

Joint Convention  
 Questions Posted To Argentina in 2015

1	Country UAE	Article 28	Ref. in National Report J-5
Question/ Comment	Are imported sealed sources retained in Argentina? Is there a return-to-manufacturer policy or requirement?		
Answer	There is not a return-to-manufacturer policy or requirement due to the possibility of total or partial reuse of source components or long term storage for disused sources.		
2	Country UAE	14	Ref. in National Report H-15
Question/ Comment	Will the PTARR, the LabCar and the R&D Lab at CAC be operated by CNEA as the responsible organisation?		
Answer	Yes, once the construction of the PTARR is finished, the LABCAR and the R&D Lab at CAC these facilities will be operated by CNEA.		
3	Country UAE	Article 11.6	Ref. in National Report H-4 and K-17
Question/ Comment	Can you expand on the funding of spent fuel and radioactive waste disposal? For example, as it appears that the funding is the responsibility of the State, how is this funding obligation treated within the Argentine state budget?		
Answer	CNEA is the responsible organization for the spent fuel and radioactive waste disposal. The funding requirements to carry on these activities are included in its annual budget. As it is stated, all nuclear reactors and other nuclear fuel cycle facilities are operated by Argentine government agencies, being the Argentine State responsible for their funding. Also, the funds collected from private owner RW generators appear in the budget. This funding requirement to the State Budget is considered as a priority cost for the operation of the Government owned facilities.		
4	Country UAE	Article 10	Ref. in National Report G-10
Question/ Comment	Has there been any regulatory action or preparation for the deep geological repository?		
Answer	To date, prospective studies have been conducted concerning the purpose of determining appropriate sites from a geological point of view.		

In order to select the site for the repository, public acceptance is also very important. The task of communicating and providing public information on nuclear energy and the need for the repository are also underway as a previous stage of further studies.

5	Country UAE	Article General	Ref. in National Report B-9
Question/ Comment	Is there any recycling of metal from contaminated areas (recycling of sources are mentioned in section H.1.2)?		
Answer	No. Contaminated metal is managed as RW and stored later on.		
6	Country UAE	Article 4	Ref. in National Report B-4
Question/ Comment	With regard to the Standard AR 6.1.2, does the use of the term 'as low as possible' for releases of radioactive material preclude an optimised radioactive waste management plan for a facility with regard to the balance of discharges versus solid radioactive waste retained?		
Answer	<p>The Standard AR 6.1.2 establishes that the discharge limitation systems must be optimized, providing as minimum sufficient retention in order to fulfill the dose constraints.</p> <p>The Standard AR 10.1.1 establishes that all radiation protection systems must be optimized to obtain the approval of the Regulatory Body. That means that the optimization applies to the discharge systems as well as to the solid radioactive waste management.</p>		
7	Country UAE	Article 3	Ref. in National Report B-2
Question/ Comment	How will/has CNEA implement "having the generator the obligation of providing the necessary resources for such management." (i.e. forthedevelopmentradioactivewastemanagement)		
Answer	<p>When the generator is the State, resources to implement the RW management are supplied by the State according to the requirements established by CNEA in the annual budget approved by the Government.</p> <p>In the case of private owner generators, CNEA has a range of rates and fees in relation to its RW management services.</p>		
8	Country UAE	Article General	Ref. in National Report A-3
Question/ Comment	It is a Good Practice that there is a National Radioactive Waste Management Program (PNGRR) approved by the National Congress to comply with the Radioactive Waste Management Strategic Plan (PEGRR) which not only contains mechanisms to manage the waste, but also propose research and development plans for the different stages		
Answer	The objective of this scheme is to have a comprehensive system to face the challenge in the matter; in this way, we find this comment quite rewarding.		
9	Country	Article	Ref. in National Report

	CANADA	16.5	K-13
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Question/ Comment Will the Waste Characterization program involve retrieving and sampling older stored waste?

Answer It is in study, a system of sampling and analysis of NPP's older stored waste will be included in order to obtain representative information on waste characterization with the minimum number of samples.

10	Country CANADA	Article 11.2	Ref. in National Report H-14
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Question/ Comment As noted in section H.4.2 , in relation to the steam generators and other metallic components from Embalse, is Argentina looking into alternative technologies rather than storage such as metal melting, segmentation, decontamination, etc.?

Answer There is a plan to store waste and/or components removed from the plan in facilities specially built for this purpose.

Following , the facilities built in Embalse NPP (CNE) appear in detail and show what will be stored in each of them:

- Silos to store high-level waste (CANISTER): Calandria tubes, pressure tubes, and annulus spacers. Calandria tube Inserts, end fittings/shield plug/ liner tube combination.
- Building to store intermediate-level wastes: Mainly feeders and thermal insulation of the feeder cabinet.
- Building to store low-level wastes (compactable): Compactable waste (low-level consumable, material, etc.).
- Steam generators building: GV's will be stored as long as they are delivered by the manufacturer and then GV's removed from the plan will be stored.

11	Country CANADA	Article GENERAL	Ref. in National Report G-4
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Question/ Comment Section G.2.3 mentions failed fuel elements. Does Argentina have plans and technology in place to deal with the failed fuel elements in the pool? Will that waste go to dry storage as well? Please clarify.

Answer The topic of failed fuel elements and of those elements with the possibility of failure in the pool and its possible transfer to dry silos is currently dealt with.

There are three stages for this purpose:

- 1.- Defining changes in the process of transfer from pools to silos taking into account that some of the FE (fuel elements) may have rods damaged.
- 2.- Undertaking tests of transfer to adjust the procedure.
- 3.- Besides, the discussion with the Regulatory Body will begin with the Regulatory Body to obtain the authorization of this

topic to transfer it. When the dry storage system began (1993), it was stated that the failed fuels were not included.

12	Country CANADA	Article GENERAL	Ref. in National Report E-17
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Question/ Comment Has the drinking water at Ezeiza been an ongoing public concern? What has been done to communicate the peer review report results to the public? Has the public been receptive to this?

Answer As described in previous National Reports, currently, the drinking water at Ezeiza is definitely not a public concern. Several national inspections as well as an international peer review made by the International Atomic Energy Agency underlined the safe conditions of the drinking water from that area.

With regard to how the peer review has been communicated, once the International Atomic Energy Agency peer review (which was sponsored by the WHO, FAO, PAHO, UNSCEAR, IRPA and ICRP) was concluded in 2005, the final report was sent officially by the Argentine Nuclear Regulatory Authority to the following institutions:

- Academia Nacional de Ciencias de Buenos Aires;
- Academia Nacional de Medicina;
- Academia Argentina de Ciencias del Ambiente;
- Instituto de Matemática Aplicada –CONICET-;
- Instituto de Geocronología y Geología Isotópica –CONICET-;
- Universidad Nacional de Córdoba;
- Universidad Nacional del Sur;
- Universidad Nacional de San Luis;
- Universidad Nacional de Cuyo;
- Universidad Nacional de Buenos Aires, Facultad de Ingeniería;
- Universidad Nacional de Buenos Aires, Facultad de Ciencias Exactas Físicas y Naturales;
- Universidad Nacional de Buenos Aires, Facultad de Farmacia y Bioquímica;
- Departamento Químico de la Dirección de Policía Científica de la Gendarmería Nacional;
- Ministerio de Salud Pública de la Nación;
- Instituto Nacional del Agua;
- Sociedad Argentina de Radioprotección;
- Organismo Internacional de Energía Atómica;
- Agencia Brasileño Argentina de Contabilidad y Control de Materiales Nucleares;
- Organización Panamericana de la Salud, y
- Organización Mundial de la Salud.

Furthermore, the final conclusion reached by the peer review was also communicated to the Ezeiza Municipality, residents, and other local institutions.

On the other hand, the final international report, as well as other related studies, has been published since 2005 at the

Nuclear Regulatory Authority's webpage (<http://www.arn.gob.ar>) at the following link [http://www.arn.gob.ar/index.php?option=com\\_content&view=article&id=81&Itemid=76&lang=es](http://www.arn.gob.ar/index.php?option=com_content&view=article&id=81&Itemid=76&lang=es). The final international report was translated into Spanish to make it available to as many people as possible. Additionally, all the information as well as the technical data as analyzed at the Seisbersdorf Laboratory, Austria, is provided to all the people interested in consulting it. The Argentine Nuclear Regulatory Authority offers an email address for questions about this topic as well as any other related topic.

Over the last couple of years, practically no questions about this issue have been received. Thus, it can be assumed that public concern about this case has faded away. Notwithstanding, the Argentina Nuclear Regulatory Authority inspects the area periodically, fulfilling the national law, and updates the public information with the aim of offering transparency.

13	Country CANADA	Article GENERAL	Ref. in National Report B-9
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Question/ Comment Please provide further information on how is public engagement being sought as part of the site selection process for repositories for VLLW and LLW in order to ensure a willing host community?

Answer Public engagement is a very important issue. So far a communication plan is under development in order to spread the benefits of nuclear energy and the need for solutions for disposal. This plan is developed by audiovisuals media, workshops, public hearings to discuss specific situations, lectures in schools and NGOs, etc.

14	Country CANADA	Article 16.4	Ref. in National Report B-9
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Question/ Comment With respect to the low level radioactive waste stored within transoceanic containers at AGE, please provide further information as to what aging management activities are planned to ensure container integrity since a date for a LLW repository is not planned for several decades?

Answer Waste is contained in a steel drum and sealed in a plastic overpack as necessary. Drums are located in the ocean containers. These ocean containers are located in the Long Term Storage Deposit which is a building that was specially designed for this purpose. It fulfills the safety analysis for scenarios of flooding, firing and intrusion. It was licensed by the regulatory authority in 2010. Periodic inspections are carried out in order to ensure the integrity of the system.

15	Country USA	Article 6	Ref. in National Report K-17
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Question/ Comment What technical/social issues are envisioned in siting a deep geologic repository by 2030 and it's start up in 2060? Please consider addressing this at your National Country Presentation at the Fifth Review Meeting.

Answer While there are several technical challenges for implementing geological repository, public acceptance aspects are currently the most difficult to overcome.

In recent decades, the public has developed concerns and an adverse opinion on nuclear energy, especially in relation to waste and its final destination. This is why we have designed a long term communication plan in order to keep the society

informed regarding the benefits and features of nuclear energy and, in particular, the safe management of spent fuels and waste.

16	Country USA	Article 5	Ref. in National Report B-2
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Question/Comment Please clarify whether the spent fuel is initially in wet storage, then moved to dry storage, and back to wet storage. Is the fuel dry stored in the temporary spent fuel storage facility (DCMFEI)? What measures are taken to minimize risks during fuel movement?

Answer DCMFEI was conceived as a wet storage facility. Spent fuels were located in underground tubes connected to a water recirculation system.

Since new wet storage facility (FACIRI) has started up in September 2014, SFs are transferred from a reactor pool directly to FACIRI. Anyway, both DCMFEI as FACIRI facilities are located in the CAE, so there will be few internal transport of SF for which there are already designed, tested and licensed means.

17	Country USA	Article 32	Ref. in National Report K-3.1, pg. K-1
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Question/Comment What Fukushima Daiichi lessons learned have been implemented for waste and spent fuel storage facilities away from power plants?

Answer FACIRI is the new facility for storage of SF. The safety assessment of this facility included the definition of design bases on seismic events and flooding, as well as redundant measures to maintain the existence of water.

Like other RW management facilities, they are located in the CAE, where support for emergency cases is provided, which have been properly reassessed.

The reactor safety is reassessed periodically, including storage pools for SF. These assessments take into account the operational experience, including those occurred in Fukushima.

Taking into account the characteristics of the area and the buildings where waste and spent fuel are stored, the regulatory body has not required any additional measurements. Electricity is guaranteed by the atomic centers where the facilities are emplaced, using their own generators in case of failure of public network.

18	Country USA	Article 28	Ref. in National Report J-8, pg. J-5
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Question/Comment Is Argentina able to take back legacy, exported sources even if the source cannot be recycled? If so, please elaborate.

Answer Yes, indeed. Argentina can take back disused sources built in Argentina. The facility that manufactures industrial sources has a number of lots to store sources that were taken back and a term of 5 years to find alternative options to recycling or reuse (including training or education activities). In case of not having possibilities for recycling or reusing a source, this will lower the available number until it is finally disposed of.

19	Country USA	Article 28	Ref. in National Report E.3.3.5 AND J.3, pg. E-21, J-2
Question/ Comment	At present, who pays for disused sources to be relocated to ARN safe storage – the licensee or the ARN? Are most licensees, with imported sources requiring Type B transport, able to afford sending them back to the manufacturer or secure national storage? Is Argentina considering requiring licensees who import sources to set aside funding for return to manufacturer, recycling or transport to secure national storage?		
Answer	<p>ARN does not own a safe storage for disused sealed sources. The mentioned facility is owned and operated by the Radioactive Waste Management National Program. The cost for storage of disused sealed sources is in charge of the licensee. In case of insolvency, neglect or severe radiological hazard, the ARN is authorized to cover the costs of management to prioritize radiological safety and subsequently initiates legal action on licensee who had responsibility for the source.</p> <p>The importers do not have any restrictions to return empty reusable containers (for example, import and export of radiopharmaceuticals). Notwithstanding, if the source has to be kept in a safe temporary decay storage (for example, industrial gammagraphy projectors) before its final disposal (the process of cementing waste), the source has to remain in its safe package during the temporary storage before its final disposal.</p> <p>There is no obligation for importers to contribute to a fund to pay the return of imported sources to its manufacturers or for the return of its package. In the case of sources delivered to the Radioactive Waste Management National Program for its safe recycling or storage, the licensee shall pay the fees required for these cases. It is worth mentioning that in Argentina there is not a significant number of imported radioactive sources.</p>		
20	Country USA	Article 26	Ref. in National Report G-7 to G-10, H-13 to H-19 pg. G.4, H.4
Question/ Comment	Please elaborate on how Argentina considers decommissioning plans during the design and construction of spent fuel and radioactive waste treatment and storage facilities.		
Answer	It is envisaged that for every new facility, in order to obtain the license of construction, a decommissioning plan must be included as a section of the application presented to the regulatory body. It is the same in the reassessment process of the existing facilities.		
21	Country FINLAND	Article Planned Activities	Ref. in National Report K-5, pg. 14
Question/ Comment	Text explains different IAEA review missions conducted in the country. Is there a plan to conduct an IRRS mission in Argentina and when could it take place?		
Answer	As it was announced during the Meeting of the IAEA Board of Governors in March 2015, Argentina decided to begin with the process by which its Nuclear Regulatory Authority will receive an Integrated Regulatory Review Service (IRRS)		

mission.

The date of the IRRS Mission will be set jointly with the IAEA Secretariat.

22	Country FINLAND	Article 22	Ref. in National Report F.6.5, pg. 21-22
Question/ Comment	Based on the text is understood that the National Government is responsible for funding the decommissioning of nuclear facilities. It is not clear if the decommissioning fund already exists or not. If not, is there a plan to start collecting the fund before the time of decommissioning? In addition are the cost estimates available on the decommissioning of nuclear facilities in Argentina?		
Answer	As the NPP's operation was not privatized, funding for their decommissioning was never integrated. The responsibility for financing the decommissioning of NPP's and other nuclear facilities will be provided by the National Government in due time.		
23	Country FINLAND	Article 25	Ref. in National Report F.5, pg. 18-20
Question/ Comment	Text does not address emergency exercises on the state level where all involved organizations would participate in the exercises. Are such type of emergency exercises conducted periodically?		
Answer	In Argentina, emergency drills are performed periodically in facilities working with radioactive material or ionizing radiations. The characteristics of those drills are directly related to the associated risk to workers, the public and environment. The most important drills are performed at nuclear reactors operating in Argentina. In particular, Embalse NPP and Atucha (Units I and II ) NPP conduct annual emergency drills. Every two years, this is undertaken with the participation of various agencies (at municipal, provincial and national levels) and local public participation. The Municipal, Provincial and National Civil Defense carry out the external emergency plan led by the ARN. Along with these organizations, the following are involved: in terms of law enforcement (Police, National Gendarmerie and Coast Guard) and the armed forces (the Army and the Navy). There are regular exercises to test the effectiveness of emergency plans at municipal, provincial and national levels.		
24	Country FINLAND	Article 23	Ref. in National Report F.3.1, pg. 7
Question/ Comment	In the report it is written "The Regulatory Body controls the implementation of quality programs through the Responsible Institution". What does this mean in practice?		
Answer	The Regulatory Body controls the implementation programs through the Responsible Institution by regulatory assessments and regulatory audits: 1) Through regulatory assessments, the regulatory body assesses if the program and quality manuals sent by the Responsible Entity meet the requirements of AR Regulatory Standards, mainly Regulatory Standard AR 3.6.1 (Quality System in Nuclear Power Reactors).		



These assessments are performed under the regulatory procedure for licensing assessments / authorization for construction / commissioning / use of the site of nuclear plants. The most important actions in this procedure are: the production of reports and evaluations (with and without external support), approval of the technical report, and monitoring and closure of the relevant findings produced by the evaluations.

2) With periodic regulatory audits to the Responsible Entity, the regulatory body verifies the degree of compliance with quality systems regarding the requirements of AR Regulatory Standards, mainly the Regulatory Standard AR 3.6.1. These audits are conducted under the Regulatory Quality Audits to Nuclear Reactors Procedure. The most important actions in this procedure are: the adoption of an annual program of regulatory quality audits, performance audits, sending Responsible Entities approved audit reports, and monitoring and closure of corrective actions generated after regulatory audits.

25	Country FINLAND	Article 22	Ref. in National Report E.3.3.5, pg. 21-23
Question/ Comment	Text and figures explain the use of resources with financial terms. However, it is not visible what has been the budget allocation to the regulatory control of nuclear and radioactive waste. Could the budget distribution of regulatory tasks to nuclear and radioactive waste be explained either in terms of money or working hours per year?		
Answer	For regulatory control of nuclear and radioactive waste, considering only inspection and assessments tasks, at least 15,520 hours are worked per year.		
26	Country FINLAND	Article 19	Ref. in National Report E.3.2, pg. 13 - 16
Question/ Comment	Could it be elaborated how many experts and inspectors ARN has in the area of the safety of nuclear and radioactive waste		
Answer	In Control of RWM and SFM Sector nowadays 6 professionals work full time and a 7th professional is in the hiring process. Moreover, other ARN sectors perform tasks to support the regulation of radioactive waste management (radiochemical laboratory measurements, control of transport of radioactive materials, safeguards and physical protection sector). There are also groups for Inspectorate of installations that within their functions is the control of the RW management in collaboration with the sector mentioned above. There are 2 inspectors responsible for the Ezeiza Management Area; there are inspectors who perform the verification of radiological safety of nuclear power plants in addition to the resident inspectors.		
27	Country FINLAND	Article 19	Ref. in National Report E.2.2.7, pg. 9-10
Question/ Comment	It is said that ARN reports to the Argentine Presidency. Could it be explained to whom CNEA reports to just to explain possible conflicting interests?		
Answer	CNEA reports to the Argentine Secretary of Energy (which is part of the Ministry of Federal Planning, Public Investment and Services)		
28	Country	Article	Ref. in National Report

Question/ Comment Text lists documentation for the operating license. Could it be explained if there is a similar or different list of documents to be submitted to ARN for the construction license phase?

Answer Documentation to be submitted during licensing process of nuclear power reactors is established in the ARN Standard AR 3.7.1.

**For construction license, it is required to submit:**

- Preliminary Safety Report (PSR): Nine (9) months before submitting the request of construction license
- Systematic reporting of possible changes in design and any other aspects, resulting from interaction between Licensee and Regulators: Begins Two (2) months after presentation of Preliminary Safety Report and continuous until one (1) month before introduction of fuel elements and Moderator into the reactor
- Submission of Quality System including quality program and all the related documentation: Begins One (1) months after the presentation of Preliminary Safety Report and progressive continuity.

**During construction (for commissioning license):**

- Systematic sending of “progress reports” on reactor construction excluding preliminary tests: Monthly, after receiving construction license.
- Presentation of an operating organization draft and personnel training program: On the date of the beginning of construction. Must be an update every time changes are made.
- Presentation of preliminary tests program: Six (6) months before the beginning of preliminary tests.
- Systematic presentation of progress reports on the development of preliminary test program: From the start of preliminary test program and continuously during the execution of the program.
- Presentation of Safety Report (SR): Twelve (12) months before requesting the commissioning license.
- Submit any additional reports related to modifications of SR resulting from the interaction between the Responsible Organization and Regulators: From the presentation of IS and continuously until one (1) month before requesting of operating license.
- Presentation of the ongoing commissioning program, including reactor criticality, testing and power increase: Twelve (12) months before requesting of commissioning license.
- Systematic Reporting Progress on the development of program implementation: From the start of commissioning and continuously during the program execution.
- Submission of the code of practice and
- the preliminary version of the operating manual: Four (4) months prior to reactor criticality.

- Submission of a report containing the results of the implementation of the quality program: Four (4) months before reactor criticality.
- Presentation of staff licenses together with the results psychophysical and theoretical-practical examinations: Four (4) months before reactor criticality.
- Submission of documentation: Three (3) months before reactor criticality
- Presentation of the emergency plan: Three (3) months before reactor criticality

29	Country FINLAND	Article 32	Ref. in National Report E.2.2.1, pg. 4
Question/ Comment	In the report it is written "Besides Law No. 24804, Art. 16 grants the ARN the following powers, among others: the power to issue regulatory standards in matters of its competence, to grant licenses, permits or authorizations to facilities and persons, to conduct regulatory inspections and assessments, and to impose sanctions in the corresponding cases" Does power to issue regulatory standards mean authority to issue legally binding regulations, or only guidelines?		
Answer	The regulatory standards issued by ARN (AR Standards) are mandatory in Argentina. Regulatory guidance (GR Guidelines) establishes recommendations for interpretation and compliance with AR Standards requirements.		
30	Country FINLAND	Article 32	Ref. in National Report B.3, pg. 3
Question/ Comment	In the report it is written "The establishment of the PEGRR implies the definition of the treatment methodology and the final disposal technological systems for the different types of waste. The review every three years of the Strategic Plan is conducted as set forth in the provisions of the Law and provides the opportunity to introduce the modifications originated by management optimisation in its technological aspects derived from scientific breakthroughs, or from the development of innovative technologies and eventual changes in the strategic definitions relative to spent fuel treatment." Could it be explained when was the latest review and if it resulted in modifications in the Strategic plan?		
Answer	The strategic plan is reviewed and updated every three years. The last version was released in 2012. This version includes the corresponding projections for the fourth NPP and CNE NPP Life Extension, among other relevant related topics.		
31	Country CHINA	Article 10	Ref. in National Report G-7, p92
Question/ Comment	It is mentioned in G.7 that the last version of the PEGRR foresees a deep geological repository in Argentina by 2060, then (1) Has Argentina carried out any R&D for deep geological repository? (2) What are the lifetimes of SF storage facilities that existing, under construction and planned? Could these facilities meet SF storage demands before SF reprocessing facility is built up or deep geological repository is put into operation?		
Answer	There have been R & D activities in relation to the geology of candidates' sites for the location of the repository. The current storage facilities covering different periods to ensure the operation of power plants. Moreover there are several expansion projects to increase the capacity of existing storage and thereby covers the life of plants and provide a period of several decades to transfer to a reprocessing plant or a repository.		

32	Country CHINA	Article 32	Ref. in National Report B-4.3, p29
Question/ Comment	It is mentioned in the report that duly treated and conditioned Intermediate Level Radioactive Waste shall also be disposed of in the geological repository. How to treat and condition Intermediate Level Radioactive Waste before ILW is disposed of in the geological repository? What is the acceptance criteria of ILW disposed of in the geological repository? How to ensure the performance of the conditioned ILW meet the disposal acceptance criteria?		
Answer	The processes for treatment and conditioning of ILW are under research & development. The acceptance criteria for ILW will depend on the design of the deep geological repository.		
33	Country GERMANY	Article 7	Ref. in National Report K-14 (SECTION K.5)
Question/ Comment	Irradiated Fuel Management Advisory Programme The IAEA has implemented an advisory programme covering all aspects of spent fuel management called IFMAP (Irradiated Fuel Management Advisory Programme). In March 2012, the first IFMAP peer review mission was conducted for the Spent Fuel Dry Storage Project of CNA I. Could Argentina please share information on the recommendations and suggestions for technical and organisational improvements of the project made by the mission? Did the mission also discuss backup options in case of any delays of the dry storage project?		
Answer	The first peer review related to the IFMAP was undertaken in March 2012. To date, as Nucleoeléctrica Argentina S.A. has not received the IAEA official report, it is not possible to provide information on recommendations and suggestions of said misión related to this project.		
34	Country GERMANY	Article 20.1	Ref. in National Report F-6, (SECTION F.2)
Question/ Comment	Human and financial resources Did the Argentine Atomic Energy Commission (CNEA) and the Nuclear Regulatory Authority (ARN) suffer any shortenings/drawbacks of human and/or financial resources due to the recent debt crisis in Argentina? Are such shortenings/drawbacks to be expected for the near future? If so, how does Argentina face this challenge?		
Answer	Neither CNEA nor ARN suffered personnel shortage of human resources problems in recent years. Generally in all entities related to nuclear energy, there was a significant growth with the addition of junior staff and recruitment retired individuals with great experience in order to ensure the transfer of knowledge and to meet the demands of the new nuclear projects.		
35	Country GERMANY	Article 32.1.4	Ref. in National Report B-9, (SECTION B.4.3)
Question/ Comment	Waste management. According to the report, conditioned LLW packages in the Ezeiza Radioactive Waste Management Area (EGA) have been recovered from the solid waste semi-containment system, re-encapsulated and placed in transoceanic containers stored within the Long-Term Storage Deposit, awaiting their disposal. Could you please describe in more detail what the "transoceanic container" is? How is the long-term safety of the stored waste ensured? What is the expected time frame for the interim storage?		

Answer A transoceanic container is a metallic container used for shipping. They are located at the Long Term Storage Building. The Long Term Storage Building has a special design, fulfilling the safety analysis for scenarios of flooding, firing and intrusion. It was licensed by the regulatory authority in 2010. Periodic inspections are carried out in order to ensure the integrity of the system.

36	Country GERMANY	Article 32.1.2	Ref. in National Report B-1, (SECTION B.2)
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Question/ Comment Storage capacities Spent fuel arising from the Atucha NPP Unit I (CNA I) is subject to wet storage at the power plant itself. The report says that, from today's perspective, the capacity for wet storage is sufficient until 2015 at least. Which measures are foreseen if the storage capacity at CNA I has been reached?

Answer The foreseen measures are the following:  
 1) Construction of a facility to enable dry storage of 2754 SFE. It is expected to conclude in March 2018.  
 2) Project to Transfer the SFE from CNA Unit I to Unit II. This Project is expected to be executed from May to December 2015. This Project will enable the transfer of 620 SFE that are currently in the Building of Pools I to Pool (UFA) of the Unit II.

37	Country DENMARK	Article 32.1.1	Ref. in National Report B-1
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Question/ Comment Section B.1 Spent Fuel Management Policy. It is stated that a deep geological repository must be completed by 2060. In section B.2 "Spent Fuel Management Practice", it is stated that: "At CNA I, spent fuel is subject to wet storage at the power plant itself. Nowadays, its capacity is enough to store spent fuel in CNA I until 2015 at least." In section G.4 "Design and Construction of New Facilities", plans for eliminating the imminent shortage of storage capacity are outlined. What plans are in place to cope with spent fuel storage requirements in Argentina in the time until a deep geological repository can be completed, latest by 2060?

Answer Until a deep geological repository can be completed, at the latest by 2060, spent fuel will be stored in dry silos at NPP's or will be reprocessed if it were decided.

38	Country KOREA	Article GENERAL	Ref. in National Report A-3, 5
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Question/ Comment It is stated that although spent fuel is considered a potential energetic resource due to its fissile material content, the decision about including spent fuel management reprocessing has been postponed until 2030.  
 - What made Argentina Government postpone the decision on spent fuel reprocessing until 2030?

Answer The decision on the possible reprocessing or final disposal of the SF would be made according to the evolution of the national nuclear plan and subject to the completion of the studies for the siting of the Deep Geological Repository. These studies have to conclude at the latest by 2030. At least thirty years in advance to 2060, is a period considered necessary to develop the repository for HLW from reprocessing or direct SF disposal.