## Answers to the Questions Posted to Lithuania

## Joint 8th and 9th Review Meeting of the Contracting Parties to the Convention on Nuclear Safety (CNS) 2023

No.	Posted By	Article	Referenc e	Question/ Comment	Answer
1	Czech Republic	Planned Activities	N/A	<ul> <li>Q1: Is Lithuania considering the construction of small modular reactors? If so, what technologies are being considered and in what time frame? What preparatory steps does the regulatory body take to prepare for the licensing process?</li> <li>Q2: From the perspective of the regulatory body, what are the bottlenecks for licensing and deployment of SMRs?</li> <li>Q3: What changes to the legislation will be necessary for the successful inclusion of SMR technologies in the energy mix?</li> </ul>	Q1: National Energy Independence Strategy (2018) does not foresee development of nuclear energy in Lithuania. The Strategy is focused on the renewable sources of energy and energy efficiency. Lithuania will continue accelerating the transition to renewable energy. However, we are thinking ahead about additional energy generation technologies once a potential of renewable energy is realized. At the moment Lithuanian institutions with the partners from USA have started long-term study which will prepare scenarios and investment pathways to full self-sufficiency and carbon neutrality for Lithuania's electricity sector. We will have a clear answer regarding the future of nuclear energy and SMR in Lithuania around 2027- 2028. Q2. Regulatory body, following world-wide trends and preliminary plans of the neighbouring countries, is taking limited interest to SMR technologies and discussions on licensing procedures. The corresponding political decisions should be made for more active actions in this field. Q3. From regulatory side – the existing safety requirements should be reviewed in order to define if they are still applicable for SMRs, or need corresponding corrections.

2	Indonesia	Article 16	page 83	It is written that: "Population in the zones of long-term protection measures (100 km) shall be supplied with stabile iodine preparations in advance by local municipalities of cities and regions". Could you please elaborate more why chosen up to the long-term protection zones for supplying of the stable iodine in advance? and how is the management of the stable iodine supplied be distributed to those people (since the storage until it was received and consumed by the public)?	According to the IAEA General Safety Requirements No. GSR Part 7, the definition Extended planning distance (EPD) has an additional warning: "As a precaution, some urgent protective actions may be warranted within the EPD to reduce the risk of stochastic effects among members of the public". In the Republic of Lithuania EPD is determined as a 100 km area around a neighboring Belarusian NPP. In this area lives about one third population of Lithuania. Taking into account the fact, that Belarusian NPP started operations despite of some nuclear and radiation safety violations and public worries related to the safety, under the decision of the Government of Lithuania, the applying of urgent protective action - iodine thyroid blocking (ITB) – was extended till EPD (100 km). For the residents in the EPD two single doses of stable iodine pills (KI) were bought by state budget money. The distribution of KI was organized by the order approved by the Minister of Health. Recommendations for municipalities:- to distribute KI to residents permanently living in the UPZ (30 km) for their personal storage (through wards or other methods acceptable to municipalities);- to distribute KI to residents permanently living in the EPD for their personal storage or to store KI intended for them in the places provided by the municipalities so that in the event of a nuclear accident it can be distributed within 2-3 hours to the residents (by providing distribution on safe
					can be distributed within 2-3 hours to the residents (by providing distribution points in wards or others). The written description on safe keeping and use of KI were given to every resident during the distribution of KI.

3	Indonesia	Article 16	page 85	it is written that: " other nuclear or radiological emergency is an unusual event in case of the transportation of radioactive materials outside the boundaries of the site area of the nuclear facility,". How about EPR arrangement for other emergency that may warrants taking protective actions and other response actions at any unpredictable location (e.g. transnational release, theft/lost/found dangerous source, etc.)? How is the EPR arrangement for such emergencies?	For other emergencies that may warrant taking protective actions and other response actions at any unpredictable location (e.g., transnational release, theft/lost/found dangerous source, etc.): 1. The State Residents Protection Plan in Case of Nuclear or Radiological Emergency, approved by the Resolution No. 1085 of the October 31, 2018 of the Government of the Republic of Lithuania (hereinafter referred to as – Plan) identifies at state level the measures of civil protection to be taken, in case of radioactive contamination, also transnational release, due to nuclear accident in nuclear power facility, irrespective of whether it is in the Republic of Lithuania or beyond its boundaries. The Plan describes organization and implementation of urgent, early and long-term protective actions, etc.2. EPR arrangements are adopted in the Rules on the handling of orphan radioactive sources, substances of orphan nuclear fuel cycle, orphan nuclear and fissile substances and objects contaminated by radionuclides (hereinafter referred to as – the Rules) approved by the Resolution No. 918 of the September 12, 2018 of the Government of the Republic of Lithuania. The Rules determine the actions of the state and municipal authorities and other institutions, managers of radioactive waste and other legal or natural persons, who have found, detected, detained, melted or have suspicion that orphan radioactive sources have been found, detected, detained, or melted, objects contaminated by radionuclides and the identification of the ionizing radiation in excess background natural ionizing radiation.
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4	Indonesia	Article 16	page 85	In case an NPP accident	The State Residents Protection Plan in Case of Nuclear or Radiological Emergency, approved by the Resolution No. 1085 of the October 31, 2018
		10		how is arrangement for the	of the Government of the Republic of Lithuania (hereinafter referred to as –
				Lithuanian public protective	Plan) identifies at state level the measures of civil protection to be taken
				actions? Is there any EPR	while organizing and implementing protective actions, which seek to
				arrangement for	protect and (or) minimize the risk of deterministic and stochastic effects of
				harmonization of public	ionizing radiation impact for residents till release of radionuclides to
				protective actions with the	environment, and to protect the property of residents as well as
				neighboring States and/or	environment from radioactive contamination due to nuclear accident in
				within the region?	nuclear power facility, irrespective of whether it is in the Republic of
					Lithuania or beyond its boundaries. The Plan describes organization and
					implementation of urgent, early and long-term protective actions,
					etc. According to the legislation of the Republic of Lithuania, authorized
					Government institutions using bilateral or international information
					exchange systems, must cooperate and provide information to international
					organizations and authorized institutions of foreign states about occurred
					(when it is possible), which will have rediclogical consequences in the
					(when it is possible), which will have radiological consequences in the territory of Lithuania. In these cases, authorized Government institutions
					according to their competence, must provide information on the assessment
					of the exposure situation and coordinate the applied and planned protective
					actions, but it should not interfere with informing the public and applying
					protective actions in the territory of Lithuania.

5	Indonesia	Article 7	page 14	Article 7 Page 14 states " Both Ignalina NPP Units have the status of the permanent shutdown and are going to be decommissioned".Have all nuclear power plants in Lithuania received decommissioning permits?Does Lithuania have any special regulations governing decommissioning? If so, what is the scope of the arrangement?	According to Lithuanian regulatory framework licensing of decommissioning of nuclear power plants includes an "overarching licence" for decommissioning, referring to the overall decommissioning plan, and outlining the general limits and conditions for the decommissioning project as a whole. The conduct of specific dismantling tasks (e.g. removal of peripheral systems, removal of biological shielding, reactor internals etc.) require further regulatory approval – permits are required to perform decontamination and (or) dismantling of contaminated structures, systems and components of the nuclear power plant (Pursuant to Subpart 8 of Part 2 of Article 22 of the Law on Nuclear Safety).For the decommissioning of other nuclear facilities (e.g. radioactive waste storage facility), only a decommissioning licence is required and no additional permits are necessary.The Law on Nuclear Safety together with the Regulations on the Issuance of Licences and Permits Necessary to Engage in Nuclear Energy Activities, approved by the Government of the Republic of Lithuania, regulate issuance, amendment, suspension, and revocation of the suspension of licences and permits (listed in the Law on Nuclear Safety).Nuclear Safety Requirements BSR-1.5.1-2019 "Decommissioning of nuclear facility", approved by Order No. 22.3-19 of the Head of VATESI of 24 January 2019 "On the approval of Nuclear Safety Requirements BSR-1.5.1-2019 "Decommissioning of nuclear facilities and cover all aspects of the planning, conducting and completing decommissioning of nuclear facilities, including the withdrawal of the licence to carry out decommissioning, of a nuclear facility seeking to prepare for carrying out decommissioning.
6	Indonesia	Article 13	page 55	Has the regulation BSR- 1.4.1-2016 on "Management System" (page 55) adopted GSR Part 2?	The regulation BSR-1.4.1-2016 on "Management System" 2019 was revised, clarified and supplemented with provisions on leadership and safety management to comply with the IAEA GRS Part 2 recommendations.

7	Indonesia	Article 14	page 65	Considering that 2 units of Lithuanian NPPs have been shut down, how is the Assessment and Verification of Safety for nuclear power plants carried out?	Pursuant to the provisions of the Law on Nuclear Safety the Ignalina NPP Units operation licences are valid as long as all nuclear fuel is not completely removed from the Units. All requirements pertaining to the operation of Units are applicable during this period. Therefore, currently Unit 1 and Unit 2 are maintained in the post-operation state, based on VATESI operation licence and in accordance with the safe operation conditions and limits set in the Technical Specifications for operation of the Units. The removal of nuclear fuel from the Units will decrease the risks related to the storage of nuclear fuel, thus leading to decrease in the number of systems important to safety and remaining in operation. After reclassification and safety justification these systems will be subject to dismantling under the Decommissioning Licence following the regulatory requirements. In addition, in order to be able to proceed with isolation, modification, dismantling and decontamination of some of the equipment and systems which are not needed anymore during each defueling stage, the Ignalina NPP was required to perform safety systems analysis to determine their status (safety class) during separate defueling stages by comparing performed corresponding functions prior to shutdown and the need of these functions to be performed after the reactor final shutdown and such reclassification was substantiated from the safety point of view. After this analysis, 2 decommissioning projects (for each Unit) and following documents for dismantling and decontamination activities during defueling stage have been prepared, coordinated and accepted by with VATESI. The safety analysis report for the decommissioning phase is going to be approved for obtaining licence for decommissioning. Moreover, concrete decommissioning projects). Before approval by regulatory body all safety uistifving documents shall nass independent verification inside the
					for decommissioning projects).Before approval by regulatory body all safety justifying documents shall pass independent verification inside the Ignalina NPP organisation.Ignalina NPP organisation shall perform maintenance of all remaining safety related equipment Ignalina NPP is



8	Slovakia	Article 6	p. 12	Are there any plans for restarting a nuclear power porogramme (new design/project)?	National Energy Independence Strategy (2018) does not foresee development of nuclear energy in Lithuania. The Strategy is focused on the renewable sources of energy and energy efficiency. Lithuania will continue accelerating the transition to renewable energy. However, we are thinking ahead about additional energy generation technologies once a potential of renewable energy is realized. At the moment Lithuanian institutions with the partners from USA have started long-term study which will prepare scenarios and investment pathways to full self-sufficiency and carbon neutrality for Lithuania's electricity sector. We will have a clear answer regarding the future of nuclear energy in Lithuania around 2027-2028.
9	Slovakia	Article 7.2	7 (2)(iv), p. 27	Could you specify an approximate number or ratio of such insignificant findings?	Most of the findings identified during regulatory inspections are insignificant violations. In 2021, 61 % of all violations identified during regulatory inspections were insignificant violations.
10	Slovakia	Article 15	p. 75	Could you specify which activities are the largest contributors to the gamma nuclides discharges into environment?	The main activities that make the greatest contribution to the gamma nuclides discharges into environment are: reactor internals and equipment dismantling and decontamination, spent nuclear fuel management (already finished) and radioactive waste packages formation.
11	Slovakia	Article 16.1	p. 89	Are there any emergency preparedness activities and personnel training performed within VATESI?	Emergency preparedness activities starts from planning and in this regard VATESI Emergency Situation Management Plan in Case of Nuclear or Radiological Accident was renewed in 2022. Also there were some improvements of VATESI Emergency Response Centre (ERC) done. VATESI has an early warning system in place and includes early warning officers consisted from VATESI ERC staff. As stated in report (p. 88), every year VATESI ERC staff takes part in various IAEA's ConvEx and European Commission drills and exercises. Additionally VATESI ERC staff is trained according to internal training procedures in VATESI and on civil protection topics in the Branch of the Fire Fighters Training School of the Fire and Rescue Department.

12	Slovakia	Article 16.2	p. 91	Could you explain why aren't the bilateral information exchange agreements with Poland and Estonia mentioned?	Bilateral agreement with Poland is mentioned in the report on continuing page 92:"Agreement between the Government of the Republic of Lithuania and the Government of the Republic of Poland on early notification of a nuclear accident, and co-operation in the field of nuclear safety and radiation protection has been signed on 2 June 1995".Lithuania doesn't have bilateral agreements with Estonia in emergency preparedness field.
13	Slovakia	Article 19.8	p. 118	By the time this review, were the schedules of cleaning activities completed?	The cleaning activities were completed in December 2022.
14	Slovakia	Article 7.2	7(2) (iv), p. 28	In relation to the legal actions and enforcement measures VATESI issued mandatory requirements to eliminate detected violations of the nuclear safety requirements and rules (to take remedial actions) during the reporting period. Could you please specify what kind of remedial actions are being referred to?	The examples of remedial actions taken by economic entities during the reporting period: to conduct cyber security exercises, to update internal documents, to include into the methodology for technical condition checks and functionality assessment physical security equipment, to perform corrections in logs, to solve housekeeping issues, etc.
15	Pakistan	General	Page 6	Lithuania may like to share the major issues encountered during handling, transportation and storage of the damaged fuel	There were no major issues during handling, transport, or storage of damaged nuclear fuel. Handling, transport, or storage of damaged nuclear fuel was done in accordance with authorized technical design.

				in the Interim Spent Fuel Storage Facility (ISFSF).	
16	Hungary	Article 7.2	Page 26	According to the "figure 7.1. of National Report inspections performed by VATESI in 2016-2021", there were more inspections carried out in year 2021 then in previous years. What was the main reason of the increased number of inspections in 2021?	In 2021, more inspections were conducted of activities with sources of ionising radiation in the field of nuclear energy, because of increased number of economic entities with issued licence to carry out activities in the environment of ionising radiation in a nuclear facility.
17	Hungary	Article 13	Page 58	According the National Report, the audit reports were distributed to the INPP Senior Management, managers of audited departments, senior managers of audited suppliers and to VATESI as appropriate. In which cases were the suppliers audit reports sent to VATESI?	All reports are submitted to VATESI in case the supplier of product important for safety was audited.

18	Hungary	Article 18.2	Page 102	According to the National Report, the contracting parties involved in decommissioning preparation activities were selected by open tenders taking into account the previous experience. What kind of previous experience criteria were taken into consideration for the selection of the contractors? Do the involved contractors have only experience in the domestic market or do they have relevant experience abroad? How many contractors were required to be involved into the preparatory activities?	The previous experience of the contractors refers to the performance of analogical decommissioning activities. It should be noted that INPP is only nuclear installation in Lithuania and no decommissioning infrastructure and decommissioning knowledge were available in the beginning of the decommissioning process. Actually, the decommissioning experience was available abroad only. Therefore, for development of the first dismantling projects, implementation of the main decommissioning infrastructure objects (for instance interim spent fuel storage facility, waste treatment and storage facilities, disposal facilities, etc.) the foreign contractors were involved for development of conceptual designs based on already implemented facilities abroad with the support of the local sub-contractors for the performance of the conventional works like constructions, detailed designing, etc. Finally, one of the criteria for the contractors were to have the experiences in implementation of analogical activities.
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19	Russian Federation	Article 19	19 (8)	Have the probable external natural impacts been assessed for the spent fuel storage facilities SNFSF-1	<ul> <li>During screening process, the most potential external natural events selected for further analysis were following :</li> <li>Earthquake. During the further analysis it was demonstrated that the facilities itself and the equipment important to safety are designed to</li> </ul>
				and SINFSF-2, as well as for radioactive waste storage	• Extreme winds. It was demonstrated that the whirlwinds cannot cause
				facilities? If so, what are	hazard to SNF or Radwaste storage safety, since the casks/containers are
				the results of the assessments?	designed to withstand the extreme loads and temperatures during events, such as airplane crash, big fire, drop of a cask, etc.
					• Flooding. The analysis demonstrated that flooding of the analysed
					facilities site due to the water level rise in Lake Drūkšiai is impossible, therefore the sites cannot be overflooded.
					• Extreme precipitation. The analysis demonstrated that the design of
					facilities foresees measures against flooding due to extreme precipitation,
					the site levelling provides run-off of the water.
					Extreme snow pack. It was demonstrated that the facilities are designed to
					withstand the snow load on structures of the buildings based on the national
					snow load calculation regulations. Natural Forest Fire. During analysis it
					analysed within the scope of the external fires caused by the human
					activity, demonstrating also the facilities resistance to the external
					fire. According to the 24 May 2011 Declaration of ENSREG, Annex 1 "EU
					"Stress Tests" specifications and in accordance with the Technical scope of
					the "stress-tests" both spent fuel storage facilities (SNFSF-1, 2) were
					assessed by impact of the earthquake, flooding, loss of electrical power and loss of ultimate heat sink and severe accident management. "Stress-tests"
					results of both SNFSF confirmed their robustness to the specified impacts.

20	United States of America	Article 8.1	page 31	The report states that VATESI was financed from the State Budget during the reporting period. (1) Please clarify the funding of VATESI and whether it has changed over time. (2) Please clarify what is meant by "other legally generated income." Does that mean that it was not supported by other legally generated income?	Budget of the state institutions each year is calculated based on the existing needs, economic situation and other aspects. Accordingly, budget allocations can slightly differ each year. VATESI is financed through the State Budget. However, very limited amount of other type of financial resources can also be available, for example:- VATESI can use European Union Ignalina Programme (The nuclear decommissioning assistance programme of the Ignalina Nuclear Power Plant in Lithuania) financial support for some specific tasks related with review of safety assessment documents VATESI can have minor additional incomes from the expert services provided through the EU support and cooperation projects (for example Instrument for Nuclear Safety Cooperation).
21	United States of America	Article 14.2	page 67	<ul> <li>(1) What entities are qualified to do the independent verification of the analysis and justification of nuclear safety?</li> <li>(2) Is this verification in addition to a review by VATESI?</li> </ul>	The licence holder is responsible for an independent verification of analysis and justification of nuclear safety before submitting it to VATESI. This verification is performed prior and in addition to a review performed by VATESI. The licence holder can perform independent verification using its own staff if it complies with requirement for independence set in the Nuclear Safety Requirements BSR-1.4.1-2016 "Management System". Also pursuant the Article 30 of the Law on Nuclear Safety the licence holder "shall have the right to use scientific and technical support organisations and independent experts, specialists and consultants to carry out the independent verification of the analysis and justification of nuclear safety, but the responsibility for the results of this work shall lie with the licence holder".
22	United States of America	Article 10	page 41	Please provide an update on the implementation of the Corrective Action Plan that resulted from the Safety Culture Management process audit.	National Report mentioned the audit of the Safety culture management process, which was performed in December 2021. On the results of this audit Correction and prevention action plan was developed. As of 12 January 2023: 14 measures were planned; 12 are implemented; 2 are still in progress. There are no delay in implementation of measures.

23	Finland	Article 8.1	chpaters related to the article	As the INPP is in decommissioning and there are no projects to built more nuclear power, it might be difficult to attract experts to work with nuclear energy. What measures have been taken to ensure VATESI will have the necessary expertize and human resources for its tasks also in the future?	The need for VATESI employees is periodically evaluated and planned in accordance with VATESI's management system procedures for the employee need planning. Following this procedure the VATESI staff planning for 5 years is performed. This includes evaluation of needed competences and number of employees. The age of employees, the probability that they will take a long-term vacation or express they will to change jobs/position are taken into account. Also in the frames of the VATESI strategic planning the factors that affect VATESI's abilities to achieve its mission are addressed. This includes the allocation of proper state funding to ensure the necessary expertize and human resources will be available at the disposal of VATESI.Also see the answer to the question No. 24
24	Finland	Article 11.2	Descript ion of the national supply of, and demand for, experts in nuclear science and technolo gy	INPP has taken measures to manage its competence and resource needs in the decommissioning phase. Are there any measures at national level to ensure availability of needed competnece in situation, where nuclear energy may not be seen as a very attractive career option (only NPP in decommissioning and no new porjects starting).	Lithuania's nuclear energy programme is declining and the demand for labour will be low in the future. The demand for new nuclear specialists is too low for sustaining a separate study programme in nuclear energy at educational institutions of the Republic of Lithuania. INPP and other institutions involved in SF and RAW management continue addressing capacity building needs through their own plans and activities. It is planned to establish a working group, the purpose of which is to facilitate the coordination of capacity building activities of these institutions. The working group will be established by the order of Minister of Energy and will consist of representatives of the Ministry of Energy, VATESI, RPC and INPP.

25	Finland	Article 8.1	chp. Develop ment and mainten ance of human resource s	Are there any measures for ensuring VATESI remains an attractive employer in the future despite of the fact that future career prospects in nuclear do not look so promising (no new projects).	VATESI seeks to be attractive employer. VATESI's employee motivation system is described in the management system procedure. Material and non-material incentive measures are applied: one-off payments, flexible working hours, the possibility to work remotely, etc.
26	Russian Federation	Article 13	n/a	Could you please provide more detailed information on monitoring the process indicators of the Integrated Management System and on the procedure for assessment of the Integrated Management System performance?	The integrated management system (the IMS) of the Ignalina NPP is developed and implemented in accordance with the VATES's regulations, recommendations of the IAEA, and is certified against the standard ISO 9001:2015. For each process of the IMS are identified measurable indicators. They are planned and reported annually. For each process there are indicators of effectiveness, efficiency and safety/quality. Annually during the Management System Review the whole IMS is assessed. Based on indicators and characteristics of each process conclusions about the effectiveness, efficiency and safety/quality of the whole IMS are made.
27	Russian Federation	Article 11.1	p. 45	Could you please clarify the sources used by the licensee to comply with the requirements of the state for the financial security of civil liability for nuclear damage and to what extent?	Nuclear liability in Lithuania is regulated by 1963 Vienna Convention on Civil Liability for Nuclear Damage which is directly applicable in national law since 1993. All principles of the Vienna Convention are directly applied under Lithuanian laws, so the liability is exclusively channelled to the operator/licence holder of nuclear installation. Under the Law on Nuclear Energy the operator/ licence holder is also obliged to ensure the availability of monetary compensation for nuclear damage. The operator/licence holder shall insure a nuclear installation or procure in some other way the funds necessary to compensate for the damage (to the natural and legal persons, their property or to the natural environment) after a nuclear accident. If the insurance and other available funds are insufficient to compensate for the nuclear damage, the payment of the missing amount is guaranteed by the state, in compliance with the

		obligations undertaken by the Republic of Lithuania under the Vienna Convention.

28	Russian Federation	Article 15	n/a	The staff that works in radiation exposure conditions is trained according to the programs on radiation protection training. What changes were made to the radiation protection training programs after the NPP final shutdown and start of the NPP decommissioning?	Activities of INPP starting from reactor final shutdown were changed, training programs on radiation protection also were changed and now include lots of questions about dismantling and decontamination, use of personal protective means and equipment, new radioactive waste treatment and storage facilities.Prior to the final shutdown of the INPP, radiation protection training was conducted according to the Training program for persons responsible for radiation protection and according to the Training program for employees working with ionizing radiation sources. In 2016 VATESI approved requirements regarding radiation protection training and briefing for activities in the nuclear energy area. These requirements were revised and updated in 2019 on periodical review basis. Six training programs on radiation protection for employees working under ionizing radiation exposure.2. Training program on radiation protection for employees working with ionizing radiation sources.3. Training program on radiation protection for employees working with ionizing radiation sources, including activities with ionizing radiation sources of hazard category I-III.4. Training program on radiation protection for persons responsible for radiation safety, including activities with ionizing radiation protection for employees carrying out transportation of radioactive substances.

ederation		7.2	Article 7(2) (1), Subsection "A System for Regulation, Inspection and Injunctions", mentions a list of criteria describing what breaches of legal act requirements are considered insignificant. Please provide more details on this question. What the penalties are foreseen for these breaches?	In accordance with Nuclear Safety Requirements BSR-1.1.4-2017 Rules of Procedure for Applying Enforcement Measures set by the State Nuclear Power Inspectorate", if an insignificant violation is identified during the regulatory inspection which may be immediately eliminated in the presence of the VATESI employee performing the inspection, the investigation of such violation are terminated, the sanction provided for in the requirements are not imposed and the economic entity are given an oral request. In the cases where it is impossible to eliminate the insignificant violation of requirements of legal acts in the presence of the VATESI employee performing the inspection, the economic entity receives mandatory requirement to eliminate the insignificant violation of requirements of legal acts within a reasonable period, which may be extended once. If the economic entity did not eliminate the insignificant violation of requirements of legal acts, a repeated oral request or mandatory requirement to eliminate the insignificant violation of
us ed	sian A eration	sian Article 7 eration	sian Article 7 Section eration 7.2	sian eration Article 7 Section eration 7.2 Article 7(2) (i), Subsection "A System for Regulation, Inspection and Injunctions", mentions a list of criteria describing what breaches of legal act requirements are considered insignificant. Please provide more details on this question. What the penalties are foreseen for these breaches?

30	Russian Federation	Article 7	Section 7.2	Article 7(2) (i), Subsection (Commissioning, Operation and Modernization", mentions categories of nuclear installations. Please clarify what the modification categories are used in Lithuania?	Nuclear Safety Requirements BSR-1.8.2-2015 "Categories of Modifications of Nuclear Installations and Procedure of Performing the Modifications" establish categories of modifications of nuclear installations (NIs) and assigns the licensee with the responsibility to document the modification process, carry out safety assessments and in the case of safety related modifications – to submit documents to VATESI for the approval. The following modifications categories, including temporary modifications, are established: 1.1. Category 1 includes the changes in the composition and (or) characteristics of structures, systems and components (SSCs) important to safety of Safety Class 1 or the related operational limits and conditions defined in the NI design and/or technological regulation for operation. 1.2. Category 2 includes: 1.2.1. changes in the composition and (or) characteristics of SSCs important to safety of Safety Class 2 or related operational limits and conditions defined in the NI design and/or technological regulation for operation; 1.2.2. changes in the composition and (or) characteristics of SSCs important to safety of the Safety Class 3, including software, that require a change in the operational limits and conditions indicated in the NI design and/or technological regulation for operation. 1.3. Category 3 includes: 1.3.1. changes in SSCs important to safety of Safety Class 2, including software, that do not change the composition and (or) characteristics of SSCs important to safety of the Safety Class 3, including software, that do not change the composition and (or) characteristics of SSCs important to safety of the Safety Class 3, including software, that do not require a change in the operational limits and conditions indicated in the NI design and/or the technological regulation for operation; 1.3.2. changes in the composition and (or) characteristics of SSCs important to safety of the Safety Class 3, including software, that do not require a change in the operational limits and conditions indicated
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shutdown of the NI or the decommissioning projects; 1.4.2. modifications related to the implementation of the preparatory activities of the decommissioning project during the shutdown and decommissioning stages of the NIs;1.4.3. modifications of SSCs that have no influence to the safety of the NI;1.4.4. modifications related to the assignment of structures to not used longer in operation and unnecessary structures, which are planned to be demolished, and/or the execution of demolition works on not operating and unnecessary structures.1.5. Category 5 includes modifications related to changes in the organisational structure of operating organisation.

31	Russian Federation	Article 8	Section 8, p. 31, 33	Lithuania's NR says two RBMK-1500 power units are being decommissioned, their equipment is being dismantled and fuel is being taken off-site. The above said requires continuous supervision, as well as proper technical support of the nuclear and radiation safety regulatory body. As per NR, since 2017 VATESI personnel have diminished (from 75 down to 65 people). With that, in NR there is no information actually presented concerning technical support of the Regulatory Body (only one bullet is given). Please provide more details concerning the fact that 66 persons of the Regulatory Body work within the legislative and regulatory framework, issue licenses, carry out inspections and technical safety assessments of the complex nuclear facility, as well as please demonstrate compliance with the	VATESI has implemented an integrated management system, a clear distribution of functions and responsibilities, which allows efficient use of available human resources. In addition, a tool for monitoring the workload of employees has been installed, with the help of which work is distributed evenly to all employees, taking into account the experience of the employees. For the performance of large-scale works or the evaluation of documents requiring specific knowledge or competence, VATESI turns to TSO for help. In order to ensure independence, it is required that the TSO specialists performing the review and evaluation of the documents were not involved in the preparation of these documents.
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				principle of independence and division when selecting support organizations for technical safety assessments of Ingnalina NPP.	
32	Russian Federation	Article 8	Section 8, p. 33	Lithuania's NR does not cover practically the issue of financial support to the Regulatory Body. Please provide additional information to confirm the fulfillment of the Convention Article 8 para. 2 as regards this aspect as described in Article 10 of NR of Lithuania.	The budget of the State Nuclear Power Safety Inspectorate is allocated each year in the law adopted by the Parliament of the Republic of Lithuania (Seimas) and signed by the President of the Republic of Lithuania. Budget of the State Nuclear Power Safety Inspectorate for the year 2022 was allocated in the Law of the Republic of Lithuania on the approval of the state budget and financial indicators of municipal budgets for the year 2022. The Ministry of Energy of the Republic of Lithuania, responsible for promotion of nuclear power in the Republic of Lithuania, does not have any decision-making power to influence the budget of the State Nuclear Power Safety Inspectorate foreseen in this law.

33	Russian Federation	Article 14	Section 14, p. 122	The Lithuanian Report shows that periodic safety assessment by deterministic methods and engineering assessment stated a low probability of nuclear and radiation accidents at Ignalina NPP. Were the probabilistic safety assessments of Ignalina NPP performed in the framework of PSA? Are the comprehensive probabilistic and deterministic safety assessments carried out in the storage facilities of RS and RAW on-site, off-site and in transport? If yes, what results are obtained?	Probabilistic safety assessment (PSA) was performed only for Ignalina NPP Unit 2 for full power operating conditions. PSA has not performed for other nuclear installations (for instance, spent fuel or radioactive waste storage facilities) and is not applied for decommissioning planning activities of Ignalina NPP units. Probabilistic methods are used for postulated initiating events screening analysis in performing safety analysis of spent fuel and radioactive waste storage facilities, but safety assessments of these facilities and transportation activities are based on deterministic analysis and proven engineering practice.
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34	Russian Federation	Article 14	Section 14	Did Ignalina NPP and RS and RAW storage facilities carry out nuclear and radiation safety assessments taking account of extreme external natural impacts (earthquakes, tornadoes, high winds, floods and other phenomena)?	According to BSR-3.1.2-2016 Requirements for Pre-Disposal Radioactive Waste Management at Nuclear Installations, systems structures and components important to safety (SSC IS) of facility shall be designed in such a way to ensure that the SSCs IS withstand the effects of internal and external hazards specified in the design in the event of design-basis accidents. The following shall be described in the design (including supporting evidence): external natural hazards likely to affect the safety of the radioactive waste management facility (e.g. extreme weather conditions (rain, hail, snow, icing, wind, tornado, hurricane, lightning, high and low temperatures, humidity), flooding and impoundment, earthquake, fire, impacts caused by terrestrial and aquatic fauna and flora). Safety analysis of external natural impacts (assessment of hazards, postulated initiating events and their consequences, measures of protection against external and internal hazards, safety analysis and substantiation of safety compliance under the conditions of normal operation and upon occurrence of design-basis and beyond-design-basis accidents, substantiation and control of safe and normal operation limits and conditions, containment and control of the release of radionuclides, aveneurs accent and optimization for approximation of the release of radionuclides,
					occurrence of design-basis and beyond-design-basis accidents, substantiation and control of safe and normal operation limits and conditions, containment and control of the release of radionuclides, exposure assessment and optimisation for employees and population, protection of employees and population against the dangers related to the whole activity of radioactive waste processing) shall be evaluated.

35	Russian Federation	Article 16	p. 109	Lithuania's National Report states that the power unit has applicable beyond design basis accidents management guides, including that of severe accidents. Are the actions described in these guides confirmed by deterministic analyses? If yes, does the Regulatory Body VATESI carry out assessments of analytical data when licensing emergency documentation?	All the strategies (actions) foreseen in the beyond design basis accidents (BDBA) management guides (RUZA) have been confirmed by calculations using deterministic safety analyses methods. Before the approval of the INPP RUZAs in 2008, which were dedicated for management of BDBA in Unit 2, including Spent Fuel Pools (SFP) and BDBA in the SFP of Unit 1, VATESI, in cooperation with Lithuanian TSOs (Kaunas University of Technology, Vilnius Gediminas Technical University, Center for Physical Sciences and Technology) carried out the review and assessment of these guidelines. Taking into account the changes of the storage conditions of the fuel during the decommissioning progress (defueling of the reactor core of Unit 2 in 2018, complete defueling of all Units in 2022), the RUZAs were the subject of the continual revision by INPP and corresponding reducing the number of the strategies (actions) foreseen for management of BDBA that were no longer relevant for the shutdown INPP. There were no new strategies (actions) introduced at INPP for management of BDBA after the permanent shutdown, which would require use of the deterministic safety analyses methods (specific software). Therefore, VATESI used engineering (analytical) methods and expert judgment for review and assessment of the RUZAs that were revised and applied for shutdown state of the INPP.
36	Poland	General	Summar y, page 6 and art.6, page 12	What is the progress of work related to the cleaning of the bottoms of SFSP at Unit 1 and 2 from possible nuclear fuel debris and sludge?	The cleaning activities of the bottoms of SNFSP at Units were completed and accepted by INPP and then by VATESI in December 2022. No debris of spent fuel were found in all SNFSP.

37	Poland	Article 6	page 127	What time is foreseen, according to the law for VATESI, to review and assess the application for a decommissioning and to issue a license?	The Law on Nuclear Safety (paragraph 16 of the Article 25) stipulates that a licence for decommissioning has to be issued within 24 months starting to count time when all correctly completed safety documents are submitted to VATESI. The established time limit includes also necessary time for consultations with public. Meanwhile, the public consultations period cannot be shorter than 2 months and should be expected to last 5 months: at least 2 months have to be foreseen to provide comments and the additional 3 months should be foreseen for reviewing and responding to the presented comments and for a public hearing (if decided to organise it).Regarding correctly completed safety documents, Paragraph 19 of the Article 25 explains that the condition is fulfilled when all the documents listed in the document submission schedule (i.e. all documents necessary for the decision on issuance of the licence) have been duly received, including document changes based on comments received.
38	Poland	Article 7.2.1	pages 17, 22	What kind of control and for how long is foreseen for closed radioactive waste repository according to the newly updated Nuclear Safety Requirement BSR 3.2.2 – 2016 "Radioactive Waste Repository"?	In accordance with provisions of BSR-3.2.2 institutional control measures (active and passive) shall be described in post closure surveillance programme that is part of submittals for application of post-closure surveillance licence. Time frame of institutional control is set in safety assessment report of disposal facility based on long term safety assessment and taking into account content of radioactive waste disposed of. It is evaluated via natural evolution, radionuclides dispersion, "what if" and inadvertent intrusion scenarios.

39	Poland	Article 7.2.2	page 23 also art. 9, page 38	What are the ways the public can comment on the license application and what is the deadline for submitting comments according to the "Rules of Procedure for Public Participation in Decision- Making in the Area of Nuclear Energy"?	According to the Nuclear Safety Law (Article 391), the process of public participation in decision-making in the field of nuclear energy consists of:1) providing information to the public about the start of the processes of authorisations: licences for activity regarding nuclear facilities, permit to first carry radioactive material to a site (if combined licence was issued), approval of site evaluation reports or revocation of decommissioning licences (hereinafter – authorizations);2) familiarization of the public with the documents required for making the decisions;3) public familiarization with the draft decisions;4) assessment of public comments, information, analyses or opinions and draft decisions. According to the Rules of Procedure for Public Participation in Decision-Making in the Area of Nuclear Energy, adopted by VATESI, (hereinafter – the Rules), public comments, information, analyses, opinions, draft decisions can be submitted to VATESI in writing in the following ways: by post, fax, e-mail, electronically, for example on the website, delivered in person or by other means. If a person cannot submit proposals orally, which are recorded (for example, provide an audio or video recording) or, if the person cannot record the proposals himself, recording is made upon arrival at VATESI. The Rules, inter alia, determine that the information about application have to be published together with a safety document submisting comments is established by the Nuclear Safety Law (Article 391) and varies depending on the type of authorisation.For example, deadline for submitting comments regarding licences or site evaluation report cannot be shorter than 2 months. However, deadline for submitting comments regarding revocation of a decommission ing licence cannot be shorter than 14 days. The Rules refer to the provisions of the Law, specifying that the deadline begins after the publication at the VATESI
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40	Poland	Article 7.2.3	page 25	Could Lithuania provide more ifnormation on the types of inspections carried out annually? How many special inspections and technical inspections are conducted each year?	The number of inspections during the last 3 year:1. In 2021, 62 inspections were carried out, including 51 Regular (routine), 8 Special and 3 Technical inspections.2. In 2020, 54 inspections were carried out, including 46 Regular (routine), 6 Special and 2 Technical inspections.3. 2019, 57 inspections were carried out, including 43 Regular (routine), 12 Special and 2 Technical inspections.
41	Poland	Article 14.1	page 61	According to the information on different types of licenses and permits could you please explain for which nuclear installations or in which case combined license for construction and operation and separate construction license and operation license are applicable?	Both types of the licence are applicable to any nuclear installation, depending on choice of an applicant. When a licence for construction and operation is issued, the next step is a granting of a permit to start transportation of nuclear or other radioactive material to a nuclear facility and initiate hot tests (hereinafter – Permit). After testing, the normal operation is to be authorized by a permit for commercial operation. When a licence for construction is issued, no Permit is needed, but a licence for operation instead of it is necessary to obtain. A licence for operation is necessary to start transportation of nuclear or other radioactive material to a nuclear facility and initiate hot tests. After testing, the normal operation is to be authorized by a permit for commercial operation. The only difference to mention is that only the licence holder can apply for any permit. Meanwhile, any other legal entity (not only the holder of a construction licence) can apply for an operation licence, if it meets the criteria and conditions set for applicant by law.

42	Poland	Article	page 94	Taking into account	The licence or permit for the siting is not issued, but as it is stated in the 9th
		17.1		information on evaluation of	Lithuanian National Report, the Site Evaluation Report must be submitted
				site could you please	to VATESI for its review and approval. The initial list of the credible
				explain the way the site is	natural and human induced events, which have to be comprehensively
				assessed and approved by	analysed in the Site Evaluation Report, have to be agreed with VATESI
				VATESI if the siting license	prior starting the site evaluation. The NPP site evaluation covers many
				is not foreseen?	areas – nuclear safety, physical security, meteorology, hydrology, geology,
					aviation, so apart from VATESI, the Ministry of Health, Lithuanian
					Transport Safety Administration, Lithuanian Geological Survey, Lithuanian
					Hydro Meteorological Service, Fire Safety and Rescue Department have to
					take part in reviewing the Site Evaluation Report. The detailed procedures
					for reviewing the Site Evaluation Report are defined in the Governmental
					Resolution of the Republic of Lithuania No. 83 the "Description of
					procedure on review of the construction site evaluation report of nuclear
					installation" and Nuclear Safety Requirements BSR-2.1.3-2010 "General
					requirements on site evaluation for nuclear power plants". According to
					Governmental Resolution, VATESI forward the Site Evaluation Report for
					other institutions, which are involved in the process of reviewing the Site
					Evaluation Report. Nuclear Safety Requirements BSR-2.1.3-2010 "General
					requirements on site evaluation for nuclear power plants" based on IAEA
					Safety Requirements No. NS-R-3 "Site Evaluation for Nuclear
					Installations" and best international practice. The regulation sets the main
					requirements for site evaluation, as well as proposals to use IAEA
					standards and guides for more detailed analysis. In the course of the site
					evaluation, all factors related to the site or its environment that could
					impact the NPP's safety, including physical protection and planning of
					the identified definition of the site if any have to be proposed VATESI
					an approve the Site Evaluation Pepert only after verifying that the site
					can approve the Site Evaluation Report only after very sing that the site evaluation is performed in line with requirements of the logal acts and after
					having received positive decisions form other institutions, which are
					involved in the process of reviewing a report
					more in the process of reviewing a report.

43	Poland	Article 19.8	page 119	What kind of rocks are taken into account to host geological repository? What is the status of work on the site selection process?	Crystalline basement, the Lower Cambrian clay formation, the Upper Permian evaporites, the Lower Triassic clay formation were preliminary identified as potentially suitable formations for implementation of the Deep Geological Repository (DGR).DGR conceptual planning stage is ongoing including preparation of set of selection criteria for rock formation and territory. Site selection is foreseen in years 2025-2035.
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44	Belarus	Article	Article	The report offered a fairly	The organization and implementation of environmental radiological
		15	15, p. 79	detailed presentation of the	monitoring in Lithuania Republic is regulated by the Law on
				RADIS automated radiation	Environmental Monitoring of the Republic of Lithuania. This law stipulates
				monitoring system	that environmental radiological monitoring, which is part of environmental
				operation. However, it is not	monitoring, is a systematic and continuous monitoring of the ambient
				clear from the information	gamma dose rate and dose equivalent, environmental components, food and
				provided how activities are	their raw materials, feed and their raw materials and drinking water
				practically implemented	contamination with radionuclides, public exposure assessment and
				within the framework of	forecasting at the state, municipal or economic entity level. From 2021,
				State radiation monitoring:	January 1 state environmental radiological monitoring is organized by the
				which environmental	Ministry of Health of the Republic of Lithuania and carried out by the
				objects (atmospheric air,	Radiation Protection Center. Until 2021, January 1 this monitoring was
				soil, surface and	carried out by the Environmental Protection Agency together with the
				underground water, bottom	Radiation Protection Center. The Radiation Protection Center is responsible
				sediments) beyond the	for carrying out state radiological environmental monitoring and providing
				Ignalina NPP site are	data to the public and national institutions of the Republic of Lithuania and
				subject to long-term	the European Commission.Environmental radiological monitoring is a part
				observations, how many	of State Environmental Monitoring Program for 2018–2023, approved by
				stationary observation	the Government of the Republic of Lithuania in 2018, October 3 by
				points are operating, what is	resolution No. 996.In order to implement the objectives of the State
				the composition of the	Environmental Monitoring Program for 2018–2023, the responsible
				measured parameters and	institutions must prepare plans for this purpose for each year. Minister of
				radionuclides. It also	Health of the Republic of Lithuania in 2021, November 8 by order No. V-
				follows from the report that	2502 approved the plan for the implementation of the tasks for the year
				measurements for the	2022 due to environmental radiological monitoring. The state environmental
				isotopes content of	radiological monitoring carried out in Lithuania complies with the
				radionuclides are performed	Recommendations of the European Commission on the implementation of
				by testing laboratories,	Article 36 of the Euratom Treaty, approved in 2000. In implementing the
				however, it is not clear who	provisions of these recommendations, by order No. V-3003 of the Minister
				performs the analysis of the	of Health of the Republic of Lithuania in 2020, December 23 "On the
				measurement findings and	Approval of the Description of the Procedure for Carrying Out the State
					Radiological Environmental Monitoring and Providing Information to the

	predicts zones of spread of radioactive contamination.	European Commission and the Public", the radiological environmental monitoring networks, measurement and sampling requirements and radionuclides and parameters have been approved.Monitoring in the vicinity of Ignalina NPP is performed from 1976.Near Ignalina NPP within state radiological environmental monitoring surface water, sediments, vegetation and fish is monitored in Lake Drūkšiai, which was used as a cooling water pool for Ignalina NPP.Five automated spectroscopic detection systems (within RADIS network) are allocated around the Ignalina NPP site, thus every 10 minutes updated information about current ambient gamma dose rate data in this territory is available. Air aerosol and air gaseous monitoring station is operating in the Ignalina NPP possible impact area – Utena, sampling is performed each 5-7 days. One automatic air aerosol station is operating in Vilnius, measurements are performed each 6 hours for gamma, beta and alpha radioactivity.Food (milk, meat, fish, cabbages, potatoes and grains) and drinking water samples are monitored in three nearest municipalities: Utena, Ignalina and Zarasai. Drinking water samples (from private wells and water supply systems) are monitored for gamma radionuclides and strontium-90.Food products are monitored for gamma radionuclides and strontium-90.Food products are monitored for tritium, gross alpha and gross beta radioactivity.Air aerosol and gaseous filters from Utena station are monitored for gamma radionuclides.Radiation Protection Centre is responsible for collection of all data from state environmental radiological monitoring, summarize obtained measurement results to confirm/specify/correct spread of radioactive contamination previously predicted by emergency management tools to evaluate dose for public and to analyze trends of radioactivity in the environment. No other laboratories than Radiation Protection Centre is involved in the state environmental radiological monitoring. This laboratory has accreditation to
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45	Saudi Arabia	Article 7	P 25	For the special inspections (unplanned inspections), how efficient does VATESI see the current frequency of this type of inspection, and what is VATESI's recommendation to enhance it?	The question should be clarified in more detail. There are no periodicities established for unplanned inspections of economic entities. It can be carried out in specific cases when grounds specified in the Law on Public Administration or in the Law on Nuclear Safety exists.
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46	Belarus	Article	Article	The report provides	The organization and implementation of environmental radiological
		10	10, p.	information about the	monitoring in Litnuania Republic is regulated by the Law on
			02	operational centers of the	Environmental Monitoring of the Republic of Lithuania. As it is stated in
				competent authorities. The	the report, from 1st January, 2021 all functions related to radiological
				Lithuanian side needs to	environmental monitoring were transferred from the Environmental
				explain the composition and	Protection Agency under the Ministry of Environment to the Radiation
				powers of the specified	Protection Centre under the Ministry of Health (RPC). The legislation
				center of the competent	governing the radiological environmental monitoring was amended
				authority in charge for	accordingly. That means that RPC is the competent authority in charge for
				implementing State	State Environmental Monitoring, where State Radiological Monitoring the
				Radiation Monitoring. Who	part of State Environmental Monitoring. RPC functions and responsibilities
				is responsible for predicting	are established in the law on Radiation Protection. RPC functions and
				the development of a	responsibilities (including the State Radiological monitoring) in case of the
				radiation emergency or a	nuclear or radiological accident are established in the Governmental
				nuclear accident? What	Resolution "National plan for protection of population in case of a nuclear
				software tools are provided	or radiological accident" (hereinafter – the National Plan). Also see answer
				to analyze and predict the	to question No. 44.
				development of a radiation	According to the National Plan, in case of nuclear or radiological
				emergency or a nuclear	emergency at nuclear facilities, VATESI is responsible for collecting the
				accident?	information about the technical circumstances of the accident and
					mitigatory actions applied, assessment of the progression of the accident
					and characteristics of corresponding radioactive release into environment or
					their prediction. Currently, VATESI does not have specific software that
					would be used for possible nuclear or radiological incident or accident
					assessment at INPP. In case of the possible nuclear or radiological accident
					at INNP, an assessment of the accident scenario and characteristics of the
					corresponding radioactive release into environment would be based on the
					pre-calculated results available in the safety analysis reports and the report
					of the analysis of the consequences of hypothetical nuclear and radiological
					accidents at INPP. In additional to the regulatory requirements, which
					obligate the INPP to provide all necessary information about incident or
					accident, VATESI has technical solutions, which allow to monitor the vital
safety parameters of INPP (water level, temperature in the spent fuel pools, radiation level in the compartments and on-site and etc.). Having abovementioned sources of information available in case of possible incident or accident at INNP and taking into account current state of INPP, use of the engineering methods and expert judgment is sufficient to assess the accident progression and possible release in case of incidents and accidents at INPP. The assessment of radionuclides dispersion in the environment is laid on RPC responsibility.

47	Belarus	Article	Article	Article 16 of the National	The response to the mentioned letters of Belarus was provided by the letter
		16	16, p.	Report of the Republic of	of Ministry of Environment of the Republic of Lithuania of 4 October 2022
			92-93	Lithuania contains	No. (10)-D8(E)-5071 and the letter of VATESI of 4 July 2022 No. (13.1-
				information that the	43)22.1-453. The latest IAEA ARTEMIS mission was conducted 15-25
				Republic of Lithuania has	May 2022, which covered all safety aspects related with current activities at
				repeatedly called on Belarus	Ignalina NPP site – spent nuclear fuel and radioactive waste management
				to invite the IAEA SEED	as well as decommissioning of both units. The organization of additional
				mission dedicated to the	missions could be considered after further consultations with IAEA
				review of the NPP site	representatives, taking into consideration a decreasing risk of current
				selection and assessment.It	Lithuanian nuclear program: both units of Ignalina NPP are finally
				is worth noting that three	shutdown since 2009, all spent nuclear fuel was safely removed from units`
				new nuclear facilities have	pools to the dry storage facilities, radioactive waste generated during
				recently been put into	operation and during INPP dismantling and decontamination works
				industrial operation at the	continues to be safely managed. The risk posed by these activities in
				Ignalina NPP site, in	Lithuania is significantly lower than that of nuclear power plants in
				particular: an intermediate	operation.
				spent nuclear fuel storage	
				facility (project B1), a MI-1	
				solid radioactive waste	
				retrieval facilities (Project	
				B2-1) and a MI-2, MI-3	
				solid radioactive waste	
				retrieval facilities (Project	
				B2-2). However, the	
				Republic of Lithuania has so	
				far not invited any SEED	
				missions in relation to its	
				nuclear installations. In turn,	
				within the framework of the	
				Belarusian-Lithuanian	
				bilateral meeting on the	
				Belarusian NPP	

	l	(03.02.2022) the Relarusian	
		delegation informed	
		Lithuanian counterparts that	
		based on the IAFA Site and	
		External Events Design	
		Guidelines for the	
		Branaration and Conduct of	
		SEED Missions) this	
		mission can be applied not	
		only to nuclear power	
		plants but to any other	
		plants, but to any built nuclear facilities as well in	
		fact in order to build a	
		constructive dialogue and	
		uniform application of the	
		IAEA guidelines and	
		requirements for nuclear	
		installations on the territory	
		of the two countries, the	
		Ministry of Natural	
		Pasouroos requested in	
		Resources requested III	
		Witting from the Republic of Lithuania (lattars of the	
		Lithuania (letters of the Ministry of Natural	
		Nimistry of Natural	
		Kesources inc. $11-1-2/80-$	
		100 01 19.04.2022, $100 11-1-$	
		1/20/-100 OI 15.09.2022)	
		information on plans for	
		inviting the SEED mission	
		in relation to the Ignalina	
		NPP. However, the	
		Lithuanian side gave no	

		reply to the letters. Taking into account the foregoing, we have found it necessary once again draw the attention of the Republic of Lithuania to the need for uniform application of the IAEA requirements in the framework of implementing international obligations, including the Convention on Nuclear Safety, which seems to be particularly important in light of the serious difficulties with the Ignalina NPP decommissioning.			
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48	Japan	Article 7.2.3	page 25	VATESI conducts three types of inspections, namely Special inspections, Regular (routine) inspections and Technical inspections. As for Technical inspections, what differs from other two inspections? Inspection is generally conducted form technical viewpoints.	Technical inspections are carried out to control the performance of technical checks of the important to safety pressurised components carried out by Ignalina NPP staff and to assess the technical condition of the important to safety pressurised components of Ignalina NPP, the preparedness for the start-up – commissioning works and routine operation of the important to safety pressurised components. Technical inspection of the important to safety pressurised components covers external and/or internal survey of equipment and pipelines, checks of performance of hydraulic tests, verification of parameters indicating the conformity of the important to safety pressurised components with the nuclear safety normative technical documents, and other safety compliance assessment actions.As far as Ignalina NPP is under decommissioning, the demand for such inspections currently is low.
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49	Japan	Article	page 32	The ninth Lithuanian	The 6 Article 39(1) of the Law on Nuclear Safety, defines terms for public
		8.1		national report states that	comments on the regulatory decision, when the public participation
				"Pursuant to Article 39 of	procedure starts in regulatory decision making process. As it is an
				the Law on Nuclear	administrative procedure, where the decision for licence or permission
				Safety, the public has a	issuance results, citizen-authority relations should be implemented
				right to participate in	regarding the 12(3) Article of the Law of Public Administration, where
				decision making process of	reasonable time-frames and a concrete timeline should be set for the
				the most important	submission of documents, information and comments from the
				authorization decisions	public.Periods for submission of public comments (questions and
				related to nuclear safety"	suggestions) on the regulatory decision, defined by the Law on Nuclear
				and the Article 39, as	Safety were estimated taking into account potential amount of information
				explained in the Lithuanian	related to the particular decision, which is made available to the public and
				answers to questions on the	considering that applicant for the particular authorization of VATESI is
				eighth national report	obliged to inform public and provide for the comments documents, that are
				(Question ID 26141 and	submitted for VATESI evaluation. Public basically has possibility for
				26142), stipulates detailed	familiarisation with the evaluated documents a period defined in the Law
				procedure of public	on Nuclear Safety and additionally the whole period until VATESI
				participation under the	evaluates the documents and prepares a draft decision on authorization.
				UNECE Convention on	Usually VATESI initiates a communication campaign when publishing
				Access to Information,	VATESI draft decision and Summary of the Report of the Evaluation on
				Public Participation in	the website. Then the press release to the national and regional media
				Decision-Making and	follows with announcements and letters to the municipalities in the vicinity
				Access to Justice in	of NF. Media channels and also municipalities are involved and
				Environmental	communicate an invitation for the local public to participate in the decision
				Matters.Taking into	making process. Also posters, messages with timetable when and how to
				consideration that the	familiarise with the documents and submit comments to VATESI are used.
				Aarhus Convention does not	
				define the time-frames	
				sufficient for effective	
				public participation, would	
				you please give the reason	
				why the people may provide	

radioactive waste repository" under the Article 39?From a viewpoint of administrative law, public participation such as public comment is conducted to protect the rights of the public, to improve transparency and fairness, and to ensure democracy.What is the background of stipulating the period "2 months"?		and final documents within "2 months in case of decisions regardingdecommissionin g of nuclear installation and supervision of a closed radioactive waste repository" under the Article 39?From a viewpoint of administrative law, public participation such as public comment is conducted to protect the rights of the public, to improve transparency and fairness, and to ensure democracy.What is the background of stipulating the period "2 months"?
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50	Japan	Article	page 27	The Lithuanian national	1. One of the last case was case linked to security regime. During the
		7.2.3		report states that "Some	regulatory inspection was identified that not all members of staff of
				violations, identified during	Ignalina NPP were wearing their personal identification cards in a clearly
				regulatory inspections, in	visible place as it is required by regulations. According to the criteria's set
				accordance with legal acts	in a Nuclear Safety Requirements BSR-1.1.4-2017 "Rules of Procedure for
				can be recognized as	Applying Enforcement Measures set by the State Nuclear Power
				insignificant. Such	Inspectorate" a violation was classified as insignificant. After making an
				violations are required to be	oral request, the workers pinned their identification cards in a visible place
				eliminated by oral request of	in the presence of the inspection commission. The examples of
				inspector in his presence,	insignificant violations might be, for example, clerical errors in log sheets,
				either inspector shall issue	absence of formal signs, etc.2. "Insignificant violation" means
				mandatory written	"insignificant negative impact to assets defended by legislation"
				requirement to license or	"insignificant violation" should be such violation which can be eliminated
				permit holders, committing	in evidence of inspector or during short time after inspection.3. The
				them to eliminate the	regulatory system of enforcement measures, sets out the enforcement
				identified insignificant	measures gradually, depending on the nature of the violation, ensures that
				violations" on page 27.The	the enforcement measures will be applied according to the gravity of the
				country report provides	non-compliance.Provision of oral request to eliminate the insignificant
				general description about	violation of legal acts is based on the legal principle of graded approach.4.
				"insignificant violations"	An oral request is a kind of enforcement measure, used, when insignificant
				stipulated in Nuclear Safety	violation identified during the regulatory inspection, usually are quite
				Requirements BSR-1.1.4-	simple and evident. The fact that insignificant violation was eliminated and
				2016 "Rules of Procedure	how it was eliminated shall be noted in the inspection report. The clause(s)
				for Applying the	of legal requirements related to the violation shall be notified as well.5. An
				Enforcement Measures Set	oral request is applied when identified violation is insignificant and it can
				by the State Nuclear Power	be eliminated in the presence of the VATESI inspector (if it can be
				Safety Inspectorate" on	eliminated only after inspection the mandatory requirement to eliminate the
				page 17, however, we would	insignificant violation shall be issued by inspector). In all other cases,
				like to know the	except when inspector may require to halt the certain activity due to rough
				details.Would you please	violation, mandatory requirement to eliminate the violations shall be issued
				answer to the following	by inspector indicating terms for elimination of them.6. An "oral request"
				questions?(1)Would you	is not a kind of consultation, it is kind of enforcement measure applied only

		please provide a practical	for certain insignificant violations identified during the inspections. Also
		example of the "identified	see answer to question No. 29.
		insignificant violations"	
		corrected by the "oral	
		request" by a VATESI	
		inspector as explained in the	
		country report on page	
		27?(2)What is a definition	
		of "insignificant	
		violations"?(3)Does a	
		VATESI inspector make the	
		"oral request" based on the	
		legal principle of graded	
		approach?(4)Is the "oral	
		request" a kind of	
		administrative	
		guidance?From a viewpoint	
		of administrative law, it	
		seems to be difficult to	
		impose administrative	
		enforcement measures	
		without using documents,	
		and it seems that the "oral	
		request" by a VATESI	
		inspector might be a kind of	
		guidance, recommendation,	
		or advice provided by	
		administrative	
		organ.(5)Does a VATESI	
		inspector make the "oral	
		request" as previous step to	
		impose administrative	

enforcement measures?It seems that VATESI has a procedure to impose administrative enforcement measures on a step-by-step basis, and the "oral request" might be made in order to encourage the licensee to address violation voluntarily.(6)If the "oral request" is a kind of guidance, recommendation, or advice, does a VATESI inspector make the "oral request" in order to create a collaborative and blame free working environment in Ignalina Nuclear Power Plant? Does a VATESI inspector make the "oral request" to encourage honest disclosure of human error such as an honest error and ensure accountability at the same time?	
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51	Japan	Article 8.1	page 33	The report states that "To improve transparency and ensure feedback, VATESI organizes surveys of stakeholders, including the general public." And, the answer to the question on the eighth national report (Question ID 26145) mentions that "VATESI has developed internal management procedure for stakeholders' feedback monitoring. According to this procedure, general public surveys conducted once in two-year period, for other stakeholders (e.g. license holders, government institutions) every year Survey results are used as the indicators to continuous management system improvement and to measure level of achievement of the annual tasks of the regulatory authority." This could be considered as a good performance.	We are grateful for the recognition of this practice as good performance.
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52	Belarus	Article 17.2	Article 17 (2), p. 97	Article 17(2) of the National Report of the Republic of Lithuania indicates amendments in the proceedings for assessing the impact of economic activity on the environment effective since January 1, 2022. In this regard, could you please provide information on changes in the Lithuanian national legislation in the field of environmental impact assessment.	Firstly, we would like to note that the report indicates January 1, 2021, instead of January 1, 2022, as indicated in the question. There is indicated in the National Report of the Republic of Lithuania that from the 1st of January 2021 there is possibility to skip the EIA scoping, in this case a notice of the commencement of environmental impact assessment shall be prepared and submitted to the competent authority (EPA), relevant parties of the EIA. The public should be also informed in accordance with the procedure established by the Minister of Environment. However, it should be mentioned that the scoping document (programme) shall be obligatory if a transboundary environmental impact assessment of the proposed economic activity is to be performed and the submission of the programme to another state is stipulated by international treaties concluded between the Republic of Lithuania and another state. The introduction of a notice of the commencement of environmental impact assessment as a programme alternative and the relevant provisions on preparation, publicity and submission of a notice is the only change that came in force from the January 1, 2021.English version of the Law of the Environmental Impact assessment with the change mentioned above can be found here: https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/97e1a98200d711ecb4af84e751d2e0c9? jfwid=11z9pyzh.
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Ministry of Defense, VATESI, RPC, INPP) to implement the Development Program for Nuclear Energy Facilities and Radioactive Waste Management Facilities Decommissioning for 2021-2030, which will contain a schedule for nuclear energy facilities and radioactive waste management facilities decommissioning not only for the declared period up to 2030, but also for decades to come. The Republic of Belarus is interested in the issue of the current stage of implementing the SNF management stategy after		<ul> <li>(comprising the representatives of the Ministry of Defense, VATESI, RPC, INPP) to implement the Development Program for Nuclear Energy Facilities and Radioactive Waste Management</li> <li>Facilities Decommissioning for 2021-2030, which will contain a schedule for nuclear energy facilities and radioactive waste management facilities decommissioning not only for the declared period up to 2030, but also for decades to come. The Republic of Belarus is interested in the issue of the current stage of implementing the SNF management strategy after SNE terms energy after</li> </ul>	aging management program and other safety measures. In the Development Programme is foreseen that prolongation procedure for the SNFSF-1 will be performed in 2045-2050, for the SNFSF-2 in 2061-2066. National Development Program sets that during the storage period Deep Geological Repository (DGR) will be developed and put in operation in 2068. Currently DGR is on conceptual planning stage including preparation of set of selection criteria of geological structure and territory.Similar questions were answered providing more detailed information in 2022 during the review meeting under theJoint Convention on the Safety of Spent FuelManagement and on the Safety of RadioactiveWaste Management.
management strategy after SNF temporary storage		management strategy after SNF temporary storage	

54	Belarus	Article 16	Article 16, p 83	Accidents at which nuclear facilities will require applying protective measures in the form of evacuation?	After the complete removal of spent nuclear fuel from Ignalina NPP Units 1 and 2 and transferring it to the intermediate storage facility, there are no more internal events that can lead to a general emergency and only a local emergency is possible at the INPP facilities due to internal events. A general emergency is possible only in the case of two external events - an earthquake and an aircraft crash (beyond design basis accidents). In accordance with the Emergency Preparedness Plan, in the event of general emergency, termination of all planned work and the evacuation of personnel from workplaces, where the indicators of the specified criteria have been achieved, shall be performed and evacuation of personnel from contaminated facilities or premises may be performed to avoid elevated dose.
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55	Belarus	Article	Article	P. 86 «General Emergency	1. "General emergency" is not linked just to accidents, that were analysed
		16	16, p	is a nuclear or radiological	in Safety analysis reports or other documents.2. The analysis that was
			86-87	accident at nuclear facility,	carried out by Ignalina NPP was dealing with events that are usually
				during which: emission of	rejected from ordinary Safety analyses in accordance with exclusion criteria
				radionuclides into	(not necessary probabilistic) by screening process. The scenarios were
				environment spreads outside	chosen linked to seismic event, that is assumed far overcoming the design
				the site area of nuclear	limits, and with crash of large aircraft. The specific estimation of
				facility. This causes	probability of such events was not performed.3. In analysis over tip of
				environment contamination	container with spent fuel it was assumed, that during the event certain
1				and the irradiation of	amount of radioactive substances is escaping container causing radiological
				population, so the urgent	consequences. These substances escapes from gaps of fuel rods that are
				protective actions should be	assumed to lose their tightness due to falling of container. The fuel bundles
				applied established by the	loaded into the container remain inside the container after accident.
				Hygienic Standard of	Performed analysis revealed that the radiological consequences (expose
				Republic of Lithuania HN	dose) related to the overtip of container are only relevant for workers. The
				99:2019 "Protection of the	corresponding emergency management actions were implemented in the
				Population in Case of	INPP Emergency Preparedness Plan. The specific analysis of case with
				Radiation or Nuclear	transportation of damaged fuel makes no sense as far as gaps of damaged
				Accident Occurrence";the	rods initially contains no gases.4. All fuel assemblies are already
				spent nuclear fuel is	transported from the units of Ignalina NPP to interim storage facilities
				damaged».P.87 «The	without plans to be transported back to the reactor units.
				measures of the National	
				Action Plan implemented at	
				INPP:evaluation of	
				radiological consequences	
				due to over-tipping of a cask	
				filled with spent nuclear fuel	
				during its transportation	
				from the INPP Units to the	
				ISFSF site in case of beyond	
				design basis earthquake».P.	
				87 «In order to meet the	

above mentioned	
requirements during 2010	
2020 Ignaling NDD corried	
2020 Ignanna NFF carned	
out analysis of the	
consequences of	
hypothetical nuclear and	
radiological accidents of	
very low probability at all	
nuclear facilities situated at	
Ignalina NPP	
site».Question:What is the	
scenario for this	
hypothetical nuclear or	
radiation accident? What is	
the estimated probability of	
this hypothetical accident?	
Question:Was the presence	
of damaged nuclear fuel in	
the container taken into	
account when assessing the	
radiological consequences	
in the event of rollover with	
SNF accident during	
transportation from the	
Ignalina NPP power units to	
the intermediate SNF	
storage facility? What is the	
scale of radiological	
consequences if such event	
is implemented?	

56	Belarus	Article 16	Article 16, p 87	P. 87 ""The most undesirable off-site radiological consequences were obtained in case of accident at Solid Waste Management and Storage Facility. But even for such accident, even using very conservative assumptions, radiological consequences will not give rise to doses to people off-site (outside the 3 km sanitary protection zone)».Comment 1. The accident scenario and the conservative assumptions underlying it are not presented, therefore, the conclusion that the least adverse radiological consequences will entail an increase in exposure of the population outside the 3-km sanitary protection zone is not justified.	It should be noted, that exact full sentence in the national report is: "The most unfavourable off-site radiological consequences were obtained in case of accident at Solid Waste Management and Storage Facility. But even for such accident, even using very conservative assumptions, radiological consequences will not cause doses to people off-site (outside the 3 km sanitary protection zone) that would require precautionary urgent, urgent or early protective action as they are defined in the IAEA GSR Part 7 "Preparedness and Response for Nuclear or Radiological Emergency". It means that very limited radiological consequences may occur if to assume highly conservative postulated scenario and progress of accident. The projected doses will not require the implementation of protective actions such as iodine thyroid blocking, evacuation, sheltering etc.
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57	Belarus	Article 6	Article 6, p. 13	The subsection ""Review of safety assessments conducted in the light of Article 6 of the Convention"" (p. 13) specifies that the Safety Analysis Report for decommissioning of both units along with information on the periodic safety review (hereinafter referred to as PSR) of unit No. 2, was submitted to the regulatory authority in 2021 and is currently under consideration and assessment.Is there a procedural deadline set by regulatory acts during which VATESI is obliged to complete the review and evaluation of the submitted documents?	The 18 month time limit is set in the Law on Nuclear Safety for review and assessment by VATESI on a condition that the documentation set is complete and information provided is sufficient to make a regulatory decision. VATESI considers that the information provided to VATESI for the time being is incomplete. In accordance with review procedure, established in the Law on Nuclear Safety VATESI has performed review of the submitted documentation and did not identify any findings that preclude further performance of technological processes at Unit No.2.
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	6, p. 13	of major safety-related issues, including events that happened in a nuclear installation over the past three years, and measures taken in response" (p.13) reports 15 events for the period of 2019 - 2021 which were recorded, analyzed, and preventive and corrective measures aimed at eliminating the consequences of events and causes of emergence, as well as to prevent their recurrence in accordance with the established procedure.	recorded, analyzed, and preventive and corrective measures aimed at eliminating the consequences of events and causes of emergence, as well as to prevent their recurrence in accordance with the established procedure. No one of aforementioned event during this period was recurrent. It would be incorrect to draw conclusions about the effectiveness of the corrective measures implemented solely on the basis of this single event, which has no analogues among those listed in the report.
		What are the reasons for the low efficiency of the preventive and corrective measures taken earlier, since similar events continue to take place, as evidenced by the fall of a container with radioactive waste from a vehicle during transportation from a controlled zone in July 2022.	

59	Belarus	Article 6	Article	Following the subsection	Yes, stakeholders were provided with an opportunity to submit comments
			6, p. 13-	"Installations for which a	on the Final Decommissioning Plan of Ignalina NPP (FDP of Ignalina
			14	decision to shut down has	NPP).In 2019 April, a new version of the FDP of Ignalina NPP was
				been made" (pages 13-14),	submitted by Ignalina NPP to the state authorities for their agreement.
				the decommissioning of the	According to the Law on Nuclear Energy, the FDP of Ignalina NPP must
				Ignalina NPP shall be	be agreed on with VATESI, the Ministry of Energy, the Ministry of the
				implemented in line with	Environment, the Ministry of Health, the Ministry of Social Security and
				final decommissioning plan,	Labor before its approval. Also, in 2019 April this new version of the FDP
				the next review of which	of Ignalina NPP was published on the Ignalina NPP website, where it was
				was made in the period of	indicated that the public can submit their proposals for this document in
				2018-2019, followed by	accordance with the established procedure. Also, pursuant to Article 39(1)
				consideration by the	of the Law on Nuclear Safety of the Republic of Lithuania, the public will
				competent authorities,	be able to participate in the decision-making regarding the issuance of a
				including VATESI, and	license to decommission the Ignalina NPP. The FDP of Ignalina NPP is one
				approval by the Minister of	of the documents that are submitted together with the application for the
				Energy in 2020. Were	decommissioning license. According to the established procedure, the FDP
				stakeholders provided with	of Ignalina NPP, like other licensing documents, will be made available to
				an opportunity to submit	the public with the opportunity to submit comments and only after that,
				comments on the final	VATESI will make a decision on issuing a decommissioning license. Yes,
				decommissioning plan and	the internal independent review of the FDP of Ignalina NPP has been
				supporting documents prior	implemented prior to submitting it to the regulatory authority and other
				to their approval, in	institutions. At the Ignalina NPP there are performed internal independent
				accordance with the IAEA	reviews of safety assessments, safety justifications, and safety analysis
				recommendations set out in	reports as well. The internal independent reviews are performed by
				paragraphs 3.3, 7.16 of the	personnel of the Safety surveillance and quality management department,
				General Safety	which is directly subordinate to director general and has highest level of
				Requirements GSR Part 6	independency at the Ignalina NPP. Yes, the FDP of Ignalina NPP is
				"Decommissioning of	supported by a safety assessment – Safety analysis report for
				Facilities" and paragraph	decommissioning of Ignalina NPP, addressing the planned
				7.46 of the Special Safety	decommissioning actions and incidents, including accidents that may occur
				Guide SSG-47.Have the	or situations that may arise during decommissioning of Ignalina NPP.The
				IAEA recommendations set	FDP of Ignalina NPP and Safety analysis report for decommissioning of

		out in paragraph 7.23 of the Special Safety Guide SSG- 47 been implemented, according to which, prior to submitting the final decommissioning plan and safety assessment to the regulatory authority, they are subject to an internal independent audit performed by the licensee?Has such independent review been implemented at the Ignalina NPP?Have the Ignalina NPP management implemented the IAEA recommendations given in paragraph 2.6 of the General Safety Requirements GSR Part 6, following which the final decommissioning plan shall be developed using an auxiliary safety assessment concerning planned decommissioning activities and incidents, including accidents that may occur at that time?	Ignalina NPP are among the documents that Ignalina NPP prepared and submitted with the application for a license to decommission both Units and other facilities located at the Ignalina NPP site.
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60	Belarus	Article 7.1	Article 7(1), p 15	Amendments to the Nuclear Safety Law are aimed at streamlining the system of impact measures applied in case of breach of legal acts that regulate activities in the field of nuclear energy use (p.15).Is there a reason for applying these measures of influence to the management of Ignalina NPP due to the continued increase in the number of significant events being recorded (9 events were detected in the previous period from 2013 to 2016, 15 events have been revealed during the considered reporting period)?	The mentioned Amendments to the Nuclear Safety Law are not related to any releases of safety requirements and cannot make any impact to number of unusual events, as far as they were linked to clarification and legal formalism of application of enforcement measures.From 2016 to 2018, nine and from 2019 to 2021 fifteen reportable events were occurred at Ignalina NPP. An increasing number of reportable events is not considered as violation. Each reportable event is reviewed separately and compliance for nuclear safety requirements is evaluated.In case of violation of legal acts or requirements the enforcement measures are taken.
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61	Belarus	Article	Article	The subsection "Review of	Resolution No. 1116 of 20 December 2017, of the Government of the
		7.2	7(2) (i),	By-laws on Nuclear Safety"	Republic of Lithuania on the approval of Rules of Procedure for Review of
			p. 17	reports the adoption of a	National Nuclear Safety Regulation System and Evaluation of Nuclear
				new Decree of the	Installations' Safety and other Lithuanian legal acts establish requirements
				Government of the Republic	and procedure for international peer reviews carried out by different
				of Lithuania No. 1116 of	international missions (e.g. IAEA IRRS, ARTEMIS). It does not regulate
				December 20, 2017 which	review and evaluation of the safety assessment reports of individual nuclear
				established a procedure for	energy facilities and activities (e.g. safety assessment report for the
				checking the national	decommissioning of Ignalina NPP) by the experts.
				nuclear safety regulatory	Pursuant to Article 12 of the Law on Nuclear Safety, VATESI has the right
				system to ensure the	to use the services of experts and consultants, as well as scientific and
				fulfillment of obligations,	technical support organizations, in performing the functions of state
				according to expert	regulation and supervision of nuclear safety assigned to it.
				assessment (p. 17).	Also in accordance with Article 30 of the Law on Nuclear Safety, the
					license holder shall have a right to involve scientific-technical support
				Are the safety assessment	organizations and external experts, specialists, and consultants for carrying
				reports for the	out the analysis and justification of nuclear safety and for preparing other
				decommissioning of both	related documents as well as for performing an independent verification of
				Ignalina NPP units, the final	such documents, however, responsibility for the results of such activities
				decommissioning plan, the	shall fall on the license holder.
				final PSR report and other	
				documents subject to expert	
				evaluation?	

62	Belarus	Article	Article	Article 11(2) "Human	Decommissioning is a complex process that requires different
		11.2	11 (2),	Resources" (p. 45) provides	competencies. Specialists with higher engineering education prepare
			p. 45	information that as of	technical designs and safety justification. Technical projects are
				January 01, 2022, the	implemented by employees with technical education and experience in
				Ignalina NPP is staffed with	performing such works. All employees of the NPP are instructed, trained
				a number of highly qualified	and certified. Employees are assigned to perform dismantling work only
				employees with unique	after training and certification when it is ensured that they have sufficient
				knowledge; in addition, the	skills to safely perform the assigned tasks.VATESI has defined the general
				INPP personnel (1744	requirements for competence assurance for persons responsible for the
				people in total) are well	safety of facilities and activities and verifies during inspections how these
				educated and properly	requirements are met. Moreover, VATESI certifies the senior management
				trained: 45% of personnel	and participates in certifying employees responsible for safety.VATESI
				have higher education (790	annually conducts INPP inspections related to human resources
				people); 18% - secondary	management. During the inspections carried out during the accounting
				special education (306	period, it was confirmed that the management of human resources is carried
				people);24% - vocational	out by INPP in accordance with the established requirements.
				schools (415 people); 12% -	
				general secondary education	
				(211 people); 1% -	
				incomplete general	
				secondary education (22	
				people). Does this situation	
				with the education and	
				training of personnel, where	
				more than half of the	
				employees do not have	
				higher education, comply	
				with the IAEA	
				recommendations set out in	
				the General Safety	
				Requirements GSR Part 6,	
				according to paragraph 4.4	

		of which "individuals performing decommissioning actions shall have the necessary skills, expertise and training to perform decommissioning safely"?Does VATESI comply with other IAEA recommendations set out in paragraphs 2.36, 4.53 of the General Safety Requirements GSR Part 1 (Rev.1), according to which the regulatory authority shall stipulate a necessary level of competence for persons with responsibilities in relation to the safety of facilities and activities, and consider aspects of competence of staff during inspections?Have such inspections of the personnel competence at the Ignalina NPP been implemented in the reporting period, what are their outcomes?		
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63	Belarus	Article 11.2	Article 11 (2), p. 46	The subsection "Methods used to analyze competence requirements and training needs on all safety-related issues" of Article 11(2) (p.46) provides information on recurrent changes in the organizational structure at the Ignalina NPP since 2016. Have the requirements set out in Article 9 (p.39) been applied to this important process, according to which the licensee's intentions to change the organizational structure or the number of employees should be implemented as a modification with the appropriate safety justification and approval of VATESI. Have modifications related to changes in the organizational structure of the Ignalina NPP with the development of safety justifications and VATESI approval been implemented since 2016?	In accordance with Nuclear Safety Requirements BSR-1.8.2-2015 ,,Categories of Modifications of Nuclear Installations and Procedure of Performing the Modifications" all safety related organizational changes are subject of regulatory review and assessment and authorisation. The last organizational change which passed the process of approval by VATESI in accordance with BSR-1.8.2-2015 was implemented in 2022.
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64 Belar	rus Article 14.1	Article 14 (1), p. 60	Page 60 provides information that the results of the analysis and nuclear safety justification pass an independent expertise based on VATESI-established procedure. The responsibility for conducting such independent check lies with an applicant or licensee.It seems appropriate to provide information on implementing by the management of the Ignalina NPP of the specified VATESI requirements, as well as the IAEA recommendations set out in the General Safety Requirements GSR Part 4 (Rev.1) "Safety Assessment for Facilities and Activities" on the organization and terms of such independent inspections.	SE Ignalina NPP performs an independent verification before submitting safety justification to VATESI. An obligation to perform independent verification is set in the Article 30 of the Law on Nuclear Safety. Aforementioned Article implements the IAEA GSR Part 4 (Rev.1) Requirement 21 on independent verification. The Nuclear Safety Requirements BSR-1.4.1-2016 "Management System" specifies more detailed requirements for independent internal verification. This verification is performed in addition and prior to review performed by VATESI.
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65	Belarus	Article	Article	Page 63 of the subsection	The PSRs are performed in accordance with legal requirements as well as
		14	14, p. 63	"Review of periodic safety	management system procedure of operating organisation on PSR. Before
				assessments during	preparation of PSR for the particular nuclear installation content and scope
				operation" provides	is a subject for approval by regulatory body. The strict application of SSG-
				information on results of	25 guide for the Ignalina NPP units is not possible as far as the plant is
				PSR conducted at the	under final shutdown, nevertheless this document is taken into account. The
				Ignalina NPP units in 2017	application of much modern standards in mechanical engineering or
				and 2020, and the	electronics is not reasonable in this stage as far as the majority of safety
				consideration of final PSR	related equipment is already or will be in near future isolated or dismantled
				reports by the regulatory	as far as they lost its functions (especially after removal of all fuel from
				body.Have the basic PSR	reactor core). Regarding the application of the former Soviet Union Rules
				documents recommended by	and Norms for Nuclear Energy PNAE G-7-008-89. During the
				paragraph 4.6 of the IAEA	decommissioning stage and for PSR IAE made a decision to continue
				Specific Safety Guide SSG-	following these PNAE G-7-008-89 requirements for maintenance and
				25 "Periodic Safety Review	inspection of important to safety pressure equipment as this equipment was
				for Nuclear Power Plants"	previously designed and operated according to these PNAE requirements
				been developed with time	and during the decommissioning stage as the operation conditions are much
				schedules including all the	lighter (natural circulation) comparing to that which were during plant
				main milestones and	operation PNAE requirements was continuously followed.
				specific dates, in particular,	
				the deadlines for approval	
				by the management of	
				Ignalina NPP of the final	
				PSR reports and the	
				deadlines for forwarding	
				these reports to the	
				regulatory body?Have the	
				IAEA recommendations set	
				out in SSG-25 paragraphs	
				4.5, 4.8 been implemented,	
				according to which, before	
				the review work is started, a	

number of prerequisites should be satisfied between the operating organization and the regulatory body as to the scope and objectives of the PSR, including the effective international codes and standards to be applied. In particular, are these IAEA recommendations breached in connection with the practical application of the document of the Russian Federation canceled in 2015 (PNAE G - 7 - 008 - 89 )?	
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66	Belarus	Article 15	Tables 15.2, 15.3, p. 71	Based on data provided in tables, the maximum individual radiation doses for both the personnel and employees of contracting organizations were established in 2017. What are the reasons for high radiation dose values against previous periods?	The high individual radiation dose values of the NPP workers were caused by the repair works of the equipment in the hot cell, reactor hall, spend fuel storage pool hall and repair works of the long equipment shredding device. In case of employees of contracting organizations, the highest doses were caused by the radiography works in the controlled area. In both cases the doses are related to the amount and specifics of works, which may vary from year to year and this should be taken into account while analysing the doses of different periods.
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67	Belarus	Article 15	Table 15.5, p. 72	Given the title, the table should contain data on the radionuclides content in the body of personnel; at the same time, information is provided only on the doses of internal radiation of personnel and employees of contracting organizations. The text notes only the maximum activity values of 60Co and 137Cs. It seems appropriate to show the dynamics of activity values over the past 5 years.	Thank you for your remark regarding the incorrect table name, which shall be related to the internal exposure doses rather than to the nuclide content. According to the analysis of the nuclide vectors of deferent flows of radioactive waste arising due to decommissioning activities, the main contributors to the internal exposure doses are radionuclides Co-60 and Cs-137, which contributes up to 97-98 % of the internal exposure dose, therefore they are the main radionuclides of interest. The data regarding maximum measured activities of the main radionuclides for the past five years is following:449 Bq for Co-60 and 4387 Bq for Cs-137 in 2016;424 Bq for Co-60 and 8211 Bq for Cs-137 in 2017;651 Bq for Cs-60 and 2171 Bq for Cs-137 in 2018;555 Bq for Co-60 and 8415 Bq for Cs-137 in in 2019;1082 Bq for Cs-137 in 2021. The provided Co-60 and Cs-137 values correspond to the different workers.

68	Belarus	Article	Article	The annual radiation doses	As it is shown in the report the activity of radionuclides released from the
		15	15, p. 75	of a representative person	INPP into the environment is in the same order of magnitude. Recalculation
				for 2016-2021 are provided.	of dose coefficients showed the changes in the calculated doses by two
				Given the explanation of the	orders of magnitude. Recalculation of dose coefficients were done in
				authors of the report	accordance with Nuclear Safety Requirements BSR-1.9.1-2017 "Standards
				justifying the growth in the	of Release of Radionuclides from Nuclear Installations and Requirements
				values of annual radiation	for the Plan on Release of Radionuclides". These requirements suggest to
				doses starting in 2018 by	use ICRP recommendations and IAEA safety report series No. 19 "Generic
				three orders of magnitude	Models for Use in Assessing the Impact of Discharges of Radioactive
				relative to the annual	Substances to the Environment" (SRS No. 19). In 2018, implementing
				radiation doses in 2016-	Nuclear Safety Requirements BSR-1.9.1-2017, INPP renewed "Plan on
				2017, we consider it	release of radionuclides from Ignalina NPP into the environment" where,
				appropriate to explain the	based on the IAEA guidance SRS No. 19, recalculated dose coefficients
				reason for significant	were set.Question statement that the presence of Sr-90 in Lake Drūkšiai as
				difference in the values of	the dominant radionuclide is wrong. The report states that 90Sr
				the conversion coefficients	radionuclide is widely spread in the ecosystem. That is because of the
				applied (up to 3 orders of	nuclear weapon explosions and nuclear accident at Chernobyl NPP. Hence
				magnitude) and to give the	the statement in the report that the concentration of Sr-90 in the intake and
				values of annual radiation	discharge channels is practically the same and is equal to the detection limit
				doses for 2016-2021,	of the measurement equipment (0.002 Bq/l) and because of that it is
				calculated with using a	impossible to identify 90Sr radionuclide concentration ingress. Monitoring
				single unified and	of Sr-90 activity in water discharges is carried out in accordance with the
				reasonable approach that	European Commission recommendation "On standardized information on
				meets international	radioactive airborne and liquid discharges into the environment from
				requirements and	nuclear power reactors and reprocessing plants in normal operation (2004/2
				recommendations. It seems	/Euratom).
				appropriate to indicate the	
				reasons for the presence of	
				90Sr in Lake Drūkšiai as the	
				dominant radionuclide,	
				whereas according to	
				UNSCEAR-2016 data, 90Sr	

		is not included in the list of the main dose-forming radionuclides emitted at normal RBMK operation.		

69	Belarus	Article 19.7	Article 19(7), p. 114	The subsection "Review of mechanisms and regulatory requirements for license holders for the collection, analysis and exchange of operational experience" of Article 19 (7) (p.114) details the activities implemented by the management of Ignalina NPP and the regulatory body for the analysis of operational experience, including through evaluating the operating experience feedback. Is there a practical application of the IAEA recommendations set out in paragraph 2.76 of the IAEA Specific Safety Guide SSG- 50, according to which the effectiveness of the operating experience programme should be assessed using methods such as self-assessment, benchmarking and independent peer review?	The regulatory requirement regarding evaluation of effectiveness of the operating experience programme is established in Nuclear Safety Requirements BSR-1.4.4-2019 "Use of Operating Experience in the Field of Nuclear Energy", which takes into account IAEA Specific Safety Guide SSG-50. In accordance with this requirement the license holder – SE Ignalina NPP shall perform an evaluation of effectiveness of the operating experience programme on a periodic basis.
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70	Belarus	Article 19.7	Article 19(7), p. 116	The text of Article 19(7) provides information on the use of operational experience at the Ignalina NPP using a safety indicator system (for the decommissioning stage) (p.114), as well as on the VATESI analysis in supervising a safety indicator system related to the operating experience feedback (p.116). What system of safety indicators is involved, what regulatory document or procedure provides for the need for their development, what is the frequency that management of Ignalina NPP send these indicators to the regulatory body, are they all subject to accounting and analysis?	In accordance with VATESI Nuclear Safety Requirements BSR-1.4.4-2019 "Use of Operating Experience in the Field of Nuclear Energy" (Requirements), paragraph 5.9, licensee holder must have, develop and describe procedures of safety performance indicators system for quantitative evaluation of nuclear and radiation safety level at nuclear facility. In accordance with Requirements the license holder must have the safety performance indicators system which include all aspects that have an impact on the safety of a nuclear energy facility including technical, human and organizational factors. Trends and changes in the safety performance indicators of Ignalina NPP are analyzed periodically, and the reports of this analysis are provided to VATESI once a quarter.
71	Belarus	Article 8	Article 8, p. 31	For new employees inside a 5-year individual plan, what are the requirements for initial qualifications and experience, do employees perform activities requiring higher qualifications during	The minimum qualification requirement for new employees is a bachelor's degree. The required field of study depends on the desired position (physics/math/law/IT/etc.). Direct managers assign tasks to employees according to the area of responsibility and according to competences.

				this time (5-year individual plan)?	
72	Belarus	Article 10	Article 10, p. 41	Is the Corrective Action Plan elaborated based on the results of reviews, inspections and audits, as a sanction, or does it supplement licensing requirements and conditions, or something else?	The concrete corrective action plan, mentioned in the Report, was prepared to address the INPP internal audit findings. Internal management system process audits are performed on an annual basis in compliance with the annual audit plan. In case of non-compliances are determined in the audited process, corrective action plan is being developed and implemented.
73	Belarus	Article 9	Article 9, p. 36	«In addition, Organisations operating nuclear installations and other holders of licences and/or permits, ccording to the national legal requirements shall: - have the material, financial and human resources that are sufficient for involvement in the licensed activity or operations regulated by permits in compliance with the legal acts and technical standard documents of nuclear safety».	Human resources are determined by the organizational structure of the INPP. The sufficiency of human resources is assessed annually and, if necessary, the number of resources in the staffing lists of the INPP units is adjusted. If the organizational structure is changed, a modification is prepared, within the framework of which the necessary human resources are assessed and justified, considering the existing licenses and regulatory requirements. At the end of the modification implementation, a report is issued, which includes information on the sufficiency of human resources after the modification implementation.
		How is the adequacy of human resources assessed?			
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74	Belarus	Article	Article	Safety culture development	The main regulatory requirements in the area of safety culture are defined
		10	10, p.40	at Ignalina NPP According	in Law on Nuclear Safety and Nuclear Safety Requirements BSR-1.4.1-
				to Article 17 of the Law on	2016 "Management System". 2. Each division of Ignalina NPP
				Nuclear Energy Ignalina	organizational structure annually performs self-assessment. The scope of
				NPP have guarantee the	the self-assessment includes questions or topics for discussion. Each
				high level of safety culture	question or topic in the annual self-assessment is considered additionally
				in the organization. The	according with the attributes of strong safety culture. Divisions themselves
				Director General of the	identify possible problems or causes for each issue.3. In addition to the fact
				Ignalina NPP annually	that annual self-assessment reports and quarterly safety culture indicators
				approves the Action Plan on	evaluation reports are provided to the regulatory body - VATESI, these
				safety culture and security	reports are sent to the heads of departments at SE Ignalina NPP, thereby
				culture development at	ensuring that the data, received from departments, is properly used for
				Ignalina NPP providing	safety culture assessment. Anonymity in provision of information in
				specific measures on	questionnaires preclude the preparation of a deliberately good report or the
				implementation of the	selection of indicators for analysis that show a "good" picture of safety
				Ignalina NPP safety culture	culture for the regulator.4. External assessment of the safety culture:
				and security culture	Regulatory body State Nuclear Power Safety Inspectorate (VATESI)
				development programme.	regular inspections; an external contractor in 2021 has performed an
				Mainly those measures are	evaluation of the maturity of safety culture at Ignalina NPP. It conducted an
				the results of selfassessment	electronic survey of employees on safety culture issues, conducted
				of activities and evaluation	interviews with the company's specialists supervising the area of safety
				of safety culture	culture and with the company's management, etc. Based on the obtained
				indicators.What regulatory	results, a report with conclusions and recommendations was prepared.
				requirements are set for	
				maintaining a safety culture	
				at the Ignalina NPP?What is	
				the process for evaluating	
				results of the safety culture	
				self-assessment?How	
				exactly is objectivity in	
				conducting safety culture	
				assessments ensured given	



75	Belarus	Article 11.2	Article 11 (2), p.45	VATESI during regulatory inspections and other activities verifies suitability of personnel qualifications, quality of safety important training and sufficiency of competent INPP personnel to ensure the INPP safety.What regulatory requirements have been established by VATESI for the implementation of control and supervisory activities on the personnel training issues (selecting, compliance with the personnel qualification, evaluation of training, independent work permits, etc.)?What are the results of such inspections?	The Nuclear Safety Requirements BSR-1.4.3-2017 "Human resources of organizations performing licensed activities in the field of nuclear energy" contain requirements related to the training of the licensee's employees. Among other requirements, BSR-1.4.3-2017 contains requirements for introductory and periodic training, training programs, training tools, competence of teachers, certification of employees, etc. During inspections, VATESI verifies if Ignalina NPP complies with the requirements of BSR-1.4.3-2017 in the field of human resources management. The last inspection in the aforementioned area was performed in 2022. No non-compliances were identified during this inspection.
76	North Macedonia	Article 7	Article 7 Legislati ve and Regulat ory Framew ork	In the update of the national legislation for implementation of the relevant EU directives are there identified any challenges and difficult issues?	No challenges and difficult issues were encountered.

77	Belarus	Article 11	Article 11, page	«Since 1 January 2010 the main activity of INPP is	In order to accumulate and preserve INPP personnel critical knowledge and unique experience the loss of which may have a significant negative impact
			45	decommissioning. Today	on the safety and smooth activity of the division / enterprise, the INPP
				many employees	Knowledge accumulation and preserving program was approved. Criteria
				employedat the enterprise	for identification of critical employees (a person who has critical
				have a huge experience,	knowledge / skills and the highest priority for maintaining them) and
				unique knowledge that shall	methods for assessment of critical knowledge were set out in the INPP
				be maintained and applied.	critical personnel identification Methodology. According to the Program
				While implementing the	and Methodology the List of INPP critical employees is prepared and
				decommissioning projects	updated every two years. The individual knowledge/mind maps are
				the knowledge and	developed for every critical employee and the individual plans for measures
				experience of these	to preserve the critical knowledge are prepared. Examples of critical
				employees are applied to the	knowledge preservation measures are: Critical employee reserve
				most extent. The	preparation; Transfer of critical employee experience / knowledge to other
				procedures, manuals and	employees / newcomers (seminars, practical training/on-job training,
				guidelines in the field of	mentoring); Filming of technological processes and work operations.
				personnel management are	Training material based on video and audio material is used to train new
				developedin accordance	employees; Review of instructions or other document authored by a critical
				with the IAEA standards.»	employee or preparation of a new instruction or other document;
				How is knowledge	Preparation of a report in which the employee describes their critical, tacit
				preserved, snared and	knowledge / skills; Keview of the job preparation program based on the
				applied?	and other information related to the critical amplevee's workplace to a
					and other information related to the critical employee's workplace to a
					completed a progress report is prepared for each critical employee, which
					is analyzed and evaluated in terms of effectiveness of implemented
					measures by the heads of relevant division and department
					incustres by the neads of relevant division and department.

78	Belarus	Article 7.2.3	Article 7(2)(iii), p.26	Does the review program change for the corresponding facility or activity, or stays the same?	We assume, that the question concerns program of regulatory inspections. According to the Procedure document for inspections, the inspection program is reviewed once a year and, when necessary, updated. The review of the inspection program includes assessment of relevance of planned inspections for the corresponding nuclear facility or activity, the need for additional inspections, the need of revision of the VATESI annual inspection plan, the relevance of the information provided in the inspection program on the nuclear facility or activity and other aspects.
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79	North Macedonia	Article 7	Article 7(2)(ii) – System of licensin g	In the National report is mentioned that the Law on Nuclear Safety sets requirements and conditions and time limits for issuance of a license and permit. In accordance with the legislation what is the difference of the license and permit? In which case is issued license and in which permit?	Permit for a nuclear facility can be issued for more specific activities provided that the applicant for the permit holds a licence for operation or a licence for construction and operation, either a licence for decommissioning of the nuclear facility. These permits are granted after safety of the corresponding safety-critical steps is proved and demonstrated in the necessary documentation. For example, a permit for the first carry-in and testing of the nuclear facility using nuclear and/or nuclear fuel cycle materials can be issued only if operation of the nuclear facility is authorised by the licence. According to the Law on Nuclear Safety, the following types of licences and permits are established and can be issued by VATESI: licence for construction of a nuclear facility (or facilities); licence for operation of a nuclear facility (or facilities); licence for operation of a nuclear facility (or facilities); licence for construction and operation of a nuclear facility (or facilities); licence for transportation of nuclear facility (or facilities); licence for supervision of a closed radioactive waste repository (or repositories); licence for transportation of nuclear fuel cycle materials, nuclear materials and other fissile materials with exception of the small amount as described in the Law; licence for acquisition, keeping and use of nuclear materials and other fissile materials with exception of the small amount as prescribed in the Law; permit for first carry-in of nuclear fuel to site of nuclear power plant, unit or non- power nuclear reactor; permit for the first carry-in and testing of the nuclear facility using nuclear and/or nuclear fuel cycle materials; permit for first start-up of unit of nuclear power plant or non-power nuclear reactor; permit for industrial operation of the nuclear facility; permit for start-up of the nuclear reactor after its short-term shutdown; permit to perform decontamination and (or) dismantling of contaminated structures, systems and components of the nuclear power plant
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80	Belarus	General	Summar y, p.6, Challen ge 1	The report states that the Challenge "To maintain safety of INPP while fuel is at units of INPP" is planned to be fully addressed by the end of 2022.Does this mean that by the end of 2022, all activities to remove all spent nuclear fuel from both Units of INPP, including cleaning of the bottoms of the SFSP from the sludge, collection, packaging and removal of nuclear fuel debris, will be completed?	The last cask with spent nuclear fuel was transported to the Interim SNF storage facility (SNFSF-2) in April 2022. All activities regarding spent fuel pools cleaning and confirmation of fuel debris absence were completed in December 2022.
01	Macedonia	13	13 Quality Assuran ce	assurance, it is mentioned in the Report that "VATESI performs review of the INPP's management system's documents	of the state enterprise Ignalina NPP must be submitted for review and assessment. The review and assessment of INPP management system documents is performed by VATESI personnel only.
				VATESI using its own resources or in case of need may request support from technical organizations?	

82	North Macedonia	Article 15	Article 15 Radiatio n Protecti on	Are there authorized dosimetry services for performing the monitoring of the occupational exposed persons and are there established requirements for authorization of dosimetry services?	There are several dosimetry laboratories which are authorized for performing of individual monitoring in Lithuania. However, individual monitoring of workers of the Ignalina NPP is carried out only by its own dosimetry laboratory, which is authorized by the State Nuclear Power Safety Inspectorate (VATESI) in accordance with the Nuclear Safety Requirements BSR-1.9.7-2018 "Rules of Procedure for Recognition of Nuclear Facilities". These requirements establish the procedure for recognition of dosimetry services of nuclear facilities, which includes requirements regarding the documents, which shall be submitted, the quality management system of the dosimetry service provider, the measurement accuracy etc.
83	Belarus	Article 15	Article 15, p. 72	Table 15.4 shows the collective doses of Ignalina NPP personnel from neutron radiation. Could you clarify what caused the higher level of collective dose of the personnel from neutron radiation in 2019 (0.085 person-Sv) compared to other years (0.005-0.032 person-Sv/year)?	The reason of the highest level of collective dose from the neutron radiation in 2019 was caused by loading of spent fuel into containers in the reactor unit premises and operations with spent fuel containers CONSTOR®RBMK-1500/M2 in the Interim Spent Fuel Storage Facility. In 2019 was loaded the highest number of CONSTOR containers – 51 per year.

84	Belarus	Article 15	Article 15, p. 72-73	What is the method of controlling the internal exposure of personnel which can be obtained from "pure" alpha and beta emitters?	The methods of controlling the internal exposure of personnel which can be obtained from pure alpha and beta emitters are set in Annex 8 of Lithuanian Hygiene Standard HN 112:2019 "Requirements of internal exposure monitoring". The alpha and beta emitters can be detected using indirect (in vitro) methods after the collection of appropriate biological samples, such as urine, faeces or nose blow. If necessary, biological samples must be radiochemically prepared before measurement. Also, the air samples from the workplaces can be measured. The alpha emitters can be measured using methods of alpha spectrometry or gross alpha counting. The beta emitters can be measured using methods of alpha spectrometry or gross alpha counting, proportional counting or gross beta counting. The routine internal contamination measurements with pure alpha and beta emitters are not carried out in Lithuania. These measurements can be performed at the laboratory of Radiation Protection Centre when needed, i.e., urine tests were performed to determine beta emitters for Ignalina NPP workers. At Ignalina NPP the "in vivo" methods for routine monitoring of internal exposure of personnel is used. There is no need to use special "in vitro" methods for routine monitoring of internal exposure of personnel is used. The main contributors to the internal dose are Cs-137 and Co-60 and for these radionuclides the "in vivo" method is sufficient. The risk of contamination with pure alpha and beta emitters is under control by implementing adequate workplace monitoring and implementing safety measures if needed.
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85	Belarus	Article 16.1	Article 16 (1), p. 81	VATESI is part of the national emergency response system at the state level. Does VATESI participate in emergency plans development? If so, in which part?	Responsibility for development, maintenance and updates of the National off-site plan (hereinafter – Plan) lays under Ministry of Interior. In case of need for revision of existing plan or drafting a new version, special working group is set up from representatives of different institutions and municipalities, taking part in preparedness and response to nuclear or radiological emergencies. This group also involves the representatives of licence holders. VATESI also delegates representatives to this group. The working group works as one team and are responsible for development of all parts of the plan.
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86	Belarus	Article 16.1	Article 16 (1), p. 82	The report says, "In case of nuclear or radiological emergency at nuclear facilities, at a later stage, the radioactive waste manager shall install and maintain temporary storage facilities for radioactive waste". What regulatory requirements are established in Lithuania for "temporary storage facilities"? Do emergency plans define their locations? Have the emergency RW volumes been estimated in advance?	The management of radioactive waste in Lithuania is regulated by The Law of Radioactive Waste Management. There are no specific regulatory requirements for temporary storage facilities. According to The State Residents Protection Plan in Case of Nuclear or Radiological Emergency, approved by the Resolution No. 1085 of the October 31, 2018 of the Government of the Republic of Lithuania, in case of nuclear or radiological emergency radioactive waste manager (at the moment State enterprise Ignalina NPP) is responsible for collecting radioactive waste (radionuclide contaminated clothing, personal protective equipment, tools and other objects) and transporting it for radiological characterisation and/or to interim storage sites and/or radioactive waste management facilities. If the radioactive waste manager does not have sufficient capacity, he shall apply to the municipal administration to organise the collection and transport of radioactive waste. In case if radioactive waste management facilities have no capacity of handling and storing waste generated during emergency, temporary storage facilities (interim storage sites) shall be installed. Such temporary storage facilities (interim storage sites) may be needed only in case of severe accident at operating nuclear power plant, with large release of radionuclides to the atmosphere. The exact locations and volumes of
				been estimated in advance?	temporary storage facilities (interim storage sites) shall be installed. Such temporary storage facilities (interim storage sites) may be needed only in case of severe accident at operating nuclear power plant, with large release of radionuclides to the atmosphere. The exact locations and volumes of temporary storage facilities are not defined in advance, as it will depend on the scale of contamination of environment and location of contaminated areas.

87	Belarus	Article 16.1	Article 16 (1), p. 87	As stated in the report, "the analysis of the consequences of hypothetical nuclear and radiological accidents of all nuclear installations and facilities located at Ignalina NPP site was approved by VATESI in 2021. Based on the performed analysis, the former emergency preparedness categories of the nuclear installations and facilities in Lithuania will be reviewed and the emergency planning zones and emergency planning distances will be adjusted».Please specify when it is planned to complete the revision of emergency response zones and distances. When will the on-site and off-site emergency plans of the Ignalina NPP be revised given the change in its status and threats reassessment?	The new zones and distances for emergency planning will be defined after final determining of the emergency preparedness categories for the nuclear installations and facilities of INPP and evaluation of the results of off-site population doses that were assessed in the analysis of the consequences of hypothetical nuclear and radiological accidents of the INPP nuclear installation and facilities. The reassessment of the emergency preparedness categories of the nuclear installations and facilities of INPP is in progress and has to be finalized by the end of 2023. For your information, the INPP emergency preparedness plan (EPP) is being updated constantly due to all major changes in emergency preparedness. Also, in accordance with the regulatory requirements, EPP is being revised and renewed once per three years.
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88	Belarus	Article 16.1	Article 16 (1), p. 89	The report provides information that in the period 2020-2021 during the COVID-19 pandemic, most of the planned emergency training at the Ignalina NPP was conducted remotely. Has the regulatory body assessed the efficiency of remote training, including drilling practical skills of personnel?	According to item 25.9 of Nuclear Safety Requirements BSR-1.3.1-2020 "Ensuring Emergency Preparedness at Nuclear Power Facilities", license holder shall evaluate effectiveness of training and exercises and apply its results for preparing and updating training and exercise programmes, no matter if training and exercises are conducted using remote or face-to-face training methods. As a regulatory body, VATESI supervises if a license holder is following these requirements. COVID-19 pandemic had no negative effect to the effectiveness for training of the personnel in form of the theoretical lectures and tabletop exercises, which were organised using remote training tools. Remote training revealed some advantages and such type of training may be used in some cases after pandemic. The main concern was the practical training, as some of the training/exercises had to be postponed or organised with reduced number of personnel because of difficult pandemic situation, to not compromise the health of personnel and the safety of nuclear facility (in case the majority of personnel would become sick and unable to perform functions in case of emergency). Therefore, pandemic had some negative effect for personnel training using practical methods.Currently the training/exercising regime is back to normal and is being carried out according to training programmes, which are renewed every year, taking in account lessons learned from pandemic time, staff changes and lessons learned from previous trainings/exercises.
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89	Belarus	Article 16.1	Article 16 (1), p. 90	The inclusion in the subsection "International arrangements" of the statement about the threat to Lithuania in the event of an accident at the Belarusian NPP is not in line with the guidelines for preparing national reports set out in INFCIRC/572 (Part III, section 6.1).	Chapter 16 (1) of Lithuanian National Report, dedicated to describe implementation of provisions of Article 16 of CNS, provides information on actions taken by Lithuania in the area of emergency preparedness and identifies the potential problems or challenges with implementation of emergency plans in case of radiological emergency at Belarusian NPP, which is constructed only 20 km from European Union border and only 40 km from Lithuanian capital Vilnius. Belarusian NPP is the only nuclear installation, which is in the event of a radiological emergency likely to have significant safety impact on the territory of Lithuania. In the context of emergency preparedness this is a significant source of the risk, which assigned to emergency preparedness category V (sub-paragraph 4.19 of IAEA General Safety Requirements GSR Part 7) and needs to be addressed in emergency preparedness plans as well as by necessary international arrangements. As defined in INFCIRC/572/Rev6 guidance related to Article 16 (1), 6th indent as well as guidance related to Article 16 (3), 2nd indent, the National Report shall describe "International arrangements, including those with neighbouring States, as necessary.". Based on the above, National Report provides information on Lithuania`s international arrangements and main results.
					indent, the National Report shall describe "International arrangements, including those with neighbouring States, as necessary.". Based on the above, National Report provides information on Lithuania`s international arrangements and main results, stemming from international cooperation. Taking into account aforementioned we strongly disagree with the claim of Belarus that inclusion of the corresponding statement regarding Belarusian NPP is not in line with the guidelines for preparing national reports set out in INFCIRC/572 and consider this claim as unfounded.

90	Belarus	Article 16.3	Article 16 (3), p. 92-93	Please note that the information provided in section 16 (3) of the National Report of the Republic of Lithuania on the implementation of the Convention on Nuclear Safety 2022 does not comply with the guidelines set out in INFCIRC/572 for the preparation of national reports. The said section is filled in by Contracting Parties that do not have nuclear installations on their territory (such parties are available in the Lithuanian side), but which may be exposed in the event of a radiation emergency at a nearby nuclear installation. In addition, according to INFCIRC/572, section 16(3) should describe measures for preparing and working out emergency plans covering the activities to be implemented on their territory in the event of such an emergency, as well as international agreements, including agreements with	After completion of Ignalina NPP defueling, Belarusian NPP is the only nuclear installation, which in the event of a radiological emergency is likely to have significant safety impact on the territory of Lithuania as it is constructed and operated only 20 km from European Union border and only 40 km from Lithuanian capital Vilnius. In the context of emergency preparedness this is a significant source of the risk, which assigned to emergency preparedness category V (sub-paragraph 4.19 of IAEA General Safety Requirements GSR Part 7) and which raises challenges and needs to be addressed in emergency preparedness plans as well as by necessary international arrangements as it is set in INFCIRC/572/Rev6 guidance related to Article 16 (3), 2nd indent. Taking into account aforementioned we disagree with the claim of Belarus that information provided in section 16 (3) of the National Report does not comply with the guidelines set out in INFCIRC/572 as unfounded.
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91	Belarus	Article	Article	Please note that within the	The information requested by Lithuania under Article 17 para iv) of CNS is
		16.3	16 (3),	framework of	necessary to evaluate and make its own assessment of the likely safety
			p. 92	correspondence based on	impact on the territory of the Republic of Lithuania by the Belarusian NPP.
				Article 17 of the Convention	We would like to draw Belarus' attention to Article 27 para 2 of the
				on Nuclear Safety on the	Convention. It foresees possibility for Contracting Party to provide
				issue of providing the	information identified by it as protected, while such information shall be
				Lithuanian side with	used by other Contracting Party only for the purposes for which it has been
				information for studying	provided and its confidentiality shall be respected. Such protected
				and conducting its own	information could be provided within the scope of existing bilateral
				assessment of the possible	agreement between Ministry of Emergency Situations of the Republic of
				impact of the Belarusian	Belarus and VATESI of Lithuania. Getting necessary permissions from the
				NPP on the safety of the	third party is responsibility of Belarusian side, as Belarus caries all
				territory of the Republic of	responsibility for safety of nuclear installation located on its territory.
				Lithuania, the Belarusian	Lithuania is still awaiting the requested information to make its own
				side provided information to	assessment and necessary emergency preparedness arrangements.
				the extent that, in our	
				opinion, is sufficient to	
				perform such assessment.	
				Providing more detailed	
				information, which the	
				Lithuanian side insists on,	
				would disclose information	
				about the Belarusian NPP	
				project, which is protected	
				by the obligations of the	
				Republic of Belarus under	
				the relevant agreement with	
				the Russian Federation and	
				cannot be transferred to a	
				third party without the	
				consent of the latter. Taking	
				into account the provisions	

		of Part 1 of Article 27 of the Convention on Nuclear Safety, which states: "The provisions of this Convention shall not affect the rights and obligations of the Contracting Parties under their law to protect information from disclosure", Article 17 of the CNS cannot be the basis for the transfer by the Belarusian side to the Lithuanian side of detailed information about the Belarusian NPP project, that would be a violation of our obligations to the Russian Federation.			
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92	Russian Federation	Article 19	19 (8)	Due to unavailability in the Section of information on handling the irradiated reactor graphite after dismantling of the reactors at Ignalina NPP units No. 1- 2, please explain whether the irradiated reactor graphite refers to radioactive waste in accordance with Lithuanian regulatory documents? What are the priority actions and strategy for handling the radioactive reactor graphite?	According to national regulations and preliminary assessment carried out by SE Ignalina NPP irradiated reactor graphite refers to long-lived radioactive waste Class D and E. The final step of management is to dispose irradiated reactor graphite in Deep Geological Repository (DGR) (in accordance with provisions of National Development Programme for Decommissioning of Nuclear Power Facilities and Radioactive Waste Management for 2021–2030 (Development Programme). The same and more detailed questions related to the classification of graphite and the strategy for the management of it were answered within the frame of the Joint Convention on the Safety of Spent FuelManagement and on the Safety of RadioactiveWaste Management.
93	Russian Federation	Article 6	p.12	The article refers to stage No. 2 for removal of nuclear fuel from the NPP, including the removal of possible fragments of spent nuclear fuel from spent fuel pools at the NPP units No. 1 and 2, while there is no information on search and removal of possible fragments of spent nuclear fuel that might remain in the reactor fuel tubes. How and when will these works be carried out/or have been already carried out and with	No events of SFA damage / destruction with signs of nuclear fuel debris either in the reactor channels or in the repeated forced circulation circuit (hereafter as RFCC) were recorded during the Units operation. Radiological research of RFCC equipment and reactor components after the final shut-down of the reactor did not discover any signs of nuclear fuel debris in RFCC as well as in the auxiliary systems. This is being confirmed during dismantling activities: no signs of nuclear fuel debris were discovered in the dismantled pipelines of the reactor at the Unit 1 (currently 60% of lower water pipelines are dismantled).

				involvement of what specialists?	
94	Norway	Article 6	p.12	"Once the fresh and spent fuel has been removed from the NPP, a decommissioning licence can be applied for." Could you describe the plans concerning fresh nuclear fuel, left after INPP shutdown. If fresh fuel will be stored outsite NPP site, is necessary infrastructure for this arranged?	The fresh fuel assemblies are removed from fresh fuel storage facility at Ignalina NPP site, which was used during the operation period, to the hall of the dry spent fuel storage facility SNFSF-2. Fresh fuel is stored in the same containers, designed for the fresh fuel, and in the same scheme, keeping conditions of sub-criticality. All necessary arrangements and authorizations regarding transportation and storage was prepared and agreed upon with VATESI. No additional infrastructure is needed.
95	Norway	Article 6	p.13	One of the events, reported by operator in 2019-2021 was a detection of small quantities of unaccounted nuclear fissile material.Could you provide more detail description of this event?	There were four cases during the period of 2019-2021, when undeclared small quantities of fissile material was discovered at Ignalina NPP. All four cases have been reported to the IAEA ITDB: 1. ITDB Key: 2020-03-005. Three ionizing radiation sources (used for calibration) containing Pu-239, were discovered by the INPP staff during routine inspection. 2. ITDB Key: 2020-10-003. Unused fission chambers (KHT-31-1 and KT-19) containing highly enriched uranium (1.61 g in total), were discovered by the INPP staff during inventory check. 3. ITDB Key: 2021-03-017. Five units of unused fission chambers (Russian abbreviation – KHT-31) containing highly enriched uranium (4 g in total), were discovered by the INPP staff during inventory check. 4. ITDB Key: 2021-09-004. A radioactive source for quality control of radiometer "FHT 111M" containing ThO2, was not accounted as containing nuclear material.

96	Norway	General	p.6	Summary, Challenge 1: "Defueling of the INPP SFSP is completed, including handling and transportation for storage in the ISFSF of the damaged fuel. To ensure that no fuel debris is left in the SFSP, cleaning of the bottoms of the SFSP from the sludge, collection, packaging and removal of nuclear fuel debris at Unit 1 started in September 2021 and is planned to be finished at Unit 1 until the end of 2nd quarter of 2022, at Unit 2 – until the end of 2022." Could you provide an update on progress of Spent Fuel Storage Ponds cleaning activities in both INPP units? Where and how spent fuel debris, if it is found, is stored?	All Spent Fuel Storage Ponds cleaning activities in both INPP units were completed in December 2022. No debris of spent fuel were found in all SNFSP. Spent fuel debris were found only during the preceding handling of heavily damaged SF assembles and recovered by special vacuum unit, put to the specially designed cartridge. This cartridge then was loaded to the spent fuel cask into the dedicated cell of the cask's internal basket.
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97	Canada	Article 6	Article 6	How many phases are part	Basically, there are two decommissioning phases of Ignalina NPP. The first
				of the decommissioning and	decommissioning phase (the defueling phase of Ignalina NPP Units) covers
				what are they?	the period when the nuclear fuel was at the Ignalina NPP Units and when
					the decommissioning related works were carried out under operation
					license (dismantling and decontamination activities during transition
					period). The defueling phase of Ignalina NPP Units is subdivided into two
					stages: Stage 1 – defueling of reactors (fuel is being unloaded from the
					reactor core and transferred for storage to the spent fuel storage pools in the
					Units); Stage 2 – defueling of Units (complete fuel removal from the spent
					fuel storage pools to the Interim Spent Fuel Storage Facility, including
					damaged fuel). In addition, in order to be able to proceed with isolation,
					modification, dismantling and decontamination of some of the equipment
					and systems which are not needed anymore during each defueling stage, the
					Ignalina NPP was required to perform safety systems analysis to determine
					their status (safety class) during separate defueling stages by comparing
					performed corresponding functions prior to shutdown and the need of these
					functions to be performed after the reactor final shutdown and such
					reclassification was substantiated from the safety point of view. After this
					analysis, 2 decommissioning projects and following documents for
					dismantling and decontamination activities during defueling stage have
					been prepared, coordinated and accepted by with VATESI. After the
					removal of all nuclear fuel from the Ignalina NPP units, the second phase
					of decommissioning begins – this activity will be carried out and safety
					justified according to the decommissioning license. In this phase,
					equipment heavily contaminated with radionuclides (such as the reactors,
					steam drum separators, etc.) remains, the dismantling of which will be
					carried out according to separate decommissioning projects, which are
					specified in the Final Decommissioning Plan of Ignalina NPP. In the
					decommissioning phase, the dismantling of equipment is subdivided into
					three stages: 1. The dismantling of equipment, after the fuel has already
					been unloaded from the Units (mainly continuing the second stage of the
					first phase); 2. Dismantling of the reactor cores (R3 zone) of Units 1 and 2;



98	Canada	Article 6	13/123	There was an increase of events from the 8th national report. Have any trends been noticed? Has decommissioning introduced any knowledge gaps?	During recent period, the volume of decommissioning activities at the INPP has increased significantly. This has contributed to a rise in events number. No one of aforementioned event during this period was recurrent. There were no recurring issues arising particularly in certain operating modes, particular systems or during certain activities. Increase in event number, is mostly adressed by additional briefing of personnel engaged in the event and familiarisation with operating experience during training sessions and strengthening of supervision of activities.
99	Canada	Article 10	41/123	What was the last safety culture inspection at the NPP?	The last VATESI inspection, when safety culture was inspected at INPP was performed in 2022. It was performed in the frames of inspection of implementation of organizational structure changes. This included interviews with certain NPP managers on safety culture aspects in decision making. There were no non-compliances identified during inspection.
100	Canada	Article 16.1	85/123	"INPP does not have a licence for this activity yet". Is a licence being processed for this activity? How is training conducted for a non-licenced activity?	The licensing process is ongoing. The documents needed to obtain a license are being prepared and agreed on with VATESI. The Emergency Preparedness Plan for the Accidents during Transportation of Nuclear and Nuclear Fuel Cycle Materials (hereinafter – Plan) is one of the documents which is mandatory to obtain the licence. Such document is already prepared by INPP and agreed on with regulatory authority. The personnel responsible for different actions during accident defined in this plan is already trained in accordance with INPP training programme. In addition, according to this programme responsible INPP personnel will be trained to act during transport accident periodically.

101	Canada	Article 16.1	Art 16	There were two functions recently changed to RPC in 2021 - the radiological environmental monitoring and the emergency management tools from the environmental protection program. How have these functions been transferred in terms of knowledge? Are there any lessons learned from the transfer?	Starting 1 January 2021 functions of environmental radiological monitoring and contamination forecast were transferred from Environmental protection Agency of Ministry of Environment to Radiation Protection Centre. Regarding the same radiological standard operating procedures (SOP) were used in both institutions, the integration of functions took physically one week, when the measuring equipment was disconnected, transported and newly installed at the premises of Radiation Protection Centre. All staff (except one at retirement age) became staff members of Radiation Protection Centre. Some of SOPs were corrected and adapted within one month, and National accreditation bureau was informed about finishing of transition. Verification of same SOPs were performed due to equipment installed at new premises. Flexible scope of accreditation gave opportunity to continue work without breaks. The external audit performed by the National Accreditation Bureau approved accreditation for new scope in the end of 2021. Transposition of functions were made without brakes due to preparation of documents in advance and usage harmonize SOPs for radiological measurements within the country.
102	Canada	Article 16.1	Art 16	"Based on the performance analysis, the former emergency preparedness categories of the nuclear installations and facilities in Lithuania will be reviewed and the emergency planning zones and emergency planning distances will be adjusted" - Has this review taken place? What will be the new distances for emergency planning?	The reassessment of the emergency preparedness categories of the nuclear installations and facilities of INPP is in progress. The exact range of the new zones and distances of emergency planning will be defined taking into account the determined emergency preparedness categories (II or III) for the particular nuclear installations or facilities of INPP, results on off-site population doses that were assessed in the analysis of the consequences of hypothetical nuclear and radiological accidents of the INPP nuclear installation and facilities, as well as requirements of the relevant national legal acts.