

ARPANSA Regulatory Assessment of the Replacement Reactor Construction Application

18 July 2001- Reactive Review Questions and Issues

PSAR Chapter 3 Site Characteristics (partial review)

Question reference	PSAR Section	Topic	ARPANSA Comment, Issue or Question
3.1.	3.2.2.1 Present and Projected Population; LBD-03, appendix 1.	Facility Licence F0001 special condition 5.7 (b) regarding “special	LBD-03, appendix 1 statement of compliance with condition 5.7 (b) states that “identification of special needs groups ... are provided in chapter 3”; however, there appears to be no mention of the treatment of special needs groups in chapter 3. Please explain.
			Response: Given the very low doses predicted, no specific treatment is necessary for special groups. These groups are identified in local emergency plans.
3.2.	3.2.5.1 Surface Geology and Soils; 3.2.5.2 Groundwater Hydrology	“PPK has completed a detailed baseline groundwater investigation for ANSTO at LHSTC.”	Please provide the referenced documents: PPK 2000a Groundwater Sampling Plan and Monitoring Protocols – Lucas Heights Science and Technology Centre, July 2000; and PPK 2000b Environment & Infrastructure Pty Ltd, Groundwater Monitoring and Management Program – Lucas Heights Science and Technology Centre, August 2000.
			Response: ARPANSA received copies of both these references in September 2000 after a joint presentation by PPK and ANSTO.
3.3.	3.3.1 Radiological Impact; 3.3.2 ongoing site evaluation; LBD-03 Appendix 1 item 5.6	Radiological characterisation of the site.	There is insufficient information in these sections to describe what is being radiologically characterised and the methods being used to ARPANSA’s satisfaction. Please provide information on the “ultra sensitive radiation detectors”. Please provide the “preliminary review.... Undertaken within ANSTO’s EMAP”.
			Response: ARPANSA attended the demonstration of the ultra sensitive radiation detectors on Friday 3 August 2001. These detectors, developed by Exploranium (Canada) have the capability to extract the small operational contribution to dose from the far larger natural background. A portable unit will be used to provide a detailed examination of critical areas such as the RRR site. The ‘Preliminary review ... undertaken within ANSTO’s EMAP’ is a living document subject to update in response to the ongoing development of the ANSTO EMAP. The relevant issues considered in this report are discussed in Chapter 14 of the PSAR and are reported in ANSTO’s Annual Environmental Report, a publicly available document published each year.

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3.4.	3.3.3 Regulatory Compliance. Table 3.3/1.	“...which demonstrate that all relevant matters required by ARPANSA or IAEA are appropriately considered.” Compliance with Facility Licence F0001 Conditions.	ARPANSA currently considers that this section and Table does <u>not</u> demonstrate relevant consideration or compliance with the ARPANSA Facility Licence F0001 Special Conditions. Appendix 1 of the Application (LBD-03) reports ANSTO’s responses and actions to address the Licence Conditions as at 18 May 2001, but this does not appear to be integrated into the PSAR.
			Response: The PSAR is one part of the total licence application and provides the safety analysis report. Various sections cover compliance issues related to safety aspects. Table 3.3.1 is a document used to cross reference other parts of the PSAR and other ANSTO documents relating to safety compliance issues only. The Licence Application provides compliance with the site licence conditions. The sentence indicated in the table will be altered to reflect this in the next revision of the PSAR.