no higher than that applied for the operational phase of the facility lifetime.

Radiological Approach to the Release of Sites from Nuclear Regulatory Control (WS-G-5.1)



Region for release of a site for restricted use if restrictions fail Dose limit (1mSv in a year)

Region of optimization for site release for restricted use provided that restrictions are in place

Dose constraint (300 μSv in a year)

Optimised site dose release criteria

Region of optimization for unrestricted site use

10 μ Sv in a year

Region where dose reduction measures are unlikely to be warranted / release of materials from regulatory control

Definition of Release Criteria



- Generic or site specific criteria
 - Definition of the scenarios and identification of the exposure pathways;
 - Compilation of the specific data and information for the scenarios and pathways;
 - Definition of the conceptual models for the site;
 - Conduct of dose assessments;
 - Determination of the release criteria.
- The release criteria should be expressed in measurable and verifiable units (Bq/g or Bq/cm²).
- The IAEA does not provide radionuclide specific site release levels (as it does for the release of materials)
- Background
- Uncertainties (level of contamination, hidden buried structures and waste, uncertainties associated with the future use of the site)

Final Survey



- Direct measurements and/or sampling
- Determination of sampling locations
 - Sampling equipment
 - Sampling technique / Sample size
 - Analysis / Measurement
- In case of contamination: increase density of grid / additional samples
- Measurement Uncertainty
 - The radionuclide vector will inevitably differ slightly from the initial radionuclide vector
 - Monitoring techniques (e.g. emission probabilities in complex spectra, selfabsorption, scan speed and detector size in case of field measurements)
 - Sampling variation
 - Analytical process imprecision
 - Background variability
- Comparison to the derived site release criteria
- Prepare a final survey report (part of the final decommissioning report)

Materials and radionuclides



- Materials of primary interest
 - steel, aluminium, concrete, graphite, resins, soil, water
- Radionuclides will depend on type of facility and decommissioning strategy
 - Activation products: ³H, ¹⁴C, ²²Na, ³⁶Cl, ³⁹Ar, ⁴¹Ca, ⁵⁴Mn, ⁵⁵Fe, ⁵⁹Ni, ⁶⁰Co, ⁶³Ni, ⁶⁵Zn, ⁷⁹Se, ⁹³Mo, ⁹³Zr, ⁹⁴Nb, ^{108m}Ag, ^{110m}Ag, ¹²⁵Sb, ¹²⁶Sn, ¹³³Ba, ¹³⁴Cs, ¹⁵²Eu, ¹⁵⁴Eu, ¹⁵⁵Eu, ^{166m}Ho
 - Fission products: ⁹⁰Sr, ⁹⁹Tc, ¹⁰⁶Ru, ¹²⁹I, ¹³⁵Cs, ¹³⁷Cs, ¹⁴⁴Ce
 - Transuranics: isotopes of Pu, Np, Am and Cm
- Levels of activities
 - From different categories of radioactive waste for processing, storage and disposal to materials for clearance and environmental samples

International Project on Completion of Decommissioning (2018-2021)



- Increasing number of ongoing decommissioning projects worldwide (for different types of facilities), some nearing completion
- Aspects that need to be discussed include:
 - end state definition
 - site release criteria
 - final cleanup, final survey
 - regulatory process for release of sites
 - release with restrictions / institutional controls
- New IAEA international project COMDEC platform for exchange of information, cooperation, "community of practice"
- 3 years, TM and CS meetings, working groups
- First TM held in Vienna 24-28 September 2018

Summary



- Concepts of exemption and clearance are related to graded approach to regulation of sources, practices and materials
- Clearance is an important option for management of material and waste from operation and from decommissioning of facilities, it enables for significant reduction of amounts to be managed as radioactive waste
- Increased interest in Member States and more frequent demands for assistance related to clearance, including conditional clearance
- The IAEA initiated revision of existing guidance on exemption and clearance - two Safety Guides and several supporting publications will be developed
- General intention with the revision is to bring successful concepts, practices and experiences from some Member States into the IAEA Safety Standards, providing point of reference for other Member States who want to follow such approaches

Summary



- With progress of decommissioning projects, the aspects related to release of sites attract more attention
- The IAEA will start soon revision of the Safety Guide on release of sites (WS-G-5.1)
- Both clearance of materials and release of sites deal with low effective doses to members of public, which can't be measured, so use of complex radiological models is needed
- Good knowledge of concentrations of DTM radionuclides and nuclide vectors is essential for application of radiological models and for decision making with regard to clearance, characterization of radioactive waste and release of sites
- Radiochemical methods for determination of DMT radionuclides are of key importance

References



IAEA GSR Part 3, Radiation Protection and Safety of Radiation Sources: International Safety Standards (2014)

IAEA GSR Part 5, Predisposal Management of Radioactive Waste (2009)

IAEA GSR Part 6, Decommissioning of Facilities (2014)

IAEA SSG-47, Decommissioning of Nuclear Power Plants, Research Reactors and Other Nuclear Fuel Cycle Facilities – in publication, revision of WS-G-2.1 and WS-G-2.4

IAEA RS-G-1.7, Application of Concepts of Exclusion, Exemption and Clearance (2004) – under revision (DS499 and DS500)

IAEA WS-G-5.1, Release of Sites from Regulatory Control on Termination of Practices (2006)

IAEA SRS 44, Derivation of Activity Concentration Values for Exclusion, Exemption and Clearance (2005)

IAEA SRS 67, Monitoring for Compliance with Exemption and Clearance Levels (2012)

IAEA SRS 72, Monitoring for Compliance with Remediation Criteria for Sites (2012)



Thank you!

