

Posted By	Sequence	Article	Reference	Question	Comment	Answer
Argentina	1	Article 7	7.3.1	It is said that after an application for a decommissioning license has been submitted, and in the wait of the completion of the licensing procedure, some operations related to decommissioning may be authorized in order to achieve a more effective radiation protection. Who is the authorizing body in this context?		<p>After an application for a decommissioning license has been submitted, in the wait of the completion of the licensing procedure, the operations related to decommissioning can be authorized following the provisions foreseen by Law N. 1860/62 for the modifications of NPPs in operation: art.6 of the Law N. 1860/62 requires that the modification is authorized by the MASE- Ministry of Environment and Energy Security (that since november 2022 replaced the Ministry of Ecological Transition and whose role is to implement the national environmental policy as well as to ensure the continuous availability of energy supply according to the national needs) following the binding advice of ISIN.</p>
Argentina	2	Article 8	8.3	It is said that the sole licensee for decommissioning and management of spent fuel and radioactive waste of NPPs and other nuclear installations is SO.G.I.N. S.p.A., whose only shareholder is the Ministry of Economy and Finance. It is also said that strategic and operational directives to the licensee are given by the Ministry of Ecological Transition. Given that the Ministry of Ecological Transition is an integral part of the Regulatory Body, responsible for the licensing process, how are potential conflicts of interests and effective independence of the Regulatory Body managed?		<p>It is correct to say, as written in the national report, that SO.G.I.N. is the national implementer entitled to conduct decommissioning operations of the four NPP's of Latina, Garigliano, Trino and Caorso, and of a few other fuel cycle installations and that, according to the legislation, strategic and operational directives are given to SO.G.I.N. by the Ministry of Ecological Transition.</p> <p>It has first to be said that as result of a recent reorganization made by the new Government, the denomination of the Ministry of Ecological Transition has been changed into MASE- Ministry of Environment and Energy Security, whose role is to implement the national environmental policy as well as to ensure the continuous availability of energy supply according to the national needs.</p> <p>The Ministry of Environment and Energy Security maintain the role and functions previously assigned to the Ministry of Ecological Transition in relation to nuclear installations and activities. It is therefore the state administration which grants authorizations (Licensing Body) requested by the legislative framework.</p> <p>This institutional system does not however generate any conflict of interests or affect to any extent the independence of the regulatory function for the following reasons:</p> <p>1) any authorization, including those for the decommissioning of nuclear installations, for all aspects pertaining nuclear safety and radiation protection is granted on the basis of the technical advice formulated by ISIN (National Inspectorate for nuclear safety and radiation protection), which is the national</p>

Argentina	3	Article 12	12.4	Given that there are no NPPs in operation, what is the current role of the so called “Plant Council of Delegates for Safety”?	Art. 92 of Legislative Decree N. 101/2020 requires that for each nuclear installation the so called "Plant Council of Delegates for Safety" has to be appointed, also for installations under decommissioning, with the following aims: a) express a preventive advice on: - projects for any modification of the installation, - changes to the operating procedures of the plant, - programs of extraordinary drills and trainings to be performed on the installation, b) periodically review the activities performed on the installation, providing recommendations and advices for improvements related to safety and security; c) draw up the internal emergency plan; f) assist the shift manager or the plant manager in adopting the required measures to deal with any event at risk for public safety or that could cause damage to the plant.
Luxembourg	4	Article 8	page 45	The report announces that public recruitment for 26 new technical staff members of the RB is ongoing, expecting to hire them by the end of 2022. Does it mean that those 26 members will take their function within a relatively short time and herewith almost double the staff of ISIN? How does ISIN prepare to integrate and to train those new staff members?	The selection procedure for the recruitment of new ISIN staff graduated in technical disciplines was concluded in November 2022 and in the period December 2022-January 2023 the new staff entered into force. Training of new staff is performed by training on the job and in house and university learning programs. It has to be mentioned that most of the new staff has knowledge of at least three years in nuclear safety and radiation protection fields due to the requirements to access the selection procedure.
China	5	General	A3.3/P14	It's stated that "treatment and conditioning of all the liquid and solid radioactive waste located on site in a suitable form for the transfer to the National Repository." Question1: The National Repository of Italy is still at the site selection stage. The report describes the wastes treated into a suitable form, could you explain what is the suitable form of waste forms and waste packages? Question2: Could you explain how to determine the acceptance criteria for waste forms and waste packages by the National Repository?	Even if the National Repository is at the site selection stage, preliminary WACs have been established by Sogin- National Repository that is the State company entrusted by law for design, construction, operation and closure of the Repository. In this context, ISIN and Sogin-National Repository established a procedure that foresees, for each batch of waste produced by operators, a declaration by Sogin-National Repository on the compliance with preliminary WACs and on the potential acceptability of the waste for the Repository.
China	6	General	A3.4/P16 ANNEX 3/P108	It's stated that "Regarding legislative framework in 2020 the Legislative Decree n.101/2020 which transposes the Directive 2013/59/Euratom, laying down basic safety standards for protection against the dangers arising from exposure to ionizing radiation, was published; this Decree entered into force on 27 August 2020 and it repeals the Legislative Decrees n° 230/1995, n° 187/200, n° 241/2000 and n° 52/2007."... It's stated that "Legislative Decree n. 52 of 6th February 2007" Question: Could you clarify whether these two Decrees are the same?	Yes, with the entry into force of the Legislative Decree N.101/2020, all the provisions foreseen by Legislative Decree N. 52/2007 were transferred in Legislative Decree N.101/2020 and the Legislative Decree N. 52/2007 was abolished. What is reported at page 108/127 of the National Report is a reference.

China	7	Article 8.2	8.2/P44	<p>It's stated that" ISIN has regulatory, operational and administrative independence. The Director is nominated with a Decree of the President of the Republic following the designation by the Council of Ministers based upon the proposal of the Minister of the Ecological Transition with the Minister of Economic Development, and following the positive advice of Parliamentary Commissions; the Advisory Board of 3 members has been nominated under the same procedure of the Director"</p> <p>Question: Could you explain whether the high-level personnel appointments of ISIN are independent of the nuclear industry development authority since the Director is nominated based upon the proposal of the Minister of the Ecological Transition with the Minister of Economic Development?</p>	<p>As Stated in art. 6 of Legislative Decree n. 45/2014, "ISIN Director is chosen among people of undisputed morality and independence, proven and documented experience and high qualification and competence in the fields of nuclear safety, radiation protection, protection of the environment and etc..For at least twelve months from the termination of the appointment, the Director cannot maintain, directly or indirectly, relationships of collaboration, consultancy or employment with operating companies in the sector of competence, nor with the relative associations".</p> <p>As stated in the National Report, the Director is appointed by the Decree of the President of the Republic who can issue the Decree only if the proposal for the nomination has the positive advice from the absolute majority of the members of the environmental and industrial Commissions of the two branch of the Parliament: Chamber and Senate. In no cases the appointment can be carried out in the absence of the aforementioned advice expressed with the absolute majority of the members of the aforementioned Commissions whose members are nominated taking into account all Parties in the Parliament.</p>
China	8	Article 12	12.3/P58	<p>It's stated that" Safety culture is stimulated and improved by a complex combination of education, training, behaviours and attitudes, management's commitment etc."</p> <p>Question1: Could you explain how to verify the safety awareness of the staff?</p> <p>Question2: Could you introduce the main content of the regular safety training?</p>	<p>1) Sogin has implemented a specific software for Operational Experience Feedback in order to allow all workers to report events related to safety. Another software has been implemented to monitor a group of safety indicators related also to the number and quality of workers' reports. Workers have been trained not only to use the software, but also on the concept of "near miss", so that they are aware of the potential risk scenarios.</p> <p>2) About 90% of the workers attended the "Safety culture" course. The main contents are: Safety Culture fundamentals; Theory of Organizations; Human Reliability Analysis and Individual, Technology and Organization interactions; Complex Systems; Root Cause Analysis; Safety Culture improvement methodologies</p>
China	9	Article 13	Article 13/P63	<p>It's stated that "Management System Manual related to the main organization"</p> <p>Question: Could you elaborate on the structure and main content of the Management System Manual?</p>	<p>The Management System Manual has the following structure and main contents: 1- Scope; 2- normative and legislative references; 3- description of the organization model; 4 - leadership; 5 - planning and objectives for quality, environment and safety; 6 - Human resources; 7 - communication processes; 8 - control of documented information; 9 - implementation of activities (design planning, licensing, acquisition of works, services, supplies, performing of the working activities, tutoring...); 10 - audit e surveillance and improvement analysis.</p>

China	10	Article 15	15.1/P69	<p>It's stated that "In relation to NPPs decommissioning activities, all projects submitted to ISIN, as described in the decommissioning plan, and in more detail in the implementation Detailed Projects and Plans of Operations, have to contain specific sections on the envisaged radiation protection programme, including doses evaluation and proper demonstration of the implementation of ALARA principle."</p> <p>Question: Could you introduce your experience in implementing the ALARA Principle in detail?</p>	<p>The transposition of Directive 2013/59/Euratom has projected Italian radiation protection into the new safety culture, in which optimization is a multidisciplinary process pursuing a suitable balance among different risks. The fundamental tools in the application of the ALARA principle are source-related dose constraints, introduced by the Directive to define the range of options to be considered for planned exposures. They represent a level of individual dose which should not, in normal circumstances, be exceeded. They are used in the planning process and the chosen value will depend on the circumstances of the exposure under consideration. They are not a limit and do not represent a demarcation between safe and dangerous levels of radiation exposure but are used, prospectively, as operational tool for optimisation. For planned exposures that have a dose limit associated with them, dose constraints must be lower than the pertinent dose limit. According to the art. 5 of the legislative decree n. 101/2020, for the purpose of optimizing protection for planned exposure situations, dose constraints are established. For occupational exposure, the dose constraint is established by the operator or the employer as a tool for optimization, under supervision of the competent authority issuing the authorization or receiving the notification. In the case of outside workers, the dose constraint is established jointly by the employer of the outside worker and by the undertaker. For public exposure, the constraint of individual dose to which individuals in the population are exposed due to the planned use of a specification source of ionizing radiation, is</p> <p>After the plants were maintained in Safe Store status, it was requested for decommissioning activities to commission a new system for the treatment of liquid wastes before discharge in the environment. The main principle for the acceptance criteria for the commissioning of the system is the respect of the 10 microSv/year to the representative man of the public established through the discharge formula of the plant. Other criteria are the maximum liquid volumes can be stored in the tanks to proceed with decommissioning activities, filtration capacity also for conventional pollutants, OLCs fixed for liquid waste treatment system operation.</p>
China	11	General	Line 7/P99	<p>It's stated that "commissioning of a new system for the treatment of the liquid waste."</p> <p>Question: Could you introduce the principles for setting the acceptance criteria for commissioning of a new system for the treatment of liquid wastes?</p>	

Austria	12	Article 7	Section 7.3.1, p 38	<p>According to the National Report the licensing process appears rather complex because many government organization (ministries) are part of the process. The role of the regulatory authorities ISIN is not fully clarified. In addition, the change of the name of the ministries, that typically occurs when a new government is constituted, makes even more challenging. Consider to evidence the functions instead of the ministries that are part of the licensing process. Please elaborate the role of ISIN in the licensing process.</p>	<p>The licensing process and the related role of ISIN are described in artt. 7 and 8 of the national report. However, if further clarifications are needed, the following can be highlighted:</p> <ul style="list-style-type: none"> - Regarding the licencing function, with reference to the Administration appointed for granting the authorization, it is always a Ministry that currently is MASE- Ministry of Environment and Energy Security, that has replaced the Ministry of Ecological Transition on the base of a recent reorganization made by the new Government and whose role is to implement the national environmental policy as well as to ensure the continuous availability of energy supply according to the national needs; however, functions and staff related to the licensing function in the nuclear field remained unchanged; - The authorization can be granted by the Ministry of Environment and Energy Security only after the issuing by ISIN of a binding technical advice on nuclear safety and radiation protection aspects, that takes into account advices and observations from other Ministries involved in the licencing process and the Region concerned; in its advice ISIN establishes conditions and technical specifications to regulate the conduct of the decommissioning operations; - once the authorization has been granted, Detailed Projects and Plans of Operation for safety relevant decommissioning activities have to be submitted to ISIN who grants the approval on the basis of its review and assessment on the safety case submitted in the application; <p>As stated in art.6, point 13, of Legislative Decree n. 45/2014, "For the performance of its duties, ISIN can avail, subject to the signing of special agreements, on the National Institute for Environmental Protection and Research and the Provincial and Regional Environmental Protection Agencies for scientific and technical support and can avail on Organizations that meet the principles of transparency and independence from any subject involved in the promotion or management of activities in nuclear field."</p>
Austria	13	Article 8	Section 8.2, p. 45	<p>Italy is in a phase characterized by activities of decommissioning, dismantling, conditioning and storage of radwaste and spent fuel. Technical support is also needed in these phase. It is not clear what are the characteristics and the procedures applied by the regulatory authority, ISIN, for selecting support technical organizations?</p>	
Austria	14	Article 11	Section 11.2, p. 53	<p>Activities regarding nuclear power in Italy are focused on the back-end of the life cycle. This poses challenges to attract young experts also affecting the costs of the activities. Please elaborate strategies regarding this situation including long-term financing.</p>	<p>The development of highly specialized know-how is part of the SOGIN strategy to guarantee maximum safety and implement an integrated knowledge management, education and training system. This is done in the light of transferring skills to future operators and satisfying the increasing knowledge demand in the sector at both international and national level. Updating of this strategy is currently related to the review of company activities due to updating of overall decommissioning plan defined within the IAEA Artemis peer review of Sogin programs.</p>

Austria	15	Article 14	general		<p>In the National Report a general description is given mainly focused on legislative requirements. No technical/administrative aspects (e.g. responsibilities for use of tools for different level of evaluation of the consequences of selected choices) are given. It is suggested to improve the section, including more technical and/or administrative details.</p>	<p>It has to be recalled that all the Italian NPPs (Latina, Garigliano, Trino and Caorso) are in the decommissioning stage since many years and the related operation are regulated by a Decommissioning licence granted to the implementer SO.G.I.N. according to the national legislation. The decommissioning licence has been granted on the basis of a decommissioning plan and associated safety assessment. The last granted decommissioning license is that related to the Latina NPP in 2020. Spent fuel has been removed from all the sites many years ago.</p> <p>Since 2020 Italian NPPs are therefore ceased to be “nuclear installations” under the scope of the Nuclear Safety Convention and the safety of decommissioning operations is covered under the Joint Convention on the safety of spent fuel management and on the safety of radioactive waste management. It is therefore in the Italian JC National Report that more technical details are provided.</p> <p>Having in mind the above clarifications, in relation to the topic of Assessment and verification of safety, the following additional information can be however provided:</p> <p>1) All applications for decommissioning licence have to be supported by a general safety assessment of the planned decommissioning operations, considering different types of events, accompanied by the associated demonstration of compliance with established safety objectives; in addition, a demonstration that all plant SSC still relevant for nuclear safety and radiation protection are maintained into operation and properly refurbished or updated, when needed, is also to</p>
Austria	16	Article 17	general		<p>The section is not reporting any indication connected with the site evaluation for other nuclear facilities different from nuclear power reactors (e.g., radwaste and spent fuel final repository). Information could be provided on voluntary basis.</p>	<p>It is not reported because it's out from the scope of the Convention: it is reported in the JCSFRWM National Report.</p>
Cyprus	17	Article 7	7.4 Regulatory Inspection and Assessment, p. 40	<p>Italy reports that "According to Art. 9 of the Legislative Decree No. 101/2020, inspections are performed by ISIN inspectors having the authority to enter any area of the installation, as well as to have access to any relevant documentation". Does ISIN apply an agreed inspection programme based on the risk associated with the facility or the activity?</p>		<p>At the beginning of each year, ISIN establish the program for the ordinary inspections. Priorities for the ordinary inspections at nuclear installations are assigned on the basis of an "algorithm" that identifies the magnitude of the potential risk of an installation, by considering general “criteria” (e.g type of installation, presence of contaminated/activated material, presence of waste, time since last inspection,...) and related “indicators”(e.g. waste conditioned or not, contaminated parts of the palnt are underground, etc..) both with defined associated weight (taking into account a graded approach).</p> <p>Moreover, specific topics can be identified in the program to be verified during the year.</p>

Cyprus	18	Article 7	7.4 Regulatory Inspection and Assessment, p. 40	<p>Could Italy provide some more information on how the results of an inspection are documented and how feedback from the findings of inspections and regulatory inspection experience is fed back to the regulatory process for improvement?</p>	<p>ISN inspection process is regulated by law and by an internal procedure that foreseen:</p> <p>a) development at the beginning of each year of the ordinary inspection program,</p> <p>b) identify the inspectors will perform the inspections,</p> <p>c) announce the inspection previously to the operator,</p> <p>d) prepare and perform the inspection with the editing of the report at the end of the inspection,</p> <p>e1) send a letter to the operator to declare if the inspection is concluded or not and to notify possible improvements (in case non compliances with regulatory framework have not been found during the inspection),</p> <p>e2) send a report to the Attorney of the Republic in case of non compliances with regulatory framework identified during inspection.</p> <p>Results of inspections are shared trough periodic meeting with the aim also to assess the regulatory and inspection process.</p>
Cyprus	19	Article 16	p. 71-74	<p>Thank you for the detailed description of on-site and off-site emergency plans. Could Italy provide some more details on the coordination mechanism between on-site and off-site EPR arrangements?</p>	<p>The licensee is part of the planning committee which supports the prefect in drafting the off-site emergency plan. On this regard the off-site emergency plans contains the response activities of the operators as well as the coordination between operator with off-site responders.</p>
Cyprus	20	Article 16	p. 71-76	<p>Some contracting parties report that they perform self-assessments of their emergency preparedness and response arrangements, for instance through the EPRIMS IAEA tool. Has Italy performed any kind of self-assessment of its existing emergency preparedness and response arrangements and what have been the most important findings?</p>	<p>Italy self-assessment on EPRIMS is ongoing.</p> <p>ISIN carried out self-assessment during the IRRS mission in 2016.</p> <p>The most important finding regarded the Italian emergency classification that at that time wasn't compliant with international emergency classification (GSR part 7). With the approval of the new version of the National emergency plan this observation has been solved.</p> <p>Another finding regarded the need of definition of operational criteria in order to effectively take early protective actions and other response actions in case of a nuclear or radiological emergency.</p>
Slovenia	21	Article 16.2	page 73	<p>The Plan includes 3 accidents scenarios in foreign NPPs. – new plan was approved in March 2022</p> <p>Q: What about the scenario of the radiological accident and accident of a nuclear-powered vessel? Does any other plan i.e., regional include these scenarios?</p>	<p>Accident on a nuclear-powered vessel are managed at local level by the Prefect of the province where the port is located which should draft an off-site emergency plan for port areas where nuclear powered ships are allowed to dock (article 185 of Legislative Decree 101/2020).</p> <p>Radiological accidents are also managed at local level by the Prefect which should prepare an emergency plan for accident during transport of radioactive material (article 186 of Legislative Decree 101/2020), for recovery of orphan sources or contaminated scrap metals (article 187 of Legislative Decree 101/2020), for activities and facilities making use of dangerous radiation sources (articles 174-176 of Legislative Decree 101/2020).</p>

Slovenia	22	Article 16.2	page 73	<p>Other issues considered in the new Plan are the protection of national citizens in the accident country, the returning of people from areas affected by the consequences of the emergency, the monitoring of the imported goods, the better definition of KI distribution mechanism as well as a better definition of the areas where these countermeasures should be prepared.</p>	<p>Appendix 13 of the plan reports the procedure for activating and implementing the ITB protective measure. The procedure defines the Administrations involved and the distribution plan. The Ministry of health manages the KI stock pills in national and local storage.</p> <p>KI distribution to the population from local storages should be defined by Regions, prefectures and municipalities by the local plans.</p>
Slovenia	23	Article 16.2	page 74	<p>Q: What does it mean better definition of KI distribution mechanism? Could you please provide more details?</p> <p>Within the framework of bilateral agreements, the participation is extended to the national exercises organized by neighboring countries (participation to Swiss national exercise of nuclear emergency in 2013, 2015 and 2017, and to Slovenian national exercise in 2014).</p> <p>Q: What were the key lessons learned within the participation on national / international exercises?</p>	<p>The most important finding regarded the Italian emergency classification that was not in line with international emergency classification (GSR part 7). Other findings regarded the need to have access to more technical information from accident country (i.e. national emergency platforms), the need of management of citizens within the territories abroad affected by the emergency, the harmonization of the emergency response, the need to improve the operational organization and procedures ISIN emergency center.</p>
France	24	Article 7	P 40	<p>Could you explain the goal of the separate Environmental Impact Assessment evaluation performed under the coordination of the Ministry of Ecological Transition?</p>	<p>An environmental impact assessment (EIA) is request to be conducted by NPPs licensees who apply for a decommissioning licence according to the Legislative Decree n. 152/2006 and subsequent amendments which, among others, has transposed into the national legislation the EU Council Directive 85/337/EEC on the assessment of the effects of certain public and private projects on the environment, as subsequently amended by the Directives 97/11/CE and 2003/35/CE.</p> <p>In particular, annex III to the above mentioned decree includes NPPs, also in the decommissioning phase, among the industrial installations for which an environmental impact assessment is requested.</p> <p>The key goals of the EIA is to ensure that in the exploitation of the proposed project the general objectives of the health protection of human beings and of protection of environment as well as conservation of different species for a better quality of life and promotion of sustainable development.</p> <p>These objectives are intended to be pursued by an assessment of the direct and indirect effects of the implementation of the concerned project on different components of the environment (human beings, flora, fauna, soil, surface and underground waters, atmosphere etc). In the case of the decommissioning of a NPP chemical contaminants may assume a particular relevance in addition to the</p>

France	25	Article 7	Section 7.4	When there is a new SSC, the change compare to the DP/PO can be accepted or refused by ISIN, how is this approval or refusal implemented in the legal framework?	<p>In the case of new systems that are realized to support the implementation of decommissioning operations, if relevant for nuclear safety and radiation protection, a Detailed Project has to be submitted and approved by ISIN. In the case during the construction the licensee realizes the need to introduce one or more relevant changes ISIN has to be notified and the approval conditions modified if needed. Once the construction is terminated the compliance of the as built configuration with the approved design has to be demonstrated before starting the commissioning tests. To this purpose a specific report has to be submitted to ISIN. As result of its review and assessment of this report, the test programme and subsequent reports on their results ISIN formally communicate to the licensee that the concerned system can stat to be operated in the respect of specific conditions, if any. These conditions or technical specifications will be integrated in the existing once already attached to the licence.</p> <p>If a substantial deviation from the approved design is identified during the construction in the context of a regulatory inspection a specific sanction is envisaged by the law.</p>
France	26	Article 8	Section 8.2	The authority mentioned that the fees introduced by legislation are under implementation. Could you precise what remains to be done ?	<p>The draft Regulation for the establishment of the fees foreseen by legislation has been developed by ISIN. Due to the lack in the staff, that has been recently solved with the recruitment of 23 new technicians, the plan for the issue of the Regulation is on delay. The actual plan foresees the publication by end 2023.</p>
France	27	Article 8	P 121	What are the articulation between the different inspectors, (ISIN, regional, and labor inspectors)?	<p>Duties of the different inspectors are described in the National Report:</p> <ul style="list-style-type: none"> - ISIN inspectors are vested with authority over the whole domain of radiation protection requirements as both workers and public are concerned; - Labour inspectorates are concerned with requirements pertaining to workers’ protection; - Regional Bodies Inspectors are mainly concerned with radiation protection requirements for the public. <p>Usually Labour and Regional inspectors do not performs inspections at nuclear installations.</p> <p>ISIN inspectors perform inspections on nuclear installations but also on hospitals, research centers, factories and industries were radioactive sources are stored/used/produced/shipped.</p>

France	28	Article 9	P 47	The report mentioned the possibility to audit maufacturers and suppliers. How are these audits organized? Does ISIN have access to the results?	ISIN performs in-factory audits to verify that the realization of Systems, Structures and Components (SSC) relevant for nuclear safety is in compliance with the design criteria and requirements. Audits are organized so that ISIN and the operator are at the same time present at the manufacturer/supplier factory for ISIN inspection. ISIN have access to the results because ISIN itself performs the audits.
France	29	Article 11	P 53	How many people are formed by the RMS program each year? Is it sufficient for the needs of SO.G.IN, taking into account new people and maintenance of skills?	The number of single participants to RaMS training courses has been of around 750 workers in 2022. RaMS has provided a total of around 11.400 hours of training in 2022. This training offering includes both the maintenance of skills for expert workers and training for junior resources
France	30	Article 16	P 74	For the off-site emergency preparedness, are exercises carried out regularly at the national and local level, besides the international ones?	At local level prefectures tests once a year during on-site exercise the notification process. At national level the only occasion to test the plan is during international exercises, even if a national exercise to test the new plan should be conducted soon.
France	31	Article 14	P 67	Could you precise if there is a periodic revision of the safety of the installation, in order to ensure that they meet the conditions of their license, and if there is a need for improvement ?	For the NPPs under decommissioning a specific condition attached to the licence request that every year the licensee has to transmit to ISIN and to other administrations a report on the progress of the decommissioning operations according to the decommissioning plan and the established assumptions and conditions. ISIN Technical Guide n. 31details the content of this report. In particular, it is specified that an assessment of SSC still relevant to safety has to be provided. As far as waste storage facilities on the site, where waste has to remain in storage until its transfer to the national repository to be constructed, ISIN Technical Guide n.30 request a periodic safety review to be conducted at least every 10 years. It is also the case to highlight that if the need of introducing significant changes in the decommissioning strategy should arise, the licensee has to apply for a new authorization.

Sweden	32	Article 11.1	p 51	<p>A (small) fee on electricity is charged to finance decommissioning and waste management. Is the decommissioning and waste management conducted by state-owned companies or private ones, and in the latter case, how is it ensured that the collected funds are sufficient?</p>	<p>SO.G.I.N. S.p.A. is the State-owned company responsible for the decommissioning of Italian nuclear plants and for the management of radioactive waste, including those produced by industrial, research and nuclear medicine activities.</p> <p>Entirely owned by the Italian Ministry of Economy and Finance, SO.G.I.N. S.p.A. operates according to the strategic guidelines of the Italian Government.</p> <p>Since the beginning of 2023, the financing system based on the A2rim tariff component of the electricity bill has been modified, replacing it with funding coming from state taxation. This funding will be defined each year by indications from ARERA on the basis of the needs envisaged by Sogin's plans (both for the decommissioning and for the safety maintenance of nuclear plants).</p> <p>This means that the costs relating to decommissioning and radioactive waste management of the Italian nuclear plants are covered by specific resources allocated to the state budget in a structural way.</p>
Sweden	33	General	A3.1	<p>Considering that Italy is in a phase of decommissioning of four NPPs, what is the situation regarding recruiting and maintaining competent personell at the sites and at the regulator, respectively?</p>	<p>The selection procedure for the recruitment of new ISIN staff graduated in technical disciplines was concluded in November 2022 and in the period December 2022-January 2023 the new staff entered into force doubling the number of technical staff.</p> <p>Training of new staff is performed by training on the job and in house and university learning programs. It has to be mentioned that most of the new staff has knowledge of at least three years in nuclear safety and radiation protection fields due to the requirements to access the selection procedure.</p> <p>Regarding the operator, Sogin established the RaMS to train the personnel: the number of single participants to RaMS training courses has been of around 750 workers in 2022. RaMS has provided a total of around 11.400 hours of training in 2022. This training offering includes both the maintenance of skills for expert workers and training for junior resources.</p>