

QuestionId	Country	Posted By	Sequence	Article	Reference	Question	Comment	Answer
16692	Poland	Slovakia	1	Article 24	F, p. 48	The category A workers are the subject to the exposure assessment based on systematic individual dose measurements that are maintained by the authorized medical practitioner. How often do exposed workers/the category A workers have to undergo preventive medical examinations?		Medical supervision includes preliminary medical examinations of the employee prior to his employment to determine whether the employee may be employed in category A, and periodic medical examinations carried out at least once a year to determine whether the employee can continue to perform his duties.
16693	Poland	Slovakia	2	General	A, p. 7 and 96	In the report only existing facilities are mentioned. As we are aware, there was a project on construction of NPP in Poland, was this project stopped? If not, what are plans for RAW and SNF management, what facilities are planned to build for waste from NPP? (on the other hand in the overview matrix on page 96, it is declared long term management policy for SNF and Nuclear fuel cycle waste, without indication in the report before).		This project is ongoing. We are now at the stage of a vendor selection. In terms of RAW and SNF management, our long-term policy and strategy is developed in the National Plan for radioactive waste and spent nuclear fuel and involves the construction of a near surface and deep geological repositories for radioactive waste and spent nuclear fuel from nuclear power plant.
16694	Poland	Slovakia	3	Article 32	8, p. 14	Chapter waste arising does not contain the waste captured (waste of unknown origin), i.e. from unknown manufacturing, agriculture machinery, policy department (criminal origin) etc. Please comment.		Waste captured constitute insignificant part, - taken by border guards: watches and compasses with radium paint dial, contaminated textiles from Charnobyl, ceramic vase stained with thorium - taken from scrap metal yards (radium contaminated pipes, equipments with radioactive sources, - taken by Police: uranium ore, radioactive sources.
17185	Poland	United States of America	4	Article 6	Annex I, p. 74-75		Poland is to be commended for working with international partners to exchange information on developing a siting process for a geological repository.	We appreciate your comment. Poland works with international partners to exchange information on the continuous basis. The Government is aware of strict connection between public support and knowledge. This year MoE will begin public education and information campaign about nuclear energy, radioactive waste and spent fuel management. In the near future, the Government plans to organize the meetings with local communities and provide public debates.
17186	Poland	United States of America	5	Article 6	Annex I, p. 74-75	How will public stakeholders be involved in the siting process for a geologic repository? Initial steps have been taken to educate the public. Is it possible to measure the success of these first interactions and determine whether public interaction might lead to community acceptance of a storage or disposal facility?		
17187	Poland	United States of America	6	Article 32	8, p. 12	The report says that spent nuclear fuel elements have been removed from the MARIA research reactor and now are stored in the reactor technological pool. What is the capacity of this pool? Is it large enough to hold all the spent fuel expected to be discharged? If not, what are the alternate plans for storage?		The capacity of the reactor's technological pool is large enough to store spent fuel from at least ten years of MARIA's reactor operation. Moreover, spent nuclear fuel can be stored in nuclear storage facility no. 19A.
18156	Poland	Finland	7	Article 24	Page 49 in Poland's JC report	Poland reports about a radiological monitoring program for the area and surroundings of the Swierk based on measurements of air, water, sewage, soil, cereals, grasses, silt and total precipitation. Apparently this radiological monitoring programme has provided the base line data for the Swierk facility. Does the monitoring at Swierk also include regular control of the impact of the final disposal activities on the local hydrological and hydrogeochemical conditions?		Radioactive waste repository where disposal activity is conducted is located in Rózan which is more than 100 km far from Swierk. This means that the impact of disposal activity on hydrological and hydrogeochemical conditions is controlled via radiological monitoring for the area of repository and surroundings of the repository.
18157	Poland	Finland	8	Article 16	Pages 62-63 in Poland's JC report	Poland is asked to give examples of what kind of parameters are monitored to assess the impact of a radioactive waste management facility to the hydrological and hydrogeochemical conditions of the nearby surroundings.		Poland carries out hydrological measurements: measurements of the content of radioactive substances (HTO, total β activity). Hydrogeochemical tests of groundwater samples of the area and the NRW environment include: determination of: pH, electrolytic conductivity, NH ₄ , total alkalinity, HCO ₃ , anions, cations and others (SiO ₂).
18158	Poland	Finland	9	Article 17	Page 63 in Poland's JC report	If Poland decides that no active monitoring of the disposed radioactive waste will be needed, will the environmental monitoring (groundwater, soil, fauna, flora, air) of the new final disposal facility still be planned and executed?		According to the Atomic Law Act and subsidiary regulation it is necessary to conduct both active and passive monitoring during operation and after closure of the facility. The detailed scope of the monitoring is described in the appropriate license.
18159	Poland	Finland	10	Article 28	Page 66 in Poland's JC report	Poland stated: "The disused sealed sources of foreign origin, which had been used in Poland and cannot be returned to the foreign manufacturer form the separate category of waste and are safely stored by the ZUOP." What is the total number so far of these disused sealed sources? How is their waste management documented? How is this kind of waste management surveilled, and by which organisation?		RWMP does not register separately disused sealed sources of foreign origin. This kind of waste is managed in the same way as other radioactive waste. Disused sealed sources are collected by the RWMP (Radioactive Waste Management Plant), the only operator licensed for the final management of RW/SF
18160	Poland	Finland	11	Planned Activities	Annex 1, page 73 in Poland's JC report	"6. Long-term monitoring". Does this long-term monitoring include both monitoring of the natural barriers, and monitoring of the engineered barriers? Have the monitoring parameters been already suggested or decided?		Article 55j of the Atomic Law Act states that a repository closure programme shall include in particular a plan for monitoring of the repository area and surroundings after closure taking into account the characteristic of the waste disposed. Such programme shall be updated at least once every 15 years. A detailed monitoring plan will be discussed and decided at the stage of submitting the application for closure of the repository.
18665	Poland	Austria	12	General	A. Introduction, p. 7	Are the spent fuel storage facilities No. 19 and 19A which currently store no fuel elements in principle still commissioned to store spent nuclear fuel?		Yes, facilities No. 19 and 19A can store spent nuclear fuel and some calculations with regard to new fuel has to be conducted. On the basis of these calculations the amendment to licences have to be issued.
18666	Poland	Austria	13	Article 32	B. Spent Fuel Management Policy, p. 10	Which improvements were recommended by the IAEA ARTEMIS mission to Poland in 2017, in connection with the Polish nuclear power programme and its spent fuel management policy? Which recommendations have been implemented by today? Which recommendations were not implemented? Can you specify, why?		IAEA ARTEMIS mission did not give any recommendations in connection with the Polish nuclear power Programme and spent fuel management policy. Recommendations were mainly related to the pre-disposal management activities and near surface disposal facilities.
18667	Poland	Austria	14	Article 32	B. Spent Fuel Management Policy, p. 12	What is the procedure foreseen for spent fuel currently stored in the technological pool of the MARIA Research reactor?		The decision on spent nuclear fuel from current operation of the MARIA's research reactor will be taken in due time whether spent fuel will be sent to the producing country or to the storage facility and then to the future repository.
18668	Poland	Austria	15	Article 32	B. Spent Fuel Management Policy, p. 10	From the information given in the report, it seems that Poland does not have any Spent Fuel Management Policy in place for the nuclear power plants to be built under its new nuclear power programme. What is the SF Management Policy in this regard?		Policy regarding spent nuclear fuel management is described in the national plan for radioactive waste and spent nuclear fuel management. One of the specified task is construction of a deep geological repository dedicated to the spent nuclear fuel.
18669	Poland	Austria	16	Article 32.2.1	D. List of spent fuel facilities, p. 21	MR and MC is stored in MARIA reactor's technological pool before it is shipped to "another place". Which place is meant? When will this shipment take place?		The decision on spent nuclear fuel from current operation of the MARIA's research reactor will be taken in due time whether spent fuel will be sent to the producing country or to the storage facility and then to the future repository.
19391	Poland	Belarus	17	Article 32	Section B, p.16	It can be assumed that such waste is a subject to be cleared from regulatory control after three years. Since this issue is now being actively considered in Belarus, we would like to know what document in the Republic of Poland defines the procedure for releasing such waste from the regulatory control, and where this waste are to be disposed of (in the municipal landfills or special sites)?	In Table 1 "Radioactive Waste Classification" the waste subcategory TRANSITIONAL is defined as "waste, in which activity concentration of isotopes is to fall below the level specified for low-activity waste after 3 years".	In case of the organizational entity generating radioactive waste as a result of its activity a procedure for radioactive waste management shall be submitted with the license application. The Regulation of Council of Ministers on radioactive waste and spent nuclear fuel sets limits for the activity concentration for different radioactive waste categories. When the activity concentration in the waste falls below these values it become conventional waste. In accordance with Article 49a the head of organizational entity carries out at least once a year an inspection to verify the conformity of the radioactive waste status with the inventory form. In case when the radioactive isotope concentration of isotopes contained in the waste falls below the values established in the regulation of Council of Ministers on radioactive waste and spent nuclear fuel, the inventory form shall contain date and method of establishing that the radioactive concentration has been reduced, name and surname of the individual who established that the radioactive concentration has been reduced and a method of further management of the waste which ceased to be radioactive waste. Inspection of radioactive waste which ceased to be radioactive waste shall include the following inspection activities: 1) Verification in the inventory form for this waste whether the decision to classify this waste as non-radioactive waste was justified, 2) Verification whether the selection of the method of further

18679	Poland	Austria	18	Article 19	E. Inspection and Enforcement, p. 35	Who can impose monetary fines in case of violation of legal requirements and/or license conditions?	Article 123 of the Nuclear Law lists violations of legal requirements punishable by monetary fine. According to Article 124, fines referred to in Article 123, in the form of an administrative decision, are imposed by: - President of PAA - if the authority competent to issue licences or receive notifications is the President of PAA; - Chief Sanitary Inspector, state regional sanitary inspector, Military Chief Sanitary Inspector, commander of military preventive medicine centre or the military sanitary inspector of the military preventive medicine centre - if these authorities are competent to issue licences or receive notifications - Director of the Regional Mining Authority – if this authority is competent to receive notifications - President of the Civil Aviation Authority – within the scope of the obligations referred to in the Atomic Law Act regarding crew member protection
18680	Poland	Austria	19	Article 20	E. Human resources, p. 39	Which measures does the PAA have in place to ensure maintaining skilled personnel hired in the last 5 years, once the construction of nuclear power plants in Poland starts and new industry players are going to compete with the PAA?	To maintain its skilled personnel hired in the last years, PAA took different measures such as: - salary increase and special bonuses for PAA staff engaged in the PNPP - introduction of individual development programmes including specific training opportunities, and on-the-job-training, - introduction of mentoring programme.
18681	Poland	Austria	20	Article 22	F. Other General Safety Provisions, p. 45	Are the qualifications for the officers according to Article 12 of the Atomic Law Act defined? If yes, where are they defined?	Qualifications for the officers according to Article 12 of the Atomic Law Act are defined in Regulation of the Council of Ministers on the job position essential for ensuring nuclear safety and radiological protection.
18682	Poland	Austria	21	Article 22	F. Other General Safety Provisions, p. 45	The financial resources for ZUOP, according to the report, are sufficient for "routine activity". How is the adequacy of financial resources for (future) private major waste producers (NPP) guaranteed?	In accordance with the National Plan for the Management of Radioactive Waste and Spent Nuclear Fuel, hereinafter referred to as the National Plan "The polluter pays principle in Poland applies, according to which the entity in which the radioactive waste or spent nuclear fuel is generated is obliged to provide financing for its management, from the moment they are generated until they are put into storage, including the financing of their storage. This responsibility may not be transferred to another entity." For the financing of radioactive waste and spent nuclear fuel from nuclear power plants, the following financing scheme was adopted. The National Plan indicates that: "The costs of the final management of radioactive waste and spent nuclear fuel from nuclear power will be covered by the decommissioning fund." "The decommissioning fund, set up by the operator of the nuclear power plant, will be a separate fund special with a separate bank account assigned to it. It will be powered by quarterly payments made by the operator of the nuclear power plant, the amount of which will depend on MWh of electricity produced in a nuclear power plant." The amount of contributions to this decommissioning fund will be determined by the Council of Ministers by way of an ordinance.
19394	Poland	Belarus	22	Article 19	Section E, page 36	1. Could you, please, give more details on applying the dose constraint concept to occupational exposure at radiation facilities: what is a role of a regulatory body in establishing dose constraint values, what are conditions for including the dose constraint in the license; and what measures are to be taken, if the established dose constraints have been exceeded?	The report specifies that "Assessment of the exposure of workers has to be performed, and if the optimization analysis indicates such necessity - shall establish for them further limitations of exposure in such manner, that the ionizing radiation doses received would not exceed established dose constraints".
19395	Poland	Belarus	23	Article 24	Section F	What are the values of the specific activity of radionuclides in biological samples and the detection limit – the minimum detectable activity of instruments?	The Section states that the average annual dose equivalent to personnel is below detectable levels (0.4 mSv). It is also noted that the personnel of the "MARIA reactor" organization is monitored in accordance with the Program for individual accounting of both external and internal exposure ("in vitro", by measuring the content of radionuclides in the urine of workers).
18683	Poland	Austria	24	Article 26	F. Other General Safety Provisions, p. 51	Is a decommissioning plan according to Art.38b already required at the first licensing of a nuclear installation?	Yes, according to Article 38b of the Atomic Law before applying for the license for construction of a nuclear facility, the head of organizational entity shall draw up a nuclear facility decommissioning programme to be submitted to the Agency's President for approval along with the application for granting the license.
19219	Poland	Austria	25	Article 19	E. Legislative and Regulatory System, p. 30	As stated in the report, the amendment of the Atomic Law Act provided for new requirements specific to radioactive waste management. Concerning high-activity sources, how was the financial guarantee to cover the cost of source collection and management regulated before the Atomic Law Act was amended? Can you describe in further detail the terms for the financial guarantee, as provided for in the amended Act?	In accordance with Article 5 section 5a of the Atomic Law Act a licence for conducting activities involving a high activity source shall be issued provided that the organizational entity applying for the licence also concludes: 1) an agreement with the manufacturer or supplier of a high activity source under which the manufacturer or supplier undertakes to collect the source after the source-related activities have been terminated, and to ensure subsequent management of the source, and which regulates the terms of financial guaranty to cover the cost of source collection and management, or 2) an agreement with a state-owned public utility referred to in Article 114 Section 1, under which this company undertakes to collect the source after the source-related activities have been terminated and to ensure subsequent management of the source, and which regulates the terms of financial security to cover the cost of source collection and management. 5b. Financial security referred to in Section 5a, Item 2, may consist of the following: 1) single payment or regular payments made by the organizational entity which conducts activities involving a high activity source, to cover the cost of source collection and management to a separate, interest-bearing account of the state-owned public utility referred to in Article 114, Section 1, which serves solely for accumulating funds to cover such costs; or In accordance with Article 110 point 13 of the Atomic Law Act the scope of activities of the President of PAA shall include the tasks that involve ensuring national nuclear safety and radiological protection, in particular submitting to the Prime Minister for approval, until 30 June of each year, reports on the activities of the Agency's President in the last year and the assessments of the status of national nuclear safety and radiation protection. There is no exhaustive list of reasons for approval or refusal of the annual report of the President of PAA stipulated in the Atomic Law Act.
19222	Poland	Austria	26	Article 20	E. Legislative and Regulatory System, p. 38	The Prime Minister may dismiss the President of the PAA before the latter's term of office ends based on the refusal of the annual report of the PAA on its activities for the previous year. Are the possible reasons for the Prime Minister to refuse an annual report from the PAA President listed exhaustively in the Atomic Law Act? If not, can you please specify these reasons and where they are stipulated?	In accordance with Article 110 point 13 of the Atomic Law Act the scope of activities of the President of PAA shall include the tasks that involve ensuring national nuclear safety and radiological protection, in particular submitting to the Prime Minister for approval, until 30 June of each year, reports on the activities of the Agency's President in the last year and the assessments of the status of national nuclear safety and radiation protection. There is no exhaustive list of reasons for approval or refusal of the annual report of the President of PAA stipulated in the Atomic Law Act.

19396	Poland	Belarus	27	Article 24	Section F, page 49	<p>1. Do the radiation protection regulations in Poland include provisions on establishing dose constraints for public exposure, as it is specified in clause 1.22 of the IAEA General Safety Requirements No GSR Part 3?</p> <p>2. What is a base for establishing numerical values of the discharge limits subject to be included into the terms of license?</p> <p>3. Is there an approved by Regulatory Body list of radionuclides, which activity concentration in the aerosol and liquid discharges shall be limited and controlled? What radionuclides are included?</p>	<p>It is stated, that the program for controlling emissions of volatile and gaseous radioactive substances to the environment, implemented in the MARIA reactor, include controlling the emissions of volatile and gaseous radioactive substances released from the reactor chimney, including noble gases in air and iodine radioisotopes in air. A radiological monitoring program for the area and surroundings of the Świerk based on measurements of air, water, sewage, soil, cereals, grasses, silt and total precipitation. According to Annex VII, page 94 "the effluents may be discharge to the environment if its radioactive concentration in the environment may be disregarded from the radiological protection point of view and numerical values of relevant limits for radioactive waste are included into the terms of license".</p>	<p>1. Yes, dose constrains for public exposure are foreseen in Atomic Law - Article 9 point 2.</p> <p>2. Discharge limits are based on analyses of radiological impact on people and environment. Discharges are regulated under Article 52 of Atomic Law.</p> <p>3. Each licence covering discharge of radionuclides is treated individually and the range of included radionuclides depends on the type of operations which are to be licensed.</p>
19609	Poland	Belarus	28	General	Section K, page 67	<p>Given the complexity of the task, aimed at building of the deep geological repository, does Poland plan to involve in its implementation foreign organizations, having an appropriate experience, and if "Yes", indicate, please, what organizations and in what stages?</p>	<p>It is stated that Poland continues working on site selection for Polish Underground Research Laboratory and selection of the site for deep geological repository</p>	<p>We are preparing our activity in this area. Of course, we think about organizations with enough knowledge and experience in the field of site selection and construction of deep geological repository.</p>
19674	Poland	Belarus	29	General	Annex 7, page 94	<p>Please clarify, whether these criteria are included in the Polish regulations?</p>	<p>It is stated that "The effective dose connected with operation of nuclear facility at its perimeter shall not exceed the value of 0.3 mSv/y. Effective dose connected with siting, construction, operation and closure (also after closure) of nuclear waste repository from all routes of exposure shall not exceed the value of 0.1 mSv/y." From this provision it is not clear, what value, 0.3 mSv/y or 0.1 mSv/y, has been established as a safety criteria for operation of nuclear waste repository. Also, the effective dose 0.1 mSv/y in the post closure period is not in compliance with the criteria for radiation protection of the repository, established in para 2.15 of IAEA Safety Standards Series, No. SSR-5 "Disposal of Radioactive Waste". Para 2.15 defines the criteria to be taken into account when designing radioactive waste disposal facility (effective dose of the representative person and for the inadvertent human intrusion after closure of facility).</p>	<p>In case of nuclear facilities the annual effective dose from all routes of exposure within the restricted use area surrounding the facility shall not exceed 0.3 mSv during normal operation and anticipated operational occurrence. As radioactive waste repository is not considered as nuclear facility the annual effective dose differs from that for nuclear facility. Article 53a of the Atomic Law Act states that radioactive waste repositories is so located, constructed, operated and closed that the effective dose to the people from the general population during the year from all routes of exposure does not exceed 0.1 mSv. Additionally Article 55f states that after the closure of repository, the effective dose from all routes of exposure to the person who might be exposed as a result of possible natural processes affecting the disposal facility does not exceed a dose of 0.1 mSv in a year.</p>
19670	Poland	Belarus	30	General	Annex 5	<p>What are the trends in the dynamics of radioactive waste activity for the specified period, if possible in the context of each of the presented radioisotopes?</p>	<p>The table provides information on RW management facilities in the Różan storage facility during the period from 01.01.1961 till 31.12.2019. At the same time, the activity of RW is presented only as of December 31, 2019.</p>	<p>The volume of waste delivered to the repository to dispose it does not exceed 100 m³ per year and has recently fluctuated between 20 and 50 m³. The activity of the delivered waste every year ranges from 25000 to 13 GBq, depending on the volume of the delivered waste. The total activity of disposed waste is 29 527,8 GBq (as of 31.12.2021).</p>
20008	Poland	Russian Federation	31	Article 32	General	<p>Are there any tax privileges or other benefits for residents in a locality expected to house an RW disposal site?</p>		<p>There are no individual tax privileges. Residents benefit as members of local community, which is eligible for an annual payment from the national budget.</p>
21246	Poland	Lithuania	32	Article 28	Section J, Page 66	<p>Please explain what can be the reasons that disused sealed sources of foreign origin, which had been used in Poland cannot be returned to the foreign manufacturer? Is it required to make an agreement with foreign manufacturer before submission a source to consignee to take an obligation to accept sealed sources after the source became disused?</p>		<p>In case of high activity sources in accordance with Article 5 Section 5a of the Atomic Law Act a licence for conducting activities involving a high activity source shall be issued provided that the organizational entity applying for the licence also concludes:</p> <ol style="list-style-type: none"> 1) an agreement with the manufacturer or supplier of a high activity source under which the manufacturer or supplier undertakes to collect the source after the source-related activities have been terminated, and to ensure subsequent management of the source, and which regulates the terms of financial guaranty to cover the cost of source collection and management, or 2) an agreement with a state-owned public utility referred to in Article 114, Section 1 (RWMP), under which this company undertakes to collect the source after the source-related activities have been terminated and to ensure subsequent management of the source, and which regulates the terms of financial security to cover the cost of source collection and management. <p>The amendment of the Atomic Law Act provided for new requirement stipulated in section 5e. In accordance with this section the Agency's President, given the interest of radiation protection, may, in the case of a high-activity source imported into the territory of the Republic of Poland, condition the issuance of the licence on the applying organisational entity's entering into the agreement referred to in Section 5a, point 1, if the handling of this source in the territory of the Republic in 2004 in Poland was made PHARE Project and base on this it was prepared Task 8, Closure Safety Report which include conceptions of final closure. Now this conceptions are in review and update. In near future Radioactive Waste Management Plant in Poland want establish cooperation with specialist from IAEA or different Operators from Europe who can help with preparation of the updated conception of closure NRWR.</p>
21386	Poland	Belarus	33	Article 12	Section H	<p>What preparations have been made so far for the closure of the National Radioactive Waste Repository in Różan?</p>		<p>Results of environment and contamination measurements, as part of monitoring and radiological protection on the site and surroundings of National Radioactive Waste Repository in Różan, do not differ from levels recorded in different part of Poland and indicate that there is no radiation threat to personnel and surroundings. Based on now and history of measurements in perspective of near and far future that measurements record will be on similar level.</p>
21388	Poland	Belarus	34	Article 12	Section H	<p>Please provide information on the current state of radiation safety of the National Radioactive Waste Storage Facility in Różan and the forecast of the radiation situation at the storage facility and in the adjacent area for the near, medium and long term</p>		<p>According to Polish Atomic law, the periodic safety review of a repository is performed with the frequency specified in the permit for the operation of a radioactive waste repository, but not less than every 15 years. It is planned to conduct and write a periodic safety review of a radioactive waste repository by 2030.</p>
21387	Poland	Belarus	35	Article 12	Section H	<p>Are there plans to conduct a comprehensive engineering and radiation survey of the National Radioactive Waste Storage Facility in Różan and when?</p>		<p>Based on Resolution No. 154 of Council of Ministers of 24 November 2020 (Item 1070) in case of Update the National Plan of Radioactive Waste and Spent Nuclear Fuel Management, choice of final closure method and preparation the safety report for closure of repository is predicted on 2030-2032 and conception of final closure is predicted on 2033-2034. They are in north part of Poland. We will do geological, hydrogeological and other studies required by the Atomic Law Act and subsidiary regulation. These studies will indicate if the site is suitable for construction of repository.</p>
21903	Poland	Belarus	36	Article 12	Section H	<p>Has the method of closing the National Radioactive Waste Repository in Różan been chosen? When is the development of the Concept for Closing the Repository planned?</p>		<p>We are now at the stage of site selection process. The new repository will be dedicated for LILW SL institutional and nuclear fuel cycle waste.</p>
21904	Poland	Belarus	37	Article 13	Section H	<p>Where are the 4 potential sites for the planned disposal facility for short-lived low- and intermediate-level radioactive waste? What research has been done there?</p>		<p>We are in the process of searching a new site for the planned disposal facility for short-lived low- and intermediate-level radioactive waste. When we, after research recommendations, will select potential site, We will organize the meetings with citizens.</p>
21906	Poland	Belarus	38	Article 13	Section H	<p>What are the actual plans for the construction and start of operation of the planned disposal facility for short- and intermediate-lived low- and intermediate-level waste?</p>		
22165	Poland	Belarus	39	Article 13	Section H	<p>Have public hearings been held in cities and towns where the planned disposal facility for short-lived low- and intermediate-level radioactive waste is supposed to be located?</p>		

22221	Poland	Belgium	40	Article 13	Appendix D.2 (L.27), p. 70	<p>Could the Republic of Kazakhstan, please, provide more details on the safety concept and safety strategy for the RWDF disposal facility.</p> <p>* What are the engineered and natural barriers of the concept, providing for radioactive waste isolation ?</p> <p>* Is the interpretation correct that the immobilization matrix of solid waste is obtained with a radioactive cement paste (mix of liquid LLW with cement). For how long can the monolith satisfy its "containment" safety function ? What is the timeframe considered for the safety assessment (one speaks of "a solid monolith, which provides an eternal and sanitary disposal of radioactive waste").</p>	A question to Kazakhstan
22222	Poland	Belgium	41	General	D.2.1		<p>The Republic of Kazakhstan is encouraged to continue on its efforts on re-establishing a complete and up-to-date national waste inventory.</p> <p>A comment to Kazakhstan</p>
22223	Poland	Belgium	42	Article 13	Section H, p. 61 and 73	<p>On what basis will (a) location(s) for the LLW/LLW-SL repository be selected, e.g. in terms of site selection criteria applied or assessments to be made ? Could you also detail the legal requirements established in article 53 of the Atomic Law ?</p>	<p>According to Article 53a and 53b of the Atomic Law: Radioactive waste repositories shall be sited, constructed, operated and closed in the manner, which prevents the members of general public from receiving an annual effective dose in excess of 0.1 mSv from all exposure pathways. Deep and surface radioactive waste repositories shall be sited in the areas, where natural environment is subject to a gentle evolution, and the conditions shaped by this evolution can be reliably forecasted for the periods in case of:</p> <ol style="list-style-type: none"> 1) surface repository – for 500 years 2) deep repository – for 10 000 years. <p>Deep radioactive waste repository cannot be sited:</p> <ol style="list-style-type: none"> 1) in the areas of occurrence, or possible occurrence, of violent phenomena, including: <ol style="list-style-type: none"> a) floods with probability higher than that for a 1000-year water, b) increased seismic activity, normal or induced by human activities, c) increased tectonic activity and in the fault zone, d) mass movements of grounds or rocks, e) ground settlement or subsidence, f) karst phenomena or erosion landslide phenomena, g) intensive erosion, deep-sited or surface; 2) within areas of city agglomerations and concentrated settlements, and also on areas of higher social value (culture, recreational and sanitary); 3) in protective zones for water intakes and protective areas
22224	Poland	Belgium	43	Article 13	Section K, p. 67		<p>We would appreciate if Poland could present at the review meeting an update on the progress made for the development of a new repository for the L&ILW-SL, including the main challenges at the moment.</p> <p>An update on the progress made for the development of a new repository for the L&ILW-SL will be presented at the review meeting.</p>
22779	Poland	Belarus	44	Article 12	Section H	<p>Please specify the date of the release, the activity of the released tritium, as well as the trend for the decrease in the activity of this radionuclide.</p>	<p>The report notes that tritium concentrations have been declining since the emissions occurred several years ago.</p> <p>Increased release of tritium has been detected in 1st quarter of 2014. Detailed information about the tritium releases is provided in the previous reports (i.e. 6th Polish National Report). It should be added that since 2015 the tritium concentration in the piezometer located close to the potential source of discharge is systematically decreases.</p>
22780	Poland	Belarus	45	Article 19	Section E, page 29	<p>Have safety culture assessment and self-assessment methodologies been developed and are such assessments carried out?</p>	<p>Each operator of a nuclear facility has developed its own safety culture assessment methodology including a reassessment of the safety culture. This has been done under introduction of Integrated Management System with use of IAEA documents, such as: Safety Culture in Nuclear Installations: Guidance for Use in the Enhancement of Safety Culture, IAEA-TECDOC-1329.</p>
22781	Poland	Belarus	46	Article 5	Section G	<p>Is there a plan for the management of spent fuel from the MARIA research reactor once the fuel has been removed to the producing country?</p>	<p>Spent fuel (HEU) has been removed and shipped to the country of origin without an intention to send back the waste after the reprocessing of spent nuclear fuel. Regarding fuel (LEU) from current operation of the MARIA's research reactor the decision will be taken in due time whether spent fuel will be sent to the producing country or to the future repository.</p>
24171	Poland	France	47	Article 19.2.1	Section E - page 36	<p>The Polish report states that "it is arbitrary decision of the head of the organizational entity on which site the waste arises to classify and register them as waste of definite category (and subcategory if appropriate)".</p> <p>Could Poland clarify what is the meaning of the term "arbitrary decision"? Does that mean that a waste producer may decide not to consider a waste as radioactive even if the concentration activity or the activity of one or several radionuclide(s) is above the threshold value(s) (EAC and/or EA) used for radioactive waste classification?</p>	<p>This statement means that the head of the organizational entity on whose site the radioactive waste is generated shall classify it into an appropriate category and subcategory based on the Atomic Law Act and Regulation on radioactive waste and spent nuclear fuel. The classification shall be done before the receipt of waste - by the head of organizational entity receiving the waste (Radioactive Waste Management Plant). Radioactive waste classification may be performed by the Agency's President in case of:</p> <ol style="list-style-type: none"> 1) discrepancy in waste classification performed by the head of the organizational entity on whose site the waste is present, and the classification performed by the head of the organizational entity receiving the waste; 2) detection of irregularities in waste classification; 3) the head of the organizational entity does not performed classification.
24172	Poland	France	48	Article 12.2	Section A - page 6 Section C - page 19	<p>The Polish report indicates on p.6 that "Poland never had neither any nuclear power reactor nor any nuclear fuel cycle facility, except uranium mine, in operation. Mining of uranium ore ended in 1968, and processing was terminated in 1973, being not a source of any new waste at present." In section C (p.19), Poland indicates that "No waste that contains only naturally occurring radioactive material and does not originate from the nuclear fuel cycle has been declared by Poland as radioactive waste for the purposes of the Convention". Therefore, uranium mining is considered as a nuclear fuel cycle activity and the waste arising from past uranium mining activities are not excluded from the scope of the report.</p> <p>Could Poland explain why is the inventory of waste generated by past uranium mining and milling activities not presented? If appropriate, could Poland give information about the location of the former uranium mines, processing plants, and tailing management plants as well as the quantity of tailings managed on the territory?</p>	<p>Poland has no official documentation with a inventory of waste from former mining activities. Mining activities related to uranium ore exploration and exploitation began in 1947 in cooperation with the USSR. The focus was on rapid acquisition of the deposit, so the various phases of resource acquisition or development of mine designs were not documented. The discovered deposit was immediately exploited. In 1973 the uranium mining company "ZPR.1" in Kowary was liquidated. The Wrocław University of Technology become the owner of the site. Waste from operations was stored on heaps, the second place was the tailing pond on the area of the plant. In 1997-2003, on the initiative of the Wrocław University of Technology, the "Kowary" tailing pond was recultivated (the process was financed from EU funds - a report on the work was sent to the IAEA: https://inis.iaea.org/collection/NCLCollectionStore/_Public/30/060/30060356.pdf). Poland provided information on the location of former uranium mines and the uranium processing plant during the verification visit in 2012: https://ec.europa.eu/energy/sites/default/files/documents/te_ch_report_poland_2012_pl.pdf.</p>
24173	Poland	France	49	Article 19.2.1	Section B - page 15	<p>Poland's report indicates that "Smoke detectors containing plutonium sources are dismantled and separately immobilized in 1 dm³ metal box with using of polyester resin. Metal boxes are subsequently placed in 50 dm³ zinc-plated metal drum and grouted with concrete. Other parts of the smoke detectors in which plutonium contamination did not exceed the clearance level, are released from the radioactive material restrictions."</p> <p>Could Poland describe the situations in which materials may be released from radioactive material restrictions? In particular, could they specify the values of clearance levels ? What is the destination of the released materials?</p>	<p>As for smoke detectors in case surface contamination is not found the part of smoke detector after removing of plutonium or americium sources is crushed and use as a filler in the boxes with barrels. In Poland material may be released from radioactive material restrictions and become conventional waste when activity concentration is lower than the values set in the regulation of Council of Ministers on radioactive waste and spent nuclear fuel for different radioactive waste categories.</p>

24174	Poland	France	50	Article 32.2.2	Section A	<p>Poland's report indicates on p.7 that the facility No. 19, located in Świerk, was used to store the encapsulated spent low enriched nuclear fuel EK-10 from the EWA reactor, shipped to the Russian Federation in September 2012 and that this facility is now used for storage of some solid radioactive waste (structural elements) from the decommissioning of the EWA reactor and operation of the MARIA reactor, as well as disused high-activity gamma radiation sources. The report also mentions that the decommissioning plan of spent nuclear fuel storage facilities No. 19 and 19A was submitted to PAA and is currently under safety assessment.</p> <p>Could Poland provide the inventory of the waste stored in facility n°19? What is planned for the long term final management of the waste currently stored at facility n°19 and what are the associated time frames?</p>	<p>In Facility No 19 disused sealed radioactive sources (DSRS) and solid radioactive waste are stored. There are 3 containers containing 6 sources of Ra-Be (High Level, Long Lived), 5 containers with 5 sources of Co-60 (High Level, Short Lived), 1 container with 1 Ra-Be source (Intermediate Level, Long Lived), 1 container with 64 sources of Co-60 (Intermediate Level, Short Lived), 1 container with 45 sources of Co-60 (Intermediate Level, Short Lived), 1 container with 1 source of Co-60 (Intermediate Level, Short Lived) and 12 drums of solid waste containing spent ion exchange resins and activated elements from MARIA Reactor. When the activity will decrease waste will be processed and sent to the Radioactive Waste Repository in Różan. Sources will be stored in RWMP in Świerk.</p>
24175	Poland	France	51	Article 32.2.4	Section E - page 39	<p>Poland's report indicates that radium sources are immobilized with glass and placed into brass containers. Subsequently, the brass containers are located in the storage containers and transported to the Rozan short-lived low and intermediate level radioactive waste repository (NRWR) for storage.</p> <p>Could Poland specify the inventory of these radium sources?</p> <p>In addition concerning the NRWR, Poland's report indicates that some short-lived low and intermediate level radioactive waste are stored (in facility n°1) while others are disposed of (in facility n°8). Could Poland indicate if the waste stored will be moved to the NRWR or NSRWR for final disposal and if so, indicate the milestone for disposal?</p>	<p>There are 51 containers with radium sources stored in facility No 1. Radioactive Waste Management Plant plans to retrieve radioactive waste from facility No 1, No 2 and No 3 after closing the repository where the closure of the repository is understood by the Polish Atomic Law as cessation of supplying radioactive waste to the repository on the basis of a decision of the competent authority, and the implementation of the work necessary to ensure the safety of repository. Radioactive waste retrieved from above facilities will be segregated and treated. Short lived radioactive waste will be disposed in place and long lived will be stored in a new near surface repository.</p>
24176	Poland	France	52	Article 22.1	Section E - page 29	<p>Poland's report indicates that following the identification of the recruitment and training needs of the PAA staff, 39 new positions at PAA (the nuclear regulatory body) funded by the government were created. This approach of PPA's skill building and capacity strengthening was successful and is to be commended.</p> <p>In order to face the PAA staff sustainability challenge, 2 documents were issued: 1) Plan for employee hiring and development of human resources for the years 2017-2019 and 2) Human Resources Development (HRD) Program for the years 2017 - 2019 which includes a report on human resources management (structure of employment, qualifications, annual changes in number of workers in the previous 4 years), sets priorities, describes areas of human resources management and sets annual objectives for the period of 3 years in identified areas.</p> <p>Could Poland state a feedback from the process of maintaining PAA staff and what is planned for the next years to consolidate this process? In particular, what are the objectives for the next 3 years?</p>	<p>The process of maintaining PAA staff in the years 2017-2019 went well. New people were hired and underwent various ways of acquiring knowledge and experience. This included participation in courses, short trainings, participation in workshops as well as in some cases on-the-job-trainings. Most of the people achieved such a level of competence that today they fully participate in all the necessary regulatory work. Unfortunately in some cases, the new people after acquiring considerable knowledge decided to quit their job. The objectives for the next 3 years cover: employing a sufficient number of new staff to be able to perform an assessment of the application for the construction of a nuclear power plant, as well as persons that will support the assessment process, initiation of a program for training new staff in nuclear safety and in specialized areas necessary for the assessment – in Poland and abroad, maintaining the experienced staff at PAA by improving their financial situation.</p>
30624	Poland	Slovenia	53	Article 28	J	<p>Do you in your country collect consumer goods and products containing radioactive substances? Do you have any restrictions on the available disposal options at the end of their useful lifetime? If yes, what are the basis for such decision?</p>	<p>Radioactive Waste Management Plant collect only "radioactive waste", that's means the radioactive concentration of a radioactive isotope in such waste must exceeds the value specified in Annex 1 to the Regulation on Radioactive Waste and Spent Nuclear Fuel (exemption level).</p>
30638	Poland	Germany	54	Article 32	p. 20	<p>The spent fuel storage facility No. 19 consists of 4 cylindrical ponds placed in an underground concrete structure. Currently, the facility is used as a place for storage some solid radioactive waste from EWA reactor's decommissioning and from MARIA reactor's operation and also spent high activity gamma radiation sources.</p> <p>What is the processing state of the radioactive waste stored in the spent fuel storage facility No. 19 and how long is it intended to be stored there?</p>	<p>Waste from EWA reactor's decommissioning and from MARIA reactor's operation is mainly pre-treated and is currently being cooled. Bigger parts are stored in a cast iron shielding container and other waste is stored in metal barrels. Its processing (treatment and conditioning) is planned when the dose rate will enable the safe conduction of the above-mentioned works.</p> <p>Then waste is planned to be disposed in a repository in Różan or in a new waste repository after its commissioning.</p>
30639	Poland	Germany	55	Article 19	p. 30, Section E	<p>The amendment of the Atomic Law Act provided for new requirements specific to the radioactive waste management. Does Poland's national waste management programme already contain a detailed cost breakdown for the management of future spent fuel, including the different alternatives of disposal options, i.e. direct disposal after appropriate interim storage or reprocessing of spent fuel?</p>	<p>National radioactive waste management programme contains a cost breakdown for the management of future spent fuel. Poland prefers one option - disposal of spent fuel in a deep geological repository and this option was estimated in cost breakdown. Reprocessing for example is more expensive option for us.</p> <p>If other options will become more realistic for us we add them to cost breakdown.</p>
30640	Poland	Germany	56	Article 20	p. 39, Section E	<p>Can you detail how you are continuing to ensure Regulatory Body maintains adequate resource levels in light of a significant new build programme, which is ongoing, according to Polish Nuclear Power Program PPEJ?</p>	<p>According to Polish Nuclear Power Programme, in the period 2020-2033 financial resources provided for strengthening nuclear regulatory control in an amount of approx. 400 million PLN. The task includes:</p> <ol style="list-style-type: none"> Strengthening the staff and building PAA's competences Adaptation of the PAA's hardware facilities and infrastructure to the tasks stemming from the PNP Programme System of technical and expert support for PAA Performing of control and other tasks accompanying the implementation of PAA's tasks stemming from the PNP Programme.
30641	Poland	Germany	57	Article 32	p. 20	<p>Storage facility No. 19A is used as a backup for the purpose of spent fuel storage from MARIA reactor in case of emergency. Since this storage facility is an external facility, how will the spent fuel from MARIA reactor be transferred there, especially in an emergency case? Is there some space reserved in MARIA reactor's technological pool for an emergency unload of the core?</p>	<p>The transport of low-enriched spent fuel from the MARIA reactor to the storage No. 19A will be based on the already proven technology. A shielded transport container is stored at the premises of MARIA reactor - it was used to transfer spent fuel from MARIA reactor's spent fuel pool to facility No. 19A.</p> <p>MARIA reactor's technological pool has enough free space to handle an emergency unload of the core.</p> <p>Releases of tritium in the National Radioactive Waste Repository in Różan are located only on site of repository. There are no impact on tap water used for drinking. Measurements of tap water indicate activity of tritium on the level of 1 Bq/dm³, which is 1% of approved value. Based on Resolution No. 154 of Council of Ministers of 24 November 2020 (Item 1070) in case of Update the National Plan of Radioactive Waste and Spent Nuclear Fuel Management, choice of final closure method and preparation the safety report for closure of repository was postponed and now is predicted in the years 2030-2032.</p>
30960	Poland	Latvia	58	Article 12	Page 60, Page 71	<p>The report mentions releases of tritium in the National Radioactive Waste Repository in Różan. The previous report on page 55 states that in the near future, ZUOP will prepare the safety assessment for the closure of the Różan Repository, which start is planned ca. 2025. Annex 1 of this report on page 71 indicates the measures for closure, but there is no information on time periods. Please indicate when such a safety assessment for the closure of the Różan Repository is planned. Please provide information on whether measures are planned to prevent the releases of tritium prior to closure of repository.</p>	<p>Releases of tritium in the National Radioactive Waste Repository in Różan are located only on site of repository. There are no impact on tap water used for drinking. Measurements of tap water indicate activity of tritium on the level of 1 Bq/dm³, which is 1% of approved value. Based on Resolution No. 154 of Council of Ministers of 24 November 2020 (Item 1070) in case of Update the National Plan of Radioactive Waste and Spent Nuclear Fuel Management, choice of final closure method and preparation the safety report for closure of repository was postponed and now is predicted in the years 2030-2032.</p>
31082	Poland	Canada	59	Article 7	Section G	<p>How is the output of the design stage ensured to be adequately addressing this Article during the facility licensing process?</p>	<p>According to Article 36b of the Atomic Law Act in the design and construction process of a nuclear facility, no solutions or technologies shall be used which have not been demonstrated to be appropriate in practice in other nuclear facilities, or by means of tests, studies and analyses.</p> <p>Article 36c. 1. of the Atomic Law Act states that nuclear facility design shall take into account the necessity to ensure nuclear safety, radiological safety and physical protection in the course of construction, commissioning, operation, including repairs and renovations, and decommissioning of the facility. The output of the design stage is reviewed and assessed at the licensing stage for construction of nuclear facility.</p>

31083	Poland	Canada	60	Article 12	Section H	Are there any planned improvements underway at any of the currently operating facilities for spent fuel management?	The RWMP (Radioactive Waste Management Plant) is constantly working on maintaining and enhancing the safety of spent nuclear fuel storage facilities – facilities No. 19 and 19A. The improvements result from, among others, adapting the facilities to legal requirements, the results of the periodic safety review and adapting the facilities to the possibility of storing the spent nuclear fuel currently used in the MARIA reactor.
31084	Poland	Canada	61	Article 17	Section H	Will the updated safety report for the final closure of the Rozan repository also include how the records of the location, design and inventory are to be preserved?	Safety report for closure stage of NRWR will contain information about records of the location, design and inventory.
31085	Poland	Canada	62	Article 27.2	Section I	No mention appears to be made regarding the position on Article 27, paragraph 2, on prohibiting licensing of shipment of radioactive waste south of latitude 60 degrees S for storage or disposal. Please clarify Poland's position on this article.	According to Article 62e. 1 of the Atomic Law Act export of radioactive waste and spent nuclear fuel from the territory of the Republic of Poland to the destination south from 60-th degree of southern latitude shall be prohibited.
31283	Poland	Indonesia	63	Article 32	8,15	It is stated that the NRWR disposal facility in Rozan is for the disposal of waste containing semi-liquid radioisotope. Why does the semi-liquid waste need to be put at its disposal?	National Radioactive Waste Repository (NRWR) in Rozan is a repository dedicated to a solid short-lived, low- and intermediate- activity radioactive waste disposal and sealed radioactive sources. It is also used to store, for an interim period, solid long-lived, mainly alpha radioactive waste, ready to be placed in a deep repository. Disposal of waste containing semi-liquid radioisotope is forbidden. Abbreviation "SL" mentioned in the report means short-lived waste, not semi-liquid.
31284	Poland	Indonesia	64	Article 20	E,39	Is the employee recruitment process done every 3 years? How is the knowledge transfer process? What if an employee is critically ill/deceased before the organization hires a new employee?	The recruitment process is not done every 3 years although a review of the current needs and plans is done periodically. The process of hiring of 39 new people, described in the report in area E page 39, was not instantaneous, it was spread over time. The knowledge transfer with respect to new employees is based on general experience in training of personnel at PAA. This includes participating in courses for specialists, on the job training at foreign regulatory bodies, participation in IAEA meetings, etc. In case of unavailability of person (due to eg. illness) the procedure is such that the work is performed by other employees. In general nearly all tasks can be split or conveyed to other persons, due to the fact that substitutability is ensured. In the long term, hiring process of new employee will begin.
31285	Poland	Indonesia	65	Article 28	J,66	How is the DSRS managed at the Polish radioactive waste management facility (non-returnable DSRS)? How is the orphan source managed? Who is responsible for both management and financing?	Such sources as described and referred to in the question are collected by the RWMP (Radioactive Waste Management Plant), the only operator licensed for the final management of RW/SF. In the case of orphan sources of unknown origin which came from illegal trade or from the activities of an organizational entity that became insolvent upon the termination of its operation, or from the environment contamination by unknown perpetrator, the responsibility for management of such materials lies with the State and Radioactive Waste Management Plant has to perform collection, transport, processing, storage or disposal of such radioactive waste or substances and the costs of such services shall be covered from the national budget (Article 119a of the Atomic Law Act).