BRAZIL NATIONAL REPORT

FOR THE 8th REVIEW MEETING OF THE JOINT CONVENTION ON THE SAFETY OF SPENT FUEL MANAGEMENT AND ON THE SAFETY OF RADIOACTIVE WASTE MANAGEMENT



AUGUST 2024

JOINT CONVENTION ON THE SAFETY OF SPENT FUEL MANAGEMENT AND ON THE SAFETY OF RADIOACTIVE WASTE MANAGEMENT

NATIONAL REPORT OF BRAZIL FOR THE 8th REVIEW MEETING

August 2024



FOREWORD

On 29th September 1997, the Joint Convention on the Safety of Spent Fuel Management and on the Safety of Radioactive Waste Management was opened for signature at the headquarters of the International Atomic Energy Agency in Vienna. Brazil signed the Convention on 11th October 1997 and ratified it by the Legislative Decree 1019 of November 14th, 2005. Brazil deposited its instrument of ratification on 17th February 2006.

Brazil has not participated in the First Review Meeting and presented its National Report for the Second Review Meeting under the condition of "late ratifier". Since then, Brazil has presented its National Report to the Parties on schedule for all subsequent Review Meetings of the Joint Convention, in Vienna, Austria.

The National Report of Brazil 2024 was prepared by a group of experts of various Brazilian organizations with responsibilities related to safety of spent fuel and radioactive waste and presents an update of the Brazilian National Report presented to the Joint Convention in June 2022.

Brazil considers that its nuclear programme has fulfilled and continues to comply with the objectives of the Join Convention on the Safety of Spent Fuel Management and on the Safety of Radioactive Waste Management, including a description of its policies and practices and an inventory of the related material and facilities. The Brazilian nuclear programme has established and maintained effective defences against potential radiological hazards in order to protect individuals, the society and the environment from harmful effects of ionizing radiation and has also ensured the adoption of good practices on radioactive waste and spent fuel management.

CONTENTS

SUMMARY	1
Section A - INTRODUCTION	9
A.1 - The Brazilian Nuclear Policy	9
A 2 - The Brazilian Nuclear Programme	11
A.2.1 - Nuclear Power Plants	11
A.2.2 - Research Reactors (RR)	12
A.2.3 – Nuclear Fuel Cycle Installations	17
A.2.4 - The Navy Programme	19
A.2.5 - Radioactive Installations	20
A.2.6 - Waste Repository at Abadia de Goiás	22
A 3 - Structure of the National Report	
Section B - POLICIES AND PRACTICES (Article 32 - Paragraph 1)	24
B.1 - Introduction	24
B.2 - Radioactive Waste	25
B.2.1 – Types and Classification	25
B.3 – Brazil Matrix	27
Section C - SCOPE OF APPLICATION (Article 3)	28
C.1 - Definition of Scope	
·	
Section D - INVENTORY AND LISTS (Article 32 - Paragraph 2)	29
D.1 - Nuclear Power Plants	29
D.1.1 - Angra-1	29
D.1.2 - Angra-2	31
D.1.3 - Angra-3	33
D.1.4 - On Site Initial Storage Facility	
D.1.5 - Old Steam Generators Storage Facility	
D.1.6 - Waste Repository for Low and Intermediate Level Waste	35
D.2 - Research Reactors	36
D.2.1 - Spent Fuel Management	36
D.2.2 - Radioactive Waste Management	38
D.3 - Other Nuclear Installations	
D.3.1 - Brazilian Nuclear Industries (INB)	
D.4 - Navy Installations at São Paulo (CTMSP) and Iperó (CEA)	
D.5 - CNEN Institutes	
D.5.1 - IPEN	
D.5.2 - CDTN	
D.5.3 - IEN	
D.5.4 - CRCN-CO	

D.5.5 - LAPOC	. 42
D.5.6 - CRCN-NE	. 42
D.6 - Waste Repository at Abadia de Goiás (Closed)	. 43
Section E - LEGISLATIVE AND REGULATORY SYSTEM	. 45
E.1 - Implementing Measures (Article 18)	. 45
E.2 - Legislative and Regulatory Framework (Article 19)	. 46
E.2.1 - New Procedures for the Development, Review and Revision of	
CNEN's Regulations	. 48
E.2.2 - Nuclear Licensing Process	. 49
E.2.3 - Environmental Licensing	. 52
E.2.4 - Emergency Preparedness Legislation	. 57
E.3 - Regulatory Bodies (Article 20).	. 58
E.3.1 - CNEN	. 58
E.3.2 - IBAMA	. 62
Section F - OTHER GENERAL SAFETY PROVISIONS	
F.1 - Responsibility of the Licence Holder (Article 21)	
F.1.1 - Nuclear Power Plants	
F.1.2 - INB Facilities	
F.2 - Human and Financial Resources (Article 22)	
F.2.1 - Human Resources	
F.2.2 - Financial Resources	
F.3 - Quality Assurance (<i>Article 23</i>)	
F.3.1 - Nuclear Power Plants	
F.3.2 - CNEN Installations	
F.3.3 - Quality Assurance at Navy Installations	
F.3.4 - Quality Assurance at INB facilities	
F.4 - Operational Radiation Protection (<i>Article 24</i>)	
F.4.1 - Nuclear Power Plants	
F.4.2 - INB Facilities	
F.5 - Emergency Preparedness (Article 25)	
F.5.1 - Nuclear Power Plants	
F.5.2 - Other Facilities (Research Reactors)	
F.5.3 - INB Facilities	
F.5.4 - Emergency Preparedness at Navy Installations	
F.6 - Decommissioning (Article 26)	
F.6.1 - Nuclear Power Plants	
F.6.2 - Research Reactors	
F.6.3 - INB Facilities	. 95
Section G - SAFETY OF SPENT FUEL MANAGEMENT	
G.1 - General Safety Requirements (Article 4)	. 97

G.2 - Existing Facilities (Article 5)	97
G.2.1 - Nuclear Power Plants	97
G.2.2 - Research reactors	99
G.3 - Siting of Proposed Facilities (Article 6)	100
G.4 - Design and Construction of Facilities (Article 7)	102
G.5 - Assessment of Safety of Facilities (Article 8)	103
G.5.1 - Nuclear Power Plants	103
G.5.2 - Research Reactors	103
G.6 - Operation of Facilities (Article 9)	104
G.7 - Disposal of Spent Fuel (Article 10)	104
G.7.1 - Fuel from Nuclear Power Plants	104
G.7.2 - Fuel from Nuclear Reactors	105
Section H - SAFETY OF RADIOACTIVE WASTE MANAGEMENT	106
H.1 - General Safety Requirements (Article 11)	106
H.2 - Existing Facilities and Past Practices (Article 12)	106
H.2.1 - Nuclear Power Plants	106
H.2.2 - INB Facilities	110
H.2.3 - Navy Facilities	115
H.2.4 - CNEN Institutes	115
H.2.5 - Waste Repository at Abadia de Goiás	120
H.3 - Siting of Proposed Facilities (Article 13)	120
H.3.1 - Nuclear Power Plants	120
H.3.2 - Low and Intermediate Level Waste Repository	121
H.4 - Design and Construction of Facilities (Article 14)	122
H.4.1 - Nuclear Power Plants	122
H.4.2 - INB Facilities	123
H.5 - Assessment of Safety of Facilities (Article 15)	124
H.5.1 - Nuclear Power Plants	124
H.5.2 – Radioactive Waste Repositories	125
H.5.3 - INB Facilities	125
H.6 - Operation of Facilities (Article 16)	126
H.7 - Institutional Control After Closure (Article 17)	126
H.7.1 - Abadia de Goiás Repository	126
Section I - TRANSBOUNDARY MOVEMENT	128
I.1 - Transboundary Movement (Article 27)	128
Section J - DISUSED SEALED SOURCES	129
J.1 - Disused Sealed Sources (Article 28)	129
J.1.1 - Disused Source Storage	129
J.1.2 - Program for Collecting of Disused Sources and Radio	pactive Waste, 130

Section K - PLANNED ACTIVITIES TO IMPROVE SAFETY	142
K.1 – The National Safety Authority (ANSN)	142
K.2 - The Brazilian National Repository (The CENTENA Project)	143
K.3 - Improvements in the Nuclear Power Plants	143
k.3.1 - Spent Fuel Complementary Dry Storage Unit (UAS)	143
K.3.2 - Angra-1 Long Term Operation Program (LTO)	144
k.3.3 - Isotopic Inventory	145
k.3.4 - The Brazilian multipurpose Research Reactor - The RMB Project	145
K.4 - Plans for Decommissioning UDSP	146
K.4 - Final Remarks	146
REFERENCES	147
Section L - ANNEXES	149
L.1 - Annex 1 – Inventory Table	149
L.2 - Annex 2 – List of Relevant Conventions, Laws and Regulations	158
L.3 - Annex 3 – List of Abbreviations	168

LIST OF FIGURES

Figure A.1	- Main Brazilian Nuclear Installations and Organizations	. 11
Figure A.2	- Pool type nuclear research reactor	. 14
Figure A.3	- RBM Project – Layout of the main buildings	. 16
Figure A.4	- Nuclear Power Generation Laboratory at the CEA	. 20
Figure E.1	- Brazilian Organizations Involved in Nuclear Safety	. 46
Figure E.2	- Simplified CNEN Organization Chart	. 59
Figure F.1	- Individual Dose in Angra-1	. 81
Figure F.2	- Individual Dose in Angra-2	. 81
Figure F.3	- Collective Dose in Angra-1	. 82
Figure F.4	- Collective Dose in Angra-2	. 82
Figure F.5	- Environmental Monitoring Program Results for 2003-2021	. 83
Figure F.6	- Mean Annual Effective Dose from Occupational Exposures – URA	. 85
Figure G.1	- Geographical Layout of Proposed CNAAA UAS Site	100
Figure G.2	- Total Area Occupied by the UAS	101
Figures G.3	3 - Warehouse - Schematic view of UAS — Security Cabin	101
Figure G.4	- Actual Photo of the UAS Facility – January 2024	102
Figures H.1	On site initial waste storage facilities – location and schematic	109

LIST OF TABLES

Table A.1 - Distribution of Active Radioactive Installations by Area (2024)	21
Table B.1 - Waste Classification	25
Table D.1 - Spent Fuel Assemblies Stored at Angra-1	30
Table D.2 - Spent Fuel Assemblies Stored at Angra-2	32
Table D.3 - Research Reactors in Brazil	36
Table D.4 - Fuel Element Characteristics	37
Table D.5 - SFA Inventory at Brazilians Research Reactors	37
Table D.6 – Radioactive Material stored at LAPOC	42
Table D.7 - Waste from Goiânia Accident	43
Table F.1 - Personnel involved in spent fuel and radioactive waste management at	
Angra-1 and Angra-2 NPPs	68
Table F.2 - INB personnel – regular workforce by location	69
Table F.3 - INB personnel involved in radioactive waste management	
at Caetité (URA)	70
Table F.4 - INB personnel involved in radioactive waste management	
at Caldas (UDC)	70
Table F.5 - INB personnel involved in radioactive waste management	
at Buena (UMP) and São Paulo sites (UDSP/UEB)	70
Table F.6 - INB Personnel involved in radioactive waste management	
at Resende (FCN)	70
Table F.7 - Personnel involved in spent fuel and radioactive waste management	
at IEN	71
Table F.8 - Personnel involved in spent fuel and radioactive waste management	
at IPEN	71
Table F.9 - Personnel involved in spent fuel and radioactive waste management	
at CDTN	72
Table F.10 - Personnel involved in radioactive waste management and execution	of the
Radiological Monitoring Environment Program (PMRA) at CRCN-CO	72
Table F.11 - Personnel involved in radioactive waste management at CRCN-NE	73
Table G.1 - Spent fuel storage capacity at Angra – Number of fuel assemblies	98
Table H.1 - Waste Stored at Angra Site – Angra-1	110
Table H.2 - Waste Stored at Angra Site – Angra-2	110
Table H.3 - Types and amounts of material stored in Storage Facility A	112
Table H.4 - Amounts of Cake II stored in Botuxim	112

Table H.5 - Waste Inventory at CINA	115
Table H.6 - CDTN Waste Treatment Facilities	118
Table J.1 - Disused sources in storage	130
Table J.2 - Number of Received Spent Sources at IPEN – 2020/2024	131
Table J.3 - Number of Received Spent Sources at CRCN-NE – 2020/2024	132
Table J.4 - Number of Received Spent Sources at CDTN – 2020/2024	133

ACKNOWLEDGMENTS

The Working Group that contributed to this National Report was composed of the following experts:

Marco Aurélio Leal (Coordinator/CNEN and National Contact Point)

Walter Mendes Ferreira (CRCN-CO/CNEN)

André Luis Faria Duarte (DINOR/CNEN)

Bruno Estanqueira Pinho (ELETRONUCLEAR - ETN)

Clédola Cássia Oliveira de Tello (CDTN/CNEN)

John Wagner Amarante (ELETRONUCLEAR -ETN)

Rogério Mourão (CDTN/CNEN Cesar Gustavo Silveira da Costa (INB)

Fábio Fumio Suzuki (IPEN/CNEN) Renata Rangel de Carvalho (INB)

Nerbe José Ruperti Jr. (DIREJ/CNEN) Ricardo Ferreira Lage (INB)

Geórgia Santos Joana (CGMI/CNEN) Carolini Ferreira Gomes (IBAMA)

Marcus Aurélio Pereira Dos Santos (CRCN-NE/CNEN)

Breno Bispo da Silva (IBAMA)

Daniela Villa Flor Montes Rey Silva (LAPOC/CNEN)

Fabiano Petruceli Coelho Lima (GSI/PR)

Francisco César Augusto da Silva (IRD/CNEN)

Renato Luiz Alves Tavares (GSI/PR)

Raul dos Santos (IRD/CNEN)

Anderson Gomes de Jesus (CTMSP)

Ricardo Fraga Gutterres (CNEN)

Bernardo Rozem (CTMSP)

Selma Parente de Jesus (IEN/CNEN)

Eduardo Medeiros Junior (CTMSP)

SUMMARY

Legislative and Regulatory System

Brazil has established and maintained the necessary legislative and regulatory framework to ensure the safety of its nuclear installations, including irradiated fuel and radioactive waste.

The Federal Brazilian Constitution of 1988 establishes in its articles 21 and 177 that the Union has the exclusive competence to operate nuclear energy services and facilities, including the operation of nuclear power plants. The Union also exercises monopoly over research, mining, enrichment and reprocessing, industrialization and trade in nuclear ores. The Union is also responsible for the final disposal of radioactive waste. All of these activities shall only be admitted for peaceful purposes and are subject to approval by the National Congress. The Federal Constitution also establishes the distribution of responsibilities among the Union, the states, the federal district and the municipalities with respect to protection of the public health and the environment, including the control of radioactive products and installations (Articles 21, 22, 23 and 24). The National Commission for Nuclear Energy (CNEN) is the national regulatory body, in accordance with the National Nuclear Energy Policy Act (Law 6189/74).

CNEN authority is a direct consequence of Law 4118/62, which created CNEN, and its alterations determined by Laws 6189/74 and 7781/89. These laws established that solely CNEN is empowered "to issue regulations, licenses and authorizations related to nuclear installations", "to inspect licensed installations", "to enforce laws and its own regulations" and "to receive, store and dispose of radioactive waste".

Furthermore, the constitutional principles regarding protection of the environment (Article 225) require that any installation, which may cause significant environmental impact, shall be subject to environmental impact studies that shall be made public. More specifically, for nuclear facilities, the Federal Constitution (Article 225, paragraph 6) provides that a specific law shall define the site of any new nuclear facility. Therefore, nuclear installations are subject to both a nuclear license by CNEN and an environmental license by the Brazilian Institute for Environment and Renewable Natural Resources (IBAMA), which is the national environmental agency, with the participation of state and municipal environmental agencies as stated in the National Environmental Policy Act (Law 6938/81) and the Supplementary Law 140 of 08 December 2011.

On 20th November 2001, the Federal Government published the Law 10308 establishing the new legal framework for the storage and dispose of low- and intermediate-level radioactive waste in Brazil. The Law confirms the Government responsibility for the final destination of radioactive waste, through the action of CNEN. The Law defines four types of storage facilities: initial, operated by the waste generator; intermediate; final (also called repository); and temporary, which may be established in case of accidents with contamination. The Law establishes the rules for the site selection, construction, operation, licensing and control, financing, civil liabilities related to the storage and dispose of

radioactive waste in Brazil. The Law also establishes the financial arrangements for the transfer of waste to CNEN and the compensation to the municipalities that accept in their territory the construction of radioactive waste storage and/or disposal facilities.

In compliance with Law 10308, CNEN issued in April 2014 two safety regulations: CNEN-NN-8.02 - Licensing of storage and disposal facilities for low- and intermediate-level radioactive waste [26] and the guide CNEN-NN-8.01 - Radioactive Waste Management for Low- and Intermediate-Level Waste [25]. The old guide CNEN NE-6.05 [6] was revoked.

Additional regulations from CNEN related to waste disposal were already in place and/or will be soon under review process, these include the regulations CNEN-NN-6.09 on Acceptance Criteria for Disposal of Low and Intermediate Level Radioactive Waste [23], CNEN-NE-6.06 on Site Selection for Radioactive Waste Storage and Disposal Facilities [7] and the safety guide CNEN-NN- NE 1.10 - Safety of Tailings Dam Systems Containing Radionuclides [32], currently under revision process.

In October 2021, CNEN issued 4 new documents related to preparation, review and revision of safety regulations: two internal guidelines and two internal procedures. These documents guide and standardize the entire process for development, review and revision of CNEN's safety standards. As a result of the implementation of these new procedures, 4 safety standards have been recently published, two new standards in 2023 and two in 2024 that have had completed their revision; currently 9 are in the process of being reviewed and 7 new safety standards are being developed.

It is also important to emphasize that, on 5th December 2018, the Federal Government published the guidelines for the Brazilian Nuclear Policy, through Decree No. 9600/2018, which highlights among its objectives "the guarantee of safe management of radioactive waste" throughout the national territory. Furthermore, it also establishes that "spent nuclear fuel will be stored in an appropriate location, in order to maintain the capacity for future use of reusable material therein".

On 15th October 2021 [34], the Brazilian Government issued the Law 14222 creating the National Nuclear Safety Authority (ANSN) and transferring the regulatory responsibilities to a new regulatory body, which will be effective when its Board of Directors are appointed. The creation of ANSN seeks, among other objectives: to adapt the legislation and the regulatory instruments to the extent and complexity of multiple uses of nuclear energy; confer the necessary agility to the State's attention to the activities of licensing, inspection, control and enforcement; address the demands of the national scientific community and representative parliamentary bodies and committees in relation to the separation of regulatory and promotional/operational functions in different institutions; align the regulatory structure of the country with the established international requirements.

The independence of the new regulatory body, ANSN, is ensured by the definition of its legal attributions, solely aimed at regulation (safety, security and safeguards); by the status as an "autarchy", that is - an entity governed by public law, with economic, technical and administrative autonomy, although supervised and monitored by the State, which eventually provides it with resources, and constitutes an auxiliary body for its services -; and by the mandate of its Board (5 years), which is disconnected from the elected and

sworn government mandate. The Board of Directors will be composed of 2 Directors and 1 President-Director, the first term will be 2 and 3 years for the Directors and 4 years for the President-Director, in order to allow future changes to the Board to occur alternately.

The Board of Directors must be nominated by the President of the Republic and appointed by him, after approval by the Federal Senate. Despite having been approved by the National Congress, the Law that created the ANSN will only come into force after the approval of the directors by the Senate in a hearing. In the meantime, while the new organization is not effectively implemented, DRSN/CNEN continues to be responsible for regulatory issues in Brazil.

Status of NPPs and Research Reactors in Brazil

Currently, Brazil has two nuclear power plants in operation (Angra-1, 640 MWe gross/ 609 MWe net, 2-loop PWR and Angra-2, 1350 MWe gross/ 1280 MWe net, 4-loop PWR), and one under construction (Angra-3, 1405 MWe gross, 4-loop PWR). Eletronuclear S.A.(ETN), the owner company of the NPPs in Brazil, expects to resume the construction of Angra-3 by 2028. The company expects to engage private partners in the project.

Regarding decommissioning, in December of 2023, ETN has reviewed its Preliminary Decommissioning Plan (PDP) and is waiting for CNEN approval to implement it in the tariff rate. The decommissioning strategy adopted is to have Angra 1 and Angra 2 with deferred dismantling and Angra 3 with immediate dismantling, allowing 3 sequential dismantling for Angra-1, -2 and -3.

Research reactors (RR) have been in operation in Brazil since the late 1950's and there are currently 4 research reactors operating at the National Commission for Nuclear Energy (CNEN) Institutes and 1 under licensing process:

- IEA-R1 at the Institute for Energy and Nuclear Research (IPEN), in the city of São Paulo (1957);
- IPR-R1 TRIGA Mark I Reactor at the Nuclear Technology Development Center (CDTN), at Campus of Federal University of Minas Gerais (UFMG), in Belo Horizonte (1960);
- Argonauta, at the Institute of Nuclear Engineering (IEN) on the campus of the Federal University of Rio de Janeiro (1965);
- IPEN/MB-01, at the Institute for Energy and Nuclear Research (IPEN) (1988);
- The Brazilian Multipurpose Research Reactor (*The RMB project*), the project is ongoing. The RMB will be a new Nuclear Research and Production Center to be built in Iperó County, about 110 kilometres from Sao Paulo city. Preliminary Safety Analysis Report (PSAR) is under assessment for the reactor construction authorization. At the beginning of October 2023, Brazil signed a cooperation agreement with Argentina for the implementation of the project. The Australian research reactor OPAL (Open Pool Australian Light Water Reactor) projected by Argentina are being used as initial references for the RMB project.

Regarding decommissioning, for IEN's Argonauta reactor a chapter on decommissioning plan was included in latest revision of the FSAR, issued in December 2023, the strategy is the safe storage (SAFESTOR), which involves deferred dismantling.

For the IPEN/MB-01 RR, the report with a study on its decommissioning will be presented by 2028. This commitment is established in the current operating license.

For the CDTN's IPR-R1 reactor a preliminary decommissioning plan was prepared, and it was integrated to the 2024 version of its FSAR.

Radioactive Waste Management Policy and Practices

The policy is to keep the radioactive waste safely isolated from the environment while a permanent solution is granted on national level. In this sense, in November 2008, a project called the Low and Intermediate Level Waste Repository, the "RBMN Project", was launched, now renamed to Nuclear and Environmental Technology Center – CENTENA, as the acronym in Portuguese. This project aims to provide Brazil with a licensed and commissioned repository for the disposal of the low- and intermediate-level waste. The CENTENA Project is part of the Brazilian solution for the disposal of radioactive waste generated in Brazil. The site selection process aiming at the construction of the Brazilian Repository is still in execution, as well as the facility's conceptual design.

Currently, this project is under supervision of the Brazilian Nuclear Program Development Committee (CDPNB), and a Technical Group was created on 29th October 2018, through Resolution No. 11 issued by the Institutional Security Cabinet of the Presidency of the Republic (GSI/PR). This Technical Group 8 (TG-8) has the objective of establishing guidelines and goals for the development of the National Repository.

The CDPNB, considering the prerogative of supervising the activities of the Brazilian Nuclear Program, has been monitoring and seeking with the Ministries and Government Agencies perennial conditions for the definitive implementation of this strategic project for the Brazilian nuclear sector. Recently, this Committee approved a proposal to establish a permanent management committee composed of the core bodies of the Brazilian Nuclear Program, aiming at monitoring and conducting the governance of projects and actions in the nuclear sector, including the viability of the CENTENA Project.

The main types of radioactive waste generated in Brazil are those ones related to nuclear power plants and activities in medicine, industry, research and education, distribution, services and production of radioisotopes (cyclotrons/Centralized Radiopharmacies).

By Law, CNEN, through the institutes of the Directorate for Research and Development (DPD), has the responsibility for receiving, treating and temporarily storing radioactive waste, while the Directorate for Radiation Protection and Nuclear Safety (DRSN) is in charge of CNEN's regulatory body function. In this sense, CNEN has radioactive waste storage facilities in the Institute of Nuclear Engineering (IEN) in the City of Rio de Janeiro, in Institute for Energy and Nuclear Research (IPEN) in the City of São Paulo, in Nuclear Technology

Development Center (CDTN) in the City of Belo Horizonte and in Northeast Regional Center for Nuclear Sciences (CRCN-NE) in the City of Recife.

The radioactive waste of the research reactors is managed together with the radioactive waste of the CNEN Institutes in their intermediate storage facilities.

The waste generated by Angra-1 and Angra-2 NPPs is being stored in an initial storage facility located at the Angra site, called Radioactive Waste Management Center (CGR). The storage facility consists of three buildings, which are submitted to CNEN inspections. In addition to these buildings, Angra-2 NPP has an internal storage facility (KPE located in UKA Building) with a total capacity of 1,644 two-hundred-liter drums.

The waste generated in the Brazilian Nuclear Industries (INB) at their units UTM (Ore Treatment Unit), URA (Uranium Concentrate Unit) and FCN (Nuclear Fuel Facture) are stored on-site, as well as the waste from the Navy program.

Disused Sealed Sources

The Brazilian regulation establishes that disused radioactive sources cannot be stored in radioactive facilities of medicine, industry, research and education, distribution, services or production of radiopharmaceuticals (cyclotrons). CNEN enforces the return of the disused sources to the manufacturer or the transfer of these sources to one of the CNEN's storage facilities at one of its Institutes, where the sources will be dismounted from its device or shielding for further disposal. To avoid unauthorized removal, these sources are identified and properly stored within controlled areas with restrict personal access. These storage facilities are under a Security Plan and under a periodic inspection program led by Nuclear Security and Standardization Division (DISEN) of Directorate for Radiological Protection and Nuclear Safety (DRSN). All transfer of radioactive sources between radiation facilities must be authorized by the National Commission for Nuclear Energy (CNEN), and in some cases it is also required the authorization for the transport of the source.

CNEN has implemented a huge regulatory policy which covers the authorization of radioactive facilities, control (transfer, import and export) of radioactive sources, the maintenance of the national inventory of the radioactive sources, inspection program, certification of radiation protection officers and registration of legal persons (specialists). CNEN, as aforementioned, also provides facilities and services necessary to manage and store disused radioactive sources.

There are no sealed source manufacturers in Brazil.

Spent fuel Management Policy and Practices

The policy adopted with regard to spent fuel from nuclear power plants is to keep the fuel in safe storage until a technical, economic and political decision is reached about reprocessing and recycling the fuel, or disposing of it as such. It should be highlighted that, by the federal Brazilian legislation, spent fuel is not considered radioactive waste. As stated by article 14 of the Brazilian Nuclear Policy (Decree No. 9600, of 5 December 2018), the spent nuclear fuel will be stored in an appropriate place, in order to preserve the future

use of reusable material. Therefore, in the scope of this Convention, spent fuel will be not considered as such.

There is no spent fuel within the military or defence program in Brazil.

The spent fuel of Angra-1 and Angra-2 NPPs, is currently storage in pools and in the new dry storage unit (UAS) onsite. In both units, Angra-1 and -2, the spent fuel pools are equipped with fuel storage racks of two different designs. The first group, named Region 1, or compact racks, is designed to receive fresh and irradiated fuel assemblies at maximum reactivity for the specified core design, without taking credit for burnup. The second group, named Region 2 or supercompact racks, is designed to receive fuel assemblies that have reached a certain minimum burnup.

The inventory and occupation (until 25th July 2024) of the spent fuel pools at NPPs Angra site is presented in the table below.

Angra-	1 NPP	Angra-2 NPP		
Spent Fuel Assemblies Stored	Occupation (%)	Spent Fuel Assemblies Stored	Occupation (%)	
986	75	433	34	

Eletronuclear (ETN) has decided to adopt the construction of the Spent Fuel Complementary Dry Storage Unit of CNAAA – UAS, designed and constructed by with capacity for 72 casks. By 2022, 15 storage devices had been loaded, 6 from Angra-1 (with 37 SFA in each cask) and 9 from Angra-2 (with 32 SFA in each cask), in the first transfer campaign.

On 23rd April 2019, CNEN issued the Resolution No. 242, the first interim construction license, with conditioning clauses, limited to the construction of the flagstone for 72 storage drums of spent fuel of the UAS system and on 3rd September 2019, the Environmental Installation License (LI Nº1310-2019) have been issued by environmental regulator body - IBAMA, valid until of 3rd September 2025.

The UAS is currently undergoing the second loading campaign where 15 casks from Angra-2 and 18 casks from Angra-1 will be transferred by 2025.

As of July 25, the following SFA had been stored at the UAS ISFSI (which is currently in transfer operation).

Angra-1 NPP		Angra-2 NPP		
Spent Fuel Assemblies Stored	Casks	Spent Fuel Assemblies Stored	Casks	
222	6	608	19	

Issues raised at the last Review Meeting

Challenges

- Design, licensing and construction of the LILW Repository CENTENA Project (formerly known as RBMN) site selection and the facility's conceptual design is in its final step. Main challenge to be achieved. A preliminary meeting was held with the mayor of the municipality that will receive the repository, an important stage of dialogue and involvement of the community and its representatives (stakeholders), in preparation for the announcement of the location.
- Finalize the construction of Angra-3, the date for the start of commercial operation of the Plant is now scheduled for 2026. Eletronuclear (ETN) expects to resume the construction of Angra-3 by 2028.
- The operation license for new Angra-3 is only issued if repository for LILW is in operation. It is a requirement from IBAMA (Brazilian Institute for Environment and Renewable Natural Resources) endorsed by CNEN.
- Finalize the licensing process and construct the Multipurpose Brazilian Reactor (RMB Project) licensing is underway. The SF & RW from the reactor could be used for research purposes on management of SF. The project is still ongoing. At the beginning of October 2023, Brazil signed a cooperation agreement with Argentina for the implementation of the Brazilian Multipurpose Reactor
- Long term policy for management of SF pending a government policy decision. By Law, SF is not considered as radioactive waste, the policy adopted is to keep the fuel in safe storage until a technical, economic and political decision is reached about reprocessing and recycling the fuel or disposing of it as such.

Suggestions

- Consider future development of capacity for decommissioning wastes from Angra-3. In December of 2023, ETN has reviewed its Preliminary Decommissioning Plan (PDP) and is waiting for CNEN approval. The decommissioning strategy adopted is to have Angra 1 and Angra 2 with deferred dismantling and Angra 3 with immediate dismantling, allowing 3 sequential dismantling for Angra-1, -2 and -3.
- Speed up process for building up capacities and resources of new regulatory body (ANSN). Very recently the federal government decided to open public exams do contract 150 new employees to CNEN, including the Directorate for Radioprotection and Nuclear Safety (DRSN), the future ANSN.
- Pursue investigation of final disposal of RW from nonnuclear facilities. Studies for the final disposal of RW from non-nuclear facilities are carried out on a case-by-case basis, depending on the characteristics of the waste.
- Consider optimal options for final disposal of SF & RW from multi-purpose reactor. This issue is being considered in the project bases.

• Continue collaboration with international regulators in order to achieve public acceptance of LILW repository. **Brazil is always opened to international collaborations.**

Areas of Good Performance

- The effective separation of the regulatory functions through the creation of an independent regulatory body, the National Authority for Nuclear Safety (ANSN). On 15th October 2021 [34], the Brazilian Government issued the Law 14222 creating the National Nuclear Safety Authority (ANSN). Although the Law has been approved, ANSN can only come into force after the approval of its Board of Directors by the Brazilian Senate, which is still pending due to administrative arrangements and political decisions.
- In order to increase the current on-site storage capacity for SNF a complementary Dry Storage Unit (UAS) was constructed and 510 SFs from the power plants' pools were transferred in the first campaign ended in March 2022. The UAS is in operation and 830 SF's have been transferred so far.
- The operational license for Angra-3 is only issued if/when a repository for LILW is in operation. As previously mentioned, it is a requirement from IBAMA endorsed by CNEN

Good Practices

• None identified at the 7th RM and similarly, Brazil has not identified any good practices, as defined for this Convention, related to practices described in this report.

SECTION A - INTRODUCTION

A.1 - THE BRAZILIAN NUCLEAR POLICY

The Constitution of the Federal Republic of Brazil establishes in its articles 21 and 177 that the Union has the exclusive competence to operate nuclear energy services and facilities, including the operation of nuclear power plants. The Union also exercises monopoly over research, mining, enrichment and reprocessing, industrialization and trade in nuclear ores. The Union is also responsible for the final disposal of radioactive waste. All of these activities shall only be admitted for peaceful purposes and subject to approval by the National Congress.

Considering the budget planning of the Federal Government, the national policy for the nuclear sector is implemented by the Multiannual Plan (PPA, as the acronym in Portuguese) for Science and Technology, which establishes quantitative objectives that define the Government strategy. Among these targets one can mention the National Nuclear Policy which guides research, development, production and utilization of all forms of nuclear energy considered of strategic interest for the Country in all aspects, including scientific, technological, industrial, commercial, energy production, civil defence, safety of the public and protection of the environment.

Lastly, the Nuclear Program also aims to increase the participation of nuclear energy in the national electricity production and involves continuous development of technology for the design, construction and operation of nuclear facilities related to the nuclear fuel cycle, which requires improvements on human and financial resources.

Another relevant legal instrument was the publication, in 2018, of Decree 9600 of December 5, 2018, which consolidated the guidelines on the Brazilian Nuclear Policy, serving as an important instrument for the construction of public policies for the Brazilian Nuclear Program. The Brazilian Nuclear Policy aims to guide the planning, actions and nuclear and radioactive activities in the country, in compliance with national sovereignty, in order to promote the development, protection of human health and the environment.

The National Commission for Nuclear Energy (CNEN) was created in 1956 (Decree 40110 of 10/10/1956) to be in charge of all nuclear activities in Brazil. Later, CNEN was reorganized, and its responsibilities were established by Law 4118/62 with alterations established by Laws 6189/74 and 7781/89. Thereafter, CNEN, a federal agency, through its Directorate for Radiation Protection and Nuclear Safety (DRSN), has assumed Regulatory Body roles and is in charge of regulating, licensing and controlling nuclear activities in Brazil concerning nuclear safety, security and safeguards. Moreover, CNEN, through its Directorate for Research and Development (DPD) is in charge of research and development and production of radioisotopes and, according to Brazilian Legislation, is also responsible for receiving and disposing of radioactive waste from the whole country.

Nevertheless, it is important to highlight that these two CNEN's Directorates, DRSN and DPD, work in a totally independent way, despite belonging to the same organization (CNEN). In this sense, Brazil has assured the independency of regulatory activities in the

nuclear area, in charge of CNEN, through the effective separation of assignments between its Directorate for Radiological Protection and Nuclear Safety (DRSN) and the Directorate for Research and Development (DPD).

Regardless of, the Federal Government approved the Law No. 14222, of 15th October 15 2021 [34], which creates the National Nuclear Safety Authority (*Autoridade Nacional de Segurança Nuclear -* ANSN, as the acronym in Portuguese), a federal agency with its own assets, administrative, technical and financial autonomy, with the institutional purpose of monitoring, regulating and inspecting nuclear safety, nuclear security and radiological protection of nuclear activities and installations, nuclear materials and sources of radiation in the national territory, in accordance with the provisions of the Brazilian Nuclear Policy and the guidelines of the federal government.

The ANSN will assume the regulatory functions previously performed by the Directorate for Radiation Protection and Nuclear Safety (DRSN). The technical team of this new organization will be composed of the current Directorate of Radiation Protection and Nuclear Safety (DRSN) staff, the Institute of Radiation Protection and Dosimetry (IRD), the Poços de Caldas Laboratory and the CNEN Districts.

Although the Law has been approved and issued, the ANSN has not yet come into force, as it depends on administrative arrangements and political decisions to complete the effective separation, therefore, the DRSN/CNEN continues to act as the Nuclear Regulatory Body on an interim basis.

A.2 - THE BRAZILIAN NUCLEAR PROGRAMME

The main Nuclear Facilities and Organizations in Brazil are showed in Figure A.1.

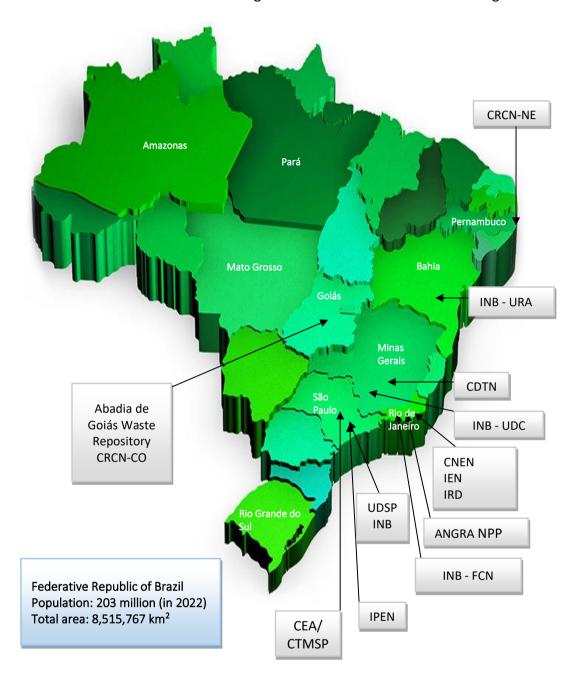


Figure A.1 - Main Brazilian Nuclear Facilities and Organizations

A.2.1 - NUCLEAR POWER PLANTS

Currently, Brazil has two nuclear power plants in operation (Angra-1, 640 MWe gross/ 609 MWe net, 2-loop PWR and Angra-2, 1350 MWe gross/ 1280 MWe net, 4-loop PWR), and one under construction (Angra-3, 1405 MWe gross, 4-loop PWR). The construction of Angra-3 was postponed in 1983 and restarted in 2009, following a decision

of the Federal Government and stopped again in September 2015. Angra-1, -2 and -3 share the same site, Itaorna Beach, a municipality of Angra dos Reis, about 130 km from Rio de Janeiro.

As it was the case in other countries, the Fukushima accident highlighted the need to reassess not only domestic nuclear safety standards, but also the overall level of participation of nuclear power in the Brazilian energy matrix. Since then, renewed domestic discussions have been taking place on the previous long-term planning studies on energy policy that outlined the convenience of building four new nuclear power plants in Brazil.

The National Energy Plan 2030 (*Plano Nacional de Energia* – PNE 2030), issued by the Ministry of Mines and Energy of Brazil through one of its organizations, the Brazil's Energy Research Company (*Empresa de Pesquisa Energética* – EPE), presents alternatives for the resumption of the Brazilian Nuclear Plan that includes new power plants up to 2030. Eletronuclear (ETN), jointly with EPE, has worked in the selection of suitable sites for the deployment of new nuclear power plants in the Northeast, Southeast and South of the country. This work is presently in hold. Furthermore, within the scope of Technical Group No. 14 (TG-14) of the Brazilian Nuclear Program Development Committee (CDPNB), guidelines were structured for the Ministries, agencies and companies involved in the process of selecting new nuclear sites, taking into account the importance of emphasizing the Government's vision for meeting future decisions in the energy sector regarding the supply of clean and steady energy, by nuclear power generation.

A new edition of the plan, the National Energy Plan 2050 (PNE 2050), was issued by the government in the end of July 2020. This document will determine the updated Brazilian energy planning for the next decades and will establish the future contribution of nuclear energy.

The construction of nuclear power plants in Brazil has required considerable effort in qualifying domestic engineering, manufacturing, supplier and construction companies, in order to comply with the strict nuclear technology and requirements. The result of this effort, based on active technology transfer, has led to an increase in the participation of domestic technology in the nuclear power sector.

Eletronuclear (ETN) expects to resume the construction of Angra-3 up to 2028. The company expects to engage private partners in the project.

A.2.2 - RESEARCH REACTORS (RR)

Brazil has 4 research reactors operating at CNEN institutes and 1 under licensing process.

A.2.2.1 - The IEA-R1 Research Reactor

IEA-R1 is the largest research reactor in Brazil, with a maximum power rating of 5 MWth. IEA-R1 is an open pool reactor, with light water as the coolant and moderator, and graphite and beryllium as reflectors. The reactor was commissioned on September 16,

1957, when it achieved its first criticality, and it is located at the Institute for Energy and Nuclear Research (IPEN), in the city of São Paulo. Although designed to operate at 5 MW, the reactor operated at only 2 MW between the early 1960's and mid 1980's, on an operational cycle of 8 hours a day, 5 days a week. At the early of the 90's, several upgrades were done allowing a safe operation at 5MWth, which was started in 1995. With the objective of producing radioisotopes for application in nuclear medicine, such as Iodine-131, the IEA-R1 reactor operated, starting in 1995, in a continuous cycle of 64 hours per week at 4.5 MWth. The weekly operation began at 8 a.m. on Mondays and ended at 11 p.m. on Wednesdays, a cycle that lasted until 2015. Currently, the IEA-R1 is operating at 4.5 MWth for 8 hours a day, 3 consecutive days per week. The reactor originally used 93% enriched U-Al fuel elements, but currently, it uses 24 MTR fuel elements with 19.9% enriched uranium (3 gU/cm³ in U₃Si₂-Al) fabricated at IPEN. The reactor is operated and maintained by the Research Reactor Center (CERPQ) at IPEN, São Paulo, which is also responsible for irradiation and other services.

The IEA-R1 reactor is localized in a multidisciplinary facility which has been consistently used for research in nuclear and neutron related sciences and engineering. The reactor has also been used for training, radioisotope production for industrial and nuclear medicine applications, and for general irradiation services. Several departments of IPEN routinely use the reactor for their research and development work. Scientists and students from universities and other research institutions also use it for academic and technological research. The largest user of the reactor is CERPQ itself, which is interested in basic and applied research in the areas of nuclear and neutron physics, nuclear metrology, and nuclear analytical techniques.

Since its early years, a permanent ageing program was implemented and nowadays all the original systems were either changed, modernized, or new systems were installed. In 2002, the IEA-R1 implemented a process based Management System in order to enhance the safe operation and to take part of the chain of radioisotope for nuclear medicine production.

A.2.2.2 - The IPR-R1 Research Reactor

The IPR-R1 TRIGA Mark I Reactor has been operating for 64 years at Nuclear Technology Development Center (CDTN), at Campus of Federal University of Minas Gerais (UFMG), in Belo Horizonte. The IPR-R1 is a pool type nuclear research reactor, with an open water surface and the core has a cylindrical configuration (Figure A.2). The first criticality was achieved in November 1960, and it is licensed to operate at 100 kW. The integrated burn-up of the reactor since its first criticality is about 2 GW.h. Due to the low nominal power, spent fuel is far from being a problem, except for aging concerns. There was not fuel element replacement so far and the reactor has four spare fresh fuel elements available. Some laboratories, which give support to the IPR-R1, were renewed especially for increasing and improving the reactor applications.

Over the years, the reactor has been used for a variety of purposes, from iodine irradiation for health applications to large-scale analysis of mineral samples, as well for the production of radioisotopes for industrial applications and tracers for environmental

studies, , like ⁶⁰Co, ¹⁹⁸Au, ¹⁹²Ir, ⁵⁶Mn, ²⁴Na etc. that are used in the stainless-steel industry, and environmental research activities. The Research Reactor Operator Training Course (CTORP) was the first one established to qualify operators of the Angra nuclear power plants and it is still be offered on demand today.

The most recent focuses have been on irradiating samples for analysis using the Neutron Activation technique, research into new substances with potential uses in health and radiopharmacy. In addition, it is used in the source production, and education in nuclear technology. The reactor is available to both CDTN researchers and students in its postgraduate program and to researchers and students from other institutions, as well as external customers.



Figure A.2 - Pool type nuclear research reactor

A.2.2.3 - Argonauta Research Reactor

The third Brazilian RR is named Argonauta, and is located at the Institute of Nuclear Engineering (IEN) on the campus of the Federal University of Rio de Janeiro, in the city of Rio de Janeiro. The first criticality of the reactor was reached in February of 1965. The reactor can operate at a maximum power of 1kW during one hour or 500 W continuously. It is usually operated in the range of 170 to 340 W. The accumulated burn-up of the reactor since its first criticality is less than 1% and due to its low nominal power, storage of spent fuel is not a problem. It is used for training purposes, research, sample irradiation and for the production of some radiotracers for industrial use.

A.2.2.4 - IPEN/MB-01 Research Reactor

The most recent Brazilian RR is IPEN/MB-01, also located at the Institute for Energy and Nuclear Research (IPEN). This research reactor is the result of a national joint program developed by CNEN and the Brazilian Navy.

The first criticality of the IPEN/MB-01 RR was reached on 9th November 1988 for its first core with 680 fuel rods. From that date until 10th July 2018, the reactor operated with its first core 3,663 times in order to measure Reactor Physics parameters to validate neutronic codes, train reactor operators and teach graduate and post-graduate courses. Some critical experiments with this core are international benchmarks of the Nuclear Energy Agency (NEA-OECD).

The IPEN/MB-01 reactor is a zero power reactor because the maximum power level is 100 watts with an average thermal neutron flux of about 5.0×10^8 n/cm².s. This neutron flux is not high enough to raise the temperature during its operation and fuel burn up. The reactor, a water tank type critical facility, has since 2020 a second core mounted on 2018-2019 that consists of up 19 fuel elements with U_3Si_2 .Al enriched at (19.75 ± 0.20)% and one massive aluminium element. The second core of the IPEN/MB-01 reactor using fuel elements had the criticality obtained on 3^{rd} March 2020. The power, and average thermal neutron flux are similar to first core (680 fuel rods).

The fuel elements are manually inserted into a perforated matrix plane, making it possible to have any desired experimental arrangements within a 4x5 matrix. The control rods are composed of a total of 4 hafnium plates that contain absorbing neutron material (Hf). During the reactor operation the control of excess of reactivity is made with 4 control rods inserted partially inside the core. There are 10 nuclear channels around the structure that sustains the matrix plate complement the critical arrangement, which is maintained within a stainless steel tank. Deionized water is used as a moderator, axial reflector and for the natural cooling system. There are 4 boxes around the core with D_2O water used as radial reflector. The second core of the IPEN/MB-01 reactor is very similar the core of the future RMB reactor and will be used to measure the reactor physics parameters and validated the calculated methodology used in its neutronic project.

The 680 fuel rods, 24 control rod rods (Ag-In-Cd Alloy) and 24 safety rod rods (B4C) from the 1st core are stored inside the critical cell building in the IPEN/MB-01 Reactor in 4 combustible concrete pits kept dry and are submitted annually IAEA and ABACC safeguards inspections.

A.2.2.5 - The Brazilian Multipurpose Research Reactor – *The RMB Project*

The project is ongoing. The Brazilian Multipurpose Research Reactor (RMB) will be the new Nuclear Research and Production Center to be built in Iperó County, about 110 kilometers from Sao Paulo city, in the southeast part of Brazil.

IBAMA, the environmental licensing body in Brazil gave the authorization for starting the site works. The DRSN/CNEN, the nuclear licensing body in Brazil gave the approval for the new nuclear site, and the Preliminary Safety Analysis Report is under

analysis for the reactor construction authorization.

At the beginning of October 2023, the Brazilian Government signed, in Buenos Aires, a cooperation agreement with Argentina for the implementation of the RMB. This partnership will facilitate the construction of the RMB, as the Argentine company has extensive experience in reactor design.

The Australian research reactor OPAL (Open Pool Australian Light Water Reactor) projected by Argentina and built in Australia are being used as initial references for the RMB project. The basic engineering projects are underway, benefiting of the cooperation with Argentina.

The estimated cost of building the RMB is 2 billion Reais (approximately 340 million dollars).

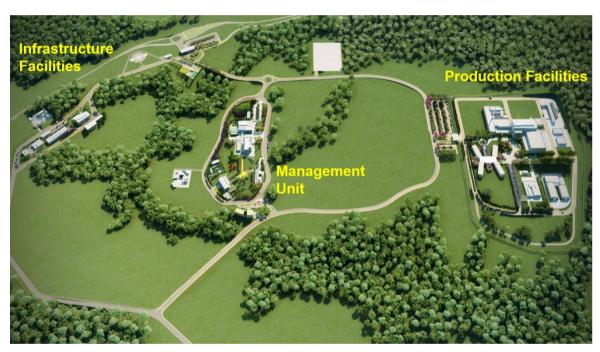


Figure A.3 - RBM Project – Layout of the main buildings

This reactor will enable the production of radioisotopes for application in medicine, industry and environment; irradiation testing of advanced nuclear fuels; irradiation and materials testing and to conduct fundamental scientific research with neutron beams in various fields of knowledge.

Concerning the treatment and storage of radioactive waste, a dedicated facility will be constructed to the handling, processing and safe storage of all radioactive waste produced by the multipurpose research reactor. The waste storage facility has been designed to accommodate all the low- and intermediate-level waste produced throughout the whole RMB operational life, set in 50 years.

For the spent fuel elements, the RMB design will also have space to store all the produced material during the reactor lifetime of 50 years. In addition, the holding time of

this irradiated fuel can span more 50 years, reaching a total storage time of 100 years.

This extended time storage will allow conducting studies for the implementation of a geological repository for the spent fuel produced by the Brazilian NPPs, as well as for the high-level waste generated in the process for obtaining the isotope ⁹⁹Mo.

A.2.3 – NUCLEAR FUEL CYCLE INSTALLATIONS

Industrias Nucleares do Brasil – INB, responsible for the Nuclear Fuel Cycle Installations in Brazil, has the following facilities:

- Uranium Concentrate Unit (URA), located in the municipality of Caetité, state of Bahia;
- Caldas Decommissioning Unit (UDC), located in the municipality of Caldas, State of Minas Gerais:
- Nuclear Fuel Factory (FCN), located in the municipality of Resende, state of Rio de Janeiro, consisting of the following nuclear installations:
 - Conversion of UF₆ to UO₂ powder
 - ➤ UO₂ Pellets Fabrication
 - Fuel Components and Assembly
 - Enrichment Plant
- Heavy Minerals Processing Unit (UMP), located in Buena, state of Rio de Janeiro.

The São Paulo Decommissioning Unit (UDSP) and the Storage Facility of Botuxim (UEB), both located in the state of São Paulo.

A.2.3.1 - Mining and Milling

The facility located in the municipality of Caldas, in the state of Minas Gerais, was the first uranium mining and milling unit in Brazil. It operated from 1982 to 1995, during a period when uranium exploration was economically viable. Currently, the Caldas unit is undergoing decommissioning, with rigorous environmental monitoring and actions being taken for complete closure and release of the site for unrestricted use. Refining the site characterization and the environmental diagnosis are in progress in order to prepare the executive project for decommissioning.

Uranium concentrate production now takes place in Caetité, Bahia state. The Uranium Concentration Unit (Unidade de Concentração de Urânio − URA), started operation in 2000 in Caetité (state of Bahia), with estimated resource of around 100,000 tons of U3O8 and capacity for production of 400 tons/year of U₃O₈, with plans to increase to 800 tons/year. Initially, the ore was extracted through open-pit mining at Mina Cachoeira from 1999 to 2014 and, since 2020, extraction has been carried out in the open pit at Mina do Engenho, with the ore being processed at the URA industrial plant.

The deposit of Santa Quitéria, located in the state of Ceará, is the largest discovered uranium reserve in Brazil. An estimated 142.2 thousand tons of uranium is inter-mixed with phosphates. The economic viability of the mine depends on the exploration of the

associated phosphate, which will be used in the production of fertilizers. Current plans are that the mine will be built in 2025 and be operational by 2027. It is planned to produce 2,300 tons of U_3O_8 per year as a by-product of 1050,000 tons of phosphate fertilizers. The project will bring a series of social benefits to the region and will allow the country to eliminate uranium imports with the possibility to selling to the future foreign market.

The two licensing processes are ongoing. As the first step towards nuclear licensing, in May 2024 CNEN granted Site Approval for the unit that will produce uranium. CNEN also has granted the only necessary authorization for the unit that will produce phosphate products. Considering the environmental licensing process (IBAMA), INB is waiting for the Previous License (first step) by the end of 2024.

A.2.3.2 - Monazite Sand Extraction

The exploration of monazite sand concentrates began in the 1950s. Indústrias Nucleares do Brasil (INB) operated a facility in São Francisco de Itabapoana, located at Buena, in the state of Rio de Janeiro, known as Buena Decommissioning Unit (Unidade em Descomissionamento de Buena – UDB), until the depletion of the deposits in that region. In 2024, INB entered into a contract for onerous assignment with a foreign company, which will mine monazite sands from other deposits in the country and perform beneficiation in Buena. In São Paulo, the Santo Amaro Processing Plant (USAM) has been completely decommissioned.

A.2.3.3 - Uranium Enrichment and Fuel Manufacture

In the city of Resende, located in the state of Rio de Janeiro, there is an industrial complex, named Nuclear Fuel Factory (Fábrica de Combustível Nuclear - FCN), consisting of two buildings, which contains four nuclear installations operated by INB, aimed to the manufacturing of nuclear fuel for the Brazilian Nuclear Power Plants.

One building performs three activities: (i) uranium hexafluoride is converted into UO₂ powder; (ii) fuel pellets are manufactured and (iii) uranium hexafluoride is enriched (up to 5% enrichment). The nominal production capacity is 160 tons/year of UO₂ powder and 120 tons/year of UO₂ pellets, but in fact the current demand corresponds only to a part of it. The plant for uranium enrichment, based on ultracentrifuge technology developed by the CTMSP is in operation since 2008, with the current nominal capacity of 70 tons of SWU (Separative Work Unit).

In the other building, PWR fuel assemblies are manufactured using the UO_2 fuel pellets from the first unit and other additional components, either imported or produced locally. The nominal capacity is 240 tons/year of uranium oxide. Since 1982, this unit produces fuel assemblies for the Brazilian Nuclear Power Plants, Angra-1 and Angra-2.

A.2.4 - THE NAVY PROGRAMME

The Brazilian Navy launched its nuclear program (PNM – Navy Nuclear Program) in 1979, with the aim of mastering the nuclear fuel cycle and developing and building a nuclear power generation plant. This Program is structured into two main nuclear technology research and development projects.

The first project, focused on the nuclear fuel cycle, aims to fully master nuclear fuel production technology. This effort is being carried out by the Navy Technology Center in São Paulo (CTMSP), located in the capital of São Paulo, and by the experimental unit, Aramar Experimental Center (CEA), located in the city of Iperó, approximately 110 km from São Paulo.

The second one is the Nuclear-Electric Generation Laboratory, whose purpose is to develop technological capabilities covering the design, construction, commissioning, operation and maintenance of PWR (Pressurized Water Reactor) nuclear reactors. This project includes the development of a prototype reactor for the propulsion of nuclear submarines. The goal of this effort is the construction of the first Brazilian Conventionally Armed Nuclear Submarine.

For this purpose, the PNM has a set of nuclear facilities subordinated to the CTMSP and licensed by CNEN, in accordance with Standard CNEN NE-1.04 – Licensing of Nuclear Facilities [3], as well as being regularly subject to regulatory inspections by this body.

The research and development plant for isotopic separation units and their instrumental laboratories is an example, located at CTMSP itself. In addition, there are those installed at the Aramar Nuclear Industrial Center (CINA) within CEA, such as the Nuclear Materials Laboratory (LABMAT), the Isotopic Enrichment Laboratory (LEI), the Enrichment Demonstration Plant (USIDE), the Uranium Hexafluoride Plant (USEXA) and the Nuclear Power Generation Laboratory (LABGENE).

LABMAT consists of a laboratory designed and built with the objective of developing and manufacturing nuclear fuels, materials for nuclear applications and other materials of interest to the Brazilian Navy, as well as the physical, chemical, mechanical, microstructural and thermal characterization of these materials. In addition, LABMAT has specialists, researchers and technicians who perform around 3,000 tests and trials per year.

On the other hand, while USEXA, which is in the commissioning phase, will be responsible for manufacturing Uranium Hexafluoride (UF₆), LEI was built with the objective of carrying out the isotopic enrichment of uranium, through the ultracentrifugation process of gaseous UF₆.

Meanwhile, LARE is already operating normally, monitoring and controlling the release of CEA effluents, carrying out analyses of the excreta of workers in restricted areas, for occupational radiation protection purposes, as well as executing the Environmental Monitoring Program - Radiological and Non-Radiological for the Aramar complex.

LABGENE is currently the main CEA facility requiring great attention from CNEN, because it is intended to be a land-based prototype of the first Brazilian Conventionally

Armed Nuclear-Propelled Submarine (SBCAPN), also known as Conventionally Armed Nuclear Submarine (SNCA). For this reason, this laboratory is constantly subject to regulatory inspections by CNEN. Today, LABGENE is under construction; its building, located in Aramar, can be seen in Figure A.4.



Figure A.4 - Nuclear Power Generation Laboratory at the CEA.

The great majority of funds for the installations at CTMSP come from the Brazilian Navy's annual budget, which is provided by the Ministry of Defense. Some special projects may also be funded by other governmental institutions, such as governmental research support agencies.

A.2.5 - RADIOACTIVE INSTALLATIONS

The National Commission for Nuclear Energy (CNEN) has implemented a huge regulatory policy that covers the authorization of radioactive facilities, control (transfer, import, and export) of radioactive sources, the maintenance of the national inventory of the radioactive sources, inspection program, certification of radiation protection officers and registration of legal persons (specialists). CNEN also provides facilities and services necessary to manage and store radioactive disused sources.

Published regulations are the main instrument of CNEN's regulatory action. The CNEN has issued 68 Regulations covering nuclear and radioactive areas and 25 among them are currently used for licensing and control of radioactive sources and facilities. The Radiation Facilities, including the ones that use radioactive sources, are classified into 8 groups covering 6 areas: medicine, industry, research and education, distribution, services, and production of radioisotopes (cyclotrons/centralized radiopharmacies).

To ensure an integrated regulation concerning the access and use of radioactive sources, the CNEN also acts in a coordinated way with other governmental organizations, such as the control on import and export of radioactive sources, carried out by the CNEN and Customs, following the import and export legislation, and the CNEN-Ministry for Health inter-ministerial regulatory cooperation, established to harmonize and improve the regulatory action implemented by both organizations.

Brazil has adhered to the Code of Conduct on the Safety and Security of Radioactive Sources and the Guidance on the Import and Export of Radioactive Sources. It has also nominated a contact point to facilitate the export and import of radioactive sources according to the Code of Conduct and the Guidance. Finally, in the context of the IAEA CoC, CNEN established bilateral agreements with some countries, namely the United States, Argentina, and Canada, to support further cooperation on import/export control of radioactive sources.

Brazil has licensed more than 7,000 radioactive installations by August 2024, but currently, the national registry includes around 2,200 active Radiation Facilities (authorized to operate). Table A.1 shows the active facilities' current distribution by area of application. About 30 new facilities start their licensing processes, every year.

-	<u> </u>	I	<u> </u>	<u> </u>	I	I 5 1	
Area:	Medicine	Industry	Research	Distribution	Services	Production (Cyclotrons)	Total
Number:	911	869	346	75	60	13	2274

Table A.1 - Distribution of Active Radioactive Installations by Area (2024)

A.2.5.1 - Medical Installations

Radiotherapy Services

A total of 481 facilities are in operation or licensing process. Currently, CNEN controls 32 blood irradiation sources, 04 multi-beam teletherapy (gamma knife) sources, 07 teletherapy sources, and 112 high dose rate brachytherapy sources.

Nuclear Medicine Services and Radiopharmaceuticals Production

The use of radioisotopes in medicine is increasing permanently. Positron emission tomography practice is well established (169 facilities) and 13 cyclotron facilities for radioisotopes production are in operation.

The disposal of disused sealed test sources for intermediate waste storage facilities increased from 107 in 2022 to 377 in 2023. By May 2024, 202 disused sources had already been disposed of.

A.2.5.2 - Industrial Installations

Currently, Brazil has 869 industrial installations as described below. CNEN controls and licenses approximately 1,700 category 1 and 600 category 2 radioactive sources, which are being used in industrial applications.

Industrial Radiography Services

The Brazilian on-offshore oil and gas industry is in constant development, leading to an increased demand for industrial radiography services. This has required a large effort to prepare personnel and develop procedures, especially for contractors. A total of 102 industrial radiography facilities are operating in the country.

Utilization of Nuclear Measuring Instruments

The chemical, metallurgic, petrochemical, plastic, paper, and other industry are increasingly using measuring instruments (gauges) based on radioactive sources. Portable instruments used for density measurement are becoming more widespread. Sources such as ¹³⁷Cs, ²⁴¹Am, ⁹⁰Sr, and ⁸⁵Kr are the most used. A total of 573 gauges are being used in the country.

Oil Exploration Well Profiling

Sources such as ²⁴¹Am, ⁶⁰Co, ²²⁶Ra, ¹³⁷Cs, and ²⁴¹Am/Be neutron sources are being used by organizations operating bases for oil exploration in the North, Northeast, and Central coastal regions.

A.2.5.3 - Industrial Irradiators

Seven ⁶⁰Co industrial irradiators are operating in Brazil. They are used for sterilization of medical equipment and food irradiation. Among them, there are two small irradiators used at research centers.

A.2.5.4 - Research Facilities

The use of radioisotopes in research occurs at CNEN research institutes (IPEN, IEN, and CDTN), other research centers and universities. The type of research is diversified, including nuclear physics, biology, agriculture, health, hydrology and environment. Generally, small sources of ³H, ¹⁴C, ²²Na, ⁵⁵Fe, ⁶³Ni, ¹²⁵I, ²²⁶Ra, ³⁵S e ³²P are used for research applications. However, small ⁶⁰Co irradiators are also used in some facilities. There are 528 active research facilities in Brazil.

A.2.6 - WASTE REPOSITORY AT ABADIA DE GOIÁS

Following the 1987 accident with a disused ¹³⁷Cs source that resulted in the contamination of a significant part of the city of Goiânia, two near surface repositories with a total volume of 3,134 m³ of radioactive waste were constructed in Abadia de Goiás in 1995. The complete inventory is described in item **D.6**.

A.3 - STRUCTURE OF THE NATIONAL REPORT

This Report is a review of the National Report of Brazil presented to the 7th Review Meeting in 2022. Once Brazil did not participate of the First Review Meeting, this is the Seventh Brazilian Report for the 8th Review Meeting of the Joint Convention 2025, which

follows the same form and structure previously adopted, and it was prepared to fulfil Brazilian commitments with the Convention [1]. Whenever possible, the information provided by the report refers to the situation as of June 2024.

Firstly, a brief Summary presents the policies, practices and status regarding the Brazilian Nuclear Program. The Brazilian nuclear policies and program are presented in more details in Section **A**. Section **B** to **K** presents an analysis of the Brazilian structures, actions and activities related to the Convention's obligations, and follow the revised Guidelines for the preparation of National Report [2]. In Section **B**, some details are given on the existing policies and practices and an overview matrix is presented. Section **C** defines the scope of application of the Convention in Brazil. Section **D** presents the inventory of installations and facilities. Section **E** provides details on the legislation and regulations, including the regulatory framework and the regulatory body. Section **F** covers general safety provisions as described in articles 21 to 26 of the Convention. Section **G** addresses the safety of spent fuel management, including during siting, design, construction and operation. Section **H** addresses the safe management of radioactive waste. Section **I** presents a case of transboundary movement of spent fuel. Section **J** details the situation of disused radioactive sources.

In general, the report presents separately the different types of facility, whenever possible. Nuclear power plants, due to their complexity, are always treated separately.

Section **K** describes planned activities to further enhance nuclear safety and presents final remarks related to the degree of compliance with the Convention obligations.

The report also contains two annexes where more detailed information is provided with respect to spent fuel storage and radioactive waste facilities, and the Brazilian nuclear legislation and regulations. A third annex presents a list of used abbreviations

SECTION B - POLICIES AND PRACTICES (Article 32 - § 1)

B.1 - INTRODUCTION

The policy adopted with regard to spent fuel from nuclear power plants is to keep the fuel in safe storage until a technical, economic and political decision is reached about reprocessing and recycling the fuel or disposing of it as such. It should be highlighted that, by the federal Brazilian legislation, spent fuel is not considered radioactive waste. As stated by article 14 of the Brazilian Nuclear Policy (Decree No. 9600, of December 5, 2018), the spent nuclear fuel will be stored in an appropriate place, in order to preserve the future use of reusable material. Therefore, in the scope of this Convention, spent fuel will be not considered as waste. Emphasizing that there is no spent fuel within the military or defence program in Brazil.

Regarding radioactive waste, the policy is to keep it safely isolated from the environment while a permanent solution is granted on national level. In this sense, in November 2008, a Project named Low and Intermediate Level Waste Repository, the "RBMN Project", was launched aiming at having a licensed and commissioned repository to dispose of the low- and intermediate-level waste. This project was renamed to Nuclear and Environmental Technology Center, the CENTENA Project, and has exactly the same goal as the former RBMN project, being part of the Brazilian solution for the disposal of radioactive waste generated in Brazil.

In addition, CENTENA project is under supervision of the Brazilian Nuclear Program Development Committee (CDPNB), and a technical group was created to establish guidelines and goals for its viability. The site selection process aiming at the construction of the Brazilian Repository is still in execution, as well as the facility's conceptual design. Details can be found in Section **H.3.2**.

It is noteworthy that waste classified as naturally occurring radioactive material (NORM) is not foreseen to be disposed of in this repository.

The basic legislations governing the Brazilian policy are the Federal Brazilian Constitution, which establishes in its article 21 that "all the nuclear energy activities shall be solely carried out for peaceful uses and always under the approval of the National Congress"; Law 6189 of 16 December 1974, which attributes to CNEN the responsibility for receiving, storing and the final disposal of radioactive wastes; and Law 10308 of 20 November 2001 which establishes rules for the siting, licensing, operation and regulation of radioactive waste storage facilities in Brazil (see also **E.2**).

An overview matrix providing the types of liabilities and the general policies and practices in Brazil can be seen ahead, in Section **B.3**.

B.2 – RADIOACTIVE WASTE

B.2.1 - TYPES AND CLASSIFICATION

Table B.1 - Waste Classification

Category	Characteristics	Disposal Option
0. Exempt waste	Activity levels equal or below the exemption limits which are based on a maximum annual dose to members of the public of less than 0.01 mSv.	No radiological restriction
1. Very short-lived waste (VSLW)	Waste containing radionuclides with half-lives of the order of 100 days or less, with activity concentrations above the clearance levels.	Stored to decay.
2. Low and Intermediate level waste	Activity levels above exemption limits, with half-lives greater than 100 days and heat generation equal or below 2 kW/m ³ .	
2.1 - Short lived	Waste containing radionuclides with half-life of less than about 30 years to beta/gamma emitters, with a limit of 370 Bq/g on average and up to 3,700 Bq/g for individual packages for long lived alpha emitters.	Near surface repository.
2.2- Containing naturally occurring radionuclides from the extraction and processing oil operations	Waste containing radionuclides from the decay series of Uranium and Thorium with activity concentrations above the clearance levels	Near surface or geological repository – to be defined by the Safety Assessment analysis.
2.3 - Containing naturally occurring radionuclides from the mining or processing of ores and minerals	Waste containing radionuclides from the decay series of Uranium and Thorium with activity concentrations above the clearance levels.	Near surface or geological repository – to be defined by the Safety Assessment analysis.
2.4 - Long lived	Long lived radionuclide concentrations exceeding limitations for short lived waste.	Geological repository
3. High level waste	Heat generation above 2kW/m³ and long-lived alpha emitting radionuclide concentrations exceeding limitations for short lived waste (2.1).	Deep geological repository

In 2014 Brazil adopted a new waste classification system based on the IAEA General Safety Guide No. GSG-1 of 2009 [22], as shown on Table B.1 below. The guide CNEN-NN-8.01 - Radioactive Waste Management for Low- and Intermediate-Level Waste [25], which established the waste classification was approved and issued on 30 April 2014.

The types of waste generated in Brazil are normally those ones related to the installations and organizations presented in Section **A** of this report and which are described in more detail in the inventory presented in Section **D**.

B.3 – BRAZIL MATRIX

Type of Liability	Long Term Management Policy	Funding of Liabilities	Current Practice / Facilities	Planned Facilities
Spent Fuel	Long term storage or reprocessing - Waiting for an economic and political decision	OPERATOR (ETN)	STORAGE ON-SITE (POOIS) A complementary DRY STORAGE UNITE (UAS) has been constructed and it is in operation since 2021	None
Nuclear Fuel Cycle Wastes	Not defined yet	OPERATOR (INB)	STORAGE ON-SITE	None
Application Wastes	LILW Repository	LICENSEES + CNEN	STORAGE AT CNEN INSTITUTES	LILW Repository
Decommissioning Liabilities	The decommissioning strategy is to have Angra 1 and Angra 2 with deferred dismantling and Angra 3 with immediate dismantling, allowing 3 sequential dismantling of the plants	OPERATOR (ETN)	NONE	Not defined yet
Disused Sealed Sources	Storage at CNEN Institutes while awaiting a final decision on borehole disposal (BOSS)	LICENSEES + CNEN	RETURN TO MANUFACTURER OR STORAGE AT CNEN INSTITUTES	Not defined yet

SECTION C - SCOPE OF APPLICATION (Article 3)

C.1 - DEFINITION OF SCOPE

The Brazilian nuclear policies and program are presented in Section **A** of this Report. Section **A.2**, specifically, describes the activities and facilities covered in the National Report, which includes all the spent fuel and radioactive waste related to the Brazilian nuclear programme.

According to the definition of the Convention, the main Brazilian policies and practices are described in Section **B.** As mentioned in **B.1**, spent fuel from NPP's is not considered radioactive waste in Brazil and there is a pending technical, economic and political decision of the Federal Government about the possibility of reprocessing this fuel or disposing it of as such. An overview matrix providing the types of liabilities and the general policies and practices in Brazil is provided in Section **B.3**.

Waste containing only naturally occurring radioactive material (NORM) will be included in the scope of this Report only to the extent that they are produced in the processing of uranium and thorium containing ores, such as Monazite sand processing, as described in Sections **H.2.2.2**, **H.2.2.3**, and **H.2.2.4**.

There is no spent fuel within the military or defence program in Brazil. The management of waste generated in the nuclear submarine program of the Brazilian Navy, although of minor importance and small quantity, is described in Section **D.4**.

SECTION D - INVENTORY AND LISTS (Article 32 – \S 2)

This section describes the facilities and activities that produce spent nuclear fuel and radioactive waste, and presents a description of the inventories. More detailed information is presented in Section **H** and on table format in Annex **1**.

D.1 - NUCLEAR POWER PLANTS

As mentioned in item **A.2.1**, Brazil has two nuclear power plants in operation (Angra-1, 640 MWe gross/ 609 MWe net, 2-loop PWR and Angra-2, 1,350 MWe gross/ 1280 MWe net, 4-loop PWR), and one under construction (Angra-3, 1,405 MWe gross, 4-loop PWR). Construction of Angra-3 was postponed in 1983 and restarted in 2009, following a decision by the Federal Government, and halted in September 2015, restarting construction and equipment acquisition in 2021, but stopping again soon after; ETN expects to resume construction of Angra-3 by 2028. The 3 NPPs share the same site, Itaorna Beach, a municipality of Angra dos Reis, about 130 km from Rio de Janeiro.

D.1.1 - ANGRA-1

Site preparation for Angra-1, the first Brazilian nuclear unit, started in 1970 under the responsibility of FURNAS Centrais Eletricas SA. The initial work for construction of the plant began only in 1972 (Base Plate concrete works 29/03/1972), shortly after the contract with the main supplier of equipment, Westinghouse Electric Co. (USA), was signed. The Westinghouse contract included supply and erection of the equipment, as well as engineering and design of the plant on a turnkey basis. Westinghouse sub-contracted Gibbs and Hill (USA) in association with the Brazilian engineering company PROMON Engenharia S.A. for engineering and design.

CNEN granted the construction license for the plant in 1974. The operating license was issued in September 1981 (Res. CNEN no. 10/81, 10/09/81), at which time the first fuel core was also loaded (20/09/81). First criticality was reached in March 1982 (13/03/1982 at 20:23h), and the plant was connected to the grid in April 1982. After a long commissioning period due to a steam generator generic design problem, which required equipment modifications, the plant finally entered into commercial operation on 1st January 1985.

In 1997, plant ownership has been transferred to the newly created company Eletrobras Eletronuclear (ETN), which has absorbed all the operating personnel of FURNAS CENTRAIS ELÉTRICAS S.A. and part of its engineering staff, and the personnel of the design company Nuclebras Engineering (NUCLEN). Currently, the company name has changed to Eletronuclear S.A., since 2022.

In 2019 Eletronuclear submitted a License Renewal Application to CNEN following CNEN specific requirements for Long term Operation of NPPs, proposing a new operation permit for additional 20 Years, starting December 23rd, 2024. This program is the so called Long-Term Operation Program of Angra1. December 2019, CNEN issued a new operation

permit of 5 Years with the requirement of the preparation of a Periodic Safety Review according to IAEA SSG25. The PSR was submitted to CNEN December 2023 and is under evaluation at the present time. It is expected that this process will be concluded by the end of 2024 and all the teams are working to achieve this goal.

D.1.1.1 - Angra-1 Spent Fuel Management

Reactor Core

The current status at Angra-1 fuel pools is presented on Table D.1.

Angra-1Storage placeCapacityOccupiedNew Fuel Storage Room450Region 1 Spent Fuel Pool25276Region 2 Spent Fuel Pool1,000910

Table D.1 - Spent Fuel Assemblies Stored at Angra-1

Note: By definition of INFCIRC/546 "SPENT FUEL" means nuclear fuel that has been irradiated in and permanently removed from a reactor core. Included in this inventory there are fuel assemblies that are not yet considered "spent fuel", since they may be reused in future cycles.

121

121

D.1.1.2 - Angra-1 Radioactive Waste Management

Angra-1 nuclear power plant is equipped with systems for treatment and conditioning of liquid, gaseous and solid wastes. The Compressible Solid Wastes are compressed by a hydraulic press and then, conditioned in 200 litter drums. Evaporator Concentrates and primary spent resins are immobilized in cement in 1.0 m³ liners. Spent filter cartridges are immobilized in cement in 200 litters drums and non-compressible solid wastes are immobilized in 1.25 m³ metallic boxes.

Concentrates from liquid waste treatment are solidified in cement and conditioned in 200 litter drums (up to 1998) and 1 m³ steel containers (after 1998). Solid waste may be conditioned in drums or in special boxes. Gaseous waste is stored in holdup tanks. These tanks have the capacity for long-term storage. The intermediate and low-level waste is currently stored in in a separate storage facility (see **D.1.4**).

Generated volume of solid radioactive waste material is kept to a minimum by preventing materials from becoming radioactive, by decontaminating and reusing radioactive materials, by monitoring for radioactivity and separating non-radioactive material prior to conditioning and storage, and by other volume reduction techniques. Procedures, personnel training and quality control checks are used to ensure that radioactive materials are properly packed, labelled and transported to the storage facility (Radioactive Waste Management Center).

D.1.2 - ANGRA-2

In June 1975, a Cooperation Agreement for the peaceful uses of nuclear energy was signed between Brazil and the Federal Republic of Germany. Under that agreement Brazil accomplished the procurement of two nuclear power plants, Angra-2 and -3, from the German company, KWU – Kraftwerk Union A.G., later SIEMENS/KWU nuclear power plant supplier branch.

Considering that one of the objectives of the Agreement was a high degree of domestic participation, Brazilian company Nuclebras Engineering S.A. (NUCLEN) (now Eletronuclear S.A. (ETN), after merging with the nuclear part of FURNAS, in 1997) was founded in 1975 to act as architect engineer for the Angra-2 and -3 project, with KWU as the overall plant designer, and, on the process, to acquire the required technology to design and build further nuclear power plants.

Angra-2 civil engineering contractor was Norberto Odebrecht Company and the civil works started on 9th September 1981. However, from 1983 on, the project suffered a gradual slowdown due to financial resources reduction. In 1991, Angra-2 works were resumed and in 1994 the financial resources necessary for its completion were defined. In 1995, a bid was called for the electromechanical erection and the winner companies formed the consortium UNAMON (seven Brazilian subcontracting companies joined to build nuclear power plants), which started its activities at the site on 1st June 1996.

Hot trial operation was started in September 1999. On 24th March 2000, after receiving from CNEN the Authorization for Initial Operation (AOI) initial core load started, followed by initial criticality on 17th July 2000, and first connection to the grid on 21th July 2000. The power tests phase was completed in November 2000. The commissioning phase was also very successful. No major equipment problems occurred in spite of the very long storage time (~20 years), indicating the high quality of the component conservation program. The Angra-2 NPP has been operating at full power since mid-November 2000 and went into commercial operation on 1st February 2001. The Authorization for Initial Operation (AOI) has been extended periodically, up to 15th June 2011, when CNEN issued the Authorization for Permanent Operation (AOP).

D.1.2.1 - Angra-2 Spent Fuel Management

In the case of Angra-2, the spent fuel pool, which is located inside the steel containment, has two types of racks:

- a) Region 1: normal racks with capacity for 264 fuel assemblies, equivalent to one full core plus one reload of fuel of any burnup and with enrichment up to 4.3%;
- b) Region 2: high-density storage racks with storage capacity for 820 spent fuel assemblies. The fuel assemblies to be stored in region 2 must have a given minimum burnup, which is a function of the initial enrichment. This spent fuel storage capacity is sufficient for about 15 years (14 cycles) of operation, which means that additional spent fuel storage space will have to be provided in the medium term.

The current status at Angra-2 fuel pools is presented on Table D.2.

Table D.2 - Spent Fuel Assemblies Stored at Angra-2

Storage place	Angra-2		
	Capacity	Occupied	
New Fuel Storage Room	75	0	
Region 1 Spent Fuel Pool	264	53	
Region 2 Spent Fuel Pool	820	380	
Reactor Core	193	193	

Note: By definition of INFCIRC/546 "SPENT FUEL" means nuclear fuel that has been irradiated in and permanently removed from a reactor core. Included in this inventory there are fuel assemblies that are not yet considered "spent fuel", since they may be reused in future cycles.

In the case of Angra-2, the spent fuel pool, which is located inside the steel containment, has two types of racks:

- a) Region 1: normal racks with capacity for 264 fuel assemblies, equivalent to one full core plus one reload of fuel of any burnup and with enrichment up to 4.3%;
- b) Region 2: high-density storage racks with storage capacity for 820 spent fuel assemblies. The fuel assemblies to be stored in region 2 must have a given minimum burnup, which is a function of the initial enrichment. This spent fuel storage capacity is sufficient for about 15 years (14 cycles) of operation, which means that additional spent fuel storage space will have to be provided in the medium term.

D.1.2.2 - Angra-2 Radioactive Waste Management

Angra-2 nuclear power plant is equipped with systems for treatment, conditioning and have an interim initial storage of solid radioactive waste. The liquid radioactive waste are collected in the Storage of Liquid Radioactive Waste System and processed in the Liquid Waste Processing System in such a way that the final product form a radioactive concentrate and dischargeable decontaminated water. Regarding the gaseous radioactive Waste, only conditioning and treatment are considered. All Angra-2 waste treatment systems are highly automated to minimize human intervention and reduce operating personnel doses. Liquid waste is collected in storage tanks for further monitoring and adequate treatment, then, they are discharged to the environment. The wastes are separately processed according to their origin and level of radioactivity.

The concentrate resulting from the liquid waste treatment is further processed in order to reduce water content before being immobilized in bitumen and conditioned in 200-liter drums. Spent resins and filter elements are dried, then immobilized in bitumen and conditioned in 200-liter drums. Compactable solid waste is compressed by a Hydraulic Press and then, they are conditioned in 200-liter drums. Non-compactable solid waste are conditioned in 1.25 m³ metallic boxes and sent to NPP Angra-1. Gaseous waste is treated in the gaseous waste treatment system, where the radioactive gases are retained in delay beds containing active charcoal to let them decay well below allowable levels, before release into the environment throughout the 150 m high plant vent stack. No residues are produced in the gaseous waste treatment system, as all the system's consumables, mainly filters and delay bed fillings, are designed to last for the whole plant lifetime. The drums with waste are initially stored within the plant prior to being transported to the on-site storage facility, still at the plant site.

Generated volume of solid radioactive waste material is kept to a minimum by preventing materials from becoming radioactive, by decontaminating and reusing radioactive materials, by monitoring for radioactivity and separating non-radioactive material prior to conditioning and storage, and by other volume reduction techniques. Procedures, personnel training and quality control checks are used to ensure that radioactive materials are properly packed, labelled and transported to the initial storage of solid radioactive waste.

D.1.3 - ANGRA-3

Angra-3 project started in the 80's, in the framework of the Nuclear Agreement between Brazil and Germany. It is a 4-loop 1,405 MW PWR pre-Konvoi design, a twin of Angra-2 that was completed and became operational in 2000.

After many years halted, the construction works of Angra 3 started in 2010, when the first concrete was poured. However, due to economic difficulties faced by Eletrobras, the parent company of Eletronuclear (ETN), the construction gradually slowed down until civil works stopped in 2015, after reaching a completion rate of 61%. After all, the construction contracts were then terminated.

All technical updates incorporated along the Angra-2 operation were included in the Angra-3 design, including those derived from the experience arising from the Fukushima accident.

This project, like the pre-konvoi German plants, is considered one of the most modern in the scope of the plants currently in operation, with high standards of safety and production, demonstrated through more than 30 years of operation of the German plants of the same family and 20 years of operation of Angra-2.

The conclusion of the Angra-3 project is part of the Brazilian nuclear program that integrates the country's energy strategy. In 2019 the Brazilian government declared Angra-3 a priority infrastructure project. To resume the project, Eletronuclear (ETN) signed a contract with the Brazilian Development Bank (BNDES), to establish a business model and financial restructuring to restore the economic viability of the project. This model was submitted and approved by the Brazilian government in June 2020. BNDES is now working on further detailing of this model, a task that included several due diligences for an independent assessment the plant, the project documentation and supplied equipment, among other aspects.

The goal was to have a complete financial restructuring and a new construction contract negotiated by the end of 2021.

In parallel, in August 2020 the board of Eletrobras (ETN) approved a plan that predicted a limited scope construction works of, in order to preserve the goal of having the plant operational by the end of 2026, but the predictions did not come true. These works were primarily focused on the nuclear island, including the completion of steel containment and its associated civilian structures. These works were expected to begin in the second quarter of 2021.

Eletronuclear (ETN) expects to resume the construction of Angra-3 up to 2028. The company expects to engage private partners in the project.

It is important to note that there will be no major design changes, the reference plant is Angra-2 and the contract with Framatome (former Areva) remains valid.

Concerning supplies, a great part of the imported equipment is already stored in the warehouses, including not only the primary circuit heavy components and the turbine-generator set parts but also special pumps, valves and piping material. Excellence of the preservation plan for long-term storage has been demonstrated during Angra-2 completion, whereby no relevant equipment malfunction due to long-term storage had adverse impact on plant commissioning or initial operation. The preservation measures, including the 24 months inspection program, continues to be applied for the Angra-3 components stored at the site.

For the plant construction, two licenses were required: the Construction License from the Brazilian Nuclear Energy Commission - CNEN, based on the acceptance of a Preliminary Safety Analysis Report (PSAR) and the Installation License from the environmental regulatory body - IBAMA, based on the acceptance of an Environmental Impact Assessment (EIA).

The Preliminary Safety Analysis Report (PSAR) for the Nuclear Licensing procedure was reviewed and delivered to CNEN. In 2010, Eletrobras Eletronuclear (ETN) received a Construction License from CNEN.

The environmental licensing proceeded with the preparation and submission of the Angra-3 Environmental Impact Assessment (EIA) to IBAMA. Still in the frame of the environmental licensing process, public hearings to inform the population of the contents of the EIA were held in all municipalities bordering the emergency planning zones of the Plant. ETN received the Pre-installation License from IBAMA in July 2008 and the Installation License in March 2009, both with several conditions to be fulfilled either before or during the construction phase.

Angra-3 will be the third nuclear power plant in Admiral Álvaro Alberto Nuclear Power Station, located at Itaorna beach, in the municipality of Angra dos Reis (RJ).

This new plant will have 1,405 MWe of gross electrical output, producing about 10.9 million MWh per year. According to the National Grid Operator, ONS, Angra-3 will greatly increase the reliability, stability and supply safety of the grid.

D.1.3.1 - Angra-3 Spent Fuel Management

The spent fuel will be stored similarly to Angra-2.

D.1.3.2 - Angra-3 Radioactive Waste Management

The radioactive waste will be treated and initially stored within the plant, similarly to Angra-2, and then forwarded to the Waste Repository at the proper time.

D.1.4 – ON-SITE INITIAL STORAGE FACILITY

The waste of Angra-1 and Angra-2 is being stored in an initial storage facility located at the Angra site. The storage facility consists of three buildings, which are submitted to CNEN inspections.

In addition to these buildings, Angra-2 NPP has an internal storage facility (KPE located in UKA Building) with a total capacity of 1,644 two-hundred-liter drums.

For additional information, see Section **H.2**.

D.1.5 - OLD STEAM GENERATORS STORAGE FACILITY

With the replacement of Angra-1 steam generators, a new facility was constructed on-site. The Old Steam Generator Storage Building is a reinforced concrete structure designed to provide shielding and storage for the two Angra-1 replaced steam generators, the reactor pressure vessel head, all associated contaminated material and part of the radioactive waste evaporator and components of a primary system cooling backup pump.

The facility is located inside the Eletronuclear (ETN) property area, close to the site dock and within the site boundary. The old steam generators were arranged side by side in separate compartments and the reactor pressure vessel head with its CRDM's in other separate compartments. The building is designed to be seismic qualified according to Angra-1 class I structure design criteria and the concrete wall thickness provides radiological shielding according to CNEN-NN-3.01 [12] standard and annual limit of operational dose.

D.1.6 - WASTE REPOSITORY for LOW and INTERMEDIATE LEVEL WASTE

The plans for final disposal of waste generated by Angra nuclear power complex (units 1, 2 and in the future 3), are under development, as described in items **H.3.2** and **H.5.2.2**.

D.2 - RESEARCH REACTORS

D.2.1 - SPENT FUEL MANAGEMENT

Research reactors (RR) have been in operation in Brazil since the late 1950's and, as a result, some amount of spent fuel assemblies (SFA) has accumulated. Table D.3 shows the RR operating in Brazil.

Table D.3 - Research Reactors in Brazil

	IEA-R1	IPR-R1	ARGONAUTA	IPEN/MB-01
Criticality	September 1957	November 1960	February 1965	November 1988 (1 st Core) March 2020 (2 nd core)
Operator	IPEN-CNEN/SP	CDTN-CNEN/MG	IEN-CNEN/RJ	IPEN-CNEN/SP
Location	São Paulo	Minas Gerais	Rio de Janeiro	São Paulo
Туре	Pool	Triga Mark I	Argonaut	Zero Power Reactor
Power Level	2-5 MW	100 kW	170-340 W	100 W
Enrichment	19,9%	20%	19.91%	19.75%
Supplier	Babcock & Wilcox	General Atomics	USDOE	Brazil

The 680 fuel rods, 24 control rod rods (Ag-In-Cd Alloy) and 24 safety rod rods (B4C) of the 1st core of the IPEN/MB-01 RR are stored inside the critical cell building, in 4 combustible concrete pits, kept dry and are subjected annually IAEA and ABACC safeguards inspections.

IPR-R1 has no short- and medium-term storage problems, due to its low nominal power.

The Brazilian part of the Latin American Spent Fuel Database is presented on Table D.4, showing the main characteristics of the fuel elements used in the Brazilian research reactors.

Facility	Fuel Type	Fuel Material	Enrichment	Cladding Material
IEA-R1	MTR	U₃O ₈ -Al U₃Si₂-Al	LEU 19.9%	Aluminum
IPR-R1	TRIGA	U-ZrH	LEU 20%	Aluminum/SS*
ARGONAUTA	MTR	U ₃ O ₈ -Al	LEU 19.91%	Aluminum
IPEN-MB-01	MTR	U3Si2-Al	LEU 19.75 %	Aluminum 6061

Table D.4 - Fuel Element Characteristics

The present RR spent fuel inventory is shown on Table D.5. The only reactor subject to concerns related to medium and long-term storage is IEA-R1. The other ones are low-and zero- power reactors with very low burn up. Taking these facts into consideration and the storage capacities presently available, some projections for the next 10-15 years have been made.

Table D.5 - SFA Inventory at Brazilians Research Reactors

	# of FA in	Average # used	SFA Storage		SFA %
Facility	Present Core	per year	At RR	Outside RR	Average Burnup
IEA-R1	24 LEU, Silicide-24	~ 04, expected for 24 h/week, 4,5 MW	39 wet	0	~40
IPEN-MB-01	19 Fuel Elements	NA	0	0	NA
IPR-R1	63 rods (LEU)	NA	0	0	~ 4
IEN-R1	8 FA LEU (6 FA with 17 plates each 2 FA with 7 plates each)	NA	12	0	NA

NA = not applicable

Presently, storage facilities at IEA-R1 consist of racks located in the reactor pool with a capacity of 108 assemblies, also counting with two other racks that are located outside the pool, on the first floor of the Reactor building, and which can, if necessary, be positioned inside the pool specifically supported on its bottom. Each of the racks has 24 storage positions. One of them is made of stainless steel, and the other is made of aluminum. According to the newly proposed operation schedule (4.5/5 MW, 24 h per week), 2-3 assemblies will be spent annually. Currently, in the racks that are inside the pool, out of a total of 108 storage positions, we have 56 positions occupied by fuel elements, 35 positions occupied by other devices, and 17 positions free. We plan to send some of the devices from the rack to the waste disposal sector of IPEN by the end of 2024, which will free up 9 to 12 more positions, resulting in a total of 26 to 29 free positions out of 108 by the end of this year, suggesting that within 4 - 6 years the wet storage facility at the reactor

^{*04} units at the core (Stainless steel)

will be full. It should be noted that 24 positions should be free to maintain the reactor core. An aggravating factor to be taken into account is the project aiming to increase the operation for a shift cycle of 9 days of continuous operation and 4 days to maintenance, enhancing the operation time by a 3.5 factor per year, with 8 assemblies spent annually.

D.2.2 – RADIOACTIVE WASTE MANAGEMENT

The radioactive waste of the research reactors is managed together with the radioactive waste of the institutes to which they belong, as described in Section **D.5**.

D.3 - OTHER NUCLEAR INSTALLATIONS

D.3.1 – BRAZILIAN NUCLEAR INDUSTRIES (INB)

D.3.1.1 - Waste from Previous Uranium Production Installation and Monazite Processing Facilities

Formerly known as Poços de Caldas Industrial Complex – CIPC, and later on as Ore Treatment Unit (*Unidade de Tratamento de Minério* - UTM), the former uranium mining and milling industrial complex in the state of Minas Gerais is now renamed Caldas Decommissioning Unit (*Unidade em Descomissionamento de Caldas* – UDC). Located at the Poços de Caldas plateau, the unit produced, from 1982 to 1995, the total amount of 1,170 ton of ammonium diuranate (yellow cake). The waste generated in this process is kept in a 29.2 hectare tailing dam system, with an actual volume capacity of 2 million cubic meters. It is estimated that 4.8 TBq (130 Ci) of ²³⁸U, 15 TBq (405 Ci) of ²²⁶Ra and 4.2 TBq (112 Ci) of ²²⁸Ra were disposed of in this site, to the present date (See also **H.2.2.3**).

The operation of the rare-earth production line of Santo Amaro Processing Plant (USAM) in São Paulo has generated Mesothorium (a material containing ²²⁶Ra and ²²⁸Ra) and Cake II (called Torta II - composed basically of thorium hydroxide concentrate). These materials, although not formally classified as waste, are presently stored at the Caldas Decommissioning Unit (UDC), and at the São Paulo installations: the São Paulo Decommissioning Unit (*Unidade em Descomissionamento de São Paulo* – UDSP), formerly known as USIN, and the Storage Unit of Botuxim (*Unidade de Estocagem de Botuxim* - UEB).

In Poços de Caldas UDC there are presently about 1,200 m³ of Mesothorium and 7,250 m³ of Cake II in storage. In the São Paulo facility UDSP, there are about 39 m³ of Mesothorium and 325 m³ of Cake II presently stored and in the Botuxim storage Unit UEB there are about 2,190 m³ of Cake II presently stored (See **H.2.2.2**).

D.3.1.2 - Nuclear Fuel Factory - FCN

The nuclear waste generated by the FCN Facility has been packed in 200-liter metal drums and has been transferred to the licensed Low-Level Waste Preliminary Storage Facility (called DIRBA, Depósito Inicial de Rejeitos de Baixa Atividade).

The DIRBA Storage was designed in two modules. The Module-I was built, with an area of 325 m², with the maximum design capacity of 444 drums for solid waste and 120 drums for either solid or liquid waste, allowing to store up to 564 drums. Recently, this year, the Module II has been built and licensed to increase the storage capacity of DIRBA by 42%, enabling the total storage of 804 drums in Modules I and II. There are currently 548 drums in storage. These drums contain several materials (gloves, shoes, tools, filters, etc.) contaminated with up to 4.0% enrichment uranium. An activity is underway to reduce the number of drums by crushing and replacing the drums contents. By expanding the deposit and compacting the drums contents, it is estimated that DIRBA will allow to store the Low-Level Waste for the next 10 years, at the FCN Facility.

D.3.1.3 - Uranium Concentrate Unit - URA

The Uranium Concentration Unit (URA), located in Caetité, in the state of Bahia, adopted as a basic design assumption the minimization of effluent generation. Treatment and containment systems were implemented with the aim of reducing the generation of waste, rejects and effluents, minimizing the environmental impact of the Unit. Waste management systems have been developed with the requirements of preserving the local environment by recycling industrial water as much as possible. The waste rock from the current Engenho Mine is disposed of in a location previously authorized by regulatory bodies, in an ascending and layered manner, following the Waste Pile project. The leached ore is disposed of in a specific area of the Waste Pile encapsulated with waste rock from the mine, using procedures that eliminate or reduce the production of dust.

Water consumption is reduced through the recycling of liquid effluents, reducing the need for treatment. The material resulting from the treatment of liquid waste is kept in waste tanks equipped with a HDPE blanket lining and with bottom and side drainage, in order to retain the solid phase and allow the recycling of liquids.

The URA Unit produces up to 2,100,000 tons/year of mine tailings with approximately 0.002% U3O8 (0.1% U3O8 cut) and 180,000 tons/year of leached ore with approximately 0.05% U3O8 (uranium and radionuclides of the natural uranium series). These materials are stored in a solid waste disposal pile. This deposit consists of an area surrounded by canals built to keep rainwater out of the deposit. Rainwater that falls on the deposit is retained in the sedimentation tank from where it can be pumped to the plant process or to the environment, after monitoring and comparing the uranium concentration in the water with the predetermined maximum limit for release. of this liquid effluent. The deposit is constructed modularly with piles of leached ore surrounded by waste rock from the mine. After the construction of each module is completed, its surface is covered with top soil and is revegetated. This construction process allows the decommissioning of the solid waste deposit during the same period of mine production.

The mine's waste disposal site considered that the area has good geological conditions and the component rocks have good mechanical stability. The soil in the upper part was removed and retained for later recovery of the site. The area does not have any water source or surface water body. The rainwater that percolates from the waste is retained in the sedimentation basin and is used in the industrial process. The slope on the side of the hill is less than 18% (eighteen percent), which increases the efficiency of rainwater runoff.

The plant's liquid effluent is stored in lagoons built with high-density plastic blankets with drainage tubes at the bottom where the solid particles of the effluent are separated from the liquid part. This liquid part returns to the processing plant to be reused in the process and the solid part is kept stored in the lagoon. Once a lagoon is filled, the decommissioning process begins. The liquid effluent will be drained, and the dry waste will be isolated from the environment. Currently, the Uranium Concentration Unit produces around 7,200 tons of dry waste per year. At the end of each pond's useful life, layers of impermeable material and topsoil will cover the pond and the surface will be revegetated.

D.4 - NAVY INSTALLATIONS AT SÃO PAULO (CTMSP) AND IPERÓ (CINA)

The volume of waste generated by the Aramar Nuclear Industrial Center (CINA), in Iperó County, about 110 kilometres from city of São Paulo, is very small compared to the figures mentioned above and it's currently kept in safe and secure storage on-site. The waste generated by CINA is kept in a provisory warehouse since the Fuel Cycle Waste Storage Facility (DIRCC) is in the implementation phase.

At CINA 256 drums containing about 19,500 kg of low- and intermediate- low level waste is currently stored in the initial provisory warehouse. These are mainly contaminated materials such as plastic, paper, evaporator sludge and tools (See Table H.5 at **H.2.3**).

The radioactive waste generated at Navy Technology Center (CTMSP) headquarters in São Paulo, consisted mainly of contaminated laboratory material, are transferred to the CINA provisory warehouse.

The new Fuel Cycle Waste Storage Facility (DIRCC), with an area of approximately 220 m², dedicated exclusively to the storage of low and intermediate level waste generated in fuel cycle facilities, as mentioned in **A.2.4**, is being designed at CTMSP. The DIRCC will be located on a plateau near USEXA and the Report of the Selected Site (RL) has already been submitted to CNEN for approval.

D.5 - CNEN INSTITUTES

D.5.1 - IPEN

The Radioactive Waste Management Service (SEGRR) was formally created in 2003 as a new research centre of the Nuclear and Energy Research Institute (IPEN), in order to perform research and development, teaching and waste treatment activities in the field of radioactive waste. The SEGRR is in charge of treating and temporarily storing the radioactive waste generated at IPEN, as well as those generated at many other radioactive

facilities all over the country. The main features of the laboratory include units for: waste reception and segregation; decontamination; liquid waste immobilization and conditioning; in-drum compaction of compressible solids; spent sealed sources and lightning rods disassembly; primary and final waste characterization; storage of untreated and treated waste. For further description, see item **H.2.4.1**.

D.5.2 - CDTN

Besides the radioactive waste generated in its own laboratories, the Nuclear Technology Development Center (CDTN) has received waste coming from other radioactive installations to be treated and stored. In addition, disused sealed sources from other users like industries, hospitals and universities, are also being received. These sources include radioactive lightning rods and smoke detectors, among others. They are stored at CDTN's storage facility – Sealed Sources and Treated Waste Storage Facility (DFONTE) (see **H.2.4**, and Annex 1). In May 2024, 3,389 disused sealed sources; 3,008 lightning rods; 6,077 smoke detectors ²⁴¹Am sources and 101 packages (200-liter drum) of treated wastes (very low activity) were stored at this facility. The waste fills 70% of DFONTE and the total activity is 465 TBq. Furthermore, there were 6 m³ (4.5 t) of untreated waste of very low activity in the interim storage Untreated Waste Storage Facility (DRNT).

The strategy implemented for the management of radioactive waste at CDTN is based on the standard CNEN-NN 8.01 [25] and takes into account the available infrastructure. The main directives of the management program are:

- To minimize the waste generation by suitable segregation and characterization.
- To reduce the volume by chemical treatment of the aqueous liquid waste, and by compacting and cutting the solid waste;
- To solidify by cementation the sludge arising from the chemical treatment, and to immobilize the non-compactable solid waste in cement/bentonite.
- To register the waste and disused sealed source inventory using an electronic database. This database was developed to record the inventory of radioactive waste in order to optimize the insertion and recovery of data related to the radioactive waste generated, treated and stored in the CDTN.

D.5.3 - IEN

IEN has a radioactive waste management center that comprises two radioactive solid waste storages, a radioactive liquid treatment laboratory and a small interim storage (45.25 m^2) where liquids awaiting treatment are temporarily stored. The radioactive solid waste storages have a total area of 452.53 m^2 , the older storage (91.25 m^2) is completely full, there is only space available in the newer storage.

The storage facilities were closed in 2019 due to structural problems, but the engineering report did not indicate a risk of collapse. Efforts are being made to address the issue and reopen the facilities.

D.5.4 – CRCN-CO

The Midwest Regional Center for Nuclear Sciences (CRCN-CO) is the CNEN's branch in charge of institutional management of the near surface repository that contains the radioactive waste produced during the Cesium-137 accident in 1987 in Goiânia – Goiás. The CRCN-CO provides public information about the situation of the disposal facility and about nuclear science in general.

The only final disposal facility in Brazil is properly licenced and operates in an authorized zone since 2002, under operational control. This area is located in a State Park of Goiás, Telma Ortegal Park, with 1.600.000 m². The CRCN-CO area is about 145,514 m² - 140.000 m² for the disposal area and other 5.514 m² for facilities, laboratories, research, administration and public visitation.

CRCN-CO has also a very small interim storage facility for radioactive waste received and/or collected in the Midwest region. This waste is periodically transferred to CDTN waste storage facility, in the city of Belo Horizonte.

D.5.5 — LAPOC

The Poços de Caldas Laboratory (LAPOC) has an access-controlled interim storage with area of 61.6 m². The radioactive materials stored at LAPOC were collected in police apprehensions or are residues from research activities carried out in the past (Table D.6).

RAD	Type of Source	Quant	Total Activity (Bq)	Date of Storage
Th-232	Mesothorium/ residue	825 kg	1.06E+17	1990
U-238	Ammonium uranium oxide $(NH_4)_2U_2O_7$	345 L	1.1E+16	1995
U-238	Ammonium uranium oxide $(NH_4)_2U_2O_7$	37 kg	1.4E+16	1995
U-238/ Th-232	Mineral Uranium Thorianite	2,450 kg	8.5E+13	2007
TOTAL			1.17E+17	

Table D.6 – Radioactive material stored at LAPOC

D.5.6 – CRCN-NE

The radioactive waste storage facility of the Northeast Regional Center for Nuclear Sciences (CRCN-NE) was created in 2005 at the state of Pernambuco with the aim at assisting the North and Northeast regions of Brazil in the receiving and storing sealed sources, radioactive lightning rods and smoke detectors. The waste storage facility has

approximately 150 m^2 , with maximum stacking at three levels, the total storage capacity, using the current layout, is 230 m^3 . The total volume of radioactive waste currently stored at the facility is estimated at 34 m^3 .

The facility has a drainage system with central gutter and a collection tank for contaminated water in case of leakage, high strength floor and external walls with 6 meters height to prevent access of particles, objects and animals.

D.6 - WASTE REPOSITORY AT ABADIA DE GOIAS (Closed)

The waste generated in the decontamination process following the radiological accident with a ¹³⁷Cs medical source in Goiania is currently stored in the Repository at Abadia de Goiás, a small town circa 23 km from Goiania.

Approximately $3.500 \, \text{m}^3$ of waste were generated, with an estimated overall activity lying between 47.0 TBq (1,270 Ci) and 49.6 TBq (1,340 Ci). The waste was temporarily stored in open-air concrete platforms, occupying an area of about $8.5 \times 10^6 \, \text{m}^2$ at a site near the village of Abadia de Goiás.

The drums and the metal boxes containing waste were classified into five groups, taking into account the decay period needed for the contents of the package to reach a ¹³⁷Cs concentration level not greater than 87 Bq/g, as described on Table D.7.

Number Storage Total Current **GROUP** Volume Volume Number Metallic Activity * Volume Activity ** (Time - years) (m^3) of Drums (m^3) **Boxes** (m^3) (TBq) (TBq) ı 404 0.06 0,03 686.8 2,710 542 1,228.80 (t=0)356 605.2 980 196 0.476 801.20 0,20 (0 < t < 90)Ш 287 487.9 314 550.70 0,82 62.8 1,44 (90 < t < 150)IV 275 467.5 217 43.4 13.67 510.90 7,12 (150< t <300) 25 42.5 2 42.90 0.4 30 15,65 (t > 300)Total 1,347 2,289.9 844.6 45.71 3,134.50 23,72 4,223

Table D.7 - Waste from Goiânia Accident

NOTE: * Storage Activity: at the time of disposal / ** Current Activity: as of August 2024.

The following packages were also used in Goiânia:

- 1 metal package for the headstock, with the remaining source (4.4 Tbq and with 3.8 m³, of Group V);
- 10 ship containers (374 m³, with 0.4 TBq, from Group I); and
- 8 special concrete packages (1.4 m³, with 0.7 Bq, from Group V)

According to the IAEA classification, all the radioactive waste collected in Goiânia falls into the category of "low level - short lived" waste and this allows its disposal at shallow depths, in engineered storage facilities. The Group I waste, having specific activities below 87 Bq/g, could actually be exempted from regulatory control — which means that it could effectively have been released into ordinary waste systems. Nevertheless, it was decided to build two repositories in Goiânia: (i) a more simplified one, called Great Capacity Container for the disposal of Group I waste (about 40% of the total) and (ii) a repository with more elaborate engineered barriers for the disposal of Groups II to V waste, called Goiânia Repository.

In conclusion, the problem of providing final disposal for the waste generated in the Goiânia Accident is thoroughly addressed. More information on the Environmental Monitoring Program (PMA) for the repository is provided in Section **H.7** of this document.

SECTION E - LEGISLATIVE AND REGULATORY SYSTEM

E.1 - IMPLEMENTING MEASURES (Article 18)

The Federal Brazilian Constitution of 1988 establishes the distribution of responsibilities among the Union, the states, the federal district and the municipalities with respect to the protection of the public health and the environment, including the control of radioactive products and installations (Articles 21, 22, 23 and 24). The Federal Government is the sole responsible for nuclear activities related to electric power generation, and also for regulating, licensing and controlling nuclear safety, nuclear security and safeguards (Articles 21 and 22). The National Commission for Nuclear Energy (CNEN) is the national regulatory body, in accordance with the National Nuclear Energy Policy Act (Law 6189/74).

Furthermore, the constitutional principles regarding protection of the environment (Article 225) require that any installation, which may cause significant environmental impact, shall be subject to environmental impact studies that shall be made public. More specifically, for nuclear facilities, the Federal Constitution (Article 225, paragraph 6) provides that a specific law shall define the site of any new nuclear facility. Therefore, nuclear installations are subject to both a nuclear license by CNEN and an environmental license by the Brazilian Institute for Environment and Renewable Natural Resources (IBAMA), which is the national environmental agency, with the participation of state and municipal environmental agencies as stated in the National Environmental Policy Act (Law 6938/81) and the Supplementary Law 140 of 8th December 2011. These principles were established by the Federal Constitution of 1988, when Angra-1 was already in operation, and Angra-2 was in construction. Hence, licensing of these power plants followed slightly different procedures, as will be described in **E.2.3.1**.

Figure E.1 shows the Brazilian organizations involved in nuclear areas. While CNEN is linked to the Ministry for Science, Technology and Innovations (MCTI), IBAMA is linked to Ministry for Environmental (MMA) and Eletronuclear S.A. (ETN) is owned by ELETROBRAS (67,95%) and ENBPar (32,05%); ENBPar (Brazilian Company for Nuclear and Binational Energy Participations) is a state holding company of the electric system, ELETROBRAS is a private company with state as one of the stockholders and INB is a mixed-economy company (state and privately-owned), and both are under the Ministry for Mines and Energy (MME).

In the areas of legislation and regulation, CNEN issued 4 documents related to new procedures for development, review and revision of its safety regulations, as will be described in **E.2.1**. Because of the implementation of these new procedures, 4 safety standards completed its revision, 2 in 2023 and 2 in 2024, 9 are under revision process and 7 new safety standards are being drafted. Furthermore, on 15th October 2021, was promulgated the Law 14222, that created the National Nuclear Safety Authority (ANSN), which will assume the regulatory functions previously performed by DRSN/CNEN.

The discussions and actions related to the creation of an independent nuclear regulatory authority (ANSN) were not based on a deficiency in the existing regulatory

system but motivated by a perspective of expansion of the nuclear energy sector. The proposal was based on using the existing structure of the Directorate of Radiation Protection and Nuclear Safety (DRSN) of CNEN, complemented by a governance and administrative infrastructure, adapting to this the existing legal structure.

Although the Law has been approved, ANSN can only come into force after the approval of the Board of Directors by the Brazilian Senate, which is still pending due to administrative arrangements and political decisions. Until the new organization is effectively implemented, the DRSN/CNEN remains responsible for regulatory matters in Brazil. Details on the creation of the ANSN will be described in **E.3.1**.

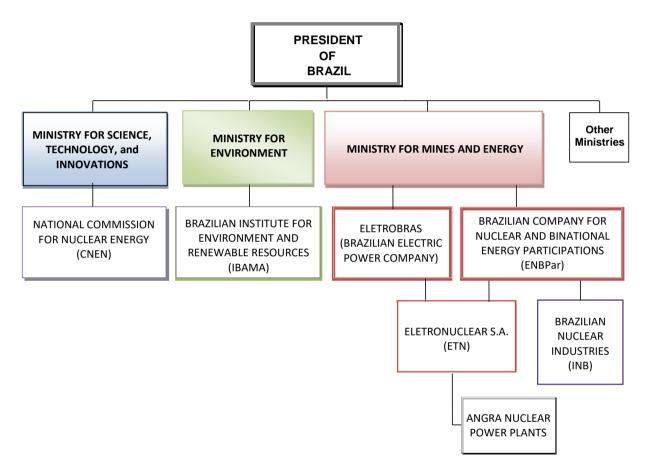


Figure E.1 - Brazilian Organizations Involved in Nuclear Areas

E.2 - LEGISLATIVE AND REGULATORY FRAMEWORK (Article 19)

Brazil has established and maintained the necessary legislative and regulatory framework to ensure the safety of its nuclear installations, including irradiated fuel and radioactive waste. A list of relevant Conventions, Laws and exiting CNEN Regulations is presented in **L.2 - ANNEX 2**.

Notwithstanding, it should be emphasized once again that the policy adopted in Brazil with regard to spent fuel is to keep it in safe storage until a technical, economic and political decision is reached about reprocessing and recycling the fuel or disposing of it as

such. Therefore, spent fuel is not considered radioactive waste in the sense of this Convention.

As mentioned before, Law 10308 of 20 November 2001 established the new legal framework for the storage and dispose of radioactive waste in Brazil.

The Law confirms the Government responsibility for the final disposal of radioactive waste, through the action of CNEN. However, it also opens the possibility for the delegation of the construction, operation and administration of the radioactive waste final disposal facilities to third parties, nevertheless, the full legal responsibility of CNEN is retained.

The Law defines three types of storage facilities: initial, operated by the waste generator; intermediate operated by the CNEN's institutes; temporary, which may be established in case of accidents with contamination; and also the final disposal facility (also called repository).

The Law establishes the rules for the site selection, construction, operation, licensing and control, financing, civil liabilities related to the storage and dispose of radioactive waste in Brazil. The Law also establishes the financial arrangements for the transfer of waste to CNEN and the compensation to the municipalities that accept in their territory the construction of radioactive waste storage and/or disposal facilities.

In compliance with Law 10308, CNEN issued on 30 April 2014 the safety regulation CNEN NN 8.02 - Licensing of storage and disposal facilities for low- and intermediate-level radioactive waste [26]. This regulation establishes general criteria and basic requirements of safety and radioprotection related to the licensing of radioactive waste storage and disposal facilities in Brazil for low- and intermediate-level waste. It is noteworthy that this safety guide is not applicable to waste classified as naturally occurring radioactive material (NORM). Furthermore, also on 30 April 2014, CNEN revised Its former guide related to radioactive waste management, from 1985, replacing it with a new guide called CNEN-NN-8.01 - Radioactive Waste Management for Low- and Intermediate-Level Waste [25].

Additional regulations from CNEN related to waste disposal were already in place and/or will be soon on revision process, these include the regulations CNEN NN 6.09 on Acceptance Criteria for Disposal of Low and Intermediate Level Radioactive Waste [23], CNEN NE 6.06 on Site Selection for Radioactive Waste Storage and Disposal Facilities [7], the safety guide CNEN NE 1.10 - Safety of Tailings Dam Systems Containing Radionuclides [32], currently under revision process, and the regulations NN-9.01 on Decommissioning of Nuclear Power Plants [29] and NN-9.02 on Financial Management for Decommissioning of Nuclear Power Plants [30].

Four safety regulations have recently completed theirs review process, which are CNEN NE 1.04 - Licensing of Nuclear Installations [3], and the safety guide 3.01 - Basic Requirements for Radioprotection and Radiological Safety of Radiation Sources [12] both published in April 2024, CNEN NE 6.02 on Licensing of Radioactive Installations [35] in March 2022, and the safety guide CNEN NN 5.01 - Regulation for the Safe Transport of Radioactive Materials, issued in 2021 [15]. Currently, 9 CNEN safety regulations are under revision and 7 new ones are being draft.

Brazil has also signed several international conventions (see Annex **L.2.1**) that, once ratified by the National Congress, become national legislation, and are implemented through detailed CNEN regulations.

E.2.1 - NEW PROCEDURES FOR THE DEVELOPMENT, REVIEW AND REVISION OF CNEN'S REGULATIONS

In October 2021, CNEN issued 4 new documents related to preparation, review and revision of safety regulations: two internal guidelines and two internal procedures. These documents guide and standardize the entire process for the development, review and revision of CNEN's safety standards. The previous documents have been revoked. The new documents are as follows:

- OI-DRS-0006 General Standardization Plan (Plano Geral de Normatização),
- OI-DRS-0007 Preparation of Regulatory Guides (Elaboração de Guias Regulatórios),
- PI-DRS-0003 Preparation-Revision of Nuclear Standards (*Elaboração-Revisão de Normas Nucleares*), and
- PI-DRS-0004 Presentation of Nuclear Standards (*Apresentação das Normas Nucleares*).

In accordance with the provisions of these documents, CNEN established a Safety Standards Committee, an internal consultative and deliberative body composed of the heads of each technical area, with the purpose of reviewing and monitoring the applicability of current CNEN standards, identifying needs for revision and opportunities for improvements, as well as the progress of the revision processes and the development of new standards.

As the first step, any proposal by a Committee member to develop and/or revise a standard requires approval by Safety Standards Committee. Once the proposal is approved, it is established a Writing Group (GR), which will prepare a "base text". The next step is the creation of a Study Committee (CE), a broader group composed of CNEN and external members, which will prepare a Draft Standard built on the "base text".

After that, the Draft Standard goes through a "Directed Consultation" for comments and suggestions for changes, which means a written consultation with external organizations and/or experts (stakeholders) impacted by the application of the Standard. These comments and suggestions are then evaluated by the Study Committee.

If necessary, a "Sectoral Dialogue" will be created, a mechanism to validate information collected in the "Directed Consultation" stage or to discuss specific demands, through face-to-face or virtual meetings with institutions and organizations impacted by the application of the Standard.

The Draft also undergoes a "Public Consultation", an instrument of social participation through which the text of the Draft is available for a period of 45 to 90 days on the CNEN website, and any interested party may submit written statements. Comments

and suggestions arising from the Public Consultation will be evaluated by the Study Committee.

Following the Public Consultation stage, the Study Committee forwards the Draft Standard to the Federal Public Prosecutor's Office for analysis, and a legal opinion is issued. After incorporating any considerations made by the Public Prosecutor's Office, the draft is forwarded to the Directorate for Radiological Protection and Nuclear Safety (DRSN), which forwards it to the CNEN Deliberative Committee (CD) for consideration, evaluation and approval. The Deliberative Committee (CD) is composed of the President of CNEN, its 3 Directors and an external expert nominated by the Federal Government. Once approved, the draft should be signed by the CD members and forwarded for publication in the Official Gazette of the Union. As soon as it is published, the draft Standard becomes a Safety Standard and is posted on the CNEN website.

It is worth noting that standards under review that require urgent or minor changes may be fully or partially exempted from this process.

As a result of the implementation of these new procedures, 4 safety standards have been recently published, two new standards in 2023 and two in 2024 that have had completed their revision, 9 are also in the process of being revised and 7 new safety standards are being developed.

E.2.2 - NUCLEAR LICENSING PROCESS

CNEN was created in 1956 (Decree 40110 of 10/10/1956) to be responsible for all nuclear activities in Brazil. Later on, CNEN was reorganized, and its responsibilities were established by Law 4118 of 1962 with alterations determined by Laws 6189 of 1974 and 7781 of 1989. Thereafter, CNEN became the Regulatory Body in charge of regulating, licensing and controlling nuclear activities. Since 2000, CNEN has been under the Ministry for Science, Technology and Innovations (MCTI).

CNEN responsibilities related to this Convention include, among others:

- the preparation and issuance of regulations on nuclear safety, radiation protection, radioactive waste management, nuclear material control and physical protection;
- receiving, treat, store and dispose of radioactive waste;
- licensing and authorization of siting, construction, operation and decommissioning of nuclear facilities, what includes storage and disposal facilities for radioactive waste;
- regulatory inspections and audits;
- acting as a national authority for the purpose of implementing international agreements and treaties related to nuclear safety, security and safeguards;
- participating in activities related to the national preparedness and response to nuclear emergencies.

Under this framework, CNEN has issued radiation protection regulations and regulations for the licensing of radioactive installations of medicine, research, industry, nuclear facilities and for licensing of storage and disposal facilities for the low- and intermediate-level radioactive waste. Still regarding radioactive waste, CNEN has issued regulations for management of radioactive waste, siting of waste repositories and acceptance criteria for final disposal of radioactive waste (see Section L.2.3 of Annex II for a list related to CNEN regulations).

The licensing regulation CNEN-NE-1.04 [3] establishes that no nuclear installation shall operate without a license. It also establishes the necessary review and assessment process, including the specification of the documentation to be presented to CNEN at each phase of the licensing process. It finally establishes a system of regulatory inspections and the corresponding enforcement mechanisms to ensure that the licensing conditions are being fulfilled. The enforcement mechanisms include the authority of CNEN to modify, suspend or revoke the license.

The licensing process is divided in several steps:

- Site Approval;
- Construction License;
- Authorization for Nuclear Material Utilization;
- Authorization for Initial Operation (AOI);
- Authorization for Permanent Operation (AOP);
- · Authorization for Decommissioning

Federal Law 9765, approved in 1998, establishes taxes and fees for each individual licensing step, as well as for the routine work of supervision of the installation by CNEN.

For the first step, site selection criteria are established in Resolution CNEN 09/69 - Siting of Nuclear Power Plants [4], taking into account design and site factors that may contribute to violation of established dose limits at the proposed exclusion area for a limiting postulated accident. Additionally, by adoption of the principle of "proven technology", the regulation CNEN-NE-1.04 [3] requires for the site approval of a nuclear power plant the adoption of a "reference plant".

For the construction license, CNEN performs a detailed review and assessment of the information received from the licensee in a Preliminary Safety Analysis Report (PSAR). The construction is followed closely by a system of regulatory inspections.

For the Authorization for Initial Operation (AOI), CNEN reviews the construction status, the commissioning program including results of pre-operational tests, the final Physical Protection Plan, updates its review and assessment of facility design based on the information submitted in the Final Safety Analysis Report (FSAR), and authorizes the nuclear material utilization. In case of NPPs, startup is closely followed by CNEN inspectors and hold points are established at different stages.

Authorization for Permanent Operation (AOP) is given after a complete review of commissioning test results and the solution of any deficiencies identified during

construction and initial operation. The authorization establishes limits and conditions for operation and lists the programs which should be kept active during operation, such as the radiological protection program, the physical protection program, the quality assurance program for operation, the fire protection program, the environmental monitoring program, the qualification and training program, the preventive maintenance program, the retraining program, etc.

Reporting requirements are also established through regulation CNEN-NN-1.14 [5] and CNEN-NN-2.02 [19]. These reports, together with a system of regulatory inspections performed by resident inspectors and headquarters personnel, are the basis for monitoring safety and nuclear material control during operation. Inspection activities are conducted on a permanent basis at the whole Angra site, including its Radioactive Waste Management Center (CGR).

Other governmental bodies are involved in the licensing process, through appropriate consultations. The most important ones are the Brazilian Institute for Environment and Renewable Natural Resources - IBAMA, which is in charge of environmental licensing and the Institutional Security Cabinet of the Presidency of the Republic - GSI/PR, with respect to emergency planning aspects.

E.2.2.1 - Licensing of Storage and Disposal Facilities for Radioactive Waste

The licensing regulation CNEN-NN-8.02 [26] establishes general criteria and basic requirements of safety and radioprotection for the licensing of storage and disposal facilities for the low- and intermediate-level radioactive waste. This safety regulation, in compliance with Law 10308 of 2001, furnishes the specific guidelines to the licensing of the storage facilities in Brazil, including the existing ones, as well as to the planned Brazilian repository.

Following the same principles applied to regulation CNEN-NE-1.04 [3], the licensing regulation CNEN-NN-8.02 establishes the necessary assessment process, including the specification of the documentation and its content that must be presented to CNEN at each phase of the licensing process. It also establishes a system of regulatory inspections and audits and the corresponding enforcement mechanisms to ensure that the licensing conditions are being fulfilled. The enforcement mechanisms include the authority of CNEN to modify, suspend or revoke the license.

The licensing process is divided in following steps:

- Site Approval;
- Authorization for Construction;
- Authorization for Operation;
- Authorization for Decommissioning, only for storage facilities (as defined by Law 10308: initial, intermediate; and temporary storage facilities);
- Authorization for Closure, only for disposal facilities.

The site selection criteria are established in regulation CNEN-NE-6.06 - Site Selection for Radioactive Waste Disposal Facilities [7]. The site selection process for radioactive waste repositories requires a series of sequential activities as the identification of regions of interest, of preliminary areas, of potential areas and, finally, of candidate-sites. The selection procedure should take into account four factors: ecological, geological, physiographic and socio economical. At the end of the process, the applicant must present a comprehensive Report of the Selected Site (RL) to CNEN for approval. This report (RL) should contain the general features about the project and operation of the proposal disposal facility and detailed information on site characterization, with documentation of all data and analytical work, including the preliminary safety analysis performed by the applicant. CNEN will review the results and will also perform an independent safety assessment to decide whether the selected site is suitable for construction of a disposal facility and, consequently, approve it or not.

For the construction authorization, CNEN performs a detailed review and assessment of the information received from the applicant in the Preliminary Safety Analysis Report (PSAR). The construction is followed closely by a system of regulatory inspections and audits and quality assurance.

The Authorization for Operation is issued by CNEN after verification whether the installation construction parameters are in accordance with the PSAR information, after checking the compliance with the waste acceptance criteria established in the regulation CNEN-NN-6.09, and after a complete and detailed assessment of the Final Safety Analysis Report (FSAR). Based on FSAR information, CNEN reviews the radiological protection program, the physical protection program, the quality assurance program for operation, the fire protection program, the environmental monitoring program, the qualification and training program, the preventive maintenance program, the retraining program etc. Furthermore, CNEN will also perform an independent safety assessment to decide whether operation authorization is granted or not.

The operators of the radioactive waste storage facilities which were already in operation in Brazil before the issue of regulation CNEN-NN-8.02 (2014) have submitted their respective Final Safety Analysis Reports (FSAR) which are periodically reviewed and submitted for assessment by the nuclear regulator – DRSN/CNEN. Furthermore, it must be emphasized that these existing storage facilities operate on safety and security conditions and under permanent inspections and audits. They were constructed before Law 10308 of 2001 and, of course, previously the licensing regulation CNEN-NN-8.02. However, despite of not have had a specific licensing process in the past, the operation of these storage facilities was authorized along with the licensing process of the nuclear installations in which they are sited.

E.2.3 - ENVIRONMENTAL LICENSING PROCESS

IBAMA was created by Law 7735 in 1989, it is linked to the Ministry of Environment (MMA) and has the responsibility to implement and enforce the National Environmental Policy (PNMA - Brazilian Law 6938 of 1981). The PNMA's goals are to preserve, improve and recover environmental quality to ensure the conditions for social and economic

development and the protection of human dignity. The PNMA established the National System for the Environment (SISNAMA), which is composed by the National Council for the Environment (CONAMA) and executive agencies at the federal, state and municipal levels.

Environmental licensing is a legal requirement necessary prior to the installation of any project or activity that exploits natural resources and has a significant potential to pollute and/or degrade the environment. The responsibility for enforcing environmental licensing is shared among Brazil's municipal and state environmental agencies, as well as IBAMA at the federal level. IBAMA is the agency tasked with the licensing of large projects involving possible impacts on a national scale, such as those that impacts multiple Brazilian states, those that may affect neighbour nations or activities in the oil and gas sectors on the continental shelf. IBAMA is also responsible to carry out the licensing of the environmental component of activities and projects related to prospecting, mining, producing, processing, transporting, storing and disposing of radioactive materials at any stage or using nuclear energy in any of its forms and applications.

The regulation of nuclear activities remains with the Federal Government. The *nuclear licensing* and the *environmental licensing*¹ processes are independent, parallel, and complementary acts. CNEN, a federal agency, through its Directorate of Radiation Protection and Nuclear Safety, is the Regulatory Body in charge of *nuclear licensing*, which consists of regulating, licensing and controlling nuclear activities in Brazil, enforcing Nuclear Safety, Security and Safeguards. IBAMA on the other hand has the Directorship of Environmental Licensing (DILIC) responsible for the environmental licensing of any installation with potentially significant socio environmental impact and risk, on a federal level, determined by Supplementary Law 140/2011, including the nuclear installations.

In the environmental licensing process, it is assessed direct and indirect impacts of a project that may be imposed to the external environment and communities. These include: the physical aspects (geology, hydro-geology, climate, water availability), atmospheric emissions (radioactive and conventional), and generation and control of effluents, and solid waste (radioactive and conventional); the interactions with biotic system (marine and terrestrial fauna and flora) and possible incorporation (bio-accumulation, toxicity); and the socioeconomic and health implications to the human populations in the vicinity of the project. The main guidelines for the implementation of the environmental licensing are expressed in Law 6938 of 1981, Supplementary Law 140 of 2011, CONAMA Resolutions 001/86 and 237/97, and IBAMA's Normative Instruction nº184/2008. These guidelines discipline the environmental licensing for projects with potentially adverse effects on the environment, following three main steps:

- Prior License (LP), granted at the preliminary planning stage, approving the general concept of the installation and location, evaluating its environmental feasibility, and establishing the basic requirements and conditions for the next implementation phases.
- Installation License (LI), authorizes the construction of the facility in accordance with the approved specifications, programs and projects including measures

¹ IBAMA is responsible for the Environmental Licensing, as stated in the National Environmental Policy Act, while CNEN is the nuclear regulatory body in accordance with the National Nuclear Energy Legislation.

- 53 -

that are considered essential to protect the environment and human populations.

Operation License (LO) – authorizes the operation of the facility, after successful
completion of the construction and commissioning activities and the verification
of the effective fulfilment of the Installation License conditions, and the
effective implementation of measures to protect the environment and human
populations during operation.

Among the requirements for issuing a Prior License, three technical reports should be presented by the project's proponent to provide IBAMA with a comprehensive set of information to support the decision-making process, such as:

- An Environmental Impact Study (EIA) EIA was established by the National Environmental Policy PNMA (Federal Act No. 6938/1981) and by the Brazilian Federal Constitution (Article 225). EIA is required for projects or activities that may potentially cause significant environmental degradation. Brazilian environmental legislation provides a guideline to an EIA that includes: technological and location alternatives of the project, environmental diagnosis of the affected areas, identification and assessment of the environmental impacts caused by the implantation and operation of the activity, definition of limits of the geographical area directly and indirectly affected by the project, definition of mitigation actions for the identified impacts, and identification of strategies for environmental monitoring in the affected area. EIA should also consider other governmental plans and programs planed to the same area, to evaluate the compatibility between projects.
- An Environmental Impact Report (RIMA) The RIMA is a document that summarizes the information presented in the Environmental Impact Study. Contents should be presented in clear, non-technical, and accessible language to facilitate stakeholders' understanding.
- A Quantitative Risk Assessment (EAR) The EAR is applied by the environmental agency to assess the industrial/conventional risks associated to the operation of projects and activities potentially harmful to people and the environment. The EAR also guides the implementation of risk management programs and emergency plans originated by any non-nuclear accidental event. It is important to stress that, in Brazil, the National Commission for Nuclear Energy (CNEN) is the sole agency responsible for the assessment of nuclear risk and safety. Notwithstanding, the conclusions and recommendations of CNEN are relevant to the decision making process of the environmental agency.

Transparency is one important requirement for the environmental licensing process. Public participation is ensured by legislation through public hearings prior the issuing the Prior License (CONAMA Resolution 09/87). The legislation also establishes that information about any public hearing, license application and decisions of the environmental agency should be made available to the public in official newspapers and local press.

E.2.3.1 - Environmental Licensing of Angra-1, 2 and 3 Radioactive Waste Storage Facilities

The beginning of construction of Angra-1 and 2, including the radioactive waste stored on-site, occurred before the creation of IBAMA. The operation of Angra-1 started in 1981, before the current environmental regulation was established. At that time, the State of Rio de Janeiro Foundation for Environment Engineering (FEEMA), Rio de Janeiro environmental state agency, issued an Installation License (on September 15th, 1981).

Since 1989, IBAMA is the legal authority for environmental control of nuclear installations in Brazil; and since 1997, following the publication of the CONAMA resolution 237/97, IBAMA is also the legal authority for environmental licensing of nuclear power plants and radioactive waste storage facilities. Given this legal setup:

- The environmental licensing of Angra-1 and the Radioactive Waste Storage Facility 1 and Facility 2-A was performed through an "adaptive licensing", in accordance with IBAMA requirements, to adjust the facility to the current environmental regulations. This process defined the necessary environmental studies to be carried out and presented to IBAMA as requirements to issuing an Operation License. Subsequently, in March 2009 the report "Environmental Control Plan PCA" was submitted to IBAMA.
- The environmental licensing of Angra-2 was performed as required by CONAMA 237/97, which involved the preparation by the facility's owner of an Environmental Impact Study (EIA) and a Report on Environmental Impact (RIMA). These documents were submitted to IBAMA for environmental impact evaluation. They also served as a basis to define environmental plans and programs that are detailed in a Basic Environmental Project (PBA). Two public hearings were performed in the period of 1999-2000. Based on the technical evaluations and inputs from stakeholders and the public, IBAMA issued a special License for Initial Operation (commissioning) in 2000. In March 2001, Brazil's Federal Public Prosecution intervened in the environmental licensing and a Statement of Commitment (Termo de Compromisso de Ajustamento de Conduta – TCAC) that laid down a series of conditions to be met by Eletronuclear (mostly centered around the improvement of the emergency plan) was signed by IBAMA, Eletronuclear, and the Public Prosecution. In June 2006, IBAMA issued a report (Parecer Técnico No 015/2006 - COEND/CGENE/DILIC/IBAMA) concluding that all of such conditions were met.
- The radioactive waste from the nuclear power plants is stored in four storage facilities in CNAAA, the Radioactive Waste Storage Facilities 1, 2 & 3 at the Radioactive Waste Management Centre (CGR) and the Storage Facility for the two old (replaced) steam generators from Angra-1. The Radioactive Waste Storage Facilities 1 is destined to low activity residue, as the storage 2 and 3 are meant for medium activity residue.
- IBAMA issued the Preliminary License No. 279/08 for Angra-3, in July 2008. In March 2009, after evaluation of compliance of conditions of the Preliminary License Nº 279/08, IBAMA issued the Installation License No. 591/09, valid for 6 years. In 2019 Eletronuclear applied for the extension of the installation license,

and, after meeting the requirements, IBAMA granted the Installation License No. 1442/2022.

- The project of the complementary unit for dry storage of irradiated fuel (UAS) was started by Eletronuclear in 2017 and its Environmental Installation License has been requested. Accordingly, following the Reference Term (Termo de Referência) of UAS issued by IBAMA in August 2016, the Simplified Environmental Report was prepared and sent to IBAMA in February 2018, and revised in May 2019 in order to meet the IBAMA requirements.
- The Environmental Installation License (LI No 1310-2019) has been issued on 3rd September 2019, valid until 3rd September 2025. Once the installation is complete, this unit will be integrated by the CNAAA's Operating License, that is currently in renewal.

In 2011 IBAMA started up a process to unify the environmental licensing processes of the units in operation at the CNAAA, with the exception of Angra-3 that is currently under construction. In March 2014, IBAMA issued a Joint Operating License (LO No 1217/2014) that encompasses the operation of Angra-1, Angra-2, the Radioactive Waste Management Centre, and the Storage Facility for the replaced old steam generators. Concomitantly, the Installation License for Angra-3 was reviewed to adjust it to the Joint Operating License of the CNAAA.

In March 2014, IBAMA issued the Combined Environmental Operation License No 1217/2014 for the Almirante Álvaro Alberto Nuclear Power Site – CNAAA authorizing the operation of Angra-1 and Angra-2 NPPs, as well as the Waste Management Center – CGR and auxiliary facilities for ten years.

Concomitantly with the issuance of the Combined Environmental Operational License No. 1217/2014 for the site in March 2014, the specific Installation License No 591/09 was revised again and generated a second amendment with a set of 33 new requirements for Angra-3 plant construction. As in 2024, while the combined license is in process of being renewed, there's a new Installation License for Angra 3, published in 2022 (LI No. 1442/2022). The license renewal process is currently in the phase of technical inspections and document analysis, specially the Risk Management Program (PGR).

E.2.3.2 - Environmental Licensing of the Repository at Abadia de Goiás

In 1996 IBAMA issued an Installation License to the repository of Abadia de Goiás, facility owned by CNEN. IBAMA has been following up the operation of the repository through reports and inspections. An Environmental Plan including air samples, sediments samples, surface water and underground water as well as external radiation doses around the two repositories has been executed every year since its construction. Further details of this environmental plan can be found under item H of this report.

On 8th September 2017, IBAMA approved the request for Renewal the Operation License of the Repository of Abadia de Goiás up to September 2027.

E.2.3.3 - Other Pre-existing Storage Facilities

Other pre-existing radioactive waste storage facilities that are now also being licensed by IBAMA, are located at IPEN, CDTN and IEN (see D.5. and H.2.4).

In 2002, IBAMA licensed CDTN facilities, including the Sealed Sources and Treated Waste Storage Facility (DFONTE) (IBAMA Operation License 225/2002, of 8 August 2002). The license was renewed in 2024 for more 10 years.

Apart of the environmental license (IBAMA) the nuclear regulatory body in Brazil – DRSN/CNEN, is licensing the CDTN storage facility. The Safety Analysis Report (FSAR) for DFONTE is currently under assessment by the regulator (DRSN).

At IPEN, a storage facility with 850 m² is divided in two twin sheds, one to receive treated waste and another to receive untreated waste. IBAMA licensed the IPEN facilities, and the radioactive storage facility was included in this process. Regarding nuclear licensing, the Safety Analysis Report (FSA) was evaluated by DRSN and is currently under review by IPEN to cover the requirements and recommendations made by DRSN.

At IEN, the environmental licensing process for radioactive storage facilities by IBAMA is temporarily suspended because the conceptual idea of the licensing process has changed. In the past, the idea was to license the Institute's site as a whole, currently the idea is to individually license each facility that makes up the Institute.

E.2.4 - EMERGENGY PREPAREDNESS LEGISLATION

As a result of the publication of the Law 12731 of 21 November 2012, which established additional objectives for the System for Protection of the Brazilian Nuclear Program (SIPRON), the Central Body for SIPRON, the Institutional Security Cabinet of the Presidency of the Republic - GSI/PR, has divided its responsibilities into two areas: nuclear emergency and nuclear security. For this purpose, the Decree 9031 of 12 April 2017, revised by Decree 11676 of 30th August 2023, formalized the creation of the General Coordination for Nuclear Emergency and of the General Coordination for Nuclear Security.

The SIPRON's structure includes organizations at the federal, state and municipal levels involved with licensing and control activities as well as those involved with public safety, civil defence, environment, health, nuclear security, information security, law enforcement and communication to the public. Operators of nuclear installations and facilities and supporting organizations are also part of SIPRON.

The Decree 2210 of 1997, which established, among other regulatory aspects of the SIPRON, a Coordination Commission for the Protection of the Brazilian Nuclear Program (COPRON) composed of representatives of the agencies involved, is in the final process of being reviewed in the aftermath of the Law 12731 of 21 November 2012. Besides Eletronuclear S.A. (ETN), as the operator, and CNEN, as the nuclear regulatory body, other agencies are involved as supporting organizations of SIPRON, such as the Angra Municipality municipal civil defence, the state of Rio de Janeiro civil defence, the IBAMA,

the National Road Authority, the Armed Forces, and the Ministries of Health, External Relations, Justice, Treasury and Transport.

Within SIPRON, the Central Body, issued a set of General Norms for Emergency Response Preparedness [13, 14], consolidating all requirements of related national laws and regulations. These norms establish the planning, the responsibilities of each of the involved organizations and the procedures for the emergency management centers, communications, intelligence and information to the public (SIPRON General Norms are listed in item **L.2.5** of Annex II). Studies are in place to consolidate those Norms into the National Plan for Nuclear Emergency Preparedness and Response.

E.3 - REGULATORY BODIES (Article 20)

As mentioned in item **E.1**, the National Commission for Nuclear Energy (CNEN) has been designated as the regulatory body entrusted with the implementation of the legislative framework related to safety of nuclear and radioactive installations. Other governmental bodies are also involved in the licensing process, such as the Brazilian Institute for the Environment and Renewable Natural Resources (IBAMA).

E.3.1 - CNEN

CNEN authority is a direct consequence of Law 4118/62, which created CNEN, and its alterations determined by Laws 6189/74 and 7781/89. These laws established that solely CNEN is empowered "to issue regulations, licenses and authorizations related to nuclear installations", "to inspect licensed installations", "to enforce laws and its own regulations" and "to receive, store and dispose of radioactive waste".

The structure of CNEN is presented in Figure E.2. Within this framework, the organizational unit of CNEN involved with the regulation, licensing and control of nuclear activities is the Directorate of Radiological Protection and Nuclear Safety (DRSN), while the Directorate for Research and Development (DPD) is responsible for the production and promotion activities, including those of receiving, treating, storing and disposing of radioactive waste carried out by its institutes.

However, the Brazilian legislative system has ensured the independence of regulatory activities in the nuclear area, still under the responsibility of CNEN, through the effective separation of attributions between DRSN and DPD. The DPD and its institutes get from DRSN the same treatment and are subjected to the same rules and regulations as any other licensee.

Although it has been ensured a functional independency between nuclear regulatory activities from others, the Federal Government took the decision to create an administratively and legally independent nuclear regulatory agency. The reason for this proposal is not a deficiency in the existing regulatory system, but rather a perspective of expansion of the nuclear energy sector.

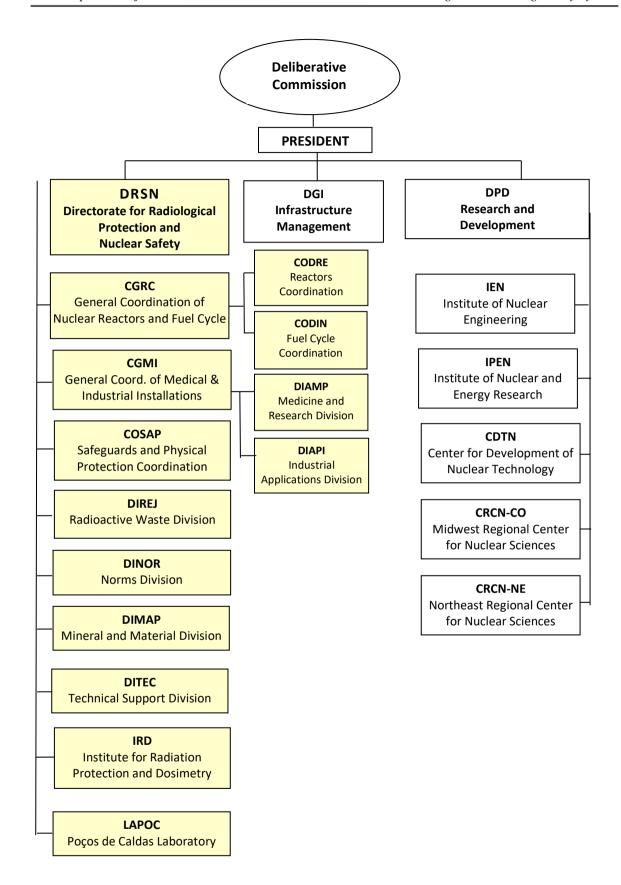


Figure E.2 - Simplified CNEN Organization Chart

Considering the national and international recommendations to the Brazilian State, the Brazilian Nuclear Program Development Committee (CDPNB), composed by 12 Ministers of State, presented a proposal with the necessary actions for the separation of the regulatory attributions, from those of production and promotion activities currently performed by the Brazilian Nuclear Energy Commission (CNEN). The Committee, established by Decree No. 9828, of 10th June 2019, is coordinated by the Institutional Security Cabinet of the Presidency of the Republic (GSI/PR) and its mission is to assist the President of the Republic, through a high-level collegiate body, in establishing guidelines and goals for the development and monitoring of the Brazilian Nuclear Program.

The abovementioned CDPNB presented an alternative for the separation of CNEN's promotion activities from those of regulations, in order to enable the creation of an independent regulatory body in Brazil. The proposal of this new body was based on the existing structure of the Directorate for Radiological Protection and Nuclear Safety (DRSN) of CNEN, adapted to the existing Laws for others Regulatory Agencies present in Brazil.

As consequence, on 15th October 2021, was promulgated the Law 14222, that created the National Nuclear Safety Authority (*Autoridade Nacional de Segurança Nuclear*, ANSN). The ANSN will become the new regulatory body in Brazil, responsible for regulating, licensing, and controlling of civilian use of nuclear energy and protect the public health and the environment against ionizing radiation.

In that case, an independent Regulatory Body is being created from the separation of the current CNEN into two distinct organizations. The *New CNEN* will have competencies associated with the research and development of nuclear energy, including the operation of research reactors, construction of the new Brazilian Multipurpose Reactor - *RMB*, and will be responsible for the production of radiopharmaceuticals, and the receipt, treatment, storage and final disposal of radioactive waste (*CENTENA Project*), while ANSN will assume the regulatory functions previously performed by CNEN.

Through the creation of this new agency, Brazil keeps the regulatory structure of the nuclear sector up to date, observing the areas of activity of its stakeholders, and fully complies with the provisions of Article 20.2 (INFCIRC/546) of the Joint Convention, which establishes that "each Contracting Party, in accordance with its legislative and regulatory framework, shall take the appropriate steps to ensure the effective independence of the regulatory functions from other functions where organizations are involved in both spent fuel or radioactive waste management and in their regulation".

The ANSN basically covers all the competences and responsibilities that are currently performed in the Brazilian regulatory system, but it brings some new important features:

- Full independence from regulatory activities in relation to nuclear technology promotion and operation activities.
- Establishment of a new decision-making process, through a Board of Directors, composed of three directors with recognized experience in the nuclear sector, approved by the Senate, and with a mandate of 5 years.

- Updating of the values of nuclear licensing fees, to be applied in safety assessment and inspection activities, which will provide better financial support to ANSN.
- Includes sanctions, through fines, on organizations for infractions related to the violation of regulatory requirements, which is presented as the biggest challenge for the ANSN, as it was not part of previous regulatory practices.

More precisely, according to Art. 1º of Law No. 14222, ANSN has financial, technical, and administrative autonomy from CNEN and according to Art. 2 it will be responsible for monitoring, regulating and inspecting nuclear safety and radiological protection of nuclear activities and facilities, nuclear materials and radiation sources in the national territory. Among its main responsibilities, ANSN will establish regulations and safety procedures for the use of nuclear materials and operation of nuclear facilities, as provided in Art. 6º-I. Also, ANSN will oversee the granting of licenses and permits to organizations involved in trading, importing, exporting, or transferring nuclear materials, as previewed in its Art. 6º-III.

In addition to other duties, ANSN will be liable for assessing safety, inspecting and issuing licenses, authorizations and approvals for site selection, construction, commissioning and operation as well as decommissioning of nuclear and radioactive facilities, and radioactive waste repositories, Art. 6º-V- a).

Under Art. 12º, ANSN will also impose sanctions on organizations for administrative infractions related to the violation of nuclear and radiological safety regulations. The sanctions applied will be based on the level of damage or risk caused to individuals, property, or the environment. Administrative infractions include failing to submit documents detailing the production and distribution of nuclear materials and neglecting to provide information about nuclear facility activities, according to Art. 13º-II and -III. Sanctions include fines and temporary suspension of nuclear facility functions, as provided in Art. 14º, and organizations with the most serious infractions may have their licenses revoked, as stated Art. 24º.

The ANSN also has the authority to impose measures to prevent any accident or damage involving nuclear or radioactive material. These measures include suspending nuclear facility functions and seizing materials and equipment, as previewed in Art. 19º. In accordance with Art. 6º-XI ANSN will also guide and collaborate with federal, state and municipal public authorities in the preparation of emergency plans in case of nuclear or radiological accidents. Art. 6º-XVII provides for collaboration between ANSN and international and foreign regulatory organizations in the areas of nuclear safety, radiological protection, nuclear security and control of nuclear materials.

In addition to the Law that created the ANSN, two decrees were issued: (*i*) Decree 10861 of 19th November 2021, which links the ANSN to the Ministry of Mines and Energy, and (*ii*) Decree 11142 of 21st July 2022, which establishes the organizational structure of the ANSN with 3 directors, who will form a Board of Directors, with mandates of: President-Director, a Director of Nuclear Installations and Safeguards and a Director of Radioactive Installations and Control. The directors must be nominated by the President of the Republic and appointed by him, after approval by the Federal Senate. Additionally,

directors must meet certain qualification requirements as stablished in Law 14222, such as 10 years of experience in the nuclear sector.

Although the Law has been approved by National Congress in October 2021, ANSN can only come into force after the approval of its Directors by the Brazilian Senate, which is still pending due to administrative arrangements and political decisions. The Senate hearing has been postponed but is expected to take place by the end of 2024. In the meantime, DRSN/CNEN continues to act as the nuclear regulatory body in Brazil.

Adequate human resources are provided to CNEN. A total staff of 1700 people, of which 85% are technical staff, is available at CNEN and its research institutes. Forty eight percent (48%) of the staff are university graduates, 16% having a master's degree (M.Sc.) and 15% having a doctorate degree (D.Sc.). The Directorate for Radiological Protection and Nuclear Safety (DRSN) staff is about 250 people, which will be the staff of the future National Nuclear Safety Authority (ANSN).

The Radioactive Waste Division (DIREJ), responsible for regulating and controlling all activities related to radioactive waste management in Brazil, comprises 17 people, being 7 with doctoral degree, 2 with master degree, 4 with college degrees people and specialization and 4 administrative. The main activities of DIREJ are review and assessment of the submitted documentation and inspection of licensee's activities. Inspection and audits activities are conducted periodically and on a permanent basis in all storage facilities in Brazil.

DRSN technical staff qualification and its maintenance has been attained through general or specific training, according to the field of work, including both academic training and course attendance, technical visits, participation in congresses, attendance of national and international workshops, participation on training courses and committee meetings, many of those sponsored by AIEA.

Financial resources for CNEN are provided directly from governmental budget. Since 1998, taxes and fees are being charged to the licensees, but this income is deducted from the Government funds allocated to CNEN.

Salaries of CNEN staff are subject to the Federal Government policies and administration.

E.3.2 - IBAMA

The Law 7735 created IBAMA in 1989 as the federal agency responsible to implement and enforce the National Environmental Policy (PNMA - Brazilian Law 6938 of 1981). In 2011, Supplementary Law 140 determined the actions under the jurisdiction of the Union in its Article 7, which includes the promotion of environmental licensing for enterprises and activities aimed at researching, mining, producing, processing, transporting, storing, and disposing of radioactive material at any stage, or that use nuclear energy in any of its forms and applications, and that holds the approval of the National Nuclear Energy Commission (CNEN).

Thus, IBAMA is a member of the Coordination Commission for the Protection of the Brazilian Nuclear Program (COPRON) and holds membership at other committees and centers at the System for Protection of the Brazilian Nuclear Program (SIPRON).

The main organizational units of IBAMA involved with the regulation and control of nuclear power plants is the Directorship of Environmental Licensing (DILIC) and the Directorship of Environmental Control (DIPRO).

The Directorship of Environmental Protection (DIPRO) represents IBAMA, in the Planning Committees for Response to Nuclear Emergency Situations (Copren-AR and Copren-Res) and three other centers regarding emergency situations: Center for Coordination and Control of a Nuclear Emergency Situation (CCCEN), National Center for Nuclear Emergency Management (CNAGEN) and State Center for Nuclear Emergency Management (CESTGEN). There're two main subjects analysed by DIPRO: emergency situations through the General Coordination of Environmental Emergencies (CGema); and evasion of the law concerning the environment or of any license's condition.

The environmental licensing of nuclear activities and facilities are analysed by the Directorship of Environmental Licensing (DILIC), through the Coordination of Environmental Licensing for Nuclear, Thermal, Wind, and Other Alternative Energy Sources (CENEF), under the General Coordination of Environmental Licensing for Riverine and Landbased Point Source Projects (CGTef).

CENEF performs the environmental licensing of the Nuclear Power Plants, the Nuclear Fuel Factory, the Nuclear Research Centers (CNEN and Navy), the Radioactive Waste Facilities, the Transportation of Radioactive Materials, and, after the enactment of Supplementary Law 140/2011, any other radioactive facility.

CENEF carries out the environmental licensing of uranium mines in the municipalities of Santa Quitéria (State of Ceará) and Caetité (State of Bahia) and the decommissioning activities of the Ore Treatment Unit of Poços de Caldas (State of Minas Gerais), now called Caldas Decommissioning Unit (UDC). The UDC is in undergoing decommissioning. There is a working group with members of DILIC and DIPRO who follow the status of the project that has been changed and adapted since IBAMA first approved the conceptual plan for the unit's decommissioning project. CENEF requested that a decommissioning operating license be applied for again.

In the case of Santa Quitéria Project, currently CENEF is analysing the Environmental Impact Study and INB expects the study to be approved by the end of 2024 and the Previous License to be granted.

CENEF also performs the environmental licensing of the Brazil's nuclear submarine. In April 2010, IBAMA issued the LP 351/2010, and In December 2014, IBAMA issued the Installation License - LI 1031/2014 to this project.

SECTION F - OTHER GENERAL SAFETY PROVISIONS

F.1 - RESPONSIBILITY OF LICENCE HOLDER (Article 21)

Brazilian legislation defines the operating organization as the prime responsible for the safety of a nuclear or radioactive installation, including the management of spent fuel and radioactive waste.

CNEN, through the licensing process, and especially through its regulatory inspection programs, ensures that the regulatory requirements for safe operation are being fulfilled by the licensee.

Therefore, to obtain and maintain the corresponding licenses, the operators must fulfill all the prerequisites established in the legislation, which are translated in the CNEN regulations presented in Annex **L.2**.

F.1.1 - NUCLEAR POWER PLANTS

In the case of nuclear power plants, the regulation CNEN-NE-1.26 - Operational Safety of Nuclear Power Plants [8], defines the operating organization as the prime responsible for the safety of a nuclear installation by explicitly stating: "The operating organization is responsible for the implementation of this regulation." According item 13.4 of CNEN-NE-1.26 [8], the operating organization must establish a radioactive waste management program, in which the treatment, packaging, initial storage, transport and provisional deposition of such waste must be included, and the requirements established in Standard CNEN-NN-5.01 – Safety Transport of Radioactive Materials [15] and Standard CNEN-NN-8.01 - Radioactive Waste Management for Low and Intermediate-Level Waste [25].

Eletronuclear (ETN), as the owner and operator of the Angra-1 and Angra-2 plants, and Angra-3 (under construction), has issued an Integrated Safety Management Policy stating its commitment to safe operation.

Therefore, its staff commitment to perform all safety-related activities in an integrated manner is essential, laying emphasis upon Nuclear Safety, which includes Quality Assurance and Environmental as well as Occupational Safety, Occupational Health and Physical Protection.

The following principles must be heeded:

- 1. Nuclear Safety is a priority, precedes productivity and economic aspects and should never be impaired for any reason.
- 2. Legal requirements and other requirements related to the various integrated safety aspects should be complied with.
- 3. Personnel and service supplier qualification training should ensure knowledge on the various integrated safety aspects required for proper performance of safety-related work.

- 4. People health and safety hazards and also environmental impacts should be preventively minimized or eliminated.
- 5. Communication procedures inside and outside the Company should be transparent and appropriate so that any unsafe condition can be promptly reported.
- 6. The Company should seek to improve continuously its Integrated Safety Management practices.

For the proper implementation of this safety policy, ETN established a program comprising all levels of the organization that complies with the concept included in the IAEA's document Safety Series 75, INSAG 4, of the International Nuclear Safety Group (INSAG), in line with the safety objectives and requirements, considering the appropriate management structures, the necessary resources, training, adequate self-assessment, external reviews and human performance programs and tools with good results in the last years.

CNEN, through the licensing process, and especially through its regulatory inspection program, ensures that the regulatory requirements for safe operation are being fulfilled by the licensee. The licensee reports periodically to CNEN in accordance with regulation CNEN-NN-1.14 [5] - Operational Reporting for Nuclear Power Plants. In addition, CNEN maintains a group of resident inspectors on the site, who can monitor licensee performance on a daily basis. Finally, a number of regulatory inspections by headquarter staff take place every year, focusing on specific topics or operational events.

F.1.2 - INB FACILITIES

At INB industrial nuclear installations, safety is prioritized in all of its activities, as a basic principle. The oversight organization, CNEN, maintains a program of constant inspections, in addition to the presence of resident inspectors at INB facilities, whose job is to track the operating routine of the units and report any occasional abnormality. Internal audits in the areas of Quality Assurance, Environment and Workplace and Occupational Safety are routinely performed, in order to detect any situation that may represent a potential unsafe operating condition.

Additionally, it may be mentioned that INB, in the past, counted on the cooperation of the International Atomic Energy Agency, for the realization of the first safety review mission, called project SEDO (Safety Evaluation During Operation), at the FCN in 2007, with a follow up mission held in 2010, with valuable results in terms of safety management improvement. INB counted as well as the organization of the first IAEA Mission UPSAT (Uranium Production Site Appraisal Team), which took place at URA, also in 2010, achieving the objective of evaluating and improving the operational and safety performance of the uranium production Unit, by means of a peer review based on the IAEA Safety Standards.

As for the FCN-Enrichment, the regulatory body CNEN have granted the Authorization for Use of Nuclear Material (AUMAN) and the Authorization for Permanent Operation (AOP) for Cascades 1, 2, 3 and 4 of Module 1, Cascades 5 and 6 of Module 2, Cascades 7 and 8 of Module 3 and Cascades 9 and 10 of Module 4, valid until November/2025.

Section **F.3.4** presents the FCN's systems which are certificated in the areas of quality assurance, environment and occupational safety, collaborating with the security system of the company.

F.2 - HUMAN AND FINANCIAL RESOURCES (Article 22)

F.2.1 - HUMAN RESOURCES

F.2.1.1 - Nuclear Power Plants

Adequate human resources are available for Eletronuclear (ETN) from its own personnel or from contractors. Currently ETN has 1,934 employees on its permanent staff which—869 have a university degree, 846 are technicians and the remainder 219 are administrative personnel.

During 2017 the company implemented a restructuration, according to holding company alignment. Because of that, some organizational units were extinguished, and the employees were distributed in other areas. Another change was the reduction of the number of supervisors and the establishment of a new retirement incentive program.

To comply with the resolutions established by the privatization of Eletrobras, during 2022 the company implemented another restructuration, which consisted in the segregation of the former Administration and Finance Directorate into Administrative Management Directorate and Financial Directorate, as well as the creation of Angra 3 Directorate.

In 2014 Eletronuclear's Programmed Employees Replacement Plan (PSPE) was developed. This Plan is a complementary tool of the Human Resources Department constituted by a set of rules and programs that enable the company to ensure a good performance through the succession plan and allow it to reduce the risk of human performance errors arising from unplanned outputs. The PSPE was supported by three projects, one of them the Substitutes Preparation Program – PPS. The goal of this program was the systematic mapping of the current workforce in order to identify and prepare substitutes.

The Human Performance Program was implemented in 2007 and since then, it has been increasing in terms of actions and areas. The Human Performance Program can be considered to have a key role in terms of reinforcement of safety culture in the company. The goal of the Program is to systematize actions in order to promote performance improvement of employees working at Eletronuclear (ETN), so as to reduce human errors and error-related events. The basic methodology is the reduction of human errors through the use of ten error prevention tools, understanding the reasons why errors occur, as well as promoting awareness and perception of emotional and behavioral factors that contribute to such errors.

The human resources representatives at the Human Performance Program are the Psychologists from the Eletronuclear (ETN) permanent staff.

In the beginning, the objective was to train every employee in the human performance fundamentals and the use of error prevention tools. After this, retraining has been developed under the responsibility of each department. This allowed the involvement of all the levels of the company with the principles of Human Performance. For the new employees and contractors, the basic training continues being conducted by psychological and technical professionals, providing uniform guidance related to Human Performance.

A summary of the main activities from this program is described below:

- Basic trainings applied to all new employees including disciplines as error theory, error precursors and error prevention tools.
- Application of the Human Performance Module inside the Outage Training.
- Application of Team Work Training for operator for some areas of the company.
 This training was structured to develop skills and attitudes for a good relationship, communication and integration of the team.

Since 2011, the psychologist staff of Eletronuclear has been effectively included in the root-cause analysis group working at the plants Angra-1 and Angra-2 analyzing all kind of events, even those that are not at first related to human errors. The goal is to verify if the event is related to human error and, if so, determine the causes of the problem and how they should be treated, seeking to avoid repetition or recurrence of events in the future.

Safety Culture and Human Performance Committees have been established, one for each plant, which meet once a month in order to monitor indicators regarding human performance, error prevention tools training, management enforcement of standards and other related topics. The committees are tasked with diagnosing vulnerabilities in human performance, developing and enforcing action plans for its continuous improvement.

Activities related to initial and continuous training of plant personnel are performed by the Training Department of ETN which reports to the Site Superintendent.

Three main areas exist at the training facilities, close to the site:

- General Building
- Angra-1 Simulator Building
- Angra-2 Simulator Building

Due to Long Term Operation of Angra-1 plant, some modifications will be implemented on the control room of the plant and the simulator.

Eletronuclear recently promoted a bidding for the supply of Angra 3 Simulator. The contract was signed and the project is currently in the development and design review phase.

In our General Building, we have installed a scale model of Angra-2 NPP, that is used for training, and also a thermohydraulics mockup, used for human performance and work conduct training.

Besides Angra-1 and Angra-2 operators training, Training Department is also responsible for Maintenance, Chemistry, Radiologic Protection, Engineering, Industrial Safety and Fire Brigade personnel training.

Technical Exchange Visits and Reviews of the training program and training center by experts from the International Atomic Energy Agencyand the World Association of Nuclear Operators (WANO) have provided valuable contribution to the identification and implementation of good practices for enhancing the quality of the training activities.

A total of 43 qualified personnel are directly involved in waste and spent fuel management, as described in the Table F.1.

CNEN monitors the adequacy of the human resources of the licensee through the evaluation of its performance, especially through the analysis of the human factor influence on operational events. The training and retraining program is also evaluated by CNEN within the licensing procedure and through regulatory inspections.

Table F.1 - Personnel involved in spent fuel and radioactive waste management at Angra-1 and Angra-2 NPPs

Qualification	Quantity	Education
Radiological Protection Supervisor	4	University degree
Senior Reactor Operator	2	University degree
Nuclear Physicist	4	University degree
Nuclear Engineer	4	University degree
Engineering Support	2	University degree
Operators	7	Technical degree
Radiological Protection Technician	10	Technical degree
Auxiliary Technician	10	Secondary

Radiation Protection Supervisor certification is done in accordance with regulation CNEN-NN-7.01 "Certification of the Qualification of Radiation Protection Supervisors" [9].

F.2.1.2 - INB Facilities

The leadership have the responsibility to identify, plan and provide development actions to improve employee's performance working in their behalf, with Human Resources Area assistance, according to the activities assigned their employees in order to achieve corporate objectives, keep and increase safety and nuclear security.

See below the main qualification required and /or provided to employees:

Education Certification: required and presented by new employees according to the specific function they applied for, before admission. The education level is often

updated as soon the employee accomplish new university specialization degrees, regarding self-development or supported by INB.

Mandatory Trainings: required to attend specific standards, licensing and certifications due the employee activities.

Technical trainings: provided to prepare employees to perform their responsibilities attending their activity plan and individual development plan, in order to achieve expected performance, accomplish the area mission and corporate objectives.

Development trainings: actions planned and implemented regarding to improve employee's professional performance and the corporate objectives achievement.

At present, INB has a total of approximately 1,191 employees. Table F.2 shows INB regular workforce by location at each of the company units.

University **Technical** Location Secondary Primary Total degree degree 290 206 Resende, RJ 157 11 664 79 4 25 7 Rio de Janeiro, RJ 115 Caetité, BA 58 130 6 280 86 9 Buena, RJ 3 4 8 24 2 São Paulo, SP 3 1 6 Caldas, MG 29 43 16 8 96 Fortaleza, CE 3 0 0 0 3 2 3 Santa Quitéria, CE 0 0 1 467 295 42 1,191 Total 387 39% 25% 32% 4% 100% Percentage

Table F.2 - INB personnel – regular workforce by location

Tables F.3 to F.6 show the qualification of INB personnel directly involved with radioactive waste management at INB's facilities: Caetité (URA), Caldas (UDC), Buena (UMP) and São Paulo (UDSP/ UEB), and Resende (FCN).

Table F.3 - INB personnel involved in radioactive waste management at Caetité (URA)

Qualification	Quantity	Education
Radiological Protection Supervisor	2	University degree
Engineering Support	1	University degree
Radiological Protection Technicians	12	Technical degree
Auxiliary Technicians	5	Secondary

Table F.4 - INB personnel involved in radioactive waste management at Caldas (UDC)

Qualification	Quantity	Education
Radiological Protection Supervisor	2	University degree
Engineering Support	3	University degree
Radiological Protection Technicians	13	Technical degree

Table F.5 - INB personnel involved in radioactive waste management at Buena (UMP) and São Paulo sites (UDSP/UEB)

Qualification	Quantity	Education
Radiological Protection Supervisor	3	University degree
Radiological Protection Technicians	4	Technical degree
Auxiliary Technicians	1	Secondary

Table F.6 - INB Personnel involved in radioactive waste management at Resende (FCN)

Qualification	Quantity	Education
Radiological Protection Supervisor	6	University degree
Engineering Support	0	University degree
Radiological Protection Technicians	19	Technical degree

Certification of radiation protection supervisors is done in accordance with the regulation CNEN–NN-7.01 "Certification of the Qualification of Radiation Protection Supervisors" [9]. Among the Radiological Protection Supervisors, there are four qualified for Waste Management.

F.2.1.3 - Other Installations

All nuclear or radioactive installations licensed by CNEN must have a certified Radiation Protection Supervisor, authorized in accordance with regulation CNEN-NN-7.01 [9]. The regulation requires different qualification for each different type of installation.

At IEN, 19 people are involved in waste management and radiation protection. Table F.7 shows the profile of the IEN staff involved on the radioactive waste management at the deposits and on spent fuel activities.

Table F.7 - Personnel involved in spent fuel and radioactive waste management at IEN

Qualification	Quantity	Education
Senior Reactor Operator	1	University degree
Radioactive Waste Technicians	5	Technical degree
Technician	1	Technical degree
Radiological Protection Technicians	5	Technical degree
Reactor Operator	3	University degree
Biologist	1	University degree
Physicist	1	University degree
Pharmacist	1	University degree
Radiological Protection Supervisor	1	University degree

Besides that, sufficient qualified staff should be available for handling radioactive waste. For instance, at IPEN, the staff of the radioactive waste unit is shown on Table F.8, together with the spent fuel management staff.

Table F.8 - Personnel involved in spent fuel and radioactive waste management at IPEN

Qualification	Quantity	Education
Radiological Protection Supervisor	3	University degree
Senior Reactor Operator	9	University degree
Physicist	4	University degree
Chemist	3	University degree
Nuclear Engineer	1	University degree
Engineering Support	3	University degree
Operators	13	Technical degree
Radiological Protection Technicians	6	Technical degree
Auxiliary Technicians	5	Secondary

At CDTN a total of 20 qualified people is directly involved in waste and spent fuel management. Table F.9 shows the profile of the CDTN staff that is involved on the waste and spent fuel management activities. Among them, four have doctoral degree and seven have master degree.

Table F.9 - Personnel involved in spent fuel and radioactive waste management at CDTN

Qualification	Quantity	Education
Radiological Protection Supervisor	2	University degree
Senior Reactor Operator	4	University degree
Senior Reactor Operator	2	Technical degree
Engineering	4	University degree
Radioactive Waste Technicians	5	Technical degree
Radiological Protection Technicians	2	Technical degree
Administrative	1	Secondary

At CDTN, all staff that works with radioactive waste management received training in Brazil and abroad in this subject. They are trained to work with administrative and technical activities. Specialized internal and external training is available for whole staff, including radiation protection and safety courses. Technical visits, courses and meetings are included in this training, and the majority of the staff has had some training in other countries, through IAEA and CNPq (Brazilian Research and Development Council) programs.

As presented in Table F.10, the Midwest Regional Center for Nuclear Sciences (CRCN-CO) has 11 employees in its current staff; being 6 of them directly involved with radioactive waste management activities and with the Radiological Environmental Monitoring Program (PMRA).

Table F.10- Personnel involved in radioactive waste management and execution of the Radiological Monitoring Environment Program (PMRA) at CRCN-CO

Qualification	Quantity	Education
Radiological Protection Supervisor	1	University degree
Operators	2	University degree
Operators	1	Technical degree
Radiological Protection Technicians	1	University degree
Operators	1	University degree

At Northeast Regional Center for Nuclear Sciences (CRCN-NE) a total of **4** qualified people is directly involved in waste management. Table F.11 shows the profile of the CRCN-NE staff involved in the waste management activities. Among them, one has a doctorate, one a master's degree and two have a bachelor's degree.

 Table F.11 - Personnel involved in radioactive waste management at CRCN-NE

Qualification	Quantity	Education
Radiological Protection Supervisor	2	University degree
Radioactive Waste Technician, and Operator	2	University degree

F.2.2 - FINANCIAL RESOURCES

F.2.2.1 - Nuclear Power Plants

As a state-owned company, Eletronuclear S.A. has its financial situation subjected Eletrobras and ENBPar.

The sale of energy produced by nuclear power plants Angra-1 and Angra-2 (1,885 MWe of net installed capacity) was amended by Law 12111 and regulated by Normative Resolution No. 530 from 21th December 2012. Under this Normative Resolution, the National Electric Energy Agency has established through the Chamber of Electric Energy Commercialization the Selling Contract of Nuclear Energy of Angra-1 and -2 nuclear power plants. This contractual change is effective since January 1st, 2013 and sets the mandatory purchase of the generated energy by all concessionaires for public distribution service of the National Interconnected System. The National Electric Energy Agency approved for the year 2024 the tariff value for sale of power from Angra-1 and Angra-2 is R\$ 355.16/MWh (~63 US\$/MWhr, in July 2024).

The provision of funds for decommissioning activities is obtained from ratepayers and is included in the tariff structure. For Angra-1, presently, a reference decommissioning cost of 601 million dollars is estimated. For Angra-2 the decommissioning costs are estimated in about 708 million dollars, in December 2019.

F.2.2.2 - Nuclear Fuel Cycle Plants

Brazilian Nuclear Industries (INB) is a public company, linked to the Ministry of Mines and Energy (MME). INB is in charge of conducting the Federal monopoly of the nuclear fuel cycle area, which covers the stages from the uranium mining to the manufacturing of the fuel assembly used in the Angra-1, Angra-2 and, in the future, Angra-3 nuclear power plants. In 2022 INB became part of the holding company Brazilian Company for Nuclear and Binational Energy Participations S.A. – ENBPar, as previously mentioned in item **E.1** (Figure E.1).

The company headquarters is located in the city of Rio de Janeiro. There are regional offices in the cities of São Paulo and Fortaleza, as well as industrial installations located in the following places:

 Caetité, BA: the Uranium Concentration Unit (URA) is in operation. At URA, uranium ore is mined and processed to produce uranium concentrate in the form of ammonium diuranate (DUA);

- Resende, state do Rio de Janeiro: the Nuclear Fuel Factory (FCN) that comprises the manufacturing of components and assembly of fuel elements, uranium enrichment plant (ten cascades commissioned, but four of them are in modernization process), conversion of UF₆ to UO₂ powder and UO₂ pellets manufacturing;
- Buena, in the state of Rio de Janeiro: the Heavy Minerals Processing Unit (UMP) is
 planning to come back to operation, through an assignment of rights for the use of
 the site. This activity is not associated to the nuclear fuel cycle, but it is where the
 following minerals are extracted: zirconite, rutile, ilmenite and monazite;
- Caldas, in the state of Minas Gerais: the first uranium mine of Brazil, along with the
 mill Unit called Caldas Decommissioning Unit (Unidade em Descomissionamento de
 Caldas UDC). The industrial activities at the site have been discontinued because
 they ceased to be economically viable. Currently, decommissioning and
 environmental remediation are being developed;
- City of São Paulo, in the state of São Paulo: the São Paulo Decommissioning Unit (Unidade em Descomissionamento de São Paulo UDSP) is a waste storage of residues from the chemical processing of monazite sands. This site has some degree of contamination in its soil with monazite sands. In 2010, the work of decontamination of the soil was initiated and in 2012 a partial area with 18,400 square meters was decontaminated. In 2013, CNEN made a final characterization of this area and confirmed that the area could be used unrestrictedly. After that, 20,000 square meters were decontaminated, and currently the remainder of the 21,600 square meters is under decontamination;
- Itu City, in the state of São Paulo: there is the waste Storage Unit of Botuxim (Unidade de Estocagem de Botuxim UEB).

Operational Revenue:

- The company's main client is Eletronuclear (ETN), operator of the nuclear power plants Angra-1 and Angra-2, and responsible for the construction of Angra-3, currently in progress;
- Gross revenue from the sale of goods and services comprises the revenue relative
 to the contracts of i) uranium concentrate, ii) conversion, enrichment and
 management and iii) fuel element manufacturing, signed with ETN for the reloads
 of Angra-1 and Angra-2, as well as the sale of products of the Heavy Minerals Unit –
 Buena.

Becaming part of the holding ENBPar, INB turned independent of the Budget resources of the National Treasury.

F.2.2.3 - Other Installations

At all CNEN's institutes the funds for the spent fuel and waste management come from the general budget that is provided by the Ministry for Science, Technology and Innovations (MCTI).

At CDTN, some additional funds come from the FAPEMIG (Minas Gerais State Foundation for Research Support), FINEP (Research and Projects Financing), CNPq

(National Council for Scientific and Technological Development) and other governmental Institutions, through special projects.

At CRCN-NE, the financial resources for the operation and maintenance of its e Radioactive Waste Storage Facility (DIRR – *Depósito Intermediário de Rejeitos Radioativos*) are part of CNEN's budget allocation and have been considered sufficient to meet the facility's operation, highlighting that these resources depend on CNEN's budgetary policies and are also provided by the Ministry for Science, Technology and Innovations (MCTI).

F.3 - QUALITY ASSURANCE (Article 23)

The requirement for a quality assurance program in any nuclear installation project in Brazil is established in the licensing regulation CNEN-NE-1.04 - Licensing of Nuclear Installations [3], recently revised in Abril 2024. Specific requirements for the programs are established in a specific regulation, Quality Assurance for Safety in Nuclear Power Plants and Other Installations, CNEN-NN-1.16 [10], which is based on the IAEA code of practice 50-C-QA Rev.1 - Quality Assurance for Nuclear Power Plants, but with the introduction of the concept of an Independent Technical Supervisory Organization (OSTI) [11].

F.3.1 - NUCLEAR POWER PLANTS

Eletronuclear S.A. (ETN) has established its quality assurance program in accordance with the requirements mentioned above. The corresponding procedures have been developed and are in use. The program provides the control of the activities influencing the quality of items and services important to safety. These activities include both spent fuel storage and radioactive waste management. Quality assurance programs are described in Chapter 17 of the FSAR.

The Quality and Environment Superintendency (SQ.T), reports to the Technical Directorate (DT) and is responsible for the establishment and supervision of the ETN Quality Assurance System.

The Quality and Environment Superintendency (SQ.T), is responsible for the coordination and performance of internal and external audits in order to verify compliance with all aspects of the quality assurance program.

A comprehensive system of planned and periodic internal and external audits is established and documented. Audits are performed according to written procedures, including checklist as appropriate. In the case of internal audits, people involved with activities being audited have no involvement in the selection of the audit team. Audit reports are distributed to, and formally analyzed by the audited organizations. During the period of January 2017 through June 2020, 64 external audits and 93 internal audits were conducted.

Audits and inspections by CNEN verify that quality assurance requirements are being implemented and that the quality assurance has been effective as a management tool to ensure safety. During the period of July 2022 through July 2024, CNEN conducted

74 audits or regulatory inspections in Angra-1, -2, -3 and other support installations of CNAAA site.

The Quality and Environment Superintendent (SQ.T) also takes part of the Nuclear Operations Review Board – NORB (or, in Portuguese, "Comitê de Análise de Segurança – CAON"), which is a collective body under the coordination of the Operation Coordination Superintendency (SC.O) whose purpose is to examine, follow-up and analyze issues concerning Angra-1 and -2 operational safety and to make recommendations for safety improvements. In the same way, the Quality and Environment Superintendency participates in the Plant Operation Reviews Commission (or, in Portuguese, "Comissão de Revisão de Operação da Usina – CROU"), which are collective bodies under each respective unit manager with the responsibility to review and analyze, on a closer basis, questions related to the operation of the units.

F.3.2 - CNEN INSTALLATIONS

CNEN has also established its own Nuclear Safety Policy [17] and Quality Assurance Policy [18]. Under these policies, all units have to establish their own quality assurance system.

At IPEN, the Radioactive Waste Center (CERER) seeks continuous improvement of the culture to promote the adoption of best practices and technological advances, enhancing the overall quality and safety of waste management. Optimization of treatment processes and improvement of the waste characterization process are being applied to minimize radioactive waste. A formal and documented quality system is currently being implemented. The Center for Nuclear Engineering (CEENG) was involved, from 2014 to 2020, in the design and adaptation of the new core for the IPEN/MB-01 RR containing plate-type fuel elements, similar to the fuel element to be used in the future Brazilian Multipurpose Research Reactor (RMB). After criticality, it carried out commissioning experiments aimed at validating the calculation methodology used in its design. The experiments carried out after the Covid-19 pandemic, from 2022 to 2024, were the prediction of the critical mass of nuclear fuel, the prediction of the critical position of the control rods, calibration of the control rods, measurement of the isothermal reactivity coefficient and measurement of the void reactivity coefficient.

The Radioactive Waste Management Program of CDTN is also subject to Quality Assurance procedures. The Quality Assurance (QA) System is divided in two parts. The first one contains CDTN's QA Manual, with the general policies and nine general procedures. The second part comprises the specific QA Manuals for the laboratories and special services. They are in force within the scope of the Program, establishing the applicable standards and the responsibilities for the different sections of the Institute involved. The Radioactive Waste Management Program describes the responsibilities and the main orientation for all personnel involved with the waste. The operational activities are specified in twenty specific procedures, such as waste segregation, collection, treatment and tests for waste product quality assessment.

The IEN radioactive waste staff is committed to fulfilling the requirements for reopening the storage facilities, currently no waste is being received to storage. Several engineering analyses were carried out in the storage facilities structures and the results indicated that there is no risk of collapse. An action plan to solve the structural problem was drawn up, which includes hiring an engineering company to reestablish the adequate structural conditions. In this meantime, the personnel continue to develop new techniques for the treatment of liquid waste and new internal procedures to keep safety and security conditions.

The "Standard Operating Procedures" (POP in Portuguese) adopted in conducting the work carried out at the Radioactive Waste Storage Facility (DIRR) of CRCN-NE, as well as the administrative procedures and those relating to environmental protection, are all described in controlled documents. The procedures describe how activities are carried out, how often operations are performed and who is responsible for carrying them out. Them can also indicate the necessary conditions and resources, and special care, in addition to the description of the forms used and the revisions history aligned with the process of continuous improvement and quality assurance.

The system for preparing and controlling procedures and their registrations is established in the procedure "Preparation and control of documents of the DIRR quality assurance system", with the purpose of ensuring that they will be approved, dated and signed by the responsible for the CRCN-NE waste management service.

The person responsible for the CRCN-NE waste management service must monitor the implementation of each procedure to ensure the intended purpose, adopting corrective and/or preventive measures in cases of deviations from the operational conduct described in each procedure.

F.3.3 - QUALITY ASSURANCE AT NAVY INSTALLATIONS

The quality required by the projects developed at the Navy Technological Center in São Paulo (CTMSP) has been assured by the application of procedures and instructions prescribed by a Quality Management System, since the beginning of the activities, in accordance with Standard CNEN- NN-1.16 – Quality Assurance for Safety of Nuclear Power Plants and Other Installations [10], applicable during the lifetime of the installation, including: siting, design, construction, commissioning, operation and decommissioning. For the stages of commissioning and operation of the nuclear facilities, the requirements of CNEN-NN-1.16 are complementary to those of the Standard CNEN-NE-1.26 - Operational Safety of Nuclear Power Plants [24].

Within the CTMSP organizational structure, the Engineering Superintendence, directly subordinated to the Director, is responsible for the Quality Assurance System, being independent of all other organizational sectors of CTMSP.

F.3.4 - QUALITY ASSURANCE AT INB FACILITIES

According to the requirements of the standard CNEN-NN-1.16 [10], INB

systematically submits to CNEN updates of the Quality Assurance Program Procedures (PGQ) for its facilities.

In 1996, the company implemented and certified, per NBR ISO 9001 Standard, the Quality Assurance System for the Nuclear Fuel Factory at Resende. Subsequently, in 2007, by adopting management standards NBR ISO 14001 and OHSAS 18001, INB expanded the scope of certifications in the areas of environment and occupational safety, respectively, through its Integrated Management System - SIG. The unit was re-certified in 2018 by a team of BR TÜV (company responsible for the certification of nuclear facilities in Brazil). In February 2022 the OHSAS 18001 certification of FCN was substituted by the ISO 45001 certification.

It is worth noting that the requirements of the referred standards, besides being in line with CNEN-NN-1.16, prioritizes customer satisfaction, management responsibility, process control and the use of quality indicators with pre-established targets.

The greatest advantage of adopting such standards through an integrated management system at the FCN consists in the fact that the company controls and continually improves its processes for activities pertaining to nuclear safety, quality, environment, safety, health and physical protection.

Other units of INB operate with the Quality Assurance System on the basis of CNEN-NN-1.16 standard, with particular focus on nuclear safety.

F.4 - OPERATIONAL RADIATION PROTECTION (Article 24)

Radiation protection requirements and dose limits are established in Brazil in the standard CNEN-NN-3.01 - Basic Requirements for Radioprotection and Radiological Safety of Radiation Sources [12]. This regulation requires that doses to the public and to the workers be kept below established limits and as low as reasonably achievable (ALARA).

Implementation of this regulation is performed by developing the basic plant design in accordance with the ALARA principle and by establishing a Health Physics Program at each installation. The plant design is assessed by the regulator at the time of the licensing review by evaluating the dose records during normal operation.

The Role of CNEN

Regulation CNEN-NN-3.01 [12], of April 2024, is the primary regulatory standard with which is applied to all planned exposure situations, emergency exposure situations and existing exposure situations. The main aspects regarding radiation protection and discharge requirements are as follows:

 Controls are established in terms of effective dose for all nuclear facilities on an annual basis, considering 12 consecutive months, that is an effective dose of 20 mSv per year averaged over five consecutive years (100 mSv in 5 years) and of 50 mSv in any single year;

- The primary annual dose limit to members of the public is 1 mSv effective dose applied to all planned exposure situations during all their life stages, i.e., past, present and future;
- For each single justified planned exposure situation, the discharges should not reach activity concentrations that exceed the reference level of 0.3 mSv/y to the critical group, taking into account all exposures pathways and all radionuclides present in the effluents. The assessment shall consider conservative hypotheses. This level is intended to be applied during the licensing stage and used as a ceiling in the optimization process;
- Unless CNEN specifically requests, the demonstration of optimization may be exempt provided that the following criteria are met:
 - the average annual effective dose to workers less than 1 mSv;
 - the average annual effective dose to individuals of the critical group or representative person less than 10 μSv.

The dose constraint is used to establish upper operational levels of activity concentration for effluent discharges to the environment. There are two ways of establishing such levels:

- The operator proposes the upper levels, based on environmental modelling during the licensing. The whole process is verified and approved by the regulatory body.
- In cases where the procedure is not presented or is not accepted, the regulatory body establishes these levels.

In both cases, CNEN performs an independent assessment to establish or approve upper levels for effluent discharges to the environment. The procedure used is based on the critical group approach and follows the model proposed by IAEA as described in Safety Standards Series No. SSG-48, adapted to the local conditions and the uses of the environment. The definition of the critical group is described in the regulation CNEN-NN-3.01 and follows the recommendations of ICRP.

To the extent possible, local data are used in the model. These data are assessed from licensing documentation provided by the operator, including those from the Environmental Impact Report (RIMA) provided to IBAMA.

Basic controls for effluent releases required by the regulation CNEN-NN-3.01 - Basic Requirements for Radioprotection and Radiological Safety of Radiation Sources [12] to the prime responsible include:

- maintain optimized the radiation protection, ensuring that all releases of radioactive effluents respect the authorized dose restriction levels, considering the exposure of the representative person or critical groups;
- establish operational levels for releasing radioactive effluents and submit them to CNEN for approval;
- monitor the release of radioactive effluents to demonstrate compliance with operational release levels;

- monitor, when justified, the exposure routes of the representative person or critical group, resulting from the release of radioactive effluents into the environment;
- record and maintain the results of these monitoring, including dose estimates, and issue monitoring reports for evaluation by CNEN; and
- immediately communicate to CNEN any release that exceeds the value of the dose restriction in the representative person or critical group or the annual dose limit for the individual member of the public.

The CNEN, as regulatory authority, carries out periodic inspections in order to verify compliance with the regulations.

CNEN regulation NE-1.04 - Licensing of Nuclear Installations [3] also requires the establishment of basic controls such as:

- The installation must provide systems to control and limit radioactive releases into air and water;
- Technical specifications related to the release limits and monitoring of radioactive effluents must be approved by CNEN;
- The operator must establish and carry out appropriate monitoring programs;
- Documented management systems are required to ensure compliance with authorization conditions;
- Effluents release accounting, dose calculation, environmental monitoring and the amount of disposed waste shall be registered and made available for further inspections;
- Operational reports that shall be provided by the operator according to regulation CNEN-NE 1.14 [5] include:
 - Monthly historical operation report;
 - Semi-annual Effluents Release Report;
 - > Dose Assessments to the Critical Group;
 - Annual Environmental Monitoring Program Report Impact Evaluation;
 - Unusual Events Report.

F.4.1 - NUCLEAR POWER PLANTS

The Health Physics Program of Angra-1 and Angra-2, included in Chapter 12 of the Final Safety Analysis Reports, sets forth the philosophy and basic policy for radiation protection during operation. The general policy is to maintain radiation exposure of the workers below the limits established by CNEN and to keep exposures as low as reasonably achievable (ALARA), taking into account technical and economic considerations.

The administrative annual dose limits to workers are 20 mSv for effective dose in a single year, 15 mSv averaged over five years, and 400 mSv for dose equivalent for individual organs and tissues, except in the case of the eye lens, for which the limits are 20 mSv in a single year and 15 mSv averaged over five years. For pregnant women, the limit is reduced

to 1 mSv for the entire pregnancy period. Pregnant or breastfeeding condition women, they shall not work inside controlled areas.

The actual personnel radiation doses for workers at Angra Nuclear Power Plants are much lower than the established limits. The dose distribution for workers at the Angra site demonstrates an adequate radiological protection program, with more than 94% of the occurrences of the year 2023 in the dose range of less than 1 mSv, which is the dose limit for the individual members of the public. Dose distributions for the year 2023 are presented in Figures F.1 and F.2.

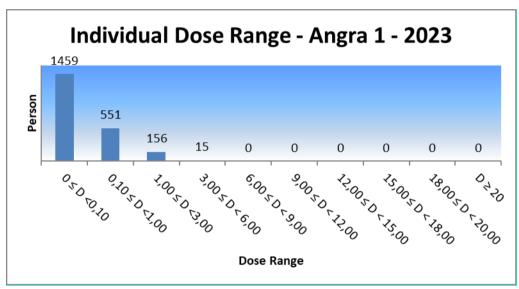


Figure F.1 - Individual Dose in Angra-1

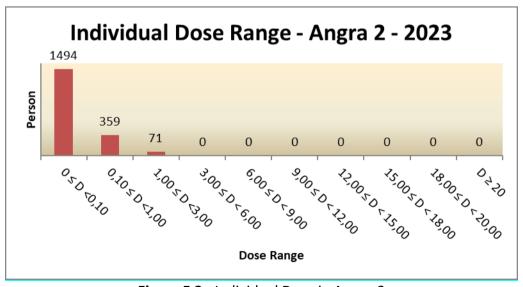


Figure F.2 - Individual Dose in Angra-2

2014

2015

2016

2017

2022

2023

2022

Annual Collective Dose - Angra 1 (Person.mSv)

454,78
389,32
367,02
396,71
427,36
347,13

The collective doses over the past recent years are shown in Figures F.3 and F.4.

Figure F.3 - Collective Dose in Angra-1

2018

21,86

2019

2020

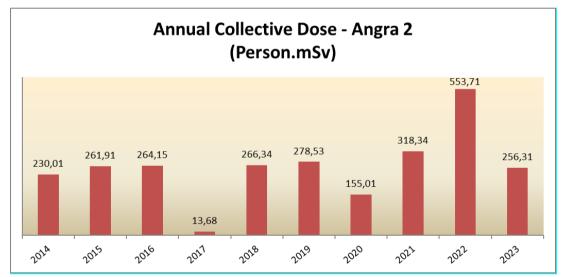


Figure F.4 - Collective Dose in Angra-2

The release of radioactive material to the environment is controlled by administrative procedures and is kept below the limits established by CNEN. Additionally, the amount of radioactive waste and the radioactive effluents discharged to the environment also follow the ALARA principle.

The effluent limits are in accordance with the reference levels established in the Offsite Dose Calculation Manual (ODCM), approved by CNEN. In this manual, the dose for the hypothetical critical individual is calculated.

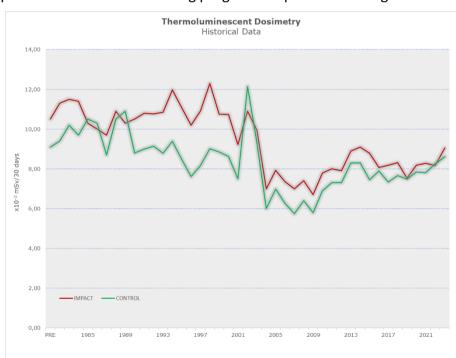
According to CNEN regulation [5], a report of solid waste and effluents is issued every semester, documenting the liquid and gaseous effluents (reporting the present radionuclides and concentration) and solid waste quantity sent to the on-site storage facility. Also, the effective dose for the critical individual is presented. In 2023, this dose

reached a value of 6.60×10^{-3} mSv for Angra-2 operation and a value of 3.67×10^{-4} mSv for Angra-1 operation, which are much lower than the 1.0 mSv/year value established in regulation CNEN-NN-3.01 [12].

An ALARA Commission for the plant, composed of different groups (Operation, Maintenance, Chemistry, System Engineering and Radiation Protection), is in charge of implementing and monitoring the ALARA Program that describes procedures, methodologies, processes, tools and steps to be used in planning the work. The ALARA Program is continuously being revised and represents the best effort to minimize occupational doses.

A Radiological Environmental Monitoring Program, based on CNEN requirements, is conducted by ETN to evaluate the possible impacts caused by nuclear power plants operation. This program defines the frequency, places, types of samples and types of analyses for the assessment of possible contamination and exposure rates. The evaluation of exposure rates is made by direct measurement using thermoluminescent dosimeters distributed in special sectors around the Angra site, and at points located in the nearest villages and cities. The results of the monitoring programme are compared with the preoperational measurements taken, in order to evaluate any possible environmental impact. Annual reports are presented to CNEN. Until the present date, no impact has been detected.

IBAMA also monitors the impact of the plants on the environment through a system of inspections in which the Rio de Janeiro State Institute for Environment (INEA), previously called State Foundation for Environmental Engineering (FEEMA), and the City Administration of Angra dos Reis also participate.



Typical results of the monitoring program are presented in Figure F.5.

Figure F.5 - Environmental Monitoring Program Results for 2003-2021

F.4.2 - INB FACILITIES

The primary purpose of the Radiation Protection Program is to keep the radiation exposure of the workers as low as reasonably achievable (ALARA).

All occupationally exposed individuals in the supervised and controlled areas are monitored by means of individual dosimeters (TLD or OSLD badges). The dosimeters are supplied by a laboratory duly certified by CNEN and are changed on a monthly basis. Individuals not exposed occupationally are monitored with prompt reading dosimeters when they access the supervised and controlled areas.

All occupationally exposed individuals attend radiation protection, emergency preparedness, first aid, and industrial safety training sessions on a yearly basis.

For occupational exposure, the legal primary dose limits for occupational exposures are an effective dose of 20 mSv per year, averaged over five consecutive years, provided an effective dose of 50 mSv is not surpassed in any single year. For public exposures, the dose limit is an effective dose of 1 mSv in a year.

The main monitoring method used for internal dose calculation is the determination of uranium concentration in urine and feces of the occupationally exposed individuals. The uranium excretion fractions are those published by International Commission on Radiological Protection (ICRP) - Individual Monitoring for Internal Exposure of Workers - ICRP 78 (1997) and the uranium dose conversion factors are extracted from the CNEN-NN-3.01 Standard [12].

In order to achieve effectiveness in the radiological control, all the radiometric data is classified according to pre-established reference levels which determine the actions to be performed according to their magnitude.

At FCN the dose constraint values are established at 16 mSv per year, for any worker.

Regarding the URA mining and milling facility, the mean effective annual doses resulting from occupational activities performed at the plant are shown in Figure F.6, from 2000 to 2023, compared to the annual production of uranium.

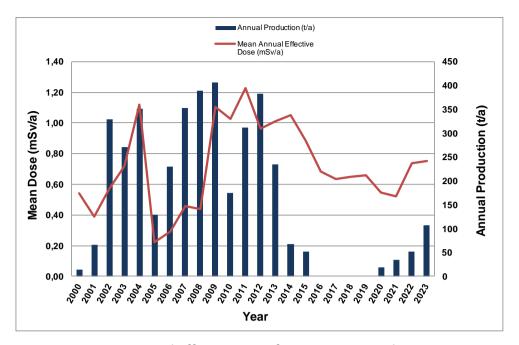


Figure F.6 - Mean Annual Effective Dose from Occupational Exposures – URA

F.5 - EMERGENCY PREPAREDNESS (Article 25)

As mentioned in **E.2.3**, Brazil has established an extensive structure for emergency preparedness under the so-called System for Protection of the Brazilian Nuclear Program (SIPRON). This includes organizations at the federal, state and municipal level involved with licensing and control activities as well as those involved with public safety, civil defence, environment, health, military personnel, firefighters, nuclear security, information security, law enforcement and communication to the public. Operators of nuclear facilities and supporting organizations are also part of SIPRON.

SIPRON was established by Law nº 12731 of 21st November 2012, which revoked Law nº 1809 of 7th October 1980, with the following assignments:

- I coordinate actions to permanently meet the safety and security needs of the Brazilian Nuclear Program;
- II coordinate actions to protect the knowledge and technology held by agencies, entities, companies, research institutions and other public or private organizations that perform activities for the Brazilian Nuclear Program;
 - III plan and coordinate actions, in nuclear emergency situations, aiming to protect:
 - a) persons involved in the operation of nuclear facilities and in the safekeeping, handling and transport of nuclear materials;
 - b) the population and the environment located in the vicinity of the nuclear installations; and
 - c) nuclear installations and materials.

Based on that, the Brazilian nuclear emergency response system is based in the following structure:

- a) A central body that is the Institutional Security Office of the Presidency of the Federative Republic of Brazil;
 - b) Three nuclear emergency response centers, and
 - c) Five collegiate bodies.

These collegiate bodies aim to assist the Institutional Security Office of the Presidency of the Republic, as SIPRON 's central body, in permanently meeting the Program's safety and security needs.

Collegiate Bodies

Within the scope of Sipron, Decree nº 9.865, of 27th June 2019, recreated the collegiate bodies of this System, namely: a) Commission for the Coordination of Protection of the Brazilian Nuclear Program - Copron; b) Planning Committee for Response to Nuclear Emergency Situations in the Municipality of Angra dos Reis - Copren/AR; c) Emergency Planning Committee in the Municipality of Resende – Copren/RES; d) Articulation Committee in the Security and Logistics Areas of the Brazilian Nuclear Program Protection System - Caslon; and e) Planning Committee for Response to Nuclear Security Event in Angra dos Reis – Copresf/AR.

These collegiate bodies aim to assist the Institutional Security Cabinet of the Presidency of the Republic, as Sipron's central body, in permanently meeting the Program's safety and security needs.

Response Centers

The National Center for Management of Nuclear Emergency (CNAGEN), in the Institutional Security Office of the Presidency of the Republic (GSI/PR), is responsible to coordinate the actions related to SIPRON and to support the decision-making at the highest level of the country. The State Center for Management of Nuclear Emergency (CESTGEN) has been established in the city of Rio de Janeiro, to manage the support requested by onscene responders. Finally, the Center for Coordination and Control of Nuclear Emergency (CCCEN) and its internal Center for Information in Nuclear Emergency (CIEN) have been established in the city of Angra dos Reis, in the vicinity of the power plant, to coordinate the response on scene and to communicate to the local people. These centers' activities during an emergency have been established in SIPRON General Norms [13] and [14]. As previously mentioned, SIPRON is carrying out studies to consolidate those norms into the update of the Decree nº 9865, that states the collegiate bodies of this System.

Corresponding plans have been prepared for CNEN, for its supporting Institute for Radiation Protection and Dosimetry (IRD) and for other agencies involved, and detailed procedures have been developed and are periodically revised.

SIPRON General Norms' prescriptions and CNEN plan's technical information are converted into detailed plans for both the Operator (Plan for Local, on-site, Response) and the responders (Plan of External, off-site, Response). The External Emergency Plan subsidizes complementary plans from other agencies who contribute for the response or directly respond along with the state civil defense system.

In Summary, the following plans were developed in order to prepare the responding institutions and coordinating actions in a nuclear emergency situation:

- Eletronuclear (ETN) Local Emergency Plan (PEL) for Units 1 and 2 of the Almirante Álvaro Alberto Nuclear Power Plant (CNAAA);
- Local Emergency Plan (PEL) of the Nuclear Industries of Brazil (INB) for the Nuclear Fuel Plant (FCN);
- Emergency Situations Plan (PSE) of the National Nuclear Energy Commission (CNEN);
- National Plan for Nuclear Emergency Situations (PNASEN);
- External Emergency Plan of the Government of the State of Rio de Janeiro (PEE/RJ);
- Municipal Emergency Plan (PEM) of the Municipality of Angra dos Reis; and
- Complementary Emergency Plans (PEC) of SIPRON's Supporting Bodies.

F.5.1 - NUCLEAR POWER PLANTS

Legislation

With respect to emergency preparedness, as mentioned bellow, additional requirements have been established by the creation of the System for Protection of the Brazilian Nuclear Program (Sipron).

Since 2009, a Governmental restructuring has designated the Institutional Security Office of the Presidency of the Republic (GSI/PR) as the Central Body for SIPRON.

At the off-site level, a National Center for Nuclear Emergency Management (CNAGEN) has been created in Brasilia, which now is also in the Institutional Security Office of the Presidency of the Republic (GSI/PR).

The Decree 2210 of 1997 also establishes the Coordination Commission for the Protection of the Brazilian Nuclear Program (COPRON) composed of representatives of the agencies involved.

SIPRON guidelines, issued by COPRON, require that ETN, the Municipal and State Civil Defenses prepare, update and practice a plan for nuclear emergency situations. The guidelines also require that all organizations and agencies involved have their complementary emergency plans.

Emergency Preparedness

The planning basis for on- and off-site emergency preparedness in case of an accident with radiological consequences in the Angra Nuclear Power Station is based on the Emergency Planning Zone (EPZ) concept.

The Emergency Planning Zones encompass the area within a circle with radius of 15 km centered on the Unit 1 reactor building at the nuclear power plants. A Precautionary

Action Zone (PAZ) encompasses EPZ 3 and 5 km. Additionally, an Urgent Protective Action Planning Zone (UPZ) encompasses EPZ 10 and 15 km.

On-Site Emergency Preparedness

The On-site Emergency Plan covers the area of property of ETN, and comprises the first zone. For this area, the planning and all actions and protection countermeasures for control and mitigation of the consequences of a nuclear accident are responsibilities of ETN.

Specific Emergency Groups (Power Plants - Units 1 and 2, Support Services, Head Office and Medical) under the coordination of the Site Manager are responsible for the implementation of the actions of the On-site Emergency Plan. Emergency Centers for coordination of the Emergency Plan activities, equipped with redundant communication systems and emergency equipment and supplies are established in different locations inside this area.

A redundant meteorological data acquisition and processing system composed of 4 meteorological towers, provides continuous data on wind temperature, speed and direction, as well as air temperature gradient, to a computerized system in the Technical Support Center / Control Room of Units 1 and 2, through which follow up and calculation of the spreading of the radioactive cloud can be made.

The On-site Emergency Plan involves several levels of activation, from Facility Emergencies, Alert, Emergency Area, to General Emergency.

The initial notification for activation of the On-site Emergency Plan is done by the Shift Supervisor from the Control Room, which notifies the Plant Manager, as Emergency Group coordinator, which alerts the coordinators of the other Emergency Groups, the Site Manager and the Regulatory Body (resident inspector and Headquarter). The plant personnel are warned by means of the internal communication system, sirens and loudspeakers.

Twenty-four-hour/ 7-day-a-week on-call personnel, under the responsibility of the Site Manager, ensure the prompt actuation of the Emergency Groups.

Training and exercises (7 per plant) are performed yearly.

Off-Site Emergency Preparedness

Brazil has established an extensive structure for emergency preparedness under the System for Protection of the Brazilian Nuclear Program.

SIPRON issued a set of General Norms for Emergency Response Planning, consolidating all requirements of related national laws and regulations. These norms establishes the planning, the responsibilities of each of the involved organizations and the procedures for the emergency centers, communications, intelligence and information to the public.

Coordination Commission for the Protection of the Brazilian Nuclear Program (COPRON) has established a Committee (COPREN/AR) for planning for the preparedness and the response to a nuclear emergency at Angra Nuclear Power Plant. This committee conducts an off-site emergency plan practice every year.

At the off-site level, a National Center for Management of Nuclear Emergency Situation (CNAGEN) has been created in Brasilia (capital of Brazil). A Regional Center for Management of Nuclear Emergency Situations (CESTGEN) has been established in the city of Rio de Janeiro. A Center for Coordination and Control of Nuclear Emergency Situation (CCCEN) and a Public Information Center (CIEN) have been established in the city of Angra dos Reis. The activities of these centers during an emergency have been established in Sipron General Norms and were approved by the state governor in the revised Rio de Janeiro State Plan for External Emergency.

Corresponding plans have been prepared for CNEN, with the support of Institute for Radiation Protection and Dosimetry (IRD) and other involved agencies, and detailed procedures have been developed.

Nuclear Emergency Exercises and Drills

Response exercises are key components in the proper preparation of the Brazilian State, at the national, state and local levels, as they provide a unique view of the readiness situation of the responding institutions, in addition to serving as the basis for a program of continuous improvement of the response structure.

Since 2009, Sipron's central body has supervised such exercises at the Almirante Álvaro Alberto Nuclear Power Plant (CNAAA), in Angra dos Reis and at the Nuclear Fuel Facility (FCN), in Resende.

The realization of these exercises constitutes a milestone in the preparation for such emergencies in Brazil, as it integrates public and private organizations at the municipal, state and federal levels. The exercises prioritize the operational aspect of the External Emergency Plan of the State of Rio de Janeiro (PEE / RJ).

The periodicity in carrying out the exercises at CNAAA is annual, under the coordination of the State Government of Rio de Janeiro. In even years, the practice is a partial exercise with only the communication system and the emergency centers activated. In odd years, a general exercise includes deployment of response teams, sirens actuation, evacuation and sheltering of part of population, external monitoring, road and air and sea navigation control.

They test the decisions regarding the actions provided in NG-06 (General Standard for Installation and Operation of the Centers in charge of Responding to a Nuclear Emergency Situation), in the Local Emergency Plan (PEL) of Eletronuclear (ETN), in the Emergency Situations Plan (PSE) of the National Nuclear Energy Commission (CNEN), in the External Emergency Plan of the Government of the State of Rio de Janeiro (PEE / RJ), in the Municipal Emergency Plan (PEM) of the Municipality of Angra dos Reis and in the Plans Complementary Emergency Plans (PEC) of the bodies that are part of Sipron.

Activities aimed at verifying the communications chain, the ability to mobilize resources, personnel and material, in addition to the dissemination of information, through prior clarification campaigns aimed at informing the public about the measures to protect the population and the environment, are also exercised.

In the 2018 Partial Exercise at CNAAA, organizations demonstrated that their plans were sufficiently integrated to provide an effective response to a severe accident.

The 2019 General Exercise at the CNAAA was attended by approximately 1,200 military personnel and 700 civilians. The response centers remained manned for 30 hours uninterrupted. The alarm system's sirens were actually activated. Field hospitals accounted for 2,000 people served. There were press conferences and interviews on local radio. There was a demonstration of the digital TV notification and alert system. For the first time, the Joint Chiefs of Staff of the Armed Forces were established on the premises of the Naval College.

Also, in 2019, the second nuclear security exercise was carried out at the CNAAA facilities with the purpose of testing the effectiveness of crisis management protocols, promoting synergy and interaction between participating agencies in situations involving nuclear security events.

From 2020, nuclear emergency exercises began to include scenarios containing events related to the safety & security interface.

The exercise conducted in 2023 involved around 2,000 people, 12 vessels, 3 helicopters, 122 vehicles of several types, 1 drone, 4 ambulances and 1 mobile laboratory for verifying samples of collected material. The Navy and the Army also brought to the exercise 2 field hospitals and 1 decontamination station. During the exercise, the following activities were carried out: invasion by an fiction armed group, suspicion of the existence of explosive material in a region that poses a chemical hazard, elaboration of press notes, fill up the proper forms and published them in the USIE EXERCISE website, simulated hostage situation inside the nuclear facility, aeromedical evacuation of a contaminated person to the specialized Hospital, distribution of potassium iodide tablets, evacuation of part of the population through sea and road routes, assembly of shelters, sample collection, healthcare service to population by Field hospitals, social media monitoring and press conferences.

F.5.2 - OTHER FACILITIES (RESEARCH REACTORS)

The safety analysis performed for other installations such as research reactors indicates that only "on-site emergency is required". The on-site emergency plan covers the area within the operator's property, and comprises the reactor building and surroundings. It involves several levels of activation, from single alert status, to reactor building evacuation and isolation.

Specific Emergency Groups, under the coordination of the COGEPE (General Coordination for Emergency Plan), are responsible for the implementation of the actions of the on-site emergency plan. COGEPE is also responsible for plant personnel emergency training and exercises planning.

IPEN also maintains a Nuclear and Radiological Emergency Response Team. Training activities in nuclear and radiological emergency for fire brigade companies, professionals of medical area, safety officers and employees are carried out systematically, with the participation of qualified observers.

At CDTN, a Nuclear and Radiological Emergency Service is also available around the clock, including weekends and holidays. The most common tasks carried out by this Service

is to attend emergency calls and to investigate possible contamination in buildings and areas, stealing of lightning rods and other radioactive sources, possible presence of orphan radioactive sources and possible disappearance of medical sources from hospitals and industries.

At IEN, there is a trained radiological emergency team which attends to all radiological emergency situations at the Institute. Periodically, this group is trained in radiological emergency procedures and associated items, in order to achieve a better performance in attend the emergency situations.

F.5.3 – INB FACILITIES

The Nuclear Fuel Factory (FCN), located in the city of Resende, has a Local Emergency Plan, comprising the municipality, mainly focused on the possible accident occurrences within its facilities. Risk analysis indicates that there is no postulated accident reaching the surrounding areas, outside the plant.

The Local Emergency Plan can be activated by a wide variety of possible incidents, such as fire, radiological accidents, and intrusion scenarios into the facilities. There is an organizational emergency structure establishing the responsibilities, as well procedures for each emergency group formed by the plant technical personnel.

Although there are no indications that accidents in that facility would reach the surrounding areas, an emergency general coordination was established with supporting groups such as the municipal civil defense, the fire brigade, the police, and CNEN emergency group. The Emergency Response Planning Committee in Resende - COPREN/RES, has been coordinating this task, besides supporting the System of Protection of the Brazilian Nuclear Progamme - SIPRON.

The effectiveness of the Local Emergency Plan is verified through simulated emergency exercises. The plan coordinator prepares a scheduled program on an annual basis with various scenarios of possible accidents. Emergency exercises are performed on monthly basis and the performance of the exercises is thoroughly evaluated.

At the Uranium Concentration Unit (URA), the Emergency Plan aims to establish preventive measures to minimize effects of accidents that may disturb the normal operation of the unit and establish procedures for the routine returns to normality after the response to a possible accident. The risk analysis and identification of possible types of accidents are supported by operational experience of mining and other industrial facilities, also considering the constructive characteristics of the regiment of URA and rules of CNEN, considering the possibility of fires, landslides or radiological incidents.

The unit has an organizational structure, multidisciplinary teams, equipment and a scheduling of theoretical and practical training. The effectiveness of Local Emergency Plan is verified through simulated emergency exercises. Moreover, evaluations are made by internal and external auditors belonging to the regulatory body.

In June 2024, it was organized the second simulated emergency field-exercise at

the Caldas Decommissioning Unit (UDC), taking into account the scenario of an accident with the tailing dam system, with satisfying results.

F.5.4 - EMERGENCY PREPAREDNESS AT NAVY INSTALLATIONS

As previously mentioned in **A.2.4**, the only nuclear facility at CTMSP headquarters, which is situated in the city of São Paulo, is a small research and development laboratory, whose inventory of nuclear material is actually very small, thus requiring emergency action only within the boundaries of the facility.

Regarding Aramar Experimental Center (CEA/CTMSP), in the City of Iperó, the Local Emergency Plan (PEL-CEA) was designed to ensure the integrated planning and coordinated response required in an emergency situation, intended to protect the activities, the facilities and the environment; and to guarantee the safety and health of the workers and the public.

The PEL-CEA is applicable to all the operational facilities located, or to be located, within the site of CEA. However, for planning purposes, the PEL-CEA must be complemented by specific local emergency plans, conceived for all those facilities, both conventional or nuclear, situated within the site of CEA, that may need emergency response. These facilities are called emergency planning unities (UPE), and their specific local emergency plans should be considered as being part and parcel of the PEL-CEA.

In case of an emergency, the PEL-CEA will be activated in order to implement precautionary and/or protective measures for possible hazards. Decisions will be taken by the Emergency Plan General Coordinator (COGEPE), assisted by the Local Emergency Coordinator (CEL-UPE) and the Support Actions Coordinator (CAAp), the Radiological and Chemical Advisory Group, the Head of the Medical Team, the Head of the Radiological Protection Team, the Commander of the Battalion of Nuclear, Biological, Chemical and Radiological Defense of Aramar (BtlDefNBQR-Aramar) and by a Technical, Administrative and Communications Group.

The BtlDefNBQR-Aramar is strategically located at the CEA site, for fast delivery of equipment and personnel in emergency situations. The Battalion, in cooperation with COGEPE, works on rescue actions, decontamination of personnel and equipment, radiological field surveys and isolation of areas.

The CEL-UPE is responsible for preparing an annual schedule of on-site emergency exercises, which must be submitted to and approved by the COGEPE. The CEL-UPE is also responsible for implementing exercises and for writing evaluation reports of the exercises.

On December 13, 2022, by Decree No. 286, the Naval Secretariat for Nuclear Safety and Quality (SecNSNQ) was created as a body providing direct and immediate assistance to the Commander of the Navy, carrying out activities arising from the regulation, licensing, inspection and control of naval assets with nuclear power plants on board. SecNSNQ is responsible for monitoring the response to Naval Nuclear or Radiological Emergencies (ENRN) through its Naval Nuclear and Radiological Emergency Response Monitoring Center (CARE).

CARE is composed of the Naval Secretary for Nuclear Safety and Quality (SecNSNQ-01) and his Deputy Secretary (SecNSNQ-02), in addition to several other representatives from naval organizations.

COGEPE, CARE, and the National Nuclear Emergency Management Center (CNAGEM) make up the structure for monitoring and responding to a nuclear or naval radiological emergency, at the local/municipal, Brazilian Navy and federal levels, respectively, in accordance with the National Plan for Nuclear Emergency Situations (PNASEN) of the Brazilian Nuclear Program Protection System (SIPRON).

F.6 - DECOMMISSIONING (Article 26)

In November 2012 CNEN issued the regulation CNEN-NN-9.01- Decommissioning of Nuclear Power Plants [29]. This safety regulation was revied in December 2017 and establishes technical and administrative activities to be performed for partial or total removal of NPPs regulatory control, covering local, buildings and associated equipment, including the safe radioactive waste management until its transfer to a final disposal facility. Furthermore, CNEN has issued in October 2016 the new regulation NN-9.02 - Financial Management for Decommissioning of Nuclear Power Plants [30], that established the basic requirements for the management of financial resources, complementary to those established in article 15 of the CNEN-NN-9.01, including the management of radioactive waste generated during decommissioning. The regulation NN-9.01 was also revied in December 2017.

F.6.1 - NUCLEAR POWER PLANTS

Based on the IAEA SRS45 - Standard Format and Content for Safety Related Decommissioning Documents Nº45 [31] and according to the CNEN regulation NN-9.01-Decommissioning of Nuclear Power Plants [29], the decommissioning of a nuclear facility involves activities that are different from those carried out during normal operation. New safety issues arise during the implementation of decommissioning activities. The regulatory body, which has the responsibility to ensure that workers, the public and the environment are protected during decommissioning activities, is required to ensure that the facility's operator has identified and resolved these safety issues. In connection with this, the principal document that provides the regulatory body with safety related information is the decommissioning plan, which is the cornerstone of a successful decommissioning project. The decommissioning plan brings together all the information on the proposed decommissioning activities and identifies relevant safety issues, as well as the financial guarantees for the activity.

A first version of a Preliminary Decommissioning Plan (PDP) was made by Eletronuclear S.A. (ETN) and sent to CNEN in November 2014, in order to meet the CNEN Standard NN-9.01 - Decommissioning of Nuclear Power Plants [29]. It has presented alternatives for the future decommissioning of Angra-1, Angra-2 and Angra-3 Nuclear Power Plants and a generic estimate of the minimum cost of these plant's decommissioning based on 10CFR 50.75 and NUREG 1307.

In this regard, CNEN-NN-9.01 [29] establishes that:

- Art. 10 The decommissioning strategy selected by the operating organization must meet the following requirements:
 - ➤ I consider the international experience, as well as the current national polices for the decommissioning and waste management, and;
 - ➤ II provide ways to and storage wastes of all classes to be generated during the decommissioning activities.

It is worth mentioning that the studies for selection of the strategy involve subjective aspects that are subject to evaluations and, therefore, the conclusions may change. The key point is to ensure that there is a connection among the shutdown condition of the installation, the proposed decommissioning activities, the risks associated with the performance of these activities, the necessary actions arising from the safety analysis and the resulting costs.

CNEN has issued in October 2016 a new regulation NN-9.02 - Financial Management for Decommissioning of Nuclear Power Plants [30], that established the basic requirements for the management of financial resources, complementary to those established in article 15 of the CNEN-NN-9.01, including the management of radioactive waste generated during decommissioning.

The financial resources for the decommissioning of Angra-1 and Angra-2 are being subsidized through electrical energy taxes, included in the tariff structure of ETN, with governmental authorization.

An updated PDP prepared by Eletronuclear S.A. (ETN) with support of a Brazilian University and an experienced international consultancy was developed and sent to CNEN in February 2019, including more detailed information. The PDP covers information on CNAAA description, including the existing Angra-1 and -2 nuclear power plants, the Angra-3 NPP under construction and the support buildings such as the Waste Management Centre and the Nuclear Fuel Dry Storage facility (UAS). It also covers decommissioning strategy, project management, decommissioning activities, surveillance and maintenance, waste management, safety environmental assessment, health and safety, quality assurance, emergency planning, physical security and final radiological survey. It is important to mention that the cost estimate presented in this updated PDP was based on the International Structure for Decommissioning Cost (ISDC) of Nuclear Installations, NEA/OECD, taking into account real data of CNAAA.

In December of 2023, ETN has reviewed its PDP, and is waiting for CNEN approval to implement it in the tariff rate.

The decommissioning strategy adopted is to have Angra 1 and Angra 2 with deferred dismantling and Angra 3 with immediate dismantling, allowing 3 sequential dismantling for Angra-1, -2 and -3.

F.6.2 - RESEARCH REACTORS

For the IPEN/MB-01 RR, the report with a study on its decommissioning will be presented by 2028. This commitment is established in the current operating license.

A chapter on the Argonauta reactor decommissioning plan was included in the latest revision of the FSAR, issued in December 2023. The preliminary decommissioning plan for IEN's Argonauta reactor is safe storage (SAFESTOR), which involves deferred dismantling, placing the plant in a safe and stable condition after the removal of spent fuel, safely until the time comes for decontamination and dismantling.

For the IPR-R1 of CDTN a preliminary decommissioning plan was prepared, and it was integrated to the 2024 version of its FSAR.

F.6.3 - INB FACILITIES

F.6.3.1 - Decommissioning of Santo Amaro Processing Plant (USAM)

As already described in the former National Report, the first activity of decommissioning executed in Brazil was the decommissioning of Santo Amaro Processing Plant (USAM) which happened successfully in the 90's.

The radioactive waste generated by the decommissioning process led to the choice of adopting the São Paulo Decommissioning Unit (UDSP), also in the state of São Paulo, as the interim storage facility to this waste (see **H.2.2.2**).

F.6.3.2 - Decommissioning of the Unidade em Descomissionamento de Caldas (UDC)

The former mining and milling complex UDC, at Caldas, is currently being decommissioned by INB. In September 2009, it was initiated the Preparation of the Remediation Plan - PRAD (Degraded Areas Reclamation Plan). This Plan has been completed in 2011 and includes all areas of the UDC. A revision was concluded in January 2012, and it has been delivered to IBAM and CNEN in April of the same year, for analysis.

The ongoing actions for decommissioning are based on main objectives:

- i) refining the site characterization and the environmental diagnosis, partially carried out during the preparation of conceptual project (PRAD), in order to identify or confirm engineering solutions for mitigating environmental impacts and remediation/rehabilitation of degraded areas;
- ii) deactivation of structures of the treatment of acid water drainage to be able to develop the processes of mitigating environmental impacts and remediation/rehabilitation of degraded areas by those structures;
- iii) disposal of industrial equipment and removal of appurtenant structures;
- iv) prioritization of adopting engineering solutions with recognized potential for mitigating environmental impacts and/or remediating areas.

F.6.3.3 - Decommissioning of the Interlagos Processing Plant, the São Paulo Decommissioning Unit (UDSP)

During the operation of USAM, big amounts of mineral fractions with no commercial value (Silica) containing a heavy minerals fraction that included percentages of Monazite were transferred to the São Paulo Decommissioning Unit (UDSP), at the time known as Interlagos Processing Plant (USIN), and were disposed in the land.

In addition, radioactive minerals from mineral research activities conducted during the 60's to 80's were stored in sheds at UDSP, in sufficient quantities for the execution of development tests of physical and chemical processes for uranium recovery. Due to imperfections on the floor, some packages were affected and some minerals gradually got dispersed.

A quantity of monazite packages were also stored in these sheds. Eventually, a number of packages got deteriorated and the floor was contaminated with small quantities of products containing thorium and uranium. By that time, there were no environmental laws, nor procedures had been established in the country, related to contaminated land.

Scintillometric surveys demonstrated the existence of 14 anomalous points that remained from the remediation carried out early in the 90's. Underground water monitoring continues and demonstrates that the contamination is not being carried out of the limits of the UDSP site.

In 2010, INB started decontamination work of the soil at the UDSP site, which has $60,000 \, \text{m}^2$ of total area. Up to 2013, an area of 18.4 thousand square meters was decontaminated and released for unrestricted use by CNEN.

During the decontamination operation, the activities performed included: soil characterization; radiological monitoring; application of the methodology of the MARSSIM (Multi Agency Radiation Survey and Site Investigation Manual); and application of the RESRAD software for dose calculation.

Thus, using the dose calculation and the results of activity concentrations in the samples collected after remediation in the area of interest, it was concluded that the selected area was decontaminated. The release criteria established reminiscent doses to be lower than 1 mSv/year. The next step is to perform the decontamination of the whole site, for unrestricted use.

SECTION G - SAFETY OF SPENT FUEL MANAGEMENT

G.1 - GENERAL SAFETY REQUIREMENTS (Article 4)

Since the current situation is the storage of spent fuel in pools, the general safety requirements for the management of spent fuel are contained in the safety requirement for siting, design and operation of the nuclear reactors. Regulation CNEN-NE-1.04 [3] applies to the fuel stored in the nuclear power plant. Additional requirements are established in Regulation CNEN-NE-1.26 [8], for the operational phase, and Regulation CNEN-NN-1.14 [5] establishes the necessary reporting requirements.

G.2 - EXISTING FACILITIES (*Article 5*)

G.2.1 - NUCLEAR POWER PLANTS

The design of the fuel pools and associated cooling systems and fuel handling systems assure adequate safety under authorized operation and under postulated accident conditions.

Both units are provided with facilities that enable safe handling, storage and use of nuclear fuel. The facilities are designed, arranged and shielded such as to rule out inadmissible radiation exposure to the staff and the environment, release of radioactive substances to the environment, and criticality accidents.

In Angra-1 the new fuel dry storage room and the spent fuel pool are located in the Fuel Handling Building, having connections with the reactor via the fuel transfer system and the refuelling machine. The path of the nuclear fuel inside the plant up to the reactor is: the entrance gate, the cask opening area inside the fuel building, the new fuel storage area, the transfer canal (or temporarily in the spent fuel pool), the fuel transfer system, the refuelling machine and the reactor core.

In Angra-2 the dry new fuel storage room and the spent fuel pool are located inside the Reactor Building. The path of the nuclear fuel inside the plant up to the reactor is: the entrance gate, the auxiliary portico, the equipment lock, the cask opening area, the new fuel storage area, the refuelling machine, the spent fuel pool, and the reactor core.

In both units the Spent Fuel Pools are equipped with fuel storage racks of two different designs. The first group, named Region 1, or compact racks, is designed to receive fresh and irradiated fuel assemblies at maximum reactivity for the specified core design, without taking credit for burnup. The second group, named Region 2 or supercompact racks, is designed to receive fuel assemblies that have reached a certain minimum burnup.

The compact and supercompact racks, made of stainless steel, have boron coupons between the storage cells in Angra-1. In Angra-2 the compact and supercompact racks use borated steel plates as the construction material of the cells. The technical specifications

have curves of discharge burnup versus initial enrichment to direct the storage of fuel assemblies in region 2 because the smaller center-to-center distance of the cells.

Structures, components, and systems are designed and located such that appropriate periodic inspection and testing are performed.

In both units, all storage places are supported by criticality safety studies. Criticality in new and spent fuel storage areas is prevented both by physical separation of fuel assemblies, by boron shields and by borated water as appropriate.

The evaluated multiplication factors of the fuel storage configurations include all uncertainties arising from the applied calculation procedure and from manufacturing tolerances. The factors are less than or equal to the adequate upper bound margin of subcriticality (1-deltaK) under normal operation and all anticipated abnormal or accident conditions.

The criticality evaluation codes used by the ETN are all codes accepted by the international industry and also licensed by CNEN.

The storage capacity is shown on Table G.1 below:

	Angra-1	Angra-2
New Fuel Storage Room	45	75
Region 1 Spent Fuel Pool	252	264
Region 2 Spent Fuel Pool	1,000	820
Reactor Core	121	193

Table G.1 - Spent fuel storage capacity at Angra – Number of fuel assemblies

Assuming a regular lifetime of 32 operating cycles for each unit and that in each cycle 1/3 of the core is replaced, then Angra-1 has enough storage capacity for its entire lifetime and Angra-2 has storage capacity for about 14 cycles.

In Angra-1, the Spent Fuel Pit Cooling system is able to remove the amount of decay heat by a circuit with two pumps and one heat exchanger. In the case of maintenance or malfunction of the main pump, a redundant spare pump is operated. This spare pump is supplied by the emergency bus control and, in the case of loss of offsite power, can be supplied by the diesel generator.

In Angra-2, the Fuel Pool Cooling system consists of two trains which are integrated into the Residual Heat Removal (RHR) system and a third independent train. In each integrated train a fuel cooling pump is connected in parallel with the RHR pump. These two trains are equipped with connections to the fuel pool via the RHR system. The independent fuel pool cooling train consists of a fuel pool cooling pump which is connected in parallel with the fuel pool purification pump, the fuel pool cooler and separate connections to the fuel pool. The redundancy of the power supply of the Fuel Pool Cooling system is ensured

by connection to the normal power supply system and to the emergency power supply systems.

Each unit is designed for a regular lifetime of 32 operating cycles. According to the national electric power demand, the refuelling policy is to operate with 11 equivalent full power monthly cycles, with an one-month refuelling outage. Studies are being carried out to increase the cycle lengths gradually up to 18 months, since longer cycles reduce waste generation and doses during refuelling outages. Shutdowns, refuelling and startups of the plants are conducted in such a way to reduce the amount of radioactive waste generated (see also items **D.1.1.1** and **D.1.2.1**).

The role of the Eletronuclear (ETN) on the nuclear fuel management can be summarized as follows:

- Definition of operating strategy
- Definition of core composition
- Procurement of fuel manufacturing together with manufacturers
- Follow up of fuel manufacturing
- Transport of new fuel from the factory to the site
- New fuel reception on-site
- Fuel storage on-site
- Fuel operation
- Refuelling Operations

Nuclear power plants fuel supply is planned several years in advance. In-core fuel management provides the basic data for this long-term planning. For this purpose, several burnup cycles have to be calculated in advance. The corresponding core loading schemes, or loading patterns, have to be determined considering safety-related and operational requirements as well as economic aspects. The main results of long-term fuel management are the required numbers of fuel assembly reloads and their enrichments for future cycles.

Of special interest in the long-term fuel management are the equilibrium cycles. To calculate the equilibrium cycles, the same loading pattern is used for several successive cycles. The equilibrium cycle is reached when the characteristic parameters do not change significantly from cycle to cycle. The most important characteristic parameters are:

- Type of loading strategy
- Number and enrichment of the fuel assembly reload
- Natural length of the cycle
- Average discharge burnup for the fuel assemblies
- Availability of storage places. In this sense, the interdependence of spent fuel (non-returnable to the reactor core) management is to be defined with CNEN.

G.2.2 - RESEARCH REACTORS

See item **D.2**.

G.3 - SITING OF PROPOSED FACILITIES (Article 6)

Considering the exhaustion of spent fuel pool storage capacity of the NPPs, Eletronuclear (ETN) decided for the implementation of SFA complementary dry storage solution (UAS) at CNAAA.

The Complementary Dry Storage Unit (UAS) of Almirante Alvaro Alberto Nuclear Power Station (CNAAA) is located on a parcel of land presently owned by Electronuclear (ETN) within the property boundaries of the current CNAAA site. The location of the UAS is shown in Figure G.1.



Figure G.1 - Geographical Layout of Proposed CNAAA UAS Site

ETN will serve as the operator of the UAS with undivided responsibility for its safety and security. ETN has also committed that the storage technology deployed at the UAS will meet the site boundary dose limit specified in 10CFR72 [33] and CNEN-NN-3.01 [12] under any normal and credible accident scenarios.

The UAS will provide to storage of 72 casks. During the first transfer campaign was loaded 15 casks (6 with SF from Angra-1 and 9 with SF from Angra-2). Total land area occupied by the UAS is of 22,360 m², Figure G.2.

On 23rd April 2019, CNEN issued the Resolution No 242, the first interim construction license, with conditioning clauses, limited to the construction of the flagstone for 72 storage drums of spent fuel of the UAS system.

The UAS design is based on the USNRC licensed HOLTEC International HI-STORM FW system, and the centerpiece of the CNAAA UAS facility is the HI-STORM FW canister storage system certified in NRC docket #72-1032. HI-STORM (acronym for HOLTEC International

Storage Module) FW System is a spent nuclear fuel storage system designed to be in full compliance with the requirements of 10CFR72 [33].

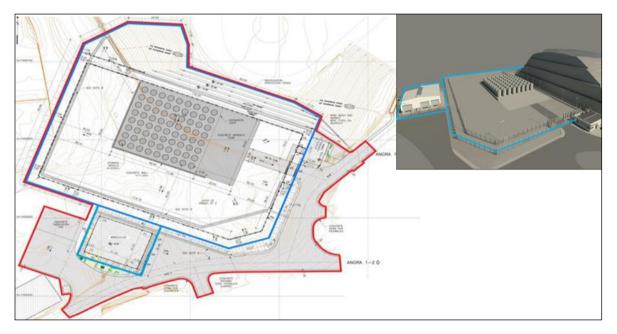
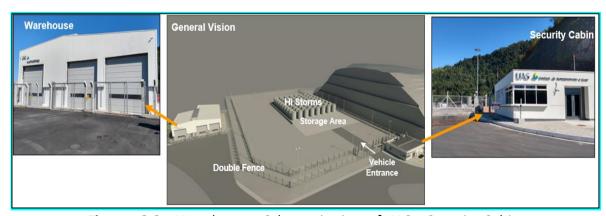


Figure G.2 - Total Area Occupied by the UAS (UAS Controlled Area Boundary shown in **blue**. Total UAS land area shown within **red** boundary)

The HI-STORM FW System consists of a sealed metallic multi-purpose canister (MPC) contained within an overpack constructed from a combination of steel and concrete. The design features of the HI-STORM FW components are intended to simplify and reduce the on-site SNF loading and handling work effort, to minimize the burden of in-use monitoring, to provide utmost radiation protection to the plant personnel, and to minimize the site boundary dose.

The HI-STORM FW System can safely store PWR fuel assemblies from CNAAA Units 1 and 2.

In Figures G.3 e G.4 shows, respectively, a schematic view of the site and an actual photo of the UAS facility, updated in January 2024.



Figures G.3 – Warehouse - Schematic view of UAS – Security Cabin



Figure G.4 - Actual Photo of the UAS Facility - January of 2024

G.4 - DESIGN AND CONSTRUCTION OF FACILITIES (Article 7)

Design and construction requirements for the existing spent fuel storage facilities at reactor sites are the same for design and construction of the nuclear power plants or research reactors.

The spent fuel storage racks are easily installed and removed. They are manufactured from stainless steel. Their purpose is to receive and store fresh and spent fuel assemblies as well as any core inserts, like control rods, primary and secondary sources and flow restrictors to be inserted into fuel assemblies.

The storage racks consist of load bearing structure supporting non-load bearing absorber cells. The load bearing structures comprise:

- The lower support structure (base plate)
- Rack foot
- · Centering grid
- Steel channels

The non-load bearing structures are provided with features to assure safe subcriticality, each fuel assembly position is provided with one absorber cell. The absorber cells are made of neutron absorbing sheets with grooved edges. The absorber sheets are manufactured from a boron-alloyed austenitic stainless steel.

The absorber cells are fixed in the rack structure by means of welded clamps. To facilitate the insertion of the fuel assembly into the absorber cell, the upper part of the cell

is provided with lead-in slopes, or chamfers and, where applicable, with guide for the refuelling machine centering device.

Only about 40% of the volume of a fuel assembly consists of fuel rods; the remaining volume is filled by water.

As mentioned, for Angra 1 and Angra 2, a spent fuel complementary dry storage unit is available to increase the on-site storage capacity of the plants. This installation is under ETN responsibility as a complementary and initial storage unit of the plant.

G.5 - ASSESSMENT OF SAFETY OF FACILITIES (*Article 8*)

A comprehensive safety assessment is a requirement established by the licensing regulation in Brazil [3].

G.5.1 - NUCLEAR POWER PLANTS

For the Angra-1 and Angra-2 plants, both a Final Safety Analysis Report (FSAR) were prepared. For the Angra-3 plant, a Preliminary Safety Analysis Report (PSAR) was also prepared. The FSARs and PSAR followed the requirements of US NRC Regulatory Guide 1.70 - Standard Format and Contents for Safety Analysis Report of LWRs.

Chapter 9 of the FSAR contains the information related to spent fuel storage onsite, including cooling requirements, subcriticality requirements, and radiation protection aspects.

These reports were reviewed and assessed by CNEN, and extensive use was made of the US NRC - Standard Review Plan (NUREG - 0800).

G.5.2 - RESEARCH REACTORS

The design and additional modifications of the Brazilian Research Reactors have been made in accordance with IAEA Safety Standards, Safety Guides and Safety Practices of IAEA Safety Series, in particular Safety Guide 35-G2 (Safety in the Utilization and Modification of Research Reactors), Safety Guide 35-S2 (Code on the Safety of Nuclear Research Reactors: Operation), Safety Series 116 (Design of Spent Fuel Storage Facilities), and Safety Guide 117 (Operation of Spent Fuel Storage Facilities). Such documents present the fundamental principles of safety for research reactors and associated facilities for handling, storage and retrieving of spent fuel before it is reprocessed or disposed of as radioactive waste. The adoption of these principles assures that the spent fuel represents no hazard to health or to the environment, and the maintenance of the following conditions for the spent fuel:

- Subcriticality
- Capacity for spent fuel decay heat removal
- Provision for radiation protection

Isolation of radioactive material

The research reactor Argonauta Final Safety Analysis Report (FSAR) was based and prepared according to US NRC - NUREG-1537 and its last revision was issued in December 2023.

G.6 - OPERATION OF FACILITIES (Article 9)

Operational requirements for the existing spent fuel storage facilities at reactor sites are the same for operating the nuclear power plants or research reactors.

Detailed limits and conditions for operations (LCOs) are established for the nuclear power plant spent fuel pools, including the related surveillance requirements and the actions to be taken in case of deviations.

G.7 - DISPOSAL OF SPENT FUEL (Article 10)

G.7.1 - FUEL FROM NUCLEAR POWER PLANTS

The decision regarding reprocessing or disposal of spent fuel has not been taken in Brazil. The current policy adopted in Brazil with regard to spent fuel is to keep it in safe storage until a technical, economic and political decision is reached about reprocessing and recycling the fuel or disposing of it as such. It should be emphasized that, by the Federal Brazilian Law, spent fuel is not considered as radioactive waste as there is still energy in each SF and the decision of not using it have not been taken.

For Angra-1 and 2, as well as for Angra-3, a spent fuel complementary dry storage unit was implemented, in order to increase the current on-site storage capacity of the plants. This installation is under ETN's responsibility.

Currently, this facility, which is called UAS, contains 25 stored concrete overpacks, totalling 830 stored spent fuels, 222 spent fuels from Angra 1 and 608 spent fuels from Angra 2. The first transfer of these fuels to UAS took place between 2021 and 2022, and a second transfer campaign is now taking place.

Storage devices have the following characteristic:

Type: Canister + Concrete Overpack

Angra 1 Canister Capacity: 37 SFs

Angra 2 Canister Capacity: 32 SFs

• Total Capacity: 72 Overpacks

The second SFs transfer campaign for UAS is scheduled to finish in 2026. The plan is to transfer 666 spent fuels from Angra 1 and 480 spent fuels from Angra 2, totalizing 1,146 spent fuels and 33 concrete overpacks for this campaign.

G.7.2 - FUEL FROM NUCLEAR RESEARCH REACTORS

The situation of research reactors was discussed in item **D.2.1**.

All fuel elements used in the IPEN/MB-01 research reactor remain stored in its critical cell building. No fuel element has failed during its 3,663 operations in 30 years of use (1988-2018).

SECTION H - SAFETY OF RADIOACTIVE WASTE MANAGEMENT

H.1 - GENERAL SAFETY REQUIREMENTS (Article 11)

General safety requirements for the management, storage and disposal of radioactive waste are established, respectively, in regulations CNEN-NN-8.01 [25] - Radioactive Waste Management for Low and Intermediate-Level Waste, and CNEN-NN-8.02 [26] - Licensing of storage and disposal facilities for low- and intermediate-level radioactive waste. Additional requirements for safety of waste management are established in regulations CNEN-NN-3.01 [12] - Basic Requirements for Radioprotection and Radiological Safety of Radiation Sources, CNEN-NE-6.06 [7] - Site Selection for Radioactive Waste Storage and Disposal Facilities, CNEN-NN-6.09 [23] - Acceptance Criteria for Disposal of Low and Intermediate Level Radioactive Wastes, CNEN-NE- 5.02 [27] - Transport, receiving, storage and handling of fuel elements in nuclear power plants, CNEN-NN-1.16 [10] - Quality Assurance for Safety in Nuclear Power Plants and other installations and CNEN-NE-2.01 [28] Physical Protection in Operating Units in Nuclear Area.

H.2 - EXISTING FACILITIES AND PAST PRACTICES (Article 12)

H.2.1 - NUCLEAR POWER PLANTS

H.2.1.1 - Gaseous Waste

To minimize the radiation released to the environment and to prevent the formation of explosive mixtures due to high hydrogen concentration, the gases are continuously removed from the primary systems and processed in the Gaseous Waste Processing System, before being discharged to the environment.

In Angra-1, the Gaseous Waste Treatment System removes the fission gases and stores them in the gas decay tanks. The safety criteria are the assumption of 1% of fuel failures being released to the Reactor Coolant System.

In Angra-2, in order to avoid a release of radioactive gases to the building atmosphere and subsequently to the environment, or the formation of explosive mixtures due to any high concentration of hydrogen that could arise inside the tanks in the auxiliary systems, the Gaseous Waste Disposal System removes such gases by continuous purging with nitrogen and processes the dissolved gases released from the reactor coolant. To fulfill the required functions, the gaseous system has the following tasks:

- To retain radioactive gases until they have largely decayed before discharging then to the exhaust air stack.
- To prevent any release of radioactive gases from the components into the building atmosphere.
- To limit the hydrogen and the oxygen concentrations in the connected components in order to prevent the formation of explosive mixtures and to

reduce the presence of oxygen in the reactor coolant, which would lead to corrosion in the reactor coolant system.

• To operate with the Hydrogen Reducing System, following a loss of coolant accident.

In Angra-2, the gaseous effluents are released continuously through the vent stack, depending on the ventilation system pressure.

H.2.1.2 - Liquid Waste

The Liquid Waste Processing and Storing Systems in Angra-1 and in Angra-2 are designed to collect the active and inactive liquid waste produced in the controlled area, treating them when necessary. After that, they may be discharged from the power plants in accordance with the safety rules established by nuclear and environmental authorities (CNEN, IBAMA and state regulators).

According to the activity and the chemical characteristics of the liquid waste, the following processes are provided for treatment:

- Evaporation
- Chemical precipitation (Angra-2 only)
- The Liquid Waste Processing and Storing Systems are designed to collect the liquid waste arising from the controlled area to specific storage tanks, and to separate different types of liquid waste for further processing

The systems are sufficiently automatic to minimize the human intervention, consequently reducing the occupational doses. The capacity is determined by the amount of liquid waste arising from the controlled area during normal plant operation and outages.

The liquid waste is collected separately in three groups of storage tanks, in accordance with its chemical and radiochemical composition (waste holdup tank, floor drain tank and laundry tank in Angra-1.

In NPP Angra-2, the liquid waste is collected in two groups; group I – Active Liquid Waste with activity in the range 3.7 to 3.7×10^3 Bq/cm³ and group II – Low level active and inactive Liquid Waste with activity up to 3.7×10^{-1} Bq/cm³.

In Angra-2, the Liquid Waste Processing and Storage Systems are designed to process approximately 20,000 m³ of liquid waste per year.

To assure the protection of the workers, of the population and of the environment against the effect of the ionizing radiation, the treated liquid waste intended for discharge is collected in monitoring tanks. Recirculation and discharge pumps are connected to the monitoring tanks to mix the liquid waste or to return it to the storage tanks.

Before discharge from the monitoring tanks, samples are taken for analysis in the laboratory. Based on the results of the analysis the radiation protection supervisor decides whether the discharge may be made. The discharge, as function of the gamma

spectrometry (in Angra-1) or the activity concentration (total gamma as equivalent Cs-137) and gamma spectrometry monitoring weekly mixed samples (in Angra-2), is performed in accordance with the technical specification for the plants, based on CNEN and IBAMA regulations and on the environmental legislation.

The released activity is monitored on-line. If the maximum allowable value of activity concentration for undiluted discharge water is exceeded an alarm is triggered and the discharge is automatically interrupted. In NPP Angra 2, the discharge of the liquid wastes to the environment is permitted (KTA 3603 standard) only if the specific activity of 1.85 E+7 Bq/m³ is not exceeded in a non-analysed mixture prior to dilution using the circulating or service cooling water.

To optimize doses to Public Individuals, CNEN sets an authorized limit of 0.25 mSv/year for each plant.

H.2.1.3 - Solid Waste

To reduce the potential of migration and dispersion of radionuclides and to minimize the dose to the environment, both plants are equipped with Solid Waste Treatment Systems. These systems process the spent resins, the concentrated liquid waste contaminated filters and the solid waste produced in the operation and maintenance of the plants, and confine them in special packages.

In Angra-1, the concentrates, spent resins and contaminated filters from the purification systems are immobilized in cement and conditioned in liners and special 200-liter metallic drums, within the prescribed requirements for transportation and storage. The non-compactable wastes are conditioned in special metallic boxes.

In Angra-2, concentrates, spent resins and contaminated filters from the purification systems are immobilized in bitumen and conditioned in special 200-liter metallic drums. The non-compactable wastes are also conditioned into special metallic boxes.

In both plants, the compressible solid waste is compacted by a hydraulic press and conditioned in special 200-liter metallic drums.

All the waste forms must fulfill the requirements for final disposal established by CNEN regulations.

To minimize the accumulation of solid radioactive waste, the entrance of materials in the controlled area is limited and controlled. Also, all the material collected in the controlled area is monitored and segregated, according to its physical and radiological features. Whenever possible, such material is decontaminated and reused or released as non-radioactive waste.

The solid radioactive waste produced in Angra-1 is stored in an on-site initial storage facility. This facility, denominated Radioactive Waste Management Center (CGR), is

composed of three installations, called Storage Facility 1, Storage Facility 2, and Storage Facility 3, all them in operation, see Figures H.1.

The solid radioactive waste from Angra-2 is stored in the Radioactive Waste Management Center (CGR) and also in a compartment inside the plant, called in-plant storage facility (KPE), located in UKA Building. This place has storage capacity for 1,644 drums.

All packed radioactive waste is monitored to assure that the surface dose rates for transportation do not exceed the established values in regulation CNEN-NN-5.01 [15] and the resulting occupational exposures are in accordance with the values established in regulation CNEN-NN-3.01 [12].



Figures H.1 – On-site initial waste storage facilities – location and schematic

Storage Facility 1 is able to store packages equivalents 4,064 drums. At the moment, this building is occupied with 1,867 drums, 128 B-25 boxes and 97 metallic boxes.

Storage Facility 2 has storage capacity for 1,035 liners and 2,296 drums. Actually, this building is occupied with 1,011 liners, 19 VBA's (VBA is a concrete cylinder with 1.3m³ from Angra-1) and 2296 drums.

Storage Facility 3 has capacity to store 2,644 drums, 390 metallic boxes and 380 liners. Nowadays, this building is occupied with 2,202 drums, 304 metallic boxes and 56 liners.

In 2016, the Radiological Monitoring Building was built and Its purpose is to perform gamma spectrometry of all kind of waste package. However, this building isn't in operation because the purchase process of equipaments isn't finished. Eletronuclear works together with IPEN (Instituto de Pesquisas Energéticas e Nucleares) to develop method for calculating isotopic inventory of waste.

The inventory of waste stored at Angra site is presented on Tables H.1 and H.2.

Waste **Packages** Location Storage Facility 1/ Storage Facility 2/ Storage Concentrate 3,219 Facility 3 **Primary Resins** Storage Facility 2/ Storage Facility 3 866 Storage Facility 1/ Storage Facility 2/ Storage **Filters** 563 Facility 3 Storage Facility 1/ Storage Facility 2/ Storage *Non-compressible 1,051 Facility 3/SG Storage Facility 1,135 Storage Facility 1 / Storage Facility 2 / Storage (1,007 drums **Compressible Facility 3 + 128 B25 boxes) Secondary Resins 828 Storage Facility 1 **TOTAL** 7,662 (Includes 207 Inactive drums)

Table H.1 - Waste Stored at Angra Site - Angra-1

Waste	Quantity (drums)	Location
Concentrate	274	In Plant Storage
Primary Resins	140	In Plant Storage
Filters	25	In Plant Storage
Non-compressible	19	Storage Facility 3 and SG Storage Facility
*Compressible	645	In Plant Storage
TOTAL	1,103	-

Table H.2 - Waste Stored at Angra Site - Angra-2

H.2.2 - INB FACILITIES

The INB units store only low activity nuclear material. The waste produced is minimized due to the high value in the nuclear content of the material processed. The recovery of uranium in all phases of the process is a constant objective not only due to the economic value, but also to avoid the presence of hazardous effluents. The material inventory is presented below, although not all this material is "radioactive waste" in the sense of the Convention.

^{*} Two Steam Generators and one reactor vessel cover are stored at SG Storage Facility.

^{**} In 2006, the NPP supercompacted 1938 waste drums from Angra-1. The pellets (crashed drums) were placed inside special metallic boxes (B-25) with 2500 liters of capacity.

^{*} In 2006, the NPP supercompacted 89 waste drums from Angra-2. The pellets (crashed drums) were placed inside special metallic boxes (B-25) with 2500 liters of capacity.

H.2.2.1 – Nuclear Fuel Factory (FCN)

The low-level nuclear waste is packed in 200-liter metal drums. The total number of drums generated by the FCN production is 548. With the implementation of a shredding machine, it is expected a consistent reduction in the number of drums generated yearly. In addition, there is an ongoing plan of shredding the waste already stored in drums within the FCN's Low-level Waste Storage Facility (DIRBA). These drums contain several materials (gloves, shoes, tools, filters, etc.) contaminated with up to 4.0% enrichment uranium. The implementation of such a plan was capable of opening 32 new sites in the deposit by shredding the waste previously stored in 90 drums. By the end of the plan, new 116 sites are expected to be opened.

The DIRBA has been built in an area of 325 m², split into two modules: the first one designed with the initial capacity of 444 drums for solid waste and the second one with the initial capacity of 120 drums for either solid or liquid waste. In 2024, the storage capacity of the DIRBA has been increased by implementing a new storage system. Currently, the first module has the capacity of storing 628 solid waste drums while the second module has the capacity of storing 182 either solid or liquid drums. This means an increasing in the storage capacity of 44%.

H.2.2.2 - São Paulo Decommissioning Unit (UDSP) and the Storage Unit of Botuxim (UEB)

Between 2008 and 2010 was made an inventory of stocks of materials at the plant. This survey has allowed the number of plastic drums and distribution of material that allowed the correction of some previously released values. At a given moment of the operational period of UDSP, however, some leakage of the material stored led to the contamination of the area surrounding Storage Facility A and also to radioactive contamination of groundwater. From 1998 to 2002 and 2010 to 2013, the area was partially decontaminated. In this operation were generated 170 plastic drums and 18 metal drums with soil contaminated. The other 1,717 plastic drums stored in UDSP were generated during decontamination of the USAM facilities.

The UDSP area is approximately 60,000 m². The site, located in an urban industrial area, was not in use at the time and, after the demolition of warehouses B and C, warehouse A, with 2,060 m², was remodeled to receive the waste from the dismantling of USAM. This process began in 1993, and the transfer of nuclear materials, waste, and radioactive residues took place between 1994 and 1998, after authorization from the regulatory agencies CNEN and CETESB.

In addition to the waste storage, Storage Facility A is also used to store radioactive material (Table H.3) that can still be used as a source for nuclear material and other applications, such as the byproducts of the USAM process, mainly a material called Cake II (Torta II), composed basically of thorium hydroxide concentrate. The inventory of Cake II awaits development of improved technology to allow its economical use.

Table H.3 - Types and amounts of material stored in Storage Facility A

Packages (100-liter plastic drums)	Amount	Mass (ton)
Cake II	3,283	590.94
Mesothorium	760	83,6
Non- Contaminates Trisodium Phosphate	768	92.16
Contaminated Trisodium Phosphate	61	7.28
Radioactive Waste (clothes, equipment, wood soil)	1,769	192.08
Radioactive Waste (soil)	236	31.71
TOTAL	6,877	997,77
Maritime Containers (30 m³ capacity)		
Contaminated press-filter canvas	3.0	32
Contaminated Wood	1.5	53
Contaminated metal parts	6.0	82
Other materials	2,5	9
TOTAL	13.0	176
Metal Boxes (1m³ capacity)	6	6

The area of the Storage Unit of Botuxim (UEB) has about 284,000 m², where there are 7 silos with 3,500 tons of Cake II stored (Table H.4).

Table H.4 - Amounts of Cake II stored in Botuxim.

Mass (ton)
321.48
376.93
374.97
504.32
479.33
778.85
664.19
3,500.07

H.2.2.3 - Caldas Decommissioning Unit (UDC)

The first uranium mine of Brazil, which was called in the past of Poços de Caldas Industrial Complex (CIPC), has finished operation and is under preparation for decommissioning. As the licensing process took place before the present radiological protection criteria were established in Brazil, there was no previous planning for the decommissioning phase. The main areas that will need attention include the open pit mining area, the waste rock piles and the tailings dam. Up to this moment, the whole area

is still under control by the operator. Radiological control is maintained at effluent discharge points, including at the waste dam and at the treatment units for the water drained from the mining area and from the waste rock piles. At UDC, the following materials and/or by-products are considered tailings, radioactive waste, or raw material:

1. Mesothorium, stored in different conditions, namely:

- a. Disposed of in the waste dam during the 1980's: there are around 13,000 fifty-liter drums corresponding to 1,500 tons of this product.
- b. Stored in five (5) silos excavated in a clay bank at the slope of the UDC waste dam: there are 2,700 fifty-liter drums, corresponding to 280 tons of mesothorium. The silos are lined and covered with a three- meter thick layer of clay and soil. This operation was performed in 1987.
- c. Placed in a trench at the slope of the waste dam, in 1984: there are 5,750 fifty-liter drums, corresponding to a total of 2,392 tons of mesothorium. This trench is covered with a two-meter thick layer of clay and soil.

2. Cake II

- a. Approximately 9,600 tons of Cake II (wet base) are currently stored in sheds, packed in 200-liter drums (19,066 units) and 100-litre plastic drums (19,175 units)..
- b. Other 1,734 tons of bulk Cake II, which were placed in four concrete silos.
- c. Additionally, there are 1,600 200-liter drums of Goianite Cake II resulting from experiments for the extraction of rare earths from Goianite mineral, which presents a low thorium content; as well as 3,560 200-liter drums of Cake II, corresponding to 534 tons, stored in silos close to the CIPC waste dam.
- d. Finally, there are 824 200-liter drums (124 tons) of Inaremo, named after the process used by Nuclemon for extracting rare earths from Goianite. Inaremo is characterized by a very low thorium content, being a neutralized waste.

3. Thorium

a. Approximately 80 tons of ThO_2 , resulting from Cake II processing in two periods: In 1990, 32.9 tons were disposed of in a pond; in 1995/1996, were stored in 159 concrete containers of 159 tons.

4. Calcium Diuranate (DUCA)

- a. The treatment of Acid Mine Drainage (AMD) is performed by conventional procedures, by the addition of hydrated lime. The slurry resulting from the process, known as DUCA, is pumped into the mine pit. DUCA is a residue containing uranium. This process accumulated approximately 936,817.29 m³ of DUCA into the pit, until 2023.
- b. Chemical composition of DUCA in the underflow sludge (results expressed as dry basis):
 - Mud pH: > 11;

- U₃O₈: 0,27 % a 0,30 %;

- Total rare earth: 3 % a 7 %;

- CaO: 34,6 % a 36,4 %;

- SO₄: 23,8 % a 24,6 %;

- MnO: 4,5 % a 5,0 %;

- Al₂O₃: 9,4 % a 9,8 %.

H.2.2.4 - Uranium Concentratrion Unit (URA)

The Uranium Concentration Unit (URA) is located at the uraniferous province of Lagoa Real in the Center-South region of the state of Bahia. The ore bodies have average U3O8 concentrations of about 0.22%. Mining activities, developed at an open pit cast, ended in 2015 at the Cachoeira Mine and resume at the new Engenho Mine. The Engenho open-pit mine is currently in operation, whose operational activities began at the end of 2020 and life of mine of 16 years. Uranium extraction is made by the Heap Leaching method. The efficiency of solubilization of this method is estimated to be about 83%. The exhausted ore is disposed of in piles along with the waste rocks from the mining activities. The leachate is captured in holding tanks that are lined with geo-synthetic membranes (HDPE). The liquor is then pumped to the milling unit where uranium is isolated by means of organic solvent extraction and then precipitated as ammonium di-uranate.

The licensing process focused mostly on the aerosol and gamma exposure pathways, because the facility avoids the release of liquid effluents to the environment, since the processed and collected waters are usually pumped back to the process. Thus, no major impacts are expected in the local rivers, which are not perennial. On the other hand, subsequent facts showed that impacts into the aquifers need attention since these water bodies are also the source of water to local communities. Besides the influence of mining activities on groundwater, other pollutant sources have to be assessed like the waste-rock/leached ore piles as well as the leaching tanks. In order to assess any impact into groundwater, a monitoring program is carried out by the mining operator under regulatory surveillance. Groundwater samples are collected monthly from monitoring wells placed close to the area of direct influence of the facility and close to the population groups living at the site surroundings. Surface water samples are also collected near major radionuclide sources to determine dissolved radionuclide concentrations, assessing the contribution of drainage to groundwater pollution.

Data from environmental monitoring carried out by the mining operator, under regulatory surveillance, are collected from around 64 sampling sites at 27 surrounding communities. There are also 190 sampling sites around the facility (plant, mine, waste rocks and leached ore), and comprise the following media: surface water, rain drainage, groundwater, rainwater, aerosol, radon, air quality, gamma exposure, sediment, soil, agricultural product and weather data.

The objectives of the monitoring control are: (1) to keep under control the radionuclide fluxes from mining and milling activities to atmosphere and groundwater compartments, according to the release limits prescribed in the nuclear licensing, (2) to assess the potential impacts of the pollutant sources by means of mathematical

simulation and (3) to establish the overall environmental management strategy for the uranium production.

In addition, it was built at URA a unit for the decontamination of materials, coming from the controlled areas. It is a masonry building, with appropriate facilities to perform the activities of monitoring, segregation, washing and decontamination of these materials. This building is also prepared to held storage of items not decontaminated, which will be cataloged and arranged according to specific procedures. A future expansion of the installation is possible due to how the unit was built. All wastewater is directed to the wastewater treatment system unit.

H.2.3 - NAVY FACILITIES

As already mentioned in **D.4**, the amount of waste that has been generated by the naval programme so far is very small. The solid waste generated in the controlled areas is stored in standardized two hundred-liter metallic drums, which, after being identified, are transferred to a Radioactive Waste Storage Facility, situated on the site of CINA (Aramar Nuclear Industrial Center) until the implementation of DIRCC – Fuel Cycle Waste Storage Facility. Liquid waste is treated in solar evaporators and the concentrate is subsequently immobilized and classified as non-combustible solid waste (SNC). The handling, storage and accounting of waste are under responsibility of the Radiation Protection Service.

The aforementioned storage facility, DIRCC, is a small building measuring 10 m long by 22 m wide, with steel frame, concrete brick walls and metallic roof. The facility is provided with natural ventilation, fire protection and physical protection equipment, and a drainage system to avoid flooding. The storage capacity of the facility is 720 200-liter drums arranged in stacks of up to 3 drums.

The current waste inventory as of June 12, 2024 is presented in the table below.

 Type of Waste
 Mass (kg)
 Number of Drums

 SC
 9,721.15
 144

 SNC
 9,786.59
 112

 TOTAL
 19,507.74
 256

Table H.5 - Waste Inventory at CINA

SC: Solid Compacted
SNC: Solid Non-Compacted

H.2.4 - CNEN INSTITUTES

H.2.4.1 - IPEN

IPEN has been storing the radioactive waste generated in its own installations since the beginning of operations in 1956.

The Radioactive Waste Center (CERER) is responsible for receiving, treating and temporarily storing radioactive waste generated at IPEN, as well as those generated at many other radioactive facilities all over the country. The main features of the CERER include units for: waste reception and segregation; decontamination; liquid waste immobilization and conditioning; in-drum compaction of compressible solids; spent sealed source and lightning rod disassembly; primary and final waste characterization; storage of untreated and treated wastes. The existing facility, an Integrated Plant for Treatment and Storage of Radioactive Waste, has a total built area of 1,450 m2 and comprises the following units:

- <u>Changing rooms and radiation protection control</u>: To allow controlled access to the working area.
- <u>Reception and segregation unit:</u> To receive, classify and distribute the waste to proper treatment. If necessary, waste segregation is carried out.
- <u>Liquid waste storage and treatment/conditioning unit</u>: Equipped with suitable containers or devices for operational storage and pre-conditioning of liquids, either for immobilization or for release to the retention tanks for further discharge to the sewage system.
- <u>Cementation unit</u>: Cementation was the process chosen for conditioning and encapsulating some kinds of wastes such as liquids, wet solids, including ion-exchange resins and activated carbon generated in the reactor operation, sludge, biological and some non-compressible waste.
- <u>Compaction unit</u>: Equipped with a 10-ton hydraulic press. Compressible solids are collected in 60 litter transparent polyethylene bags and pressed into 200 litter metallic drums. The volume reduction factor is about 4-5.
- <u>Lightning rod dismantling unit:</u> Provided with a three-cell glove-box, where
 ²⁴¹Am sources are removed from the devices and packaged in metallic
 containers.
- <u>Disused source encapsulation unit</u>: Designed to handle source activities up to about 4 TBq ⁶⁰Co equivalent. Sources will be withdrawn from original shielding or device and encapsulated in a retrievable package for interim storage.
- <u>Analytical and radiochemical laboratories:</u> For characterization of primary wastes and waste forms.
- Storage facility. For interim storage of DSRS untreated and treated waste.

The wastes managed at IPEN are characterized by a wide diversity in nature, forms, radionuclide contents and activities, so that, for some types of waste, specific methods of treatment and conditioning had to be developed.

In general, solid and liquids wastes are treated and packaged in 200 liter steel drums, as follows:

- Compressible solids: segregation at the generator installation, compaction and package.
- Non-compressible solids: dismantling and, if necessary, encapsulation in concrete.

- Wet solids: chemical conditioning and immobilization in cement.
- Liquids: Wastes of short half-lives are discharged to the sewage system as liquid effluents after temporary storage for radioactive decay; releases meet the proper radiation protection standards. Wastes of longer half-life are immobilized in cement matrix.

Lightning rods with ²⁴¹Am sources were manufactured in Brazil until 1989. In that year, CNEN issued a resolution cancelling the authorization for manufacturing of such devices. Since then, radioactive lightning rods are being replaced by conventional lightning rods. The radioactive lightning rods removed are delivered to IPEN or to other installations of CNEN. The estimated amount of lightning rods to be collected is about 80,000 pieces. From this amount, IPEN has already collected about 18,000 and dismantled almost all of them. Smoke detectors are also dismantled and about 52,000 units have been treated until now.

Disused sealed sources represent for IPEN and CNEN by far the largest waste problem from non-power applications, specially due to the long lived radionuclides such as ²²⁶Ra and ²⁴¹Am. Sources with low activity or low exposure rate received until 1993 are already conditioned and immobilized in cement as well as the ²²⁶Ra needles collected up to that date, meaning in the last case about 1,000 needles or 200 GBq. Currently, this process has been replaced by packing the sources in a retrievable package. The spent sealed sources dismantling and conditioning unit was concluded in 2016 and the start-up tests were carried out successfully. The operation licence was requested at the end of 2016 and now it is waiting the approval of regulatory body, DRSN/CNEN. In total, CERER has received about 19,000 sealed sources and treated 40% of them.

H.2.4.2 - CDTN

CDTN's waste treatment and storage facilities, as well as the laboratories are shown on Table H.6.

Facilities Characteristics 200 L batch, main components: tanks, filters, pumps, Chemical treatment control panel and sample system 200 L batch, main components: tanks, mixer, pump, Cementation, out-drum mixture automatic weighing system and control panel Compaction 16 t press Cutting/shredding Cutting mill, output 80-130 kg/h Package testing Facilities for Type A and Type B package testing Heater system Tank with heater device for about 600 L solution

Table H.6 - CDTN Waste Treatment Facilities

Supporting laboratories	Main equipment sets
Chemical treatment	Lab hood with filtration system, pH meters, analytical scale, pumps, jar-test equipment, magnetic stirrers
Cementation	Lab hood, glove box, lab oven and many equipment set using for physical-chemical and mechanical tests
Thermo differential analysis	Room with the suitable equipment to carry out the analysis.
Storage facility	Description
DFONTE - Storage building for treated wastes and disused sources	450 m ² surface hall with control system for effluents, fence, natural ventilation, appropriate lighting and alarm system
DRNT – Untreated Waste Storage Facility	90 m ² surface hall with control system for effluents, shelves, appropriate lighting and ventilation.

Besides the radioactive waste generated at its own laboratories, CDTN has received disused sealed sources from other users, like industries, hospitals and universities. These sources include radioactive lightning rods, smoke detectors, nuclear gauges and teletherapy units, which are stored at CDTN's storage facility (DFONTE). The main nuclides are 60 Co, 137 Cs, 226 Ra, 241 Am, 241 Am-Be, 85 Kr and 90 Sr.

The strategy devised and implemented for the management of radioactive waste at CDTN is based on the standard CNEN-NN-8.01 [25] and takes into account the available infrastructure. The main aspects of the management program are:

- waste generation minimization by an adequate segregation and characterization;
- volume reduction by chemical treatment for the aqueous liquid waste and compaction and cutting for solid waste;
- cementation of sludge arising from the chemical treatment and immobilization of the non-compactable solid waste in cement/bentonite matrix;
- quality control of the final product in order to guarantee safety during storage and to minimize doses to workers and individuals of the public;
- registry of the waste and disused sealed sources inventory using an electronic database.

Segregation is carried out taking into account the physical, chemical and radiological characteristics of the waste. The liquid waste is segregated into aqueous or organic and the solid waste into compactable and non-compactable. Besides, waste containing short-lived radionuclides is segregated from the ones with long-lived radionuclides, the former being stored for decay and then released from radiological control. Each waste package is identified according to the origin and type of waste.

After being monitored, the segregated waste is transferred to the treatment facilities. All relevant data, like origin, composition, volume or weight, chemical contaminants are registered in a specific form – GUIARR.

Concerning the ²²⁶Ra sources, they are conditioned to maintain retrievability. The sources are inserted in leak-proof stainless-steel capsules, which are placed in lead shields; once loaded, the shields are put inside the cavity of an internally shielded 200-liter drum.

The waste packages are identified, monitored and stored at DFONTE. The relevant packages data are registered in a specific form - GUIART. The information of both forms - GUIARR and GUIART - is used as input into the Waste Database of CDTN, where complex searches can be performed and all information about the stored waste inventory can be easily retrieved. Another database - named SISFONTE - contains data about the sealed sources from other users received and stored at CDTN. Among other features, this database performs an on-line update of the activity stored.

H.2.4.3 - IEN

The radioactive waste is classified into solid and liquid wastes. The solid waste is composed by compressible materials, smoke detectors, lightning rods and sealed sources. Liquid waste was generated in past practices, and the treatment chosen for it is volume reduction, which generates a precipitate that, after drying, will be stored as solid waste.

There are two types of solid waste: compressible and non-compressible. The compressible solid waste is pressed in a hydraulic press with a capacity of 15 ton. All solid wastes are stored in 200 litres drums. The very short-lived waste (VSLW) is stored for decay in a separate room.

The strategy for the management of radioactive waste at IEN is based on the regulation CNEN NN 01 [25].

H.2.4.4 - CRCN-NE

CRCN-NE stores radioactive waste generated by radioactivity users, such as hospitals, industries and research centers. The existing facility for radioactive waste management and treatment includes a compressive unit for compactable materials and a storage facility on an area of 366.5 m².

Disused Sealed Radioactive Sources (DSRS) are received from external customers and are stored in their original shielding. Small sources, such as those used for equipment calibration, are stored in small cylindrical shielding (castle type). The sources received are for a wide range of applications, from radiotherapy and brachytherapy sources to process gauges, such as level, humidity, density and well logging gauges and calibration sources, among others. The main sources received are ¹³⁷Cs, ⁶⁰Co, ²⁶⁶Ra, ⁹⁰Sr, ²⁴¹Am, ²⁴¹Am/Be.

Radioactive lightning rods and smoke detectors are also received from external customers. The lightning rods are segregated by radionuclide, ²⁴¹Am or ²²⁶Ra, and stored in

200 L drums. The smoke detectors are of the ²¹⁴Am type and are also stored in 200 L drums. Since the CRCN-NE RW Storage Facility (DIRR) does not have the necessary infrastructure to remove the sources from the devices, aiming to store only the radionuclides, the sources are left inside their original devices and stored as received. It is planned the construction of a laboratory to dismantle the lightning rods and smoke detectors and remove the source to reduce the waste volume stored.

H.2.5 - WASTE REPOSITORY AT ABADIA DE GOIÁS

For the repository of the waste from Goiânia accident, also the 0.3 mSv/y dose constraint defined by the Regulatory Body based on regulation CNEN-NN-3.01 [12] was used during the design of the installation. As the installation contains two buildings, each one related to different activity concentration of ¹³⁷Cs in the waste, as already described in this report. The design basis for the first repository (Waste Group 1) a dose limit of 0.05 mSv/y has been applied to critical members of the public while a level 0.25 mSv/y was used to the main repository, in agreement with the Technical Instruction CNEN IT-01/91 [16].

H.3 - SITING OF PROPOSED FACILITIES (Article 13)

H.3.1 - NUCLEAR POWER PLANTS

The On-Site Storage facility was built at the north side of the Angra site.

The Storage Facility 1 of the on-site storage facility was built in 1981. The Storage Facility 2 is composed by the old Storage Facility 2A constructed in 1992 and a Storage Facility 2B constructed in 2009.

To erect the Storage Facility 2B, IBAMA, the national environmental agency, required an Environmental Impact Study, which was submitted and accepted. The Environmental Operational License was issued in 2007.

Together with the Storage Facility 2B, in 2009, a third storage facility (Storage Facility 3) was constructed.

To improve the waste management facilities, a Monitoring Building has been planned. This building is under construction between Storage Facilities 1 and 2 and will hold all the equipment and operations related to the new system of waste packages measurement (Gamma Segmented Counter System) for the waste isotopic inventory determination.

This area is part of the south-eastern part of the Brazilian Platform. Studies made in 1982 had demonstrated that there is no sign of failure occurrence or another tectonic activity in the region of Itaorna beach, since the inferior cretacic period.

The storage facility area was constructed on 13,000 m² "plateau", as the result of a rock quarry excavation in the Ponta Fina hill.

Engineering measures were implemented in the vertical rocky slope and top of the hill, based on geological-geotechnical mapping.

In order to improve the safety of the upstream slopes of the storage facilities areas, a contention gabion walls and soil nails with gunite concrete were performed, as well as superficial draining system was implemented.

Given the geologic formation of the region, predominantly crystalline rock, there is little possibility of underground water.

Specifically, the hillside where the storage facility is located was technically certified for stability and safety conditions.

In addition, a Storage Facility for the replaced old steam generators from Angra-1 was constructed close to the site dock and within the site boundary and the replacement was concluded in 2009.

H.3.2 - LOW AND INTERMEDIATE LEVEL WASTE REPOSITORY

The present Brazilian nuclear scenario justifies the construction of a national repository for low and intermediate radioactive level waste, which represents the majority of the volume generated in the Country. The responsibility to provide facility is given to DPD/CNEN, in accordance with Brazilian Law 10308 of 2001.

In November 2009 is signed the project charter of the RBMN Project aiming at having a licensed and commissioned repository to dispose of those wastes. The waste inventory to be disposed of includes those from the NPPs operation, from nuclear fuel cycle installations, their decommissioning and from the use of radionuclides in medicine, industry and R&D activities. Material classified as NORM is not foreseen to be disposed of in this repository. The main objectives of the project are to establish, control and execute all the tasks for the implantation of the Brazilian Repository, since its site selection, through the conceptual and basic design until its construction, startup and commissioning. The design concept will be a near-surface multi-barrier repository constructed in compliance with the currently existing waste inventory and the radioactive wastes that will be generated in the future.

Within the scope of the Federal Government, the Brazilian Nuclear Program Development Committee (CDPNB), performing its duties, has followed topics of relevance to the development of the Brazilian Nuclear Program, among them the implementation of the repository for radioactive waste.

Thus, in 2018, the CDPNB, through Resolution No. 11, of October 29, 2018, of the Institutional Security Cabinet of the Presidency of the Republic, instituted a Technical Group (TG-8) with the objective of establishing guidelines and goals for the development of the national repository for low and intermediate level radioactive waste (LIRW), coordinated by the Ministry of Science, Technology and Innovations. Subsequently, through a broad name selection process conducted by the members of the TG-8, the project was renamed to *Nuclear and Environmental Technology Center* (CENTENA), - in

which, in addition to the LIRW disposal, R&D&I activities will also be carried out in the Waste Management area. In this way CENTENA reflects better the purpose, scope and scientific responsibility, as well as to highlight the undertaking environmental commitment to Brazilian society.

This Technical Group, formed by representatives of 14 government entities, including Ministries and Public Agencies, established the guidelines and responsibilities for the main stakeholders involved in the implementation process of CENTENA stands out, as well as the definition of a matrix with the key actions to make the project viable. This matrix was conceived as a tool to allow the monitoring and supervision of the actions necessary to implement the enterprise.

After a site selection process, which consisted in four progressive phases: definition of an interest region, selection of preliminary and potential areas and choice of the candidate sites, five sites are indicated, with a preferential one. This process includes studies based on the geological survey and on other properties in compliance with the technical criteria, and of course, taking into account the aspects related to public acceptance. Activities are currently underway to begin the characterization of this preferred location.

A preliminary communication plan has been drawn up and activities are underway to implement it for stakeholders in the region, state and country. Some communication materials are ready and they have been developed for various audiences.

It is important to point out that the site characterization is the first step to obtain the environmental and nuclear licenses that are given by IBAMA and by Brazilian Nuclear Authority.

Due to its transversal nature, the CENTENA Project is under discussion and outlined within the scope of the Federal Government. It should be noted that this undertaking has the characteristics of a State Project, as it is essential for the continuity of the country's nuclear activities and the development and operation of new projects in the nuclear sector. The CDPNB, considering the prerogative of supervising the activities of the Brazilian Nuclear Program, has been monitoring and seeking with the Ministries and Government Agencies perennial conditions for the definitive implementation of this strategic project for the Brazilian nuclear sector.

H.4 – DESIGN AND CONSTRUCTION OF FACILITIES (ARTICLE 14)

H.4.1 - NUCLEAR POWER PLANTS

Angra waste is mixed with cement or bitumen before transfer to the On-site Storage Facility. This operation is performed under requirements for protection of the workers, the public and the environment, according to approved plant procedures.

All packed radioactive waste are monitored to assure that the surface dose rate, for transportation, does not exceed the established values in regulation CNEN-NN-5.01 [15]

and the resultant occupational exposure and contamination are in accordance with the values established in regulations CNEN-NN-3.01 [12] and CNEN-NN- 8.01 [25].

The waste is stored according to a previously established layout, to reduce the dose rate in external areas of the building.

The possibility of the environmental contamination in terms of the storage is remote, since all the waste is in the solid form and is conditioned in certified containers. For additional precaution the units of storage are equipped with ventilation systems to assure negative pressures (including high efficiency filtering system) and internal drains directed to sumps subjected to inspections and release control.

The inventory control of the stored waste is made with the aid of validated managing software. The data bank includes information on the physical, chemical, radiological and mechanical features of the packed waste.

Periodic visual inspections are performed to verify possible alterations in the stored packed waste. Moreover, monthly inspections are performed on the general conditions of the building and the installations.

For Storage Facility 2 and Storage Facility 3, the following systems are installed:

- Remote automatic visual inspection equipment;
- On-line external radiation monitoring system;
- Ventilation system to assure negative pressures, including high efficiency filtering system;
- Internal and external drainage systems.

The storage facility for the old steam generators is equipped with on-line radiation monitoring system, ventilation system and drainage systems.

H.4.2 - INB FACILITIES

At INB, specifically at the operational facilities of FCN and URA, all Low-Level Waste, after monitoring, go through a segregation process, in order to be separated in drums according to their characteristics. After the selection, the waste is packed up in drums, which are stored within the facility.

All drums containing radioactive waste are monitored to assure that the surface contamination does not exceed the values established in the regulation CNEN-NE-5.01 [15] and that the resulting occupational exposures are in accordance with the limits established in the regulations CNEN-NN-3.01 [12] and CNEN-NN-8.01 [25].

Recently, at FCN, the Module II of the DIRBA Storage Facility has been built and licensed to increase the storage capacity of DIRBA by 42%, enabling the total storage of 804 drums in Modules I and II. it is estimated that DIRBA will allow to store the Low-Level Waste for the next 10 years, at the FCN Facility.

Additionally, at FCN, a project for a second Low-level Waste Storage Facility (DIRBA) is being developed. There is a minimum requirement for the new DIRBA to have the capacity of storing the waste generated by 50 years of FCN's operations.

H.5 - ASSESSMENT OF SAFETY OF FACILITIES (ARTICLE 15)

A comprehensive safety assessment is a requirement established by the licensing regulation in Brazil [3].

H.5.1 - NUCLEAR POWER PLANTS

For the Angra-1 and Angra-2 plants, a Final Safety Analysis Report (FSAR) were prepared. For the Angra-3 plant, a Preliminary Safety Analysis Report (PSAR) was also prepared. The FSARs and PSAR followed the requirements of US NRC Regulatory Guide 1.70 - Standard Format and Contents for Safety Analysis Report of LWRs.

Chapter 11 of the FSAR deals with radioactive waste management issue, including waste generation, treatment, in plant storage and the radiation protection aspects.

These reports were reviewed and assessed by CNEN, and extensive use was made of the US NRC - Standard Review Plan (NUREG - 0800).

H.5.1.1 - Onsite Storage Facility

Before the start-up operation of Angra-1 the documentation for the installation of the Storage Facility 1 of the On-Site Storage Facility, establishing the design, security and radiological protection plans, was submitted and approved by CNEN. The Storage Facility 1 was built in 1981. Later, the Storage Facility 2A module was also approved by CNEN and built in 1992.

To erect the Storage Facility 2B, besides the CNEN license, IBAMA, the National Environmental Agency, required an Environmental Impact Study, which was submitted by ETN and evaluated by IBAMA. The Operational Licence for Storage Facility 2 was issued by IBAMA in December 2007 and in January 2009 by CNEN.

The safety and environmental licensing procedures for the construction of the Storage Facility 3 was concluded in the beginning of 2009. This process included:

- A safety evaluation submitted to the Nuclear Regulatory Commission
- An environmental impact study
- An environmental impact report
- A set of Public Hearings for discussions with the Public and local and state Organized Society Members.

H.5.2 - RADIOACTIVE WASTE REPOSITORIES

As mentioned above, the environmental licensing process of any waste repository in Brazil is responsibility of the Brazilian Institute for Environment and Renewable Natural Resources (IBAMA). When radioactive waste is involved, CNEN acts in accordance with IBAMA, assisting this institution in nuclear matters.

In the implementation phase of the national repository for low and intermediate level radioactive waste (CENTENA Project), the Directorate for Radiological Protection and Nuclear Safety (DRSN/CNEN) is in charge to assess all documents related to nuclear safety and also to perform the evaluation of the Safety Analysis Report of the installation.

Some projects were implemented by CNEN in the field of safety assessment of final disposal facilities. The main one was developed under the assistance of the IAEA. This project was aimed to improve the national capability for assessing the safety of waste disposal facilities, and for this purpose, a multidisciplinary expert group was created and was trained in safety assessment methods, including the use of the relevant computer codes as well as laboratory and field measurements techniques.

Further, CNEN is participating in the IAEA working group of international experts in radioactive waste management and decommissioning with particular emphasis on strategies, implementation technologies and methodologies called WATEC – International Radioactive Waste Technical Committee. The main functions of WATEC, among others, are to provide advice and guidance, and to marshal support in their countries for implementation of Agency's programmatic activities in the area; to act as a link between the Agency's activities in this area and the scientific communities; to develop and review selected documents for the Nuclear Energy Series; and to provide support to Member States for planning and implementing radioactive waste management and decommissioning activities

The Radioactive Waste Division (DIREJ), under DRSN/CNEN structure, is responsible for regulating and controlling all activities related to radioactive waste management in Brazil and comprises 17 people, being 7 with doctoral degree, 2 with master's degree, 4 with college degrees people and specialization and 4 administrative.

In this sense, DIREJ has reviewed several safety assessment reports originated from nuclear and radioactive facilities across the country. This Division has also developed a publication and training material that covered the principles of safety assessment to regulated agents and research institutions, thus disseminating the safety assessment culture among the operators of nuclear and radioactive facilities, in order to improve the technical quality of the safety assessment reports. DIREJ staff has been continuously trained in several IAEA training courses in related areas.

H.5.3 - INB FACILITIES

To ensure that design and operation of the facilities are in accordance with the safety principles required by national and international authorities, all facilities owned by INB are subject to nuclear licensing procedures stablished by CNEN. To this effect, a

Preliminary Safety Analysis Report and a Final Safety Analysis Report are prepared and submitted in accordance with regulatory guide CNEN-NE-1.04 "Licensing of Nuclear Installations" [3], which is further supplemented by regulatory guide CNEN-NE-1.13 - "Licensing of Uranium and/or Thorium Mining and Milling Facilities" [20], in the case of uranium ore mining and milling operations.

Additionally, all such facilities go through an environmental licensing process, including an Environmental Impact Study in which the safety conditions relating to the environment and the population are discussed. For nuclear facilities, this process is conducted by IBAMA; in the case of UMP and in the case of UDSP and UEB sites this is responsibility of the corresponding State environmental bodies.

At the FCN facility, the low-level nuclear waste is packed in 200-liter metal drums. The drums have their surface contamination and dose rate monitored previously to their entering into the FCN's Low-level Waste Storage Facility (DIRBA), following the criteria established by the CNEN standards. In addition, inspections are performed monthly, aiming to verify the integrity of the drums and to monitor the dose rate of the building. Within the DIRBA there is a decontamination cabin aiming for personnel decontamination in potential emergency situations, such as the release of waste due to the impact of a drum falling in the floor.

At URA, a unit was built to decontaminate materials originating from controlled and supervised areas. This unit is a masonry building, with appropriate facilities to carry out monitoring, segregation, washing and decontamination activities of these materials. This building is also prepared to store contaminated items classified as waste, where they are cataloged and arranged according to specific procedures. Wastewater is not released into the sewage treatment system, but is incorporated into the Chemical Plant's effluent treatment system.

H.6 - OPERATION OF FACILITIES (Article 16)

The responsible for the safety of the radioactive waste facilities is the operator. Information on the conduct of operation is submitted to CNEN in the corresponding Safety Analysis Report and is reviewed during the licensing process. The operation is subject to CNEN regulatory inspection programs and audits, and periodical reports must be submitted according to regulation CNEN-NN-1.14 [5] and specific licensing conditions.

H.7 - INSTITUTIONAL CONTROL AFTER CLOSURE (Article 17)

H.7.1 - ABADIA DE GOIÁS REPOSITORY

The institutional control defined after the closure is maintained after the site closure to limit radiation dose to population. It involves record keeping, area delineation, land use restrictions, environmental monitoring program (PMA), inspections and any other corrective action that may be required.

In 1988, the IRD/CNEN, through its Department of Environmental Radiological Protection began the implementation of the Environmental Monitoring Program (PMA) around the interim storage facility for the radioactive waste from the decontamination of the areas affected by the radiological accident of Goiania.

Due to the need of characterizing the area that would site the repository, the results obtained in that Program for the period between 1988 and 1992 were used as a preoperational Program for the repositories.

IRD/CNEN continued with the environmental monitoring program until 1996, when the responsibility for the program was transferred to the Midwest Regional Center for Nuclear Sciences (CRCN-CO) of the District of Goiania.

The program includes a TLD net around the site, and analyses of samples of surface and groundwater, soil, sediments, pasture and milk to determine the quantity of ¹³⁷Cs.

IRD/CNEN implemented a monitoring control program in 1998, including auditing records related to site monitoring and the duplicate sampling program, that includes all environmental media included in the monitoring program performed by CRCN-CO. Results of this program control program attest the good performance of the laboratory in charge of the monitoring program and the integrity of the repository.

Although not required by regulation, the laboratory of CRCN-CO participates from the National Intercomparison Program sponsored by IRD/CNEN. The results are presented regularly at the annual environmental monitoring report and indicate a good performance.

The repository structures are not supposed to have any release of radioactive material. Therefore, no operational level on activity concentration was defined for the installation. Any increase of the background levels shall be considered as a violation of the integrity of the repository and will demand further investigation of the situation.

According to an agreement formalized between CNEN and the state of Goiás, the institutional control, started in 1998, will be maintained over 50 years with the possibility of being extended for another 50 years.

SECTION I - TRANSBOUNDARY MOVEMENT

I.1 - TRANSBOUNDARY MOVEMENT (Article 27)

The Brazilian policy on transboundary movements of spent fuel and radioactive waste follows international practices. According to this policy, no radioactive waste shall be imported into the country.

There were not transboundary movements for the last 3 years. All transboundary movements carried out in the past have already been described in previous Reports of Brazil.

SECTION J – DISUSED SEALED SOURCES

J.1 - DISUSED SEALED SOURCES (Article 28)

The Brazilian regulation establishes that disused radioactive sources cannot be stored in radioactive facilities of medicine, industry, research and education, distribution, services or production of radiopharmaceuticals (cyclotrons). CNEN enforces the return of the disused sources to the manufacturer or the transfer of these sources to one of the CNEN's storage facilities, where the sources will be dismounted from its device or shielding for further disposal. To avoid unauthorized removal, these sources are identified and properly stored within controlled areas with restrict personal access. These storage facilities are under a Security Plan and under a periodic inspection program led by Nuclear Security and Standardization Division (DISEN) of Directorate for Radiological Protection and Nuclear Safety (DRSN) of CNEN. All transfer of radioactive sources between radiation facilities has to be authorized by CNEN, and in some cases it is also required the authorization for the transport of the source.

Brazil has implemented several actions for the detection of illicit traffic of radioactive sources. These actions include the training of security forces, customs, and postal company and the use of detectors in the field. At regional level Brazil and the others MERCOSUL (Southern Common Market) and associated member countries, have implemented common policies for prevention, detection and response of the illicit traffic of radioactive sources and nuclear material.

At IPEN, the quantities and activities of Am-241 sources from lightning rods and smoke detectors, as well Ir-192 sources were corrected after characterization and recounting during the last 3 years. This is the reason why the number of sources in Table J.1 is lower than the last report.

J.1.1 - DISUSED SOURCE STORAGE

The inventory of disused sources stored at CNEN institutes in July 2024 is presented on Table J.1. The occupational rate of the storage facility is also presented.

Nuclear medicine installations have usually just weak calibration sources. Disused sources are stored in the installation, but the main concerns are towards the quality of those sources still in use.

Institute	Number of Sources	Total Volume (m³)	Total Activity (Bq)	Occupation Rate (%)
IPEN	152,918*	110	3,44E+14	~25**
CDTN	12,575***	115	4,65E+14	~70
IEN	21,233	80	3,3E+14	~40
CRCN-NE	1,329****	34	1,0E+14	~14
TOTAL	188,055	339	1,24E+15	-

Table J.1 - Disused sources in storage

J.1.2 - PROGRAM FOR COLLECTING OF DISUSED SOURCES AND RADIOACTIVE WASTE

CNEN has the legal obligation to receive and keep in safe storage any kind of radioactive waste, however CNEN has no legal obligation to collect disused sources and radioactive waste.

In the past, CNEN had a program to collect radioactive sources throughout the country, but it was discontinued around the year 2000 and since then the sources must be taken by their owners for storage at one of CNEN's institutes.

Currently, CNEN only collects radioactive waste and disused sources in case of a formal request from the owner, after a careful analysis of the request. Normally most requests are related to contaminated material of large volume.

The type o source stored at CNEN's Institutes are lightning rods, smoke detectors, small radium needles and large sources used in radiotherapy. The collection of sources stored in the CNEN institutes from 2020 are shown in the tables J.2, J.3 and J.4.

As stated in **D.5.3**, the IEN storage facilities were closed in 2019 due to structural issues and since then no spent sources have been received or stored there. Efforts are being made to address the issue and reopen the facilities.

^{*} This includes 133,101 ²⁴¹Am and ²²⁶Ra sources from lightning rods and smoke detectors.

^{**} This value represents a volumetric percentage of the total radioactive waste stored at IPEN. It is noteworthy that, in 2018 and 2019, the untreated storage was rearranged including the sealed sources, resulting 95% the total storage capacity (untreated storage)

^{***} This includes 3,389 sealed sources, 3,008 sources from lightning rods and 6,077 smoke detectors, and also 101 200L-drums with treated wastes

^{****} This includes 765 ²⁴¹Am and ²²⁶Ra sources from lightning rods and smoke detectors

Table J.2 - Number of Received Spent Sources at IPEN - 2020/2024

RAD	Type of Source	Quant	Total Activity (Bq)	Date of Storage
Am-241	Sealed Source	55	1.47E+11	06/2021to 04/2024
Am-241Be	Sealed Source	5	1.09E+11	01/2024 to04/2024
Ba-133	Sealed Source	115	3.53E+08	04/2022to 05/2024
C-14	Sealed Source	5	3.69E+11	06/2021 to 02/2024
Cd-109	Sealed Source	7	4.36E+01	08/2023
Co-57	Sealed Source	301	5.06E+09	02/2022 to 05/2024
Co-60	Sealed Source	16	3.62E+13	06/2021to 04/2024
Cs-137	Sealed Source	136	8.59E+11	06/2021 to 05/2024
Fe-55	Sealed Source	1	3.42E+06	11/2023
Gd-153	Sealed Source	6	9.93E+01	02/2024
Ge-68	Sealed Source	243	2.47E+09	02/2022to 05/2024
Ir-192	Sealed Source	274	5.60E+11	07/2020to11/2023
Kr-85	Sealed Source	22	1.06E+11	06/2021 to05/2024
Ni-63	Sealed Source	60	2.39E+10	06/2021to12/2023
Pm-147	Sealed Source	5	7.04E+08	11/2022 to 11/2023
Ra-226	Sealed Source	10	1.23E+07	06/2021to 04/2024
Se-75	Sealed Source	9	7.50E+10	06/2020 to 12/2023
Sr-90	Sealed Source	11	5.53E+10	07/2021to 02/2024
Am-241	Lightning rod	148	4.44E+09	03/2020to 12/2023
Ra-226	Lightning rod	00	0.00E+00	None
Am-241	Smoke detector	3,478	1.15E+08	04/2020 to 11/2023
	TOTAL	4,907	3.85E+13	

Table J.3 - Number of Received Spent Sources at CRCN-NE – 2020/2024

RAD	Type of Source	Quant	Total Activity (Bq)	Date of Storage
Am-241	Sealed Source	13	1.89E+10	01/2020 to 05/2024
Am-241Be	Sealed Source	2	3.54E+09	01/2020 to 05/2024
Ba-133	Sealed Source	19	4.90E+07	01/2020 to 05/2024
Cf-252	Sealed Source	2	3.92E+07	01/2020 to 05/2024
Co-57	Sealed Source	54	1.29E+07	01/2020 to 05/2024
Co-60	Sealed Source	3	6.55E+13	01/2020 to 05/2024
Cs-137	Sealed Source	55	4.76E+10	01/2020 to 05/2024
Ge-68	Sealed Source	11	2.46E+06	01/2020 to 05/2024
Ge-68 Ga	Sealed Source	34	1.69E+08	01/2020 to 05/2024
Ir-192	Sealed Source	1	1.12E-32	01/2020 to 05/2024
Kr-85	Sealed Source	12	2.53E+10	01/2020 to 05/2024
Na-22	Sealed Source	14	9.03E+05	01/2020 to 05/2024
Ni-63	Sealed Source	4	2.05E+09	01/2020 to 05/2024
Ra-223	Sealed Source	1	2.00E-21	01/2020 to 05/2024
Sr-90	Sealed Source	5	9.32E+08	01/2020 to 05/2024
Am-241	Lightning rod	71	3.94E+09	01/2020 to 05/2024
Ra-226	Lightning rod	9	4.99E+08	01/2020 to 05/2024
Am-241	Smoke detector	679	2.51E+07	01/2020 to 05/2024
	TOTAL	989	6.56E+13	

Table J.4 - Number of Received Spent Sources at CDTN - 2020/2024

Radionuclide	Type of Source	Quantity	Total Activity (Bq)	Date of Storage
Am241	Calibration source	4	6.39E+03	05/04/2022
Am241	Density gauge	1	5.44E+03	28/08/2023
Am241	Density gauge	1	1.27E-01	30/06/2020
Am241	Density gauge	12	3.73E+04	15/09/2020
Am241	Fill-level gauge	1	1.78E+01	09/12/2021
Am241	Fill-level gauge	2	3.23E+03	24/01/2022
Am241	Fill-level gauge	96	1.04E+05	21/02/2022
Am241	Moisture detector	1	1.07E+03	11/07/2022
Am241	Process gauge	1	8.96E+02	12/07/2022
Am241	Process gauge	2	2.15E+03	19/07/2022
Am241	Process gauge	2	2.10E+05	23/02/2023
Am241	Process gauge	3	1.63E+04	28/08/2023
Am241	Process gauge	2	2.09E+05	04/10/2023
Am241	Process gauge	48	5.20E+04	05/10/2023
Am241	Process gauge	2	1.09E+04	07/01/2021
Am241	Process gauge	96	1.04E+05	07/05/2021
Am241	Process gauge	96	1.04E+05	27/05/2021
Am241	Process gauge	1	5.22E+03	14/09/2020
Am241	Process gauge	2	2.16E+05	21/03/2022
Am241	Process gauge	1	9.03E+02	22/04/2021
Am241	Thickness gauge	2	3.23E+03	31/05/2023
Am241	Thickness gauge	4	6.46E+03	25/09/2023
Am241	Unknown	48	5.16E+04	02/02/2023
Am241Be	Calibration source	2	5.30E+03	05/04/2022
Am241Be	Moisture detector	2	3.47E+03	18/01/2024
Am241Be	Moisture detector	1	1.77E+03	06/07/2020
Am241Be	Moisture detector	2	3.50E+04	22/09/2022
Am241Be	Moisture detector	4	7.22E+05	07/03/2023
Am241Be	Process gauge	1	1.74E+04	29/03/2023
Am241Be	Unknown	1	1.72E+04	26/10/2023

Ba133	Calibration source	1	7.17E+00	16/03/2021
Ba133	Calibration source	2	4.10E+00	29/08/2022
Ba133	Calibration source	1	3.64E+00	07/02/2023
Ba133	Calibration source	1	2.07E+00	23/02/2023
Ba133	Calibration source	1	2.44E+00	30/05/2023
Ba133	Calibration source	1	3.78E+00	26/06/2023
Ba133	Calibration source	3	1.03E+01	27/06/2023
Ba133	Calibration source	1	3.06E+00	28/08/2023
Ba133	Calibration source	1	3.57E+00	06/09/2023
Ba133	Calibration source	1	2.54E+00	11/09/2023
Ba133	Calibration source	1	3.21E+00	13/09/2023
Ba133	Calibration source	2	5.89E+00	29/09/2023
Ba133	Calibration source	1	3.10E+00	11/12/2023
Ba133	Calibration source	1	3.12E+00	06/02/2024
Ba133	Calibration source	5	1.45E+01	19/02/2024
Ba133	Calibration source	1	1.78E+00	25/03/2024
Ba133	Calibration source	4	1.74E+01	23/04/2024
Ba133	Fill-level gauge	4	3.26E+02	15/01/2020
C 14	Process gauge	2	6.58E+00	17/11/2022
C 14	Research	5	2.22E+01	13/06/2023
Cf252	Calibration source	4	4.33E+01	24/05/2023
Cf252	Process gauge	1	3.95E+01	16/08/2021
Cm244	Process gauge	4	2.78E+04	29/03/2023
Cm244	Process gauge	8	4.69E+04	04/10/2023
Co57	Calibration source	5	4.04E-02	16/03/2021
Co57	Calibration source	9	2.86E-06	09/06/2022
Co57	Calibration source	2	1.03E-01	12/07/2022
Co57	Calibration source	2	2.10E+00	30/11/2022
Co57	Calibration source	1	5.31E-01	30/05/2023
Co57	Calibration source	3	6.03E+00	26/06/2023
Co57	Calibration source	3	4.50E-01	27/06/2023
Co57	Calibration source	2	3.81E-02	06/09/2023
Co57	Calibration source	1	7.68E-02	19/09/2023
Co57	Calibration source	2	1.14E+00	01/11/2023
-				

Co57	Calibration source	1	1.11E+00	06/11/2023
Co57	Calibration source	6	2.93E+00	11/12/2023
Co57	Calibration source	18	4.24E-01	08/01/2024
Co57	Calibration source	1	4.74E-05	06/02/2024
Co57	Calibration source	17	1.48E+01	19/02/2024
Co57	Calibration source	6	2.18E+01	18/03/2024
Co57	Calibration source	5	2.49E+00	25/03/2024
Co57	Calibration source	5	6.46E+01	23/04/2024
Co57	Moisture detector	1	3.72E-04	21/09/2020
Co57	Process gauge	2	1.42E+00	15/04/2024
Co57	Process gauge	1	5.20E-01	26/10/2023
Co60	Calibration source	12	6.77E+01	30/06/2023
Co60	Calibration source	6	1.19E+03	13/12/2023
Co60	Industrial radiography	1	2.89E+02	06/12/2022
Co60	Industrial radiography	6	1.37E+02	29/12/2022
Co60	Industrial radiography	4	1.99E+02	02/03/2023
Co60	Process gauge	1	4.61E+03	17/03/2023
Co60	Process gauge	4	4.11E+02	30/06/2020
Co60	Process gauge	1	1.49E+02	05/11/2020
Co60	Process gauge	1	6.22E+03	23/02/2021
Co60	Process gauge	1	1.08E+05	22/04/2021
Co60	Process gauge	6	8.61E+01	26/04/2021
Co60	Process gauge	34	1.26E+02	28/04/2021
Co60	Process gauge	12	4.51E+01	23/06/2021
Co60	Process gauge	1	1.22E+02	10/12/2021
Co60	Process gauge	8	2.95E+02	22/12/2021
Co60	Process gauge	14	1.02E+03	19/07/2022
Co60	Process gauge	47	1.62E+03	17/11/2022
Co60	Teletherapy	1	1.66E+05	10/11/2020
Co60	Teletherapy	1	1.80E+00	23/02/2021
Co60	Teletherapy	1	2.69E+07	15/04/2020
Co60	Teletherapy	1	3.56E+07	20/10/2020
Co60	Teletherapy	1	1.65E+07	14/12/2020
Co60	Teletherapy	1	4.86E+07	01/03/2021
		· · · · · · · · · · · · · · · · · · ·		

Co60	Teletherapy	1	4.85E+07	05/03/2021
Co60	Teletherapy	1	2.83E+07	25/03/2021
Co60	Teletherapy	1	8.87E+06	20/09/2021
Co60	Thickness gauge	1	5.48E+07	21/11/2022
Co60	Thickness gauge	2	6.87E+07	16/02/2023
Cs137	Unknown	1	2.78E-01	10/06/2020
Cs137	Unknown	1	4.68E+03	21/12/2020
Cs137	Calibration source	1	1.25E+03	10/08/2022
Cs137	Calibration source	2	5.33E-01	05/04/2022
Cs137	Calibration source	1	2.04E-01	03/06/2020
Cs137	Calibration source	1	2.68E-01	30/06/2020
Cs137	Calibration source	1	1.98E-01	26/10/2020
Cs137	Calibration source	1	6.46E-01	19/04/2021
Cs137	Calibration source	1	2.61E-01	22/04/2021
Cs137	Calibration source	1	2.39E-01	20/08/2021
Cs137	Calibration source	1	1.86E-01	21/02/2022
Cs137	Calibration source	1	1.88E-01	06/07/2022
Cs137	Calibration source	1	1.90E-01	12/07/2022
Cs137	Calibration source	1	1.72E-01	25/07/2022
Cs137	Calibration source	1	3.53E+00	29/08/2022
Cs137	Calibration source	1	2.21E-01	06/09/2022
Cs137	Calibration source	3	1.52E+04	09/12/2022
Cs137	Calibration source	1	3.03E-01	26/12/2022
Cs137	Calibration source	1	5.11E+00	26/06/2023
Cs137	Calibration source	3	1.52E+01	27/06/2023
Cs137	Calibration source	16	1.93E+00	30/06/2023
Cs137	Calibration source	1	2.55E-02	02/08/2023
Cs137	Calibration source	1	2.29E+00	11/09/2023
Cs137	Calibration source	1	5.08E+00	13/09/2023
Cs137	Calibration source	1	2.62E-01	22/11/2023
Cs137	Calibration source	1	2.51E+00	11/12/2023
Cs137	Calibration source	6	2.00E+01	19/02/2024
Cs137	Calibration source	1	2.76E+00	01/04/2024
Cs137	Chromatography	1	4.86E+00	23/04/2024
-				-

Cs137	Fill-level gauge	2	2.40E+04	26/04/2024
Cs137	Fill-level gauge	3	1.22E+04	05/06/2020
Cs137	Fill-level gauge	1	1.40E+04	06/07/2020
Cs137	Process gauge	2	1.30E+04	28/08/2020
Cs137	Process gauge	1	5.21E+00	21/09/2020
Cs137	Process gauge	3	3.76E+02	25/09/2020
Cs137	Process gauge	4	5.33E+02	29/10/2020
Cs137	Process gauge	8	1.35E+05	30/10/2020
Cs137	Process gauge	6	2.13E+04	05/11/2020
Cs137	Process gauge	1	4.68E+03	21/12/2020
Cs137	Process gauge	1	1.28E+02	03/02/2021
Cs137	Process gauge	7	4.88E+04	12/04/2021
Cs137	Process gauge	3	8.89E+04	13/04/2021
Cs137	Process gauge	3	3.98E+03	22/04/2021
Cs137	Process gauge	21	2.67E+05	05/07/2021
Cs137	Process gauge	1	3.11E+04	20/08/2021
Cs137	Process gauge	2	2.51E+02	09/09/2021
Cs137	Process gauge	7	4.25E+04	07/10/2021
Cs137	Process gauge	3	2.93E+04	08/11/2021
Cs137	Process gauge	6	3.57E+04	11/11/2021
Cs137	Process gauge	11	3.54E+04	09/12/2021
Cs137	Process gauge	1	2.35E-01	10/12/2021
Cs137	Process gauge	6	2.19E+04	24/01/2022
Cs137	Process gauge	1	4.03E+04	11/07/2022
Cs137	Process gauge	5	1.61E+05	17/11/2022
Cs137	Process gauge	2	5.82E+01	10/01/2023
Cs137	Process gauge	6	1.10E+05	16/02/2023
Cs137	Process gauge	2	4.91E+05	29/03/2023
Cs137	Process gauge	10	4.64E+04	20/04/2023
Cs137	Process gauge	12	1.98E+04	04/05/2023
Cs137	Process gauge	1	3.37E-01	28/08/2023
Cs137	Process gauge	9	8.21E+04	04/10/2023
Cs137	Process gauge	4	2.42E+04	07/03/2024
Cs137	Process gauge	2	2.48E+02	08/03/2024
-		· · · · · · · · · · · · · · · · · · ·		· · · · · · · · · · · · · · · · · · ·

Cs137	Process gauge	2	3.59E+02	17/04/2024
Cs137	Process gauge	1	2.71E-01	14/09/2020
Cs137	Process gauge	1	5.41E-02	31/05/2021
Cs137	Research	1	3.75E+03	10/08/2022
Cs137	Thickness gauge	40	7.61E+04	20/01/2020
Cs137	Thickness gauge	1	1.33E+03	22/04/2021
Cs137	Thickness gauge	1	2.32E-01	18/05/2021
Cs137	Unknown	1	6.05E-01	13/06/2023
Fe55	Calibration source	8	3.19E+02	04/10/2023
Fe55	Process gauge	2	4.56E+02	22/11/2021
Fe55	Process gauge	1	5.13E+00	09/12/2021
Fe55	Process gauge	2	5.44E+02	21/07/2023
Fe55	Process gauge	2	1.43E+01	04/10/2023
Ge68Ga	Unknown	1	1.86E-04	10/06/2020
Ge68Ga	Brachytherapy	3	6.26E-02	10/06/2020
Ge68Ga	Brachytherapy	9	1.63E+01	18/08/2020
Ge68Ga	Brachytherapy	18	2.32E+00	16/03/2021
Ge68Ga	Brachytherapy	9	2.16E+02	25/03/2021
Ge68Ga	Brachytherapy	3	1.65E+02	13/05/2021
Ge68Ga	Brachytherapy	3	2.76E+02	25/01/2022
Ge68Ga	Brachytherapy	9	5.40E+00	12/07/2022
Ge68Ga	Brachytherapy	4	3.12E+01	18/10/2022
Ge68Ga	Brachytherapy	2	4.78E-03	07/02/2023
Ge68Ga	Brachytherapy	5	1.78E+00	30/05/2023
Ge68Ga	Brachytherapy	3	1.67E+01	26/06/2023
Ge68Ga	Brachytherapy	10	4.35E+02	19/09/2023
Ge68Ga	Brachytherapy	3	1.01E+03	27/10/2023
Ge68Ga	Brachytherapy	32	1.77E+01	01/04/2024
Ge68Ga	Brachytherapy	2	7.57E+03	23/04/2024
Ge68Ga	Process gauge	1	1.41E+02	25/04/2023
Ge68Ga	Research	3	5.77E+02	25/04/2023
Ge68Ga	Research	3	6.44E+02	08/05/2023
H 3	Moisture detector	6	4.55E+00	01/03/2023
H 3	Research	3	6.86E-01	02/02/2023
•				

H 3	Thickness gauge	5	1.05E+02	13/06/2023
I 125	Brachytherapy	85	7.01E-07	22/07/2021
Ir192	Industrial radiography	2	9.98E-06	16/04/2020
Ir192	Industrial radiography	2	3.59E+00	07/01/2021
Ir192	Industrial radiography	2	3.68E+00	04/03/2021
Ir192	Industrial radiography	1	1.90E+00	28/10/2021
Ir192	Process gauge	1	1.89E+00	10/08/2021
Ir192	Process gauge	25	6.63E-01	28/01/2022
Kr85	Calibration source	1	3.42E+03	23/02/2024
Kr85	Calibration source	1	7.62E+03	18/05/2021
Kr85	Calibration source	2	1.14E+01	07/02/2023
Kr85	Calibration source	2	9.97E+03	28/02/2023
Kr85	Density gauge	1	3.13E+03	28/08/2023
Kr85	Industrial radiography	1	5.39E+03	08/01/2021
Kr85	Moisture detector	2	2.94E+02	05/11/2020
Kr85	Moisture detector	1	4.58E+03	22/11/2021
Kr85	Moisture detector	1	5.62E+03	09/12/2021
Kr85	Process gauge	1	1.01E+02	07/02/2022
Kr85	Process gauge	1	3.56E+03	21/02/2022
Kr85	Process gauge	8	5.75E-02	06/01/2023
Kr85	Process gauge	5	2.07E-01	31/01/2023
Kr85	Process gauge	4	2.87E-02	10/04/2024
Kr85	Process gauge	1	1.12E+02	10/01/2020
Kr85	Process gauge	3	2.16E+04	22/04/2020
Kr85	Process gauge	1	5.53E+03	06/05/2020
Kr85	Thickness gauge	1	2.35E+03	03/06/2020
Kr85	Thickness gauge	1	4.38E+03	03/08/2020
Kr85	Thickness gauge	1	9.10E+03	26/10/2020
Kr85	Thickness gauge	6	3.65E+04	05/11/2020
Kr85	Thickness gauge	1	5.39E+03	07/01/2021
Kr85	Thickness gauge	4	3.45E+04	25/01/2021
Kr85	Thickness gauge	2	1.56E+04	03/02/2021
Kr85	Thickness gauge	1	6.96E+03	09/04/2021
Kr85	Thickness gauge	1	9.47E+02	28/04/2021

Kr85	Thickness gauge	8	5.92E+03	31/05/2021
Kr85	Thickness gauge	1	5.53E+03	13/10/2021
Kr85	Thickness gauge	2	8.89E+03	09/12/2021
Kr85	Thickness gauge	1	4.60E+03	06/07/2022
Kr85	Thickness gauge	3	8.52E+04	25/07/2022
Kr85	Thickness gauge	4	4.02E+04	02/08/2022
Kr85	Thickness gauge	1	1.21E+04	16/08/2022
Kr85	Thickness gauge	1	3.78E+03	11/10/2022
Kr85	Thickness gauge	2	3.27E+04	21/10/2022
Kr85	Thickness gauge	1	1.25E+03	26/12/2022
Kr85	Thickness gauge	35	2.29E+00	01/03/2023
Kr85	Thickness gauge	1	4.41E+03	21/07/2023
Kr85	Thickness gauge	2	4.27E+04	23/02/2024
Kr85	Thickness gauge	1	1.12E+02	10/01/2020
Kr85	Thickness gauge	1	3.02E-03	02/02/2023
Kr85	Unknown	2	1.24E-02	01/03/2023
Na22	Calibration source	1	2.36E-01	01/11/2023
Na22	Calibration source	14	1.34E+00	18/03/2024
Na22	Calibration source	13	1.55E+00	23/04/2024
Ni63	Chromatography	1	4.78E+02	16/04/2020
Ni63	Chromatography	2	5.86E+02	01/03/2021
Ni63	Chromatography	2	1.03E+03	19/05/2021
Ni63	Chromatography	2	1.01E+03	24/05/2021
Ni63	Chromatography	2	9.18E+02	30/09/2021
Ni63	Chromatography	2	9.60E+02	24/01/2022
Ni63	Chromatography	1	5.07E+02	02/08/2022
Ni63	Chromatography	1	3.66E+02	27/01/2023
Ni63	Process gauge	125	3.50E+04	05/04/2022
Ni63	Process gauge	1	5.41E+02	13/10/2020
Ni63	Process gauge	1	5.24E+02	05/07/2021
Ni63	Unknown	1	9.83E-05	14/02/2022
Pb210	Calibration source	2	8.23E-03	08/01/2024
Pm147	Calibration source	1	2.52E+00	28/02/2023
Pm147	Process gauge	1	1.51E+03	18/01/2022

	TOTAL	1,611		
U238	Calibration source	1	3.70E-01	21/03/2022
Ta182	Research	8	8.43E-02	13/12/2021
Sr90	Thickness gauge	2	3.74E+02	09/06/2021
Sr90	Research	1	1.24E+02	06/09/2022
Sr90	Process gauge	1	5.76E+03	04/10/2023
Sr90	Process gauge	3	1.86E+04	23/02/2023
Sr90	Process gauge	3	2.69E+03	24/11/2021
Sr90	Process gauge	1	3.39E+03	13/10/2020
Sr90	Industrial radiography	1	2.34E+02	08/01/2021
Se75	Process gauge	1	1.66E+01	29/10/2020
Se75	Industrial radiography	1	1.83E+00	28/01/2022
Po210	Calibration source	1	3.56E-37	08/01/2024
Pm147	Thickness gauge	2	6.48E+02	02/08/2022
Pm147	Thickness gauge	1	7.28E+02	11/11/2020
Pm147	Process gauge	1	6.61E+00	19/07/2022

SECTION K - PLANNED ACTIVITIES TO IMPROVE SAFETY

Safety culture requires a questioning attitude and a search for excellence. Therefore, notwithstanding the good safety record, nuclear operators and regulators in Brazil are constantly working on safety improvements.

K.1 - THE NATIONAL NUCLEAR SAFETY AUTHORITY (ANSN)

As mentioned in item **E.3.1**, the Brazilian Government, through CNEN, has ensured the independency of regulatory activities in the nuclear area. Within the framework of CNEN, the Directorate of Radiation Protection and Nuclear Safety (DRSN) is in charge of CNEN's regulatory body functions and does not operate any nuclear or radioactive installation. As can be noted in Figure E.2, this allows effective separation from the production and promotion activities performed by the Directorate for Research and Development (DPD), whose institutes and centres are considered by DRSN as any other licensee, subjected to the same rules and regulations.

Although functional independence was ensured between regulatory activities and other activities such as promotion, and research and development, the Federal Government took the political decision to create an administratively and legally independent Brazilian nuclear regulatory agency. The proposal of this new regulatory body is based on the existing structure of the Directorate of Radiation Protection and Nuclear Safety (DRSN) of CNEN, adapted to the existing Law for others Regulatory Agencies present in Brazil.

As consequence, on 15th October 2021 was promulgated the Law 14222, that created the National Nuclear Safety Authority (*Autoridade Nacional de Segurança Nuclear*, ANSN), a federal agency with its own assets, administrative, technical and financial autonomy, with the institutional purpose of monitoring, regulating and inspecting nuclear safety, nuclear security and radiological protection of nuclear activities and installations, nuclear materials and sources of radiation in the national territory, in accordance with the provisions of the Brazilian Nuclear Policy and the guidelines of the Federal Government.

The ANSN will assume the regulatory functions previously performed by the Directorate for Radiation Protection and Nuclear Safety (DRSN). The technical staff of this new organization will be composed of the current Directorate of Radiation Protection and Nuclear Safety (DRSN), the Institute of Radiation Protection and Dosimetry (IRD), the Poços de Caldas Laboratory and the CNEN Districts, as can be easily observed in Figure 2.

In addition to the Law that created the ANSN, two decrees were issued: (*i*) Decree 10861 of 19th November 2021, which links the ANSN to the Ministry of Mines and Energy, and (*ii*) Decree 11142 of 21st July 2022, which establishes the organizational structure of the ANSN with 3 directors, who will form its Board of Directors, with mandates of: President-Director, a Director of Nuclear Installations and Safeguards and a Director of Radioactive Installations and Control. Directors must be nominated by the President of the Republic and appointed by him, after approval by the Federal Senate.

Although the Law that created ANSN was approved by the National Congress in October 2021, it can only come into force after the approval of its three Directors by the Brazilian Senate, which is still pending due to administrative arrangements and political decisions. For these reasons, the Senate hearing has been postponed, but it is planned to take place by the end of 2024. In the meantime, DRSN/CNEN continues to act as the nuclear regulatory body in Brazil.

K.2 - THE BRAZILIAN NATIONAL REPOSITORY (THE CENTENA PROJECT)

Site selection process aiming at the construction of the Brazilian Repository for the low and intermediate level radioactive waste was done. Five candidate sites were chosen, and it was initiated the study of the preferential one.

In order to have an international technical support and socio-political consultancy, DPD/CNEN signed with ANDRA, the French Agency for the Radioactive Waste Management, a consultancy contract to assist in the conceptual, basic and executive designs. The preliminary conceptual design is already performed, and it can be adapted to the future selected site, without major difficulties. The last phase of the contract, consisting of the review of the basic design, will be activated and executed, as soon the site characterization will be finished.

Currently, the CENTENA project is certainly the main challenge. The Project involves several specialties in different professional fields. In each one of them CNEN and other Brazilian institutions have different degrees of accomplishment. As mentioned before, currently this is a project overseen by the Federal Government, through the Development Committee for the Brazilian Nuclear Program (CDPNB), and a coordinated effort is being carried out to make possible to have the repository still operational in the next years.

K.3 - IMPROVEMENTS IN THE NUCLEAR POWER PLANTS

K.3.1 - SPENT FUEL COMPLEMENTARY DRY STORAGE UNIT (UAS)

The decision regarding reprocessing or disposal of spent fuel has not been taken in Brazil. The current policy adopted is to keep it in safe storage until a technical, economic and political decision is reached about reprocessing and recycling the fuel or disposing of it as such. It should be emphasized that, by the Federal Brazilian Law, spent fuel is not considered as radioactive waste.

Considering the exhaustion of spent fuel pool storage capacity of the NPPs, Eletronuclear (ETN) decided for the implementation of SFA complementary dry storage solution (UAS) at CNAAA.

The Complementary Dry Storage Unit (UAS) of Almirante Alvaro Alberto Nuclear Power Station (CNAAA) is located on a parcel of land presently owned by Electronuclear (ETN) within the property boundaries of the current CNAAA site.

The UAS will provide to storage of 72 casks. During the first transfer campaign was loaded 15 casks (6 with SF from Angra-1 and 9 with SF from Angra-2). Total land area occupied by the UAS is of $22,360 \text{ m}^2$.

Storage devices have the following characteristic:

Type: Canister + Concrete Overpack
 Angra 1 Canister Capacity: 37 SFs
 Angra 2 Canister Capacity: 32 SFs

Total Capacity: 72 Overpacks

Currently, the facility contains 25 stored concrete overpacks, totalling 830 stored spent fuels, 222 spent fuels from Angra 1 and 608 spent fuels from Angra 2. The first transfer of these fuels to UAS took place between 2021 and 2022, and a second transfer campaign is now taking place.

The second SFs transfer campaign for UAS is scheduled to finish in 2026. The plan is to transfer 666 spent fuels from Angra 1 and 480 spent fuels from Angra 2, totalizing 1,146 spent fuels and 33 concrete overpacks for this campaign.

K.3.2 - ANGRA-1 LONG TERM OPERATION PROGRAM (LTO)

Eletronuclear strategy for development of Angra 1 NPP Long Term Operation Program (LTO) is presented. Following Norms and Guidelines from the Brazilian licensing authority CNEN (National Commission for Nuclear Energy), Eletronuclear is implementing the Angra-1 Long Term Operation Program with basis on US NRC guidelines and standards together with IAEA guidelines and recommendations.

In Brazil the NPP Operating License is valid for 40 calendar Years and Angra-1 NPP's current license is valid utill 2024.

The necessary engineering activities to develop the Ageing Management Reviews and Aging Management Programs, including Time Limited ageing Analysis were performed. This approach was selected considering Angra-1 licensing history (Westinghouse turnkey project) and the consolidated experience from US nuclear industry with the License Renewal Process implemented for more than 90 NPPs.

Angra-1 LTO Program was also evaluated by two IAEA Pre-SALTO Peer Reviews (2013 and 2018), and a full scope SALTO mission in 2024. The recommendations, suggestions and encouragements were deeply evaluated and implemented by Eletronuclear technical staff and pave the way for the full development of the Angra 1 LTO Program.

The Angra-1 License Renewal Application was prepared according to the License Renewal Rule 10CFR 54 and submitted to CNEN in October 2019.

The Angra-1 LTO licensing process also included the preparation of the third Angra 1 Periodic Safety Review submitted to the regulator December 2023. This PSR was

performed according to IAEA SSG 25 process associated with IAEA guidelines and recommendations for Long Term Operation of NPPs.

A complete package of plant projects, engineering evaluations and tests is being implemented in the plant and will continue till 2028. The objective is to address ageing related issues, obsolescence problems and also implement plant upgrades and modernization of I&C and electrical systems and components.

K.3.3 - ISOTOPIC INVENTORY

An Isotopic Waste Characterization Program is underway in order to determine the CNAAA isotopic inventory, aiming the future Brazilian Repository called Nuclear and Environmental Technology Center, the CENTENA Project.

Isotopic inventory characterization involves determining the physical, radiological and chemical properties of low and medium level radioactive waste.

This program is essential for ensuring that low and medium level waste is handled, treated, and disposed of safely and in compliance with regulatory requirements CNEN (Comissão Nacional de Energia Nuclear) 6.09 and 8.01.

The strategy and methodology for radioactive waste characterization under development is called Scaling Fator.

The scaling factor methodology determines the radioactivity of difficult to measure and impossible to measure radionuclides using correlations between them and key nuclides chosen among the easy to measure radionuclides.

The Isotopic Waste Characterization Program began in 2014 and the second phase will be concluded until 2025.

K.3.4 - THE BRAZILIAN MULTIPURPOSE RESEARCH REACTOR — THE RMB PROJECT

The project is ongoing. The RMB will be a new Nuclear Research and Production Center to be built in Iperó County, about 110 kilometers from Sao Paulo city, in the southeast part of Brazil.

Upon completion of its conceptual project, the site for the Multipurpose Research Reactor (RMB) was chosen and the environmental impact assessments were already conducted. CNEN and IBAMA have issued the Local Approval in 2015.

At the beginning of October 2023, Brazil signed a cooperation agreement with Argentina for the implementation of the Brazilian Multipurpose Reactor. This partnership will facilitate the construction of the RMB, as the Argentine company has extensive experience in reactor design.

The Australian research reactor OPAL (Open Pool Australian Light Water Reactor) projected by Argentina and built in Australia are being used as initial references for the

RMB project. The basic engineering projects are underway, benefiting of the cooperation with Argentina.

The estimated cost of building the RMB is 2 billion Reais (approximately 340 million dollars).

K.4 - PLANS FOR DECOMMISSIONING UDC

For the decommissioning of the Caldas Decommissioning Unit (UDC), action plans were established:

- "Action Plan for Regularizing the Safety of the Caldas Decommissioning Unit UDC", including actions to improve the UDC's environmental and nuclear management plans and programs, as well as actions to maintain and improve the environmental liability control structures.
- "Planning for the Preparation of the Abandonment Plan and for the Improvement of the Degraded Areas Recovery Plan of the Caldas Decommissioning Unit UDC", including: i) the prior actions necessary for the preparation of the Abandonment Plan PA, in accordance with nuclear regulations, and for the improvement of the Degraded Areas Recovery Plan PRAD, in accordance with environmental regulations, as well as; ii) the actions necessary for the preparation of the UDC for subsequent actions to mitigate environmental impacts and remediate/rehabilitate degraded areas.

Among the actions planned for decommissioning, priority is being given to those that have the simultaneous effect of mitigating environmental impacts and decommissioning, such as diversion of streams; unification of effluent treatment to release other structures for decommissioning; covering of waste piles, as well as regulating drainage on the surface and around these structures; covering of sediment from settling basins and tailings dams, decharacterization of dams and regulating drainage on the surface and around these structures; and the dismantling of part of the industrial plant with the aim of disposing of reusable materials.

K.5 - FINAL REMARKS

Brazil has achieved and maintained a high level of safety in the area of radioactive waste and spent fuel management as well as on its nuclear and radiological installations.

Based on the safety performance of nuclear installations in Brazil, and considering the information provided in this National Report, Brazil has demonstrated that the Brazilian Nuclear Programme and the related nuclear installations have met the objectives of the Join Convention on the Safety of Spent Fuel Management and on the Safety of Radioactive Waste Management.

REFERENCES

- [1] Joint Convention on the Safety of Spent Fuel Management and on the Safety of Radioactive Waste Management INFCIRC/546 International Atomic Energy Agency Vienna 24.12.1997.
- [2] Guidelines Regarding the Form and Structure of National Reports INFCIRC/604/Rev. 4- International Atomic Energy Agency Vienna 23 January 2023.
- [3] Licensing of Nuclear Installations CNEN-NE-1.04 Resolution CNEN 324/24 **Abril 2024 (Revised)**.
- [4] Siting of Nuclear Power Plants Resolution CNEN 09/69.
- [5] Operational Reporting for Nuclear Power Plants CNEN-NN-1.14 January 2002.
- [6] Management of Radioactive Waste in Radioactive Installations CNEN-NE-6.05 -December 1985 (*Revoked*).
- [7] Site Selection for Radioactive Waste Storage and Disposal Facilities CNEN-NE-6.06 December 1989.
- [8] Operational Safety in Nuclear Power Plants CNEN-NE-1.26 October 1997.
- [9] Certification of the Qualification of Radiation Protection Supervisors CNEN-NN-7.01
 May 2016.
- [10] Quality Assurance for Safety in Nuclear Power Plants and other installations CNEN-NN-1.16 September 1999.
- [11] Qualification of Independent Technical Supervisory Organizations in Nuclear Power Plants and Other Installations CNEN-NE-1.28 September 1999.
- [12] Basic Requirements for Radioprotection and Radiological Safety of Radiation Sources CNEN NN 3.01 *April 2024 (Revied)*.
- [13] General Norm for Planning of Response to Emergency Situations SIPRON-NG-02 1996.
- [14] Directive for the Preparation of Emergency Plans related to the Unit 1 of Almirante Alvaro Alberto Nuclear Power Plant SIPRON Directiva Angra 1997.
- [15] Regulation for the Safe Transport of Radioactive Materials CNEN-NE-5.01 **August 2021**.
- [16] Radiation Protection and Safety for the Final Disposal of Radioactive Waste at Abadia de Goias CNEN IT 01 December 1993.
- [17] Safety Policy of CNEN Directive n.295 of 23 December 1996.
- [18] Quality Assurance Policy of CNEN Directive n.296 of 23 December 1996.
- [19] Nuclear Material Control CNEN-NN-2.02 September 1999.
- [20] Licensing of Uranium and/or Thorium Mining and Milling Facilities CNEN-NE-1.13 August 1989.
- [21] INTERNATIONAL ATOMIC ENERGY AGENCY, Classification of Radioactive Waste, Safety

- Series No. 111-G-1.1, IAEA, Vienna (1994).
- [22] INTERNATIONAL ATOMIC ENERGY AGENCY, Classification of Radioactive Waste, General Safety Guide No. GSG-1, IAEA, Vienna (2009).
- [23] Acceptance Criteria for Disposal of Low and Intermediate Level Radioactive Wastes CNEN-NN-6.09 September 2002.
- [24] Operational Safety of Nuclear Power Plants CNEN-NE-1.26 October 1997.
- [25] Radioactive Waste Management for Low- and Intermediate-Level Waste CNEN-NN-8.01 April 2014.
- [26] Licensing of storage and disposal facilities for low- and intermediate-level radioactive waste CNEN-NN-8.02 April 2014.
- [27] Transport, receiving, storage and handling of fuel elements in nuclear power plants CNEN-NE- 5.02 February 2003.
- [28] Physical Protection in operating units in nuclear area CNEN-NE-2.01 September 2011.
- [29] Decommissioning of Nuclear Power Plants CNEN-NN-9.01 November 2012.
- [30] Financial Management for Decommissioning of Nuclear Power Plants CNEN-NN-9.02 October 2016.
- [31] INTERNATIONAL ATOMIC ENERGY AGENCY, Standard Format and Content for Safety Related Decommissioning Documents, Safety Report Series No. 45, IAEA, Vienna (2005).
- [32] Safety of Waste Dam Systems Containing Radionuclides CNEN-NN-1.10 November 1980 (*Under revision*).
- [33] Licensing Requirements for the Independent Storage of Spent Nuclear Fuel, High-Level Radioactive Waste, and Reactor-Related Greater than Class C Waste - 10CFR72 - January 1999.
- [34] Law 14222 of 2021.10.15 Creates the National Nuclear Safety Authority (ANSN).
- [35] Licensing of Radioactive Installations CNEN NE 6.02 March 2022.

SECTION L - ANNEXES

L.1 - ANNEX 1 - Present Inventory

The following table presents the inventory of radioactive waste in Brazil until the end of July 2024, when possible.

Source/ Type	Present Situation	Inventory as of July 2024	Treatment	Interim Storage	Final Disposal (proposal)
ANGRA-1 NPP	,				
Spent Fuel	Storage inside reactor pool (Spent fuel pool) and at the UAS dry Storage facility	986 fuel assemblies (222 assembles removed from spent fuel pool to Dry Storage Unit in 2022)	Waiting for decision concerning reprocessing. Under Brazilian regulation is not considered waste.	Inside reactor pool	Deep geological disposal
Filters	Stored in 208 L drums at plant site	566 packages / 117.7 m³/ 4.83E+13 Bq	Cementation and encapsulation in steel drums	At plant site	Brazilian repository
Evaporator concentrates	Stored in 208 L drums and 1,000 L liners at plant site	3,228 packages/ 1,252.8 m ³ / 9.52E+12 Bq	Cementation and encapsulation in steel drums/shielded liners	At plant site	Brazilian repository
Non-compressibles	Stored in 208 L drums and 1,248 L metallic boxes at plant site	1,052 packages/ 789.8 m³/ 1.76E+13 Bq	Cementation and encapsulation in steel drums/metallic boxes	At plant site	Brazilian repository
Resins	Stored in 208 L drums and 1,000 L liners at plant site	1,694 packages/ 616.1 m³/ 4.59E+15 Bq	Cementation and encapsulation in steel drums/shielded liners	At plant site	Brazilian repository
Compressibles	Stored in 208 L drums at plant site and compacted drums stored in 2,500 L metallic boxes (B-25) at plant site	1,008 drums/ 209.7 m³ and 128 metallic boxes (B-25)/ 320 m³/ 2.98E+12 Bq	Compaction and encapsulation in steel drums	At plant site	Brazilian repository

Source/ Type	Present Situation	Inventory as of July 2024	Treatment	Interim Storage	Final Disposal (proposal)
ANGRA-2 NPP	•				•
Spent fuel	Storage inside reactor pool (Spent fuel pool)) and at the UAS dry Storage facility	433 fuel assemblies (608 assembles removed from spent fuel pool to Dry Storage Unit until 07/23/2024)	Waiting for decision concerning reprocessing (under Brazilian regulation is not considered waste)	Inside reactor pool	Deep geological disposal
Filters	Stored in 200 L drums at plant site	26 drums/ 5.2 m³	Betuminization and encapsulation in steel drums	At plant site	Brazilian repository
Evaporator concentrates	Stored in 200 L drums at plant site	274 drums / 54.8 m ³ / 3.69E+10 Bq	Betuminization and encapsulation in steel drums	At plant site	Brazilian repository
Non-Compressibles	Stored in 1,000 L metallic boxes at plant site	19 packages/ 23.7 m³/ 1.30E+12 Bq	Cementation and encapsulation in metallic boxes	At plant site	Brazilian repository
Resins	Stored in 200 L drums at plant site	151 drums/ 30.2 m³/ 1.17E+13 Bq	Betuminization and encapsulation in steel drums	At plant site	Brazilian repository
Compressibles	Stored in 200 L drums at plant site	659 drums/ 131.8 m³/ 3.55E+12 Bq	Compaction and encapsulation in steel drums	At plant site	Brazilian repository
	ı	1	1		1

Source/ Type	Present Situation	Inventory as of July 2024	Treatment	Interim Storage	Final Disposal (proposal)		
RADIONUCLIDE APPLICATIONS IN MEDICINE, INDUSTRY AND RESEARCH							
Waste generated by radioactive installations and research institutes (including those belonging to CNEN and lightning rods)	Stored in the institutes of CNEN: IPEN(SP), CDTN(MG), IEN(RJ) and CRCN-NE (PE)	IPEN: 544m ³ / 5.70E+14Bq CDTN: 88 m ³ / 187.5 TBq IEN: 80m ³ / 3.3E+14Bq CRCN-NE: 34m ³ / 1.0E+14Bq	According to type of waste	Institutes of CNEN	Brazilian Repository and/or waiting a final decision on borehole disposal (BOSS)		
FUEL CYCLE INSTALLATIONS							
Operation of the rare-earth production line of Santo Amaro Mill (USAM) – Uranium and Thorium concentrates (Cake II)	Stored in shed and trenches	12,534 tons / 8,035 m ³ 132,937 GBq (3,566 Ci) (Low level waste)	-	Caldas Decommissioning Unit (UDC)	Caldas Decommissioning Unit (UDC)		
Caldas Decommissioning Unit (UDC) – Mesothorium	Talings dam	1,500 tons (Low level waste)	-	Caldas Decommissioning Unit (UDC)	Caldas Decommissioning Unit (UDC)		
Caldas Decommissioning Unit (UDC) – Mesothorium	Trenches	2,672 tons (Low level waste)	-	Caldas Decommissioning Unit (UDC)	Caldas Decommissioning Unit (UDC)		
Caldas Decommissioning Unit (UDC) – Waste Generated in the Process	Tailings dam	2,111,920 tons (Low level waste)	-	Caldas Decommissioning Unit (UDC)	Caldas Decommissioning Unit (UDC)		
Caldas Decommissioning Unit (UDC) – Calcium Diuranate (DUCA)	Tailings dam and Mine Pit	251,200 tons (357 tons of U₃O ₈)	-	Caldas Decommissioning Unit (UDC)	Caldas Decommissioning Unit (UDC)		

Source/ Type	Present Situation	Inventory as of July 2024	Treatment	Interim Storage	Final Disposal (proposal)
Caldas Decommissioning Unit (UDC) – Contaminated Filters and Other Materials	Isolated areas on the site	Approximately 50 tons (Low level waste)	-	Caldas Decommissioning Unit (UDC)	Caldas Decommissioning Unit (UDC)
Caldas Decommissioning Unit (UDC) – Thorium (ThO ₂)	Pond and 148 concrete containers	192 tons (Low level waste)	-	Caldas Decommissioning Unit (UDC)	Caldas Decommissioning Unit (UDC)
Nuclear Fuel Factory (FCN) - filters of the ventilation system, filters of the air conditioned system, and filters of portable dust vacuum cleaners	Stored in 200-liter drums, temporarily in the Low-Level Waste Storage Facility (DIRBA)	129 drums / 9,800 kg 25.8 m3 (Low-level solid waste)	-	Nuclear Fuel Factory (FCN)	-
Nuclear Fuel Factory (FCN) - non compactable waste (metal pieces, wood, glass, plastic pieces, and others)	Stored in 200-liter drums, temporarily in DIRBA	239 drums / 24,272 kg 47.8 m3 (Low-level solid waste)	-	Nuclear Fuel Factory (FCN)	-
Nuclear Fuel Factory (FCN) - compactable solids (plastic sheets, gloves, clothes, and others)	Stored in 200-liter drums, temporarily in DIRBA	309 drums / 28,765 kg 61.8 m ³ (Low level solid waste)	-	Nuclear Fuel Factory (FCN)	-
Nuclear Fuel Factory (FCN) - refractory material (bricks)	Stored in 200-liter drums, temporarily in DIRBA	45 drums / 6,895 kg 9.0 m ³ (Low level solid waste)	-	Nuclear Fuel Factory (FCN)	-
Nuclear Fuel Factory (FCN) - dried lime cake	Stored in 200-liter drums, temporarily in DIRBA	43 drums / 5,901 kg / 8.6 m ³ (Low level solid waste)	-	Nuclear Fuel Factory (FCN)	-

Source/ Type	Present Situation	Inventory as of July 2024	Treatment	Interim Storage	Final Disposal (proposal)
Nuclear Fuel Factory (FCN) – contaminated oil	Stored in 200-liter drums, temporarily in DIRBA	None	-	Nuclear Fuel Factory (FCN)	-
Nuclear Fuel Factory (FCN) - pieces of molybdenum	Stored in 200-liter drums, temporarily in DIRBA	2 drums / 113 kg /0.4 m ³ (Low level solid waste)	-	Nuclear Fuel Factory (FCN)	-
Uranium Concentration Unit (URA) – waste rock	Unpackaged solid	22,918,428.11 tons	-	Uranium Concentration Unit (URA)	Uranium Concentration Unit (URA)
Uranium Concentration Unit (URA) - leached ore	Unpackaged solid	2,528,323.00 tons	-	Uranium Concentration Unit (URA)	Uranium Concentration Unit (URA)
Uranium Concentration Unit (URA) - pulp wastewater treaty	Solid dense impermeable basin	184,346 tons	-	Uranium Concentration Unit (URA)	Uranium Concentration Unit (URA)
Uranium Concentration Unit (URA) - waste treatment emulsion	Stored in 200-liter drums at isolated areas plant site	14,035 Kg	-	Uranium Concentration Unit (URA)	-
Uranium Concentration Unit (URA) - small materials from several sources (wood, glass, metal pieces, plastic pieces, sheets, gloves, clothes and others)	Stored in 200-liter drums at isolated areas on the site	Approximately 1,463 kg	-	Uranium Concentration Unit (URA)	-

Source/ Type	Present Situation	Inventory as of July 2024	Treatment	Interim Storage	Final Disposal (proposal)
Uranium Concentration Unit (URA) - scrap metals (parts of crushing, mixer, hydrocyclones, metal pipes and others equipment)	Stored in 200-liter drums at isolated areas on the site	1,831 kg	-	Uranium Concentration Unit (URA)	-
Uranium Concentration Unit (URA) – waste rock	Unpackaged solid	22,918,428.11 tons	-	Uranium Concentration Unit (URA)	-
Uranium Concentration Unit (URA) - leached ore	Unpackaged solid	2,528,323.00 tons	-	Uranium Concentration Unit (URA)	-
Uranium Concentration Unit (URA) - pulp wastewater treaty	Solid dense impermeable basin	184,346 tons	-	Uranium Concentration Unit (URA)	-
Uranium Concentration Unit (URA) - waste treatment emulsion	Stored in 200-liter drums at isolated areas plant site	14,035 Kg	-	Uranium Concentration Unit (URA)	-
Uranium Concentration Unit (URA) - small materials from several sources (wood, glass, metal pieces, plastic pieces, sheets, gloves, clothes and others)	Stored in 200-liter drums at isolated areas on the site	Approximately 1,463 kg	-	Uranium Concentration Unit (URA)	

Source/ Type	Present Situation	Inventory as of July 2024	Treatment	Interim Storage	Final Disposal (proposal)
MONAZITE SAND PROCES	SING INSTALLATIONS				
Operation of the rare-earth production line of Santo Amaro Mill (USAM) - Uranium and Thorium concentrates (Cake II)	Stored in plastic drums	590,94 ton / 328 m³ / 5,069 GBq (137Ci)	-	São Paulo Decommissioning Unit (UDSP)	-
Operation of the rare-earth production line of Santo Amaro Processing Plant (USAM) - Mesothorium	Stored in plastic drums	83.6 ton / 38 m³ / 222 GBq (6 Ci)	-	São Paulo Decommissioning Unit (UDSP)	-
Operation of the rare-earth production line of Santo Amaro Processing Plant (USAM) - Other contaminated material	Stored in plastic drums, maritime containers and metal boxes	497.88 tons / 599 m³	-	São Paulo Decommissioning Unit (UDSP)	-
Operation of the UDSP decontamination - Other contaminated material	Stored in metal drums	7.43 tons / 6 m ³	-	São Paulo Decommissioning Unit (UDSP)	-
Operation of the rare-earth production line of Santo Amaro Processing Plant (USAM) - Uranium and Thorium concentrates	Stored in concrete silos	3,500.07 ton / 1,943 m³ / 32,856 GBq (888Ci)	-	Storage Unit of Botuxim (UEB) (Itu/São Paulo)	-

Source/ Type	Present Situation	Inventory as of July 2024	Treatment	Interim Storage	Final Disposal (proposal)
RADIOLOGICAL ACCIDENT IN GOIÂNIA					
Low level wasts (¹³⁷ Cs) below exemption level	Final disposal concluded	1,525 m ³ / 1 Ci	Encapsulation in steel and concrete drums	Open air at Abadia de Goiás	Great Capacity Conteiner (CGP)
Low level waste (137Cs) above	Final disposal concluded	1,975 m ³ / 750 Ci	Encapsulation in steel and	Open air at Abadia de	Goiânia Repository

L.2 - ANNEX 2 – List of Relevant Conventions, Laws and Regulations

L.2.1 - RELEVANT INTERNATIONAL CONVENTIONS OF WHICH BRAZIL IS A PARTY

Convention on Civil Liability for Nuclear Damage (Vienna Convention). Signature: 23/12/1993. Entry into force: 26/06/1993.

Convention on the Physical Protection of Nuclear Material. Signature: 15/05/1981. Entry into force: 8/02/1987.

Convention on Early Notification of a Nuclear Accident Signature: 26/09/1986. Entry into force: 4/01/1991.

Convention on Assistance in Case of Nuclear Accident or Radiological Emergency. Signature: 26/09/1986. Entry into force: 4/01/1991.

Convention on Nuclear Safety. Signature: 20/09/1994. Entry into force: 24/04/1997.

Join Convention on the Safety of Spent Fuel Management and on the Safety of Radioactive Waste Management. . Signature: 11/07/1997. Entry into force: 16/04/2006.

Convention n. 115 of the International Labor Organization. Signature: 7/04/1964.

L.2.2 - RELEVANT NATIONAL LAWS

Decree 40110 of 1956.10.10 - Creates the National Commission for Nuclear Energy - CNEN.

Law 4118/62 of 1962.07.27 - Establishes the Nuclear Energy National Policy and reorganizes CNEN.

Law 6189/74 of 1974.12.16 - Creates Nuclebras as a company responsible for nuclear fuel cycle facilities, equipment manufacturing, nuclear power plant construction, and research and development activities.

Law 6453 of 1977.10.17 - Defines the civil liability for nuclear damages and criminal responsibilities for actions related to nuclear activities

Decree 1809 of 1980.10.07 - Establishes the System for Protection of the Brazilian Nuclear Programme (SIPRON).

Law 6938 of 1981.08.31 - Establishes the National Policy for the Environment (PNMA), creates the National System for the Environment (SISNAMA) and the Council for the Environment (CONAMA).

Law 7735 of 1989.02.23 - Creates the Brazilian Institute for Environment and Renewable Natural Resources - IBAMA

Law 7781/89 of 1989.06.27 - Reorganizes the nuclear sectors.

Decree 99274 of 1990.06.06 - Regulates application of Law 6938, establishing the environmental licensing process in 3 steps: pre-license, installation license and operation license.

Decree 2210 of 1997.04.22 - Regulates SIPRON, defines the Secretary for Strategic Affairs (SAE) as the central organization of SIPRON and creates the Coordination of the Protection of the Brazilian Nuclear Programme (COPRON).

Law 9605 of 1998.02.12 - Defines environmental crimes and establishes a system of enforcement and punishment.

Law 9765 of 1998.12.17 - Establishes tax and fees for licensing, control and regulatory inspection of nuclear and radioactive materials and installations.

Decree 3719 of 1999.09.21 - Regulates the Law 9605 and establishes the penalties for environmental crimes.

Decree 3833 of 2001.06.05 - Establishes the new structure and staff of the Brazilian Institute for the Environment (IBAMA).

Law 10308 of 2001.11.20 – Establishes rules for the site selection, construction, operation, licensing and control, financing, civil liability and guarantees related to the storage and dispose of radioactive waste.

Decree 1.019 of 2005.11.14 – Promulgates the Joint Convention on the Safety of Spent Fuel Management and on the Safety of Radioactive Waste Management.

Supplementary Law 140 of 2011.12.08 - Set standards relating to sections III, VI and VII of the sole paragraph of art. 23 of the Constitution, for the cooperation between the Union, the states, the Federal District and the municipalities in administrative proceedings arising from the exercise of common responsibility for the protection of outstanding natural landscapes, the protection of the environment, the control of pollution in any of its forms, and the preservation of forests, fauna and flora.

Law 12.731 of 2012.11.21 - Reorganizes the Brazilian Nuclear Protection System (SIPRON).

Decree 9600 of 2018.12.05 - Consolidates the Guidelines on the Brazilian Nuclear Policy.

Decree 9828 of 2019.06.10 – States about the Brazilian Nuclear Program Development Committee.

Decree 9865 of 2019.06.17 – Establishes the collegiate bodies of the Brazilian Nuclear Program Protection System.

Law 14222 of 2021.10.15 – Creates the National Nuclear Safety Authority (**ANSN**); amends Laws 4118 of 1962.08.27, 6189 of 1974.12.16, 6453 of 1977.10.17, 9765 of 1998.12.17, 8691 of 1993.07.28, and 10308 of 2001.11.20; and revoke the Law 13976 of 2020.01.07.

Decree 10861, of 2021.11.19, links ANSN to the Ministry of Mines and Energy (MME).

Decree 03 of 2022.02.23, Approves the text of the Amendment to the Convention on the Physical Protection of Nuclear Material, endorsed by Brazil on the Conference on the Amendment of the aforementioned Convention, held in 2005, in Vienna.

Decree 11142 of 2022.07.21, Establishes the Organizational Structure of the ANSN.

L.2.3 - CNEN REGULATIONS

Group 1 - Nuclear Installations

- NN 1.01 Licenciamento de operadores de reatores nucleares (Licensing of nuclear reactor operators).
- NE 1.02 Critérios Gerais de Projeto para Usinas de Reprocessamento de Combustíveis Nucleares *(General Design Criteria for Nuclear Fuel Reprocessing Plants).*
- NE 1.04 Licenciamento de Instalações Nucleares (Licensing of Nuclear Facilities) Revise completed in April 2024 (New).
- NN 1.06 Requisitos de Saúde para Operadores de Reatores Nucleares (Health Requirements for Nuclear Reactor Operators).
- NE 1.08 Modelo Padrão para Relatório de Análise de Segurança de Usinas de Reprocessamento de Combustíveis Nucleares (Standard Model for Safety Analysis Report of Nuclear Fuel Reprocessing Plants).
- NE 1.09 Modelo Padrão para Relatório de Análise de Segurança de Fábricas de Elementos Combustíveis (Standard Model for Safety Analysis Report for Fuel Elements Factories).
- NE 1.10 Segurança de Sistemas de Barragem de Rejeitos Contendo Radionuclídeos (Safety of Tailings Dam Systems Containing Radionuclides) Under revision.
- NE 1.11 Modelo Padrão para Relatório de Análise de Segurança de Usinas de Produção de Hexafluoreto de Urânio Natural (Standard Model for Safety Analysis Report of Natural Uranium Hexafluoride Production Plants).
- NN 1.12 Qualificação de órgãos de supervisão técnica independente em instalações nucleares (Qualification of independent technical supervisory organizations for nuclear installations).
- NE 1.13 Licenciamento de Minas e Usinas de Beneficiamento de Minérios de Urânio e/ou

Tório (Licensing of Mines and Plants for the Processing of Uranium and/or Thorium Ores).

- NN 1.14 Relatórios de operação de usinas nucleoelétricas (Nuclear Power Plant Operation Reports) Under revision.
- NN 1.15 Supervisão Técnica Independente Em Atividades de Garantia da Qualidade em Usinas Nucleoelétricas (Independent Technical Supervision in Quality Assurance Activities in Nuclear Power Plants).
- NE 1.16 Garantia da qualidade para a segurança de usinas nucleoelétricas e outras instalações (Quality Assurance And Safety in Nuclear Power Plants and Other Facilities).
- NE 1.17 Qualificação de Pessoal e Certificação para Ensaios Não Destrutivos em Itens de Instalações Nucleares (Personnel Qualification and Certification for Non-Destructive Testing in Nuclear Power Plants Components).
- NE 1.18 Conservação Preventiva em Usinas Nucleoelétricas *(Nuclear Power Plant Preventive Maintenance)*.
- NE 1.19 Qualificação de Programas de Cálculos Para Análise de Acidentes De Perda de Refrigerante em Reatores a Água Pressurizada (Qualification of Programs for Coolant Loss Accident Analysis in Pressurized Water Reactors).
- NE 1.20 Aceitação de Sistemas de Resfriamento de Emergência do Núcleo De Reatores A Água Leve (Acceptance Criteria for Emergency Core Cooling System of Light Water Reactors).
- NE 1.21 Manutenção de Usinas Nucleoelétricas (Maintenance of Nuclear Power Plants) Under revision.
- NE 1.22 Programas de Meteorologia de Apoio de Usinas Nucleoelétricas *(Meteorological Programme for Nuclear Power Plant Support) Under revision.*
- NE 1.24 Uso de Portos, Baías e Águas sob Jurisdição Nacional por Navios Nucleares (Use of Ports, Bays and Waters under National Jurisdiction by Nuclear Ships).
- NE 1.25 Inspeção em Serviço de Usinas Nucleoelétricas *(In Service Inspection of Nuclear Power Plants)*.
- NE 1.26 Segurança na Operação de Usinas Nucleoelétricas *(Operational Safety of Nuclear Power Plants).*
- NE 1.27 Garantia da Qualidade na Aquisição, Projeto e Fabricação de Elementos Combustíveis (Quality Assurance in the Acquisition, Design and Manufacturing of Fuel Elements).
- NE 1.28 Qualificação e atuação de órgãos de supervisão técnica independente em usinas

nucleo elétricas e outras instalações - (Qualification and Actuation of Independent Technical Supervisory Organizations in Nuclear Power Plants and Other Installations).

Resolution 09/69 - Normas para Escolha de Locais para Instalação de Reatores de Potência – (Site Selections Procedures for Power Reactors Installation).

Resolution 169/14 - Critérios de obrigação ou dispensa de garantia financeira de responsabilidade por danos nucleares — (Criteria for Obligation or Exemption from Financial Guarantee for Liability for Nuclear Damage).

Group 2 - Control of Nuclear Materials, Physical Protection and Fire Protection

NE-2.01 - Proteção física de unidades operacionais da área nuclear - Resolution CNEN 07/81 – revised by Resol. 06/96 (*Physical Protection in operating units in nuclear area*).

NN 2.01 - Proteção Física de Materiais e Instalações Nucleares — *(Physical Protection of Nuclear Materials and Installations)*.

NN-2.02 - Controle de materiais nucleares - Resol. CNEN 11/99 (Nuclear material control).

NE-2.03 - Proteção contra incêndio em usinas nucleoelétricas - Resol. CNEN 08/88 - *(Fire protection in nuclear power plants).*

NE 2.04 - Proteção contra Incêndio em Instalações Nucleares do Ciclo do Combustível - **(Fire Protection in Nuclear Fuel Cycle Installations)**.

NN 2.06 - Proteção Física de Fontes Radioativas e Instalações Radiativas Associadas - *(Physical Protection of Radioactive Sources and Associated Radioactive Facilities)*.

Group 3 – Radiation Protection

NN-3.01 - Requisitos Básicos de Radioproteção e Segurança Radiológica de Fontes de Radiação - Resolution CNEN 323/24 - (Basic Requirements for Radioprotection and Radiological Safety of Radiation Sources) - April 2024 (Revised).

NE 3.02 - Serviços de proteção radiológica - (Radiation Protection Services).

NN 3.05 - Requisitos de Segurança e Proteção Radiológica para Serviços de Medicina Nuclear - (Safety Requirements and Radiation Protection for Nuclear Medicine Services).

Group 4 - Materials, Ores and Nuclear Minerals

NN 4.01 - Requisitos de Segurança e Proteção Radiológica para Instalações Mínero-Industriais - (Safety Requirements and Radiation Protection for Mining Industries Installations) - (NORM).

Resol. 04/69 - Define regras para o exportador de minerais ou minérios que contenham elementos nucleares – (Rules definitions for the exporter of minerals or ores containing nuclear elements).

Resol. 08/77 - Esclarece a regra para o exportador (na Resolução 04/69), caso não seja possível a aquisição no mercado externo – (Clarifies the rule for the exporter (in Resol. 04/69), if it is not possible to purchase on the foreign market).

Resol. 18/88 - Estabelece critérios de dispensa de requisitos para exportadores – *(Establishe criteria for exemption of requirements for the exporters)*.

Ordinance 279/97 - Define regras para a importação de produtos à base de lítio – (Rule definitions for importing lithium-based products).

Resol. 179/14 - Uso do fosfogesso na agricultura e na indústria cimenteira – **(Use of phosphogypsum in agriculture and cement industry)**.

Group 5 - Transport of Radioactive Materials

NN 5.01 - Regulamento para o Transporte Seguro de Materiais Radioativos — Resol. CNEN 272/2021 (Regulation for the Safe Transport of Radioactive Materials) - March 2021.

NE 5.02 - Transporte, recebimento, armazenamento e manuseio de elementos combustíveis de usinas nucleoelétricas - (*Transport, receiving, storage and handling of fuel elements in nuclear power plants*).

NE 5.03 - Transporte, recebimento, armazenagem e manuseio de ítens de usinas nucleoelétricas - *(Transport, receipt, storage and handling of materials in nuclear power plants)*.

NN 5.04 - Rastreamento de Veículos de Transporte de Materiais Radioativos – *(Tracking of Radioactive Material Transport Vehicles)*.

NN 5.05 - Requisitos de Projeto e de Ensaios para Certificação de Materiais Radioativos, Embalagens e Volumes – (Design and Testing Requirements for Certification of Radioactive Materials, Packaging and Volumes) - August 2021.

Group 6 – Radioactive Facilities (Medical, industry and research facilities)

NN 6.01 - Requisitos para o Registro de Pessoas Físicas para o Preparo, Uso e Manuseio Fontes Radioativas – (Requirements for the Registration of Individuals for the Preparation, Use and Handling of Radioactive Sources).

- NE 6.02 Licenciamento de instalações radiativas (Licensing of Radioactive Installations) March 2022.
- NN 6.04 Requisitos de Segurança e Proteção Radiológica para Serviços de Radiografia Industrial (Requirements for Safety and Radiation Protection for Industrial Radiography Services).
- NN 6.07 Requisitos de Segurança e Proteção Radiológica para Perfilagem de Poços (Requirements for Safety and Radiation Protection for Well Logging).
- NN 6.10 Requisitos de Segurança e Proteção Radiológica para Serviços de Radioterapia (Requirements for Safety and Radiation Protection for Radiotherapy Services).
- NN 6.11 Requisitos de Segurança e Proteção Radiológica em Instalações Produtoras de Radioisótopos com Aceleradores Cíclotrons (Requirements for Safety and Radiation Protection in Facilities Producing Radioisotopes with Cyclotron Accelerators).
- NN 6.12 Requisitos de Segurança e Proteção Radiológica para Serviços de Radioterapia e Medicina Nuclear Veterinária (Requirements for Safety and Radiation Protection for Radiotherapy and Veterinary Nuclear Medicine Services).
- NN 6.13 Requisitos de Segurança e Proteção Radiológica em Instalações de Radiofarmácias Centralizadas e Industriais (Requirements for Safety and Radiation Protection in Centralized and Industrial Radiopharmacy Installations).
- NN 6.14 Requisitos de Radioproteção e Segurança Radiológica na Obtenção de Imagens Humanas para Fins de Segurança Pública (Requirements for Safety and Radiation Protection when Obtaining Human Images for Public Safety Purposes).
- NN 6.16 Requisitos de Segurança e Proteção Radiológica para Irradiadores de Sangue e Hemocomponentes (Requirements for Safety and Radiation Protection for Blood and Blood Component Irradiators).

Group 7 - Certification and Registration of Persons

- NN 7.01 Certificação da Qualificação de Supervisores de Proteção Radiológica Resol. CNEN 196/2016 (Qualification Certification of Radiological Protection Supervisors) Under revision.
- NN 7.02 Registro de Operadores de Radiografia Industrial (Registration of Industrial Radiography Operators).

Group 8 - Radioactive Waste

NN 8.01 - Gerência de rejeitos radioativos de baixo e médio níveis de radiação - - Resol. CNEN 167/2014 - (Radioactive waste management for low- and intermediate-level waste).

NN 8.02 – Licenciamento de depósitos de rejeitos radioativos de baixo e médio níveis de radiação - Resol. CNEN 167/2014 - (Licensing of storage and disposal facilities for low- and intermediate-level radioactive waste).

NE 6.06 - Seleção e escolha de locais para depósitos de rejeitos radioativos - *(Site Selection for Radioactive Waste Storage and Disposal Facilities)*.

NN 6.09 - Critérios de aceitação para deposição de rejeitos radioativos de baixo e médio níveis de radiação - (Acceptance criteria for disposal of low and intermediate level radioactive wastes).

Resolution CNEN 04/89 - Pára-raios com material radioativo — *(Lightning rod with radioactive material)*.

Resolution CNEN 288/21 - Requisitos para instalações obterem registro para atividades de limpeza e acondicionamento de rejeitos NORM da área de exploração e produção de óleo e gás — (Requirements for facilities to obtain registration for NORM waste cleaning and packaging activities in the oil and gas exploration and production área).

Group 9 - Decommissioning

NN-9.01 — Descomissionamento de Usinas Nucleoelétrica - Resol. CNEN 133/12-(*Decommissioning of Nuclear Power Plants*).

NN 9.02 - Gestão dos Recursos Financeiros Destinados ao Descomissionamento de Usinas Nucleoelétricas – (Resol. CNEN 204/16) - (Management of Financial Resources intended for the Decommissioning of Nucleoelectric Plants).

L.2.4 - IBAMA REGULATIONS

CONAMA – 01/86 - Estabelece requisitos para execução do Estudo de Impacto Ambiental (EIA) e do Relatótio de Impacto Ambiental (RIMA) - (Establishes requirements for conducting the environmental study (EIA) and the preparation of the report on environmental impact (RIMA)) - (23.01.1986).

CONAMA-28/86 - Determina a FURNAS a elaboração de EIA/RIMA para as usinas nucleares de Angra-2 e 3 - (Directs FURNAS to prepare an EIA/RIMA for the Angra-2 and 3 nuclear power plants) - (03.12.1986).

CONAMA-09/86 - Regulamenta a questão de audiências públicas - *(Regulates the matters related to public hearings)* - (03.12.1987).

CONAMA-06/86 – Institui e aprova modelos para publicação de pedidos de licenciamento - (Establishes and approves models for licensing application) - (24.01.1986).

CONAMA-06/87 – Dispõe sobre licenciamento ambiental de obras de grande porte e especialmente do setor de geração de energia elétrica - (Regulates environmental licensing of large companies, specially in the area of electric energy generation) - (16.09.1987).

CONAMA-237/97 – Dispõe sobre os procedimentos a serem adotados no licenciamento ambiental de empreendimentos diversos - *(Establishes procedures for environmental licensing of several types of companies)* - (19.12.1997).

IBAMA Normative Instruction n º 184/08 – (Establishes within this Agency, the procedures for federal environmental permits) - (17.07.2008).

IBAMA Normative Instruction n º 05/2012 – (Establishes transitional procedure for environmental authorization for the transport of dangerous goods activity) - (09/05/2012).

IBAMA Normative Instruction n $^{\circ}$ 01/2016 – (Establishes the criteria for the licensing of radioactive facilities) - (01/02/2016).

L.2.5 - SIPRON REGULATIONS

NG-01 - Norma Geral para o funcionamento da Comissão de Coordenação da Proteção do Programa Nuclear Brasileiro (COPRON) - *(General norm for the Coodination Commission for the Protection of the Brazilian Nuclear Programme).* Port. SAE Nr. 99 of 13.06.1996.

NG-02 - Norma Geral para planejamento de resposta a situações de emergência. - *(General norm for planning of response to emergency situations).* Resol. SAE/COPRON Nr.01 of 13.06.1996.

NG-03 - Norma Geral sobre a integridade física e situações de emergência nas instalações nucleares - *(General norm for physical integrity and emergency situations in nuclear installations).* Resol. SAE/COPRON Nr. 01 of 19.07.1996.

NG-04 - Norma Geral para situações de emergência nas unidades de transporte - *(General norm for emergency situations in the transport units).* Resol. SAE/COPRON Nr. 01 of 19.07.1996

NG-05 - Norma Geral para estabelecimento de campanhas de esclarecimento prévio e de informações ao público para situações de emergência - *(General norm for establishing public information campaings about emergency situations).* Port. SAE Nr. 150 of 11.12.1992.

NG-06 - Norma Geral para instalação e funcionamento dos centros de resposta a situações de emergência nuclear - *(General norm for installation and functioning of response center for nuclear emergency situations).* Port. SAE Nr. 27 of 27.03.1997.

NG-07 - Norma Geral para planejamento das comunicações do SIPRON (*General norm for SIPRON communication planning*). Port. SAE Nr. 37 of 22.04.1997.

NG-08 – Norma Geral para o planejamento e a execução da proteção ao conhecimento sigiloso *(General norm for planning and execution of classified knowledge protection)*. Port. SAE Nr. 145 of 7.12.1998.

NI-01 — Norma Interna que dispõe sobre instalação e funcionamento do Centro para Gerenciamento de Emergência Nuclear (*Internal norm on the installation and operation of the national Center for Nuclear Emergency Management*). Port. SAE Nr.001 of 21.05.1997.

Diretriz Angra-1 - Diretriz para elaboração dos planos de emergência relativos a unidade 1 da Central Nuclear Almirante Alvaro Alberto - (Directive for the preparation of emergency plans related to Unit 1 of Almirante Alvaro Alberto Nuclear Power Plant - Angra 1). GSIPR Nº 34 of 24.08.2012.

Comitê de Planejamento de Resposta a Situações de Emergência Nuclear no Município de Angra dos Reis – COPREN/AR - *(Committee for Nuclear Emergency Response Planning in the city of Angra dos Reis)*. Port. nº 8 – GSIPR of 24.03.2011.

Comitê de Planejamento de Resposta a Situações de Emergência Nuclear no Município de Resende – COPREN/RES (*Committee for Nuclear Emergency Response Planning in the city of Resende*). Port. nº 40 – CH/GSIPR, of 25.06.2012.

Comitê de Articulação nas Áreas de Segurança e Logística do Sistema de Proteção ao Programa Nuclear Brasileiro — CASLON *(Coordination Committee for the Safey and Support Areas of the System for Protection of the Brazilian Nuclear Program)*. Port. nº 31 GSIPR, of 26.03.2012.

L.3 - ANNEX 3 - LIST OF ABBREVIATIONS

ABACC Agência Brasileiro-Argentina de Contabilidade e Controle de Materiais Nucleares (Brazilian-Argentine Agency for Accounting and Control of Nuclear Materials) ABIN Agência Brasileira de Inteligência (Brazilian Inteligence Agency) **ALARA** As Low as Reasonable Achievable **ANSN** Autoridade Nacional de Segurança Nuclear (National Nuclear Safety Authority) AOI Autorização para Operação Inicial (Authorization for Initial Operation) AOP Autorização para Operação Permanente (Authorization for Permanent Operation) **BNDES** Banco Nacional de Desenvolvimento (Brazilian Development Bank) **BSS** Basic Safety Standards (of IAEA) **CAPES** Coordenação de Aperfeiçoamento de Pessoal de Nível Superior (Brazilian Coordination for Improvement of High Level Education Personnel) **CCCEN** Centro de Coordenação e Controle de uma Situação de Emergência Nuclear (Center for Coordination and Control of a Nuclear Emergency Situation) **CDPNB** Comitê de Devenvolvimento do Programa Nuclear Brasileiro (Brazilian Nuclear Program Development Committee) **CDTN** Centro de Desenvolvimento de Tecnologia Nuclear (Nuclear Technology Development Center) CEA Centro Experimental Aramar (Aramar Experimental Center) **CEENG** Centro de Engenharia Nuclear- IPEN (Center for Nuclear Engineering) **CENA** Centro de Energia Nuclear na Agricultura da Universidade de São Paulo (University of São Paulo's Center of Nuclear Energy for Agriculture) Centro Tecnológico Nuclear e Ambiental (Nuclear and Environmental Technology **CENTENA** Centre) **CERER** Centro de Rejeitos Radioativos- IPEN (Radioactive Waste Center- IPEN) **CERPQ** Centro de Reatores de Pesquisa-IPEN (Research Reactor Center - IPEN) **CESTGEN** Centro Estadual para Gerenciamento de uma Situação de Emergência Nuclear (State Center for Management of a Nuclear Emergency) Companhia de Tecnologia de Saneamento Ambiental (São Paulo State Institute **CETESB** for Environment) CICP Complexo Industrial de Poços de Caldas (Poços de Caldas Industrial Complex) CIEN Centro de Informações de Emergência Nuclear (Center for Information in Nuclear Emergency) CINA Centro Industrial de Aramar – (Aramar Nuclear Industrial Center - Navy Center) CGR Centro de Gerenciamento de Rejeitos (Radioactive Waste Management Center) CGRC Coordenação Geral de Reatores e Ciclo do Combustível (General Coordination for Reactors and Fuel Cycle) **CNAAA** Central Nuclear Almirante Álvaro Alberto (Admiral Álvaro Alberto Nuclear Power

	Station)
CNAGEN	Centro Nacional para Gerenciamento de uma Situação de Emergência Nuclear (National Center for the Management of Nuclear Emergency Situation)
CNEN	Comissão Nacional de Energia Nuclear (National Commission for Nuclear Energy)
CNPq	Conselho Nacional de Desenvolvimento Científico e Tecnológico (National Council for Scientific and Tecnological Development)
COGEPE	Coordenação Geral do Plano de Emergência (General Coordinator for Emergency Plan)
COEND	Coordenação de Geração de Energia Elétrica, Nuclear e Oleodutos (Coordination for Electrical Power, Nuclear Energy and Pipelines)
CONAMA	Conselho Nacional do Meio Ambiente (National Council for the Environment)
COPREN/RES	Comitê de Planejamento de Resposta a Emergência Nuclear no Município de Resende (Emergency Response Planning Committee in Resende)
COPRON	Comissão de Coordenação da Proteção ao Programa Nuclear Brasileiro (Coordination Commission for the Protection of the Brazilian Nuclear Program)
CRCN-CO	Centro Regional de Ciências Nucleares do Centro Oeste (Midwest Regional Center for Nuclear Sciences)
CRCN-NE	Centro Regional de Ciências Nucleares do Nordeste (Northeast Regional Center for Nuclear Sciences)
CTMSP	Centro Tecnológico da Marinha em São Paulo (Navy Technology Center in São Paulo)
DILIC	Diretoria de Licenciamento Ambiental (Directorship of Environmental Licensing)
DIRBA	Depósito Inicial de Rejeitos de Baixa Atividade (Low-level Waste Storage Facility)
DIRCC	Depósito Inicial de Rejeitos do Ciclo do Combustível – CTMSP (Fuel Cycle Waste Storage Facility)
DIREJ	Divisão de Rejeitos Radioativos (Radioactive Waste Division)
DIRR	Depósito Intermediário de Rejeitos Radioativos- CRCN-NE (Radioactive Waste Storage Facility)
DPD	Diretoria de Pesquisa e Desenvolvimento (Directorate for Research and Development)
DRSN	Diretoria de Radioproteção e Segurança Nuclear (Directorate for Radiological Protection and Nuclear Safety)
DSRS	Disused Sealed Radioactive Sources
EAR	Estudo de Análise de Risco (Risk Assessment)
EBRR	Empresa Brasileira de Gerenciamento de Rejeitos Radioativos (Brazilian Company for Radioactive Waste Management)
EIA	Estudo de Impacto Ambiental (Environmental Impact Study)
ENBPar	Empresa Brasileira de Participações em Energia Nuclear e Binacional S.A (Brazilian Company for Nuclear and Binational Energy Participations S.A.)

EPE Empresa de Pesquisa Energética (Brazil's Energy Research Company)

ETN Eletrobrás Termonuclear S.A. - Eletronuclear (the nuclear power plants operator

company)

FAPEMIG Minas Gerais State Foundation for Research Support (Fundação de Amparo à

Pesquisa do Estado de Minas Gerais)

FCN Fábrica de Combustível Nuclear (Nuclear Fuel Factory)

FEEMA Fundação Estadual de Engenharia do Meio Ambiente (Rio de Janeiro State

Foundation for Environmental Engeneering)

FINEP Financiadora de Estudos e Projetos (Research and Projects Financing)

FSAR Final Safety Analysis Report

GSI/PR Gabinete de Segurança Institucional da Presidência da República (Institutional

Security Cabinet of the Presidency of the Republic)

HEU Urânio altamente enriquecido (High Enriched Uranium)

IAEA International Atomic Energy Agency

IBAMA Instituto Brasileiro do Meio Ambiente e Recursos Renováveis (Brazilian Institute for

Environment and Renewable Natural Resources)

IBGE Instituto Brasileiro de Geografia e Estatística (Brazilian Institute of Geography and

Statistics)

ICRP International Commission on Radiological Protection

IEN Instituto de Engenharia Nuclear (Nuclear Engineering Institute)

INB Indústrias Nucleares do Brasil (Brazilian Nuclear Industries)

INEA Instituto Estadual do Ambiente (Rio de Janeiro State Institute for Environment)

IPEN Instituto de Pesquisas Energéticas e Nucleares (Nuclear and Energy Research

Institute)

IRD Instituto de Radioproteção e Dosimetria (Radiation Protection and Dosimetry

Institute)

LAPOC Laboratório de Poços de Caldas (Poços de Caldas Laboratory)

LI Licença de Instalação (Installation License)

LEU Urânio pouco enriquecido (Low Enriched Uranium)

LO Licença de Operação (Operation License)

LP Licença Prévia (Prior License)

MCTI Ministério da Ciência, Tecnologia, and Innovations (Ministry for Science,

Technology and Innovations)

MERCOSUL Mercado Comum do Sul (Southern Common Market)

MMA Ministério do Meio-Ambiente (Ministry for Environment)

MME Ministério de Minas e Energia (Ministry for Mines and Energy)

NORM Ocorrência natural de material Radioativo (natural occurring radioactive material)

NUCLEP Nuclebras Equipamentos Pesados (Nuclebras Heavy Equipment Industry)
OSTI Organismo de Supervisão Técnica Independente (Independent Technical

Supervision Organization)

PCA Plano de Controle Ambiental (Environmental Control Plan)

PNAN Programa Nacional de Atividade Nucleares (National Nuclear Activities

Programme)

PNMA Política Nacional de Meio Ambiente (National Policy for the Environment)

PMA Programa de Monitoração Ambiental (Environmental Monitoring Program)

PPA Plano Plurianual (Pluriannual Plan)

PRAD Plano de Recuperação de Áreas Degradadas (Degraded Areas Reclamation Plan)

PSAR Preliminary Safety Analysis Report

PTCN/MCT Programa Técnico-Científico Nuclear do Ministério de Ciência e Tecnologia

(Nuclear Scientific and Technical Program of the Ministry for Science and

Technology)

RBMN Projeto Repositório para Rejeitos de Baixo e Médio Níveis de Radiação (Low and

Intermediate Level Waste Repository Project)

RIMA Relatório de Impacto Ambiental (Environmental Impact Report)

RL Relatório do Local (Report of the Site)

RR Research Reactor

SEPRE Secretaria Especial de Políticas Regionais (Special Secretary for Regional Policies)

SAE Secretaria de Assuntos Estratégicos (Secretariat for Strategic Affairs)

SFA Spent Fuel Assembly

SISNAMA Sistema Nacional de Meio Ambiente (National System for the Environment)

SIPRON Sistema de Proteção do Programa Nuclear (System for the Protection of the

Nuclear Program)

SPE/MME Secretaria de Planejamento e Desenvolvimento Energético do Ministério de Minas

e Energia (Secretariat for Energy Planning and Development of the Ministry for

Mines and Energy)

SSSTS Serviço de Saúde e Segurança do Trabalho (Secretariat for Worker's Safety and

Health)

TAC Termo de Ajuste de Conduta (Conduct Adjustment Term)

TSO Technical Support Organization

UDC Unidade em Descomissionamento de Caldas (Caldas Decommissioning Unit)

UDSP Unidade em Descomissionamento de São Paulo (São Paulo Decommissioning Unit)

UEB Unidade de estocagem de Botuxim (Storage Unit of Botuxim)

UMP Unidade de Minerais Pesados - Buena (Heavy Minerals Processing Unit – located in

Buena)

URA Unidade de Concentração de Urânio de Caetité (Uranium Concentration Unit Of

Caetité)

USAM Usina de Santo Amaro (Santo Amaro Processing Plant)

USIN Usina de Interlagos (Interlagos Processing Plant)

USNRC United States Nuclear Regulatory Commission

UTM Unidade de Tratamento de Minérios de Poços de caldas (Ore Treatment Unit of

Poços de Caldas)

WMB Waste Monitoring Building



This report was prepared by a task force composed of representatives of the following organizations:

```
Comissão Nacional de Energia Nuclear (CNEN)

Centro Tecnológico da Marinha em São Paulo (CTMSP)

Eletronuclear S.A. (ETN)

Gabinete de Segurança Institucional da Presidência da República (GSVPR)

Instituto Brasileiro do Meio Ambiente e dos Recursos Naturais Renováveis (IBAMA)

Indústrias Nucleares do Brasil S.A. (INB)

Ministério da Ciência, Tecnologia e Inovações (MCTI)

Ministério de Relações Exteriores (MRE)
```

Rio de Janeiro - Brazil August 2024

