

Betreft: Input NEO NL op de concept Handreiking VOBK Veilig ontwerp en bedrijfsvoering kerninstallaties. (versie 29 augustus 2025)

18 september 2025

Graag delen wij onze reactie namens NEO NL op de concept Handreiking veilig ontwerp en veilige bedrijfsvoering (VOBK).

De vragen waar de ANVS voornamelijk in is geïnteresseerd zijn als volgt:

1. Zijn er volgens u onderdelen waar het VOBK niet de huidige stand van de techniek beschrijft? Kunt u dit toelichten?
2. Zijn er belangrijke internationale standaarden niet meegenomen bij de herziening van het VOBK? Zo ja, welke?
3. Is het herziene VOBK voldoende technologie onafhankelijk?
4. Mist u onderwerpen binnen het thema nucleaire veiligheid waar de ANVS een eigen interpretatie op moet geven (in aanvulling op internationale standaarden)?
5. Welke mogelijkheden ziet u om de Handreiking voor de toepassing in de praktijk nog duidelijker te maken?

In onderstaande reactie is eerst overkoepelend en daarna per vraag de input van NEO NL uitgewerkt. We geven onze reactie in het Engels.

General response – NEO NL

NEO NL thanks the ANVS for the opportunity to comment on the revised draft of the *Handreiking Veilig Ontwerp en Bedrijfsvoering van Kerninstallaties (VOBK)*. We appreciate the document's clarity and conciseness. By clearly linking Dutch (legal) requirements to international standards, the draft provides applicants with a solid and transparent framework. Additionally, the ANVS provides applicants with flexibility to use different approaches if an equivalent level of safety is substantiated. This is of importance, as it enables independence from specific safety technology.

NEO NL has identified only a limited number of comments on the consultation questions. This reflects the goal-based nature of the Dutch regulatory framework, as set out in Section 1.2 and further detailed in Section 4.2 of the VOBK. The draft establishes clear objectives for nuclear safety without prescribing detailed technical solutions. We endorse this approach, as it allows applicants to select and justify the most appropriate codes and standards while ensuring transparency and a high level of safety. On this basis, NEO NL has identified only one potentially

missing subject and two areas where additional clarification would be helpful.

Comments per question

1. Zijn er volgens u onderdelen waar het VOBK niet de huidige stand van de techniek beschrijft? Kunt u dit toelichten?

- a. NEO NL has no comments regarding question 1.

2. Zijn er belangrijke internationale standaarden niet meegenomen bij de herziening van het VOBK? Zo ja, welke?

- a. NEO NL has no comments regarding question 2.

3. Is het herziene VOBK voldoende technologie onafhankelijk?

- a. NEO NL has no comments regarding question 3.

4. Mist u onderwerpen binnen het thema nucleaire veiligheid waar de ANVS een eigen interpretatie op moet geven (in aanvulling op internationale standaarden)?

- a. The draft VOBK (see Section 1.2 *Status*) states that, in case of contradictions, legally binding criteria take precedence over the guideline. However, there is no guidance within the VOBK on how applicants should deal with evolving legal and international standards (IAEA/WENRA) during a multi-year licensing process.

We would welcome clarification from ANVS within this guideline on:

- How changes in regulation during the licensing process will be handled.
- At which point within the licensing process the regulatory basis is “frozen” – for example, at submission of the licence application, or at an earlier stage.

5. Welke mogelijkheden ziet u om de Handreiking voor de toepassing in de praktijk nog duidelijker te maken?

- a. In several places in Annex A, terms such as “2A” or “0.1A” are used to describe leak sizes or cross sections (e.g. D3a-33, D3a-36, D3a-38). Our interpretation is that “A” refers to the cross-sectional flow area of the respective tube or pipe. In this context, “2A” would correspond to a double-ended break (two full cross-sections), and “0.1A” to a leak size equal to 10% of the cross-sectional area. Could ANVS please confirm whether this interpretation is correct? Explicit clarification in the guideline would avoid ambiguity and support consistent application in practice.
- b. Requirement 4.4.(3) currently states that “a version of the safety case suitable for publication shall be provided at the same time as the licence application.” This can be interpreted in multiple ways. Making the entire safety case public (and possibly translating it into Dutch) is unfeasible. We therefore propose the following

amendment: “A summary version of the safety case meant for publication shall be provided at the same time as the license application.”

- c. We suggest clarifying the numbering of requirements to improve readability and traceability. For example, using a continuous numbering style such as “4.3.1” instead of “4.3 (1).”