

Answers to the Questions posted to Lithuania

10th Review Meeting of the Contracting Parties to the Convention on Nuclear Safety (CNS) 2026

No.	Article	Ref. in National Report	Question / Comment	Answer
1.	General	Summary, Major Common Issues	What is the status of the memorandum of understanding with the other Baltic States regarding the strengthening of civil protection? Has Lithuania begun to appoint the operational-level institutions responsible for organizing and evacuating residents at the state level, as outlined in the MOU?	<p>The Baltic States (Lithuania, Latvia and Estonia) have signed the memorandum of Understanding on co-operation in the strengthening of regional civil protection on 13 June 2025. On 28 October 2025 the Republic of Poland acceded the memorandum. The main focus of this memorandum is the cross-border evacuation.</p> <p>Lithuania has begun to appoint the operational-level institutions responsible for organizing and evacuating residents at the state level.</p> <p>The description of the procedure for organizing the evacuation of residents, approved by the Government of the Republic of Lithuania on 24 September 2025, assigns responsibilities to both state institutions and municipalities.</p>
2.	General	Summary, Major Common Issues	What prompted Lithuania to reduce their reporting from a Category 3 to a Category 4 contracting party, when they have entered into an agreement with the United States to consider the deployment of small modular reactors, which would elevate them to a Category 2 contracting party and increase reporting requirements?	<p>The categorization was based on criteria defined in <i>The Guidelines regarding the Review Process under the Convention on Nuclear Safety INFCIRC/571/Rev.9, ANNEX III</i>. Lithuania has no nuclear installations or „civilian nuclear reactors not falling under the scope of the Convention on Nuclear Safety“.</p> <p>The National Energy Independence Strategy (2024) set the goal of conducting an analysis of the possibilities of using the nuclear energy in Lithuania after 2038.</p> <p>Lithuanian institutions, in cooperation with the United States, are preparing a comprehensive report on the feasibility of nuclear power in Lithuania after 2038. Once the report on the feasibility of nuclear power in Lithuania is completed, around the year 2030 the Seimas of the Republic of Lithuania (Parliament) may make a decision regarding the possibility of constructing new nuclear power plant in Lithuania.</p> <p>Taking in to account these circumstances, Category 4 was considered the most appropriate classification.</p>

3.	Article 15	pg. 36	In addition to the classification listed in Table 15.1., is gamma radiation and/ or specific radionuclides also monitored in the vicinity of the nuclear power plant?	<p>After the shutdown of the Ignalina NPP reactors, radiological environmental monitoring has continued uninterrupted and includes both gamma radiation and specific radionuclide monitoring.</p> <p>Throughout the entire decommissioning period, the INPP consistently measures:</p> <ul style="list-style-type: none"> - Gamma radiation in the sanitary protection zone (SPZ) and the monitoring zone (MZ), using TLD dosimeters, portable dosimeters, and stationary Skylink sensors. - Specific radionuclides (Cs-137, Co-60, Sr-90, H-3, C-14, etc.) in various media: air, precipitation, surface water and groundwater, soil, lake bottom sediments, vegetation, and food products.
4.	Article 15	pg. 37	What type of radioactivity (or radionuclides) does the Ministry of Health monitor in food?	<p>The Radiation Protection Centre is the competent authority in charge of monitoring radioactivity in the environment in Lithuania.</p> <p>State radiological environmental monitoring fully corresponds to the Commission Recommendation 2000/473/Euratom of 8 June 2000 on the application of Article 36 of the Euratom Treaty concerning the monitoring of the levels of radioactivity in the environment for the purpose of assessing the exposure of the population as a whole (notified under document number C(2000) 1299).</p> <p>State environmental monitoring is carried out according to the State Environmental Monitoring Program (VAMP). The VAMP is prepared by the Ministry of Environment together with the Ministry of Health, which prepares the state radiological environmental monitoring part of this program. For new period 2024-2029 VAMP was approved on Resolution No. 527 of Government of the Republic of Lithuania of June 26, 2024 “On the Approval of the State Environmental Monitoring Program for 2024–2029” (https://www.e-tar.lt/portal/lt/legalAct/810c7c60344d11efbdaea558de59136c).</p> <p>Detail description of sampling places are indicated in the annual plans for the implementation of VAMP. For the 2026 plan is available at https://www.e-tar.lt/portal/lt/legalAct/d56232b4da4011f08918e1adc7c5b1ec.</p>

				<p>Order No. V-3003 of Minister of Health of the Republic of Lithuania of December 23, 2020 “On the Approval of the Description of the Procedure for Carrying Out the State Environmental Radiological Monitoring and Providing Information to the European Commission and the Public” (https://www.e-tar.lt/portal/lt/legalAct/e825e670454511eb8d9fe110e148c770/asr) sets Table, where the radionuclides analyzed in environmental samples (including milk and mixed diet) are indicated. ^{137}Cs, ^{90}Sr, ^{40}K are monitored in milk and mixed diet during dense network and sparse network.</p> <p>Milk is sampled 4 times per year.</p> <p>Meat and fish are sampled twice per year and are monitored for ^{137}Cs and ^{90}Sr.</p> <p>Potatoes, cabbages and grain are sampled once per year in autumn and are monitored for ^{137}Cs and ^{90}Sr.</p> <p>Edible mushrooms are sampled in autumn and are monitored for ^{137}Cs.</p> <p>In sparse network milk and mixed diet are sampled monthly.</p>
5.	Article 15	pg. 38	Is the same data monitored at all monitoring station? How frequently are the analysis results evaluated?	<p>The Radiation Early Warning Network (RADIS) network consists of the same probes made by one manufacturer and enables continuous spectroscopic online monitoring of the ambient dose rate equivalent in both air and water environments, including automatic gamma radionuclide analysis under all climatic operating conditions. All RADIS air monitoring stations are equipped with two scintillation detectors: NaI(Tl) for measurements in the low dose rate range and CeBr₃ for operation at high dose rates. Water monitoring stations differ in configuration and employ NaI(Tl) detectors for low dose measurements and Geiger–Müller tubes for high dose measurements. All RADIS stations are calibrated for radionuclide measurements of the ambient dose rate equivalent H*(10) over the range from 1 nSv/h to 100 mSv/h and for photon energies between 30 keV and 3 MeV. The analysis results are evaluated on a continuous basis. Under normal operating conditions, RADIS provides real-time measurement data at 10-minute intervals, while in emergency situations the data acquisition interval can be reduced to 1</p>

				<p>minute. RSC personnel responsible for RADIS operation receive automatic notifications of technical or radiological alarms and perform immediate assessment within a 24/7 shift-based monitoring regime. RADIS data are made available to relevant national authorities upon request and are published for the public via the Radiation Protection Centre website and the EURDEP platform with a short delay.</p>
6.	Article 16.1	pg. 41	<p>According to the evidence-based studies mentioned on p. 41, is radioactivity in the vicinity of the nuclear power plant monitored even after the plant has been shut down?</p>	<p>Radiological environmental monitoring has been carried out continuously from the moment the reactors were shut down to the present day. Each year, an environmental radiological monitoring schedule is prepared, along with a report on the results of environmental radiological monitoring for the previous year.</p> <p>During the entire period of operation and decommissioning, the INPP measures the following in the sanitary protection zone and the monitoring zone:</p> <ul style="list-style-type: none"> - gamma radiation; - radionuclide concentrations in air, precipitation, water, soil, lake bottom sediments, vegetation and food products, as well as in groundwater monitoring wells.
7.	Article 8.1	Page 27	<p>Has VATESI conducted any self-assessments on the safety culture within the organization? If yes, what were the main findings?</p>	<p>VATESI integrated management system Procedure for Development of organizational culture defines requirements for assessment of safety culture.</p> <p>The safety culture assessment at VATESI includes monitoring, an annual survey of VATESI employees (the questionnaire is based on the safety culture attributes defined in IAEA safety standard GS-G-3.1) and discussions with VATESI employees. All VATESI employees are invited to participate in an anonymous survey. The survey results and the draft organizational culture assessment report are presented at an all-staff meeting. All VATESI employees have possibility to express their opinion on the findings and suggest improvement measures. Finalised Organizational culture assessment report is distributed to all VATESI employees.</p> <p>Organizational culture assessment report provides information about the strengths and weaknesses, current trends, and opportunities for improvement in specific areas that influence safety culture. The overall</p>

				assessment results are always very or moderately positive. Nevertheless, areas for improvement are always identified.
8.	Article 16	Page 46	Has VATESI performed any form of poll to evaluate the recognition of the regulatory body among citizens? Are there any campaigns to raise awareness of the role and responsibilities of VATESI among citizens?	Every two to three years, VATESI conducts public opinion surveys to find out the population's awareness of nuclear and radiation safety issues, their opinions on the safety of nuclear facilities in Lithuania and the regulatory activities of VATESI, examines the information needs and concerns of residents. The survey results are used in VATESI's communication activities, in preparing information for the public (no special campaigns), content for the website, and in meetings with residents.
9.	Article 7.2.1	Page 16	According to the national legislation, how often should the decommissioning plan be updated during all stages of lifetime of a nuclear installation?	According to Nuclear Safety Requirements BSR-1.5.1-2015 "Decommissioning of Nuclear Facilities": when operating the facility, the licensee shall periodically but not rarer than the periodicity at which the safety analysis and substantiation of the facility are made within the time period 10 years, shall revise the updated decommissioning plan and, where appropriate, update it. The licensees at least once in 10 years from the moment of the approval of the final decommissioning plan, shall revise the final decommissioning plan and, where appropriate, update it.
10.	General	Page 5	The report states that Lithuania's National Energy Independence Strategy foresees provisions for the preparation of a feasibility study on small modular reactors (SMR) project development. Are there any specific technologies considered at this stage? Has the regulatory body performed any assessment of the national legislation to evaluate any potential gaps for SMR licensing? If yes please provide more details.	The National Energy Independence Strategy of 2024 set the goal of conducting an analysis of the possibilities of using IV generation SMRs in Lithuania after 2038. This assessment will cover the operational model of SMR projects in Lithuania and their impact on renewable energy development, power system balancing potential, cost, funding sources, project implementation timelines, nuclear fuel supply chain security, legal framework, safety assurance, potential to use existing nuclear infrastructure, human resources needs, and other aspects. The Government of Lithuania has tasked the Ministry of Energy with establishing an inter-institutional group to coordinate the analysis of the possibilities of using nuclear power in Lithuania after 2038. This analysis, among other things, will cover assessment of the national legislation, including safety regulations, for potential gaps for SMR licensing. VATESI will participate in these activities therefore VATESI specialists are

				participating in some international activities on issues related to SMRs technology and licensing.
11.	General	page 8, Major Common Issue-3	The Report indicated that Lithuania joined FIRST USA's SMR development program. What other SMR-related programs does Lithuania participate in?	Lithuanian TSO participate in the European Industrial Alliance on SMRs.
12.	General	pp.11-13	The report mentions that the ageing management program covers spent fuel storage facilities - what diagnostic and monitoring methods are used to assess the integrity and durability of CONSTOR casks throughout the spent nuclear fuel storage life?	<p>When assessing the integrity and long-term durability of CONSTOR RBMK1500/M2 containers over the entire period of spent nuclear fuel storage, structural, diagnostic, and monitoring methods are applied, based on the container design solutions and long-term operational control. Container tightness is ensured by design – through sealing and welding of the secondary lids in accordance with approved procedures. The quality of weld seams is verified by non-destructive testing (dye penetrant inspection and ultrasonic testing) during and after welding.</p> <p>Before storage, the container cavity is vacuum-dried and filled with high-purity helium, creating an inert atmosphere that protects fuel elements from corrosion during long-term storage.</p> <p>During operation, indirect monitoring of container tightness and integrity is applied, including:</p> <ul style="list-style-type: none"> • continuous monitoring measurements of inert gases (Kr-85, Xe) in the storage facility; • measurements of container surface temperature (once every 30 days) and analysis of their trends; • periodic visual and non-destructive inspection of the external condition of containers during maintenance activities.

				Throughout the entire operating period of the ISFSF, no indications of container tightness violations have been identified, and the obtained monitoring data confirm the integrity and long-term durability of the CONSTOR containers for the intended storage period.
13.	Article 16.1	p.41	Was the impact of external factors, including the potential for an aircraft crash, taken into account in safety assessment of dry spent fuel storage facilities?	Safety assessment of natural and human induced events, including aircraft crash, for dry spent fuel storage facilities were performed. The impact to the cask by an aircraft crash wreckage was analysed and demonstrated that the casks stored in the dry spent fuel storage facilities will remain sealed.
14.	Article 10	Page 32-33	How does the Ignalina NPP operator demonstrate improvements in safety culture - through internal assessments, external evaluations, or both?	Ignalina NPP demonstrates safety culture improvements both through internal and external mechanisms. Internally, this is achieved through SE INPP management system provisions: self-assessments, independent assessments (performed by dedicated independent INPP unit) and regular reviews that identify gaps and set improvement actions. Externally, VATESI inspections and regulatory reviews verify how these arrangements work in practice. When issues are found, corrective action plans are issued and tracked until closure.
15.	Article 16.3	Page 47-49	The Report documents Lithuanias ongoing concerns about the Belarusian NPP, noting that "the major part of requested information is still not provided by Republic of Belarus" since the initial 2019 request. Could you elaborate on what specific alternative measures or assessment methodologies Lithuania has developed to compensate for this information?	VATESI has acquired specialized software applicable for rapid severe accident scenario identification and source term prediction, specifically adapted to VVER-1200 type reactors to enhance preparedness for possible emergency at the Belarusian NPP. This software predicts the most likely accident scenarios and source terms with a small amount of input data at early stage of the accident, and in cooperation with the Radiation Protection Centre this information is used to develop maps forecasting the dispersion of radionuclides into the environment and to predict possible dose rates for the population. Additionally, Lithuania has developed a comprehensive National Plan for the Protection of the Population in Case of a Nuclear or Radiological Accident, which outlines procedures for civil protection, crisis management, evacuation, sheltering, decontamination, and communication with the public. This plan guides actions in the event of a nuclear accident abroad, including at the Belarusian NPP.

				<p>Lithuanian authorities regularly conduct large-scale national civil protection exercises simulating a nuclear accident at the Belarusian NPP to test readiness of state and municipal institutions and to test National Plan for the Protection of the Population in Case of a Nuclear or Radiological Accident.</p> <p>Lithuania has strengthened its radiation monitoring infrastructure and updated The Radiation Early Warning Network (RADIS) to enable early detection, notification and assessment of radiological anomalies.</p> <p>Lithuania has procured and periodically replenishes potassium iodide (KI) tablets for distribution to residents, especially those residing within zones most likely to be affected.</p> <p>The Radiation Safety Centre (RSC) and other authorities carry out education and communication initiatives designed to increase public understanding of radiation risks, protective actions, and how to respond to official warnings in case of nuclear emergency.</p>
16.	Article 7	Article 7(2)(iii) – System of regulatory inspection and assessment	What is the procedure of preparation and adoption/issuance of the two planning documents for the systematic performance of inspections: inspection program and annual inspections plan of VATESI?	<p>VATESI issues two planning documents for the systematic performance of regulatory inspections: inspection program and annual inspections plan. The program is the internal planning document of the VATESI for inspections, which shall be drawn up, approved by an order of the Head of the VATESI on an annual basis, and revised, if necessary. The inspection program is developed for period of following five years in accordance with the established criteria and taking into account risk in the corresponding facility or activity. The inspection program includes planned and unplanned announced inspections. Backbone of this program is regular (routine) inspections with established periodicity. The inspection program also includes the key activities of the economic entity, works and deadlines considered in planning inspections:</p> <ul style="list-style-type: none"> • licences, permits, temporary permits, registration, certificates to be obtained or plans to register the activity; • planned or pending commissioning of the nuclear facilities; • planned or underway dismantling and/or decontamination operations of the nuclear facilities; • other important activities or works that may require inspections to meet the aims of supervision.

				<p>The annual inspections' plan is developed on the basis of the inspection program, approved by an order of the Head of the VATESI and, if necessary, may be amended by a decision of the Head of the VATESI. The inspection plan includes regular, special and technical inspections foreseen in the inspection program for the current year. The inspection plan may also include unplanned announced inspections (for example, linked to construction or commissioning of certain installations). The annual inspections' plan and amendments to it are published on the internet site of VATESI in accordance with provision of Law on Public Administration.</p>
17.	Article 7	Article 7(2)(ii) – System of licensing	<p>How is the environmental impact assessment reviewed in the licensing process for construction and operation of a nuclear facility?</p>	<p>VATESI licence for construction, operation and decommissioning a nuclear facility can be considered only if the environmental impact assessment process has been completed. In order to obtain the VATESI licence for construction, operation or decommissioning a nuclear facility, there shall be submitted a safety analysis report in which the evaluation of the environmental impact assessment shall be included.</p> <p>The environmental impact assessment encompasses, but is not limited to, the evaluation of the following:</p> <ul style="list-style-type: none"> - discharges from the nuclear facility and the associated exposure to the public, - all potential discharge scenarios, pathways, and exposure routes, - compliance with established public dose constraints, - impact of radioactive releases on environmental compartments, - the effectiveness and adequacy of radiological monitoring systems, - methods of estimation the annual effective dose for public.
18.	Article 15	p. 35	<p>What is the basis for the annual dose limit for nuclear facilities (200 µSv/y). Please elaborate the case for several nuclear facilities: What is the “established annual effective dose constraint” in this case, as stated in the last sentence of the 1st paragraph on page 35.</p>	<p>The basis for the limitation of annual effective dose for nuclear facilities (200 µSv/y) is the optimisation of radiation safety. Lithuanian Hygiene Standard HN 73:2018 sets the dose constraint 0.2 mSv for the nuclear facilities irrespective one or several nuclear facilities. If the exposure of the population may be caused by the activities of more than one nuclear facility, the total annual effective dose of the population, determined by the</p>

				activities of all nuclear facilities that determine the exposure, may not exceed the dose constraint.
19.	General	Page 5 Introduction	What is the status of possible future SMR projects?	<p>The National Energy Independence Strategy of 2024 set the goal of conducting an analysis of the possibilities of using nuclear energy (SMRs) in Lithuania after 2038.</p> <p>The Government of Lithuania has tasked the Ministry of Energy with establishing an inter-institutional group to coordinate the analysis of the possibilities of using nuclear power in Lithuania after 2038. The group's task is to conduct detailed analysis, involve the public, cooperate with international experts and, prepare a report based on the assessments and small nuclear reactor projects. The assessment will evaluate the operational model of SMR projects, costs, funding sources required for project implementation, including potential subsidies, project timelines, and other aspects.</p> <p>The result of the working group's work will be a comprehensive report on the possibilities of using nuclear power (SMRs) in Lithuania.</p>
20.	Article 7.2.2	Article 7(2)(ii), Section: System of licensing	With reference to Article 7(2)(ii) and the section describing the national licensing system, could kindly Lithuania elaborate on how the multi-step authorization process (including construction licence, combined construction–operation licence, permits for commissioning, and licences for decommissioning) ensures independent safety verification at each stage, particularly with regard to the role of VATESI in reviewing safety justification documents?	<p>Report of independent verification of the safety assessment is included into every list of documents which have to support the applications for every authorisation when a safety analysis report or safety evaluation is required. The general principles for independent verification of the safety assessment are established in Parts 3 and 5 of Article 30 of Law on Nuclear Safety and more detailed requirements for independent verification are established in nuclear safety requirements BSR-1.4.1-2016 „Management System”.</p> <p>VATESI shall perform regulatory review and assessment of safety justification documents in accordance with the Part 4 of the Article 30 of Law on Nuclear Safety. The decisions on issuance of licence, permits or for giving any other authorisation shall be based on results of safety review and assessment.</p>

21.	Article 7.1	pages 13-17	<p>According to Article 7(1) and the information provided in the section “Establishing and maintaining a legislative and regulatory framework”, could kindly Lithuania clarify how the recent amendments—especially those related to the Law on Radiation Protection and the introduction of the new Law on Crisis Management and Civil Security—are incorporated into the overall nuclear safety framework to ensure continued alignment with updated IAEA Safety Standards?</p>	<p>The Law on Crisis Management and Civil Protection establishes the legal framework for the prevention of crises and emergencies, preparedness for crises and emergencies, their management, and the elimination of consequences. It also establishes the requirements to ensure the resilience of entities of critical importance and the continuity of their activities. This basic law is applicable in the event of various types of crises and emergencies.</p> <p>The Law on Crisis Management and Civil Protection which was adopted in 2022 has established integrated system for emergency and crisis management. This system also incorporates nuclear and radiological emergency preparedness and response. The Law establishes clear coordination mechanisms among competent authorities, defines roles and responsibilities during crisis and emergencies. The implementing acts of the law define in more detail the procedures for warning and informing the population, planning and organizing protective actions, and planning accident prevention measures.</p> <p>The Law on Radiation Protection applies to planned, existing and emergency exposure situations related to exposure risks that require an assessment from a radiation protection or environmental perspective, in order to ensure the long-term protection of human health. The Law on Radiation Protection supplements the Law on Crisis Management and Civil Protection with additional requirements such as the legalisation of activities and the obligations of operators, ensuring the physical safety of radioactive sources, the detection and management of orphan radioactive sources and objects contaminated with radioactive materials, the healthcare of workers and emergency response personnel, and radiation protection and physical safety training and instruction.</p> <p>These requirements are constantly updated and aligned with the latest IAEA safety standards, forming an integral part of the Lithuanian nuclear safety system.</p>
22.	Article 16	Summary, p 6	<p>Challenge (from 8-9th review meeting ; should be fully addressed by the end of 2026) : updating the State plan for</p>	<p>The State plan for protection of population in case of a nuclear or radiological emergency updating process is still on going. Protection of population in case</p>

			protection of population in case of a nuclear or radiological emergency (off-site plan)	of a nuclear or radiological emergency planning provisions are coordinated between various institutions.
23.	Article 7	p 14, 15, 16	Area of good performance : although Lithuania is a category 4 country in the sense of the Convention, it maintains a strong activity in every aspects of nuclear safety applied to reactors : legislation and regulation, inspection, emergency preparedness and response, international cooperation	We are thankful to France for this proposal.
24.	Article 16.1	Article 16 (1), Overview of arrangements and regulatory requirements for on-site and off-site emergency preparedness, page 39	As it is stated in Article 16 (Emergency Preparedness, page 39) "The arrangements for ensuring the off-site preparedness and response to nuclear and radiological emergencies are established in the National Plan for Protection of Population in case of Nuclear or Radiological Emergency (Plan) ... which is prepared in accordance with IAEA Requirements GSR Part 7 and IAEA Safety Guides GS-G-2.1 and GSG-11." GSR Part 7 in paragraph. 4.28(4) stipulates that: "Once the protection strategy has been justified and optimized and a set of national generic criteria has been developed ...operational intervention levels (OILs) for initiating the different parts of an emergency plan and for taking protective actions and other response actions shall be derived from the generic criteria". Question: Does the Plan include OILs, and if so, are the OILs values the	The State Plan for the Protection of the Population in the Event of a Nuclear or Radiological Accident states that protective and other emergency response actions are applied in accordance with the general and operational criteria set out in Lithuanian Hygiene Standard HN 99:2019, 'Protection of the Population in the Event of a Nuclear or Radiological Emergency', which was approved by the Minister of Health. The operational criteria used for emergency preparedness and response include operational intervention levels (OILs) and emergency action levels (EALs), as well as observable conditions on and off the site. OILs are standard values as specified in IAEA publications. HN 99:2019 also states that, when specific radionuclides have been released into the environment and generic criteria have changed, the Minister of Health may establish alternative OIL values.

			same standard OILs values as those specified in the IAEA publications, or they have been adapted to local and site specific circumstances, as it is recommended in IAEA publication “EPR-NPP-OILs Operational Intervention Levels for Reactor Emergencies (2017)”?	
25.	Article 15	Article 15, page 34	In the Report, we did not find information on how records of occupational exposure doses are maintained in Lithuania. Do you have a national dose registry established? If so, what recording levels are defined for a level of effective dose, equivalent dose, and does a national dose registry include the results of dose assessment for the public?	The Radiation Protection Center maintains the State Register of Sources of Ionizing Radiation and Occupational Exposure of Workers, which consists of two parts: one containing information on sources of ionizing radiation, and the other containing information on exposed workers. The purpose of the Workers’ Exposure Register is to collect, accumulate, process, systematize, store, and, in accordance with procedures established by legal acts, provide data on the occupational exposure of workers who work with sources of ionizing radiation. In the State Register of Sources of Ionizing Radiation and Occupational Exposure of Workers all external exposure measured doses are recorded. The recording level of external exposure dose depends on measurement method and is in the range from 0,01 to 0,05 mSv. The recording level of internal exposure committed effective dose is 0,1 mSv.

26.	Article 15	Article 15, Regulatory expectations for the license holder's processes to optimize radiation doses and to implement the ALARA principle, page 35	As mentioned in the Report "there is a regulatory requirement that the optimization of radiation protection is to be applied" and "one of the items of the radiation protection program must be the application of optimization principle (ALARA)." Could you please clarify if the optimization arrangements include the establishment of dose constraints for occupational exposures, and restriction that the doses to individuals at nuclear facilities be subject to dose constraints (as it is recommended in the IAEA Safety Standards: paragraphs 1.22-1.23 of GSR Part 3, paragraphs 3.28-3.33 of No. GSG-7)? If so, could you please provide further information on the procedure for setting the dose constraints at design and operational stage of the facility, including role of the regulatory body, operator, qualified experts, etc. in this process?	<p>The nuclear safety requirements BSR-1.9.3-2016 „Radiation protection at Nuclear facilities“ defines the requirements for optimization of radiation protection at nuclear facilities, including requirements to establish and use dose constraint for optimization.</p> <p>According to the requirements of BSR-1.9.3-2016 licence holder is required to apply dose constraints for workers as part of the optimisation process. Licence holder shall establish annual dose constraint for workers and dose constraint for works with high radiation risk. Dose constraints shall not exceed the annual effective dose limit.</p> <p>There is no regulatory predefined procedure how the dose constraints shall be established and is up to licence holder to establish values of dose constraints. However there are clearly defined requirements for optimization process itself. According to the BSR-1.9.3-2016 dose constraint is the upper limit of the individual dose used to determine the possible options that are considered during optimization process and the main goal of the dose constraint is to discard inappropriate options, although the optimization shall not end at this point. The optimization shall be continued and it shall be determined which option is the best taking into account social and economical factors and the latest technical knowledge.</p> <p>The values of dose constraints shall be defined in the Radiation Protection Programme, which is the main RP document for authorization and operation. During authorization of the new design or authorization of the operation of the facility the licence holder shall provide Radiation Protection Programme for regulatory review. During the process of authorization the regulatory body may ask whether the dose constraint is established properly or not. In such case international recommendations and international experience could be the main source of information.</p> <p>In any case licence holder may consult with the radiation protection expert with regard to the process of optimization and establishment of the dose constraints for workers.</p>
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27.	Article 16.3	Preparation and testing emergency plans with respect to nuclear installations in the vicinity of Lithuania, p. 48	<p>The Report contains the following information: “Lithuania, referring to CNS Article 17 (Siting), para. iv), continues to request that the Republic of Belarus provide the information necessary to evaluate and make Lithuania’s own assessment of the likely safety impact of the Belarusian NPP on the territory of Lithuania. Despite of prolonged communication since initial request in 2019, the major part of requested information is still not provided by Republic of Belarus, thus violating requirements of Article 17, para iv) and Article 16.2 of the CNS.”In contrast to the above information, it is worth noting that not a single request from the Ministry of Environment of the Republic of Lithuania, including on issues related to the Belarusian NPP project mentioned in the report, has been left without a response or written comment from the Ministry of Natural Resources and Environmental Protection. Throughout this period, the Belarusian side has been committed to building a professional, constructive dialogue with the Republic of Lithuania, including on issues related to the environmental impact of nuclear power facilities and their radiation safety, by clarifying scientific and technical issues related to the Belarusian NPP project, whether through expert consultations or</p>	<p>Requests for information necessary to conduct Lithuania’s own assessment of the potential safety impact of the Belarusian NPP on the territory of Lithuania, under the Convention on Nuclear Safety for the period 2022–2026, were sent on several occasions to the Ministry of Emergency Situations of the Republic of Belarus. The major part of requested information is still not provided by Republic of Belarus, thus violating requirements of Article 17, para iv) and Article 16.2 of the CNS.</p> <p>The correspondence with and requests from the Ministry of Environment of the Republic of Lithuania is the matter of the Espoo Convention. It should be noted that in 2020 and 2023 Parties to the Espoo Convention have unanimously reaffirmed Belarus's violations in the development of the nuclear power plant in Ostrovets hence the statements „Throughout this period, the Belarusian side has been committed to building a professional, constructive dialogue with the Republic of Lithuania, including on issues related to the environmental impact of nuclear power facilities and their radiation safety, by clarifying scientific and technical issues related to the Belarusian NPP project, whether through expert consultations or written information exchange“ and „the Ministry of Natural Resources and Environmental Protection has not received any questions from the Republic of Lithuania regarding the NPP project“ are misleading.</p>
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28.	Article 16.1	<p>Article 16(1) Emergency plans and programs, Implementation of emergency preparedness measures by license holders, p. 41</p>	<p>According to the Report, "The analysis of the consequences of hypothetical nuclear and radiological accidents of all nuclear facilities situated at Ignalina NPP site was agreed by VATESI in 2021." It is necessary to clarify whether the above document has been updated, taking into account the ongoing decommissioning of the Ignalina NPP facilities.</p>	<p>According to Nuclear Safety Requirements BSR-1.8.10-2021 "Analysis of the consequences of the hypothetical nuclear and radiological accidents at nuclear facility", the consequences analysis of the nuclear installation (NI) shall be revised and, if needed, updated in the case of modifications and circumstances that may significantly change the results of the assessment of the exposure of residents (e.g. changes parameters of the postulated events, the amount (mass) or total activity of the radioactive materials). Furthermore, consequences analysis of NI shall be revised during periodic safety review.</p> <p>The consequences analysis, agreed by VATESI in 2021, includes large commercial aircraft crash consequences analysis on dismantling reactor - reactor is under dismantling and uncovered (access to the graphite stack is available). This consequences' analysis was revised on issuing</p>

				decommissioning licence for INPP units and concluded that this analysis is relevant and does not need to be updated.
29.	Article 15	Page 37	<p>The Report provides the following information: "...the levels of artificial radioactivity in the analyzed samples are very low, and the radioactivity in samples from the Ignalina NPP site is the same as in the rest of Lithuania."</p> <p>However, this information is not supported by specific (numerical) results for the studied parameters (radionuclides). A comparative analysis of the results of samples obtained from the Ignalina NPP site and the rest of Lithuania is also not provided.</p>	<p>Numerical values for the comparisons for different sampling sites (including the vicinity of Ignalina NPP) are available at Annual reports of national radiological environmental monitoring.</p> <p>Annual reports are publicly available at website https://rsc.lrv.lt/lt/apie-rsc/radiacines-saugos-centro-ataskaitos in the part named <i>Valstybinio radiologinio aplinkos monitoringo ataskaitos</i>.</p> <p>Reports show comparison for Ignalina NPP site and other parts of country. These reports contain values of all radionuclides analysed ant the different monitoring sites. Ignalina NPP site includes Ignalina, Zarasai, Utena and Švenčionys monitoring places.</p>
30.	Article 16.1	Article 16(1) Emergency plans and programs, Implementation of emergency preparedness measures by license	<p>What radiological consequences are predicted for the spent nuclear fuel storage facility in the event of a low-probability hypothetical accident?</p> <p>What is the estimated probability, the initial event, and scenario of a low-probability hypothetical accident?</p>	<p>Potential consequences of large aircraft crash into interim spent nuclear fuel storage facility (ISFSF) were evaluated for a scenario in which a single CONSTOR® RBMK1500/M2 container without a lid, located in the Container Loading and Inspection Chamber (CLIC) of ISFSF, is struck by an aircraft. It is assumed that the CLIC structural elements are destroyed, aviation fuel is spilled and ignited, the container is in the fire zone, and the release occurs directly into the environment (without filtration). The consequences of this scenario is compared to aircraft crash into the spent fuel pool hall of reactor building, when fuel loaded cask is overturned, fuel rods partially spill out and are mechanically damaged. Based on this, in the event of an aircraft crash</p>

		holders, p.41		into ISFSF, the annual effective dose to the population at the boundary of the INPP SPZ would be less than 0,8 mSv. Expert judgment was used for selecting postulated extreme events - high radiological consequences events with very low probabilities.
31.	Article 16.1	Article 16(1) Emergency plans and programs, Implementation of emergency preparedness measures by license holders, p.41	According to the information provided, the SE Ignalina NPP carried out analysis of the consequences of hypothetical nuclear and radiological accidents of very low probability at all nuclear facilities situated at Ignalina NPP site, including the spent nuclear fuel storage facilities, in 2019-2020. It was noted that the most unfavorable off-site radiological consequences, which would require urgent, emergency, or early protective measures, would be at the solid radioactive waste management and storage facility. It was also reported that the former emergency preparedness categories of nuclear facilities situated at Ignalina NPP site have been reviewed based on the performed analysis. Please indicate the classification of the new INPP spent nuclear fuel storage facility (Facility B-1) according to the IAEA GS-G-2.1 nuclear facility categorization.	According to carried out analysis of the consequences of hypothetical nuclear and radiological accidents by SE Ignalina NPP, new INPP interim spent nuclear fuel storage facility (Facility B-1) falls under emergency preparedness category (EPC) III, which means that in case of worst-case scenario in Facility B-1, no urgent protective actions are needed to be planned for off the site.

32.	General	<p>Summary, Reporting on Major Common Issues,</p> <p>7. Strategies for ageing management in support of the operation of nuclear installations, p. 11-12</p>	<p>The Ignalina NPP has implemented and is updating the Programme for the Ageing Management of SSCs important to the safety, taking into account the current state of the decommissioning process for Units 1 and 2. It reflects the isolation and dismantling of systems, the elimination of safety functions in some systems that were previously subject to mandatory ageing management, and the inclusion of SSCs from newly constructed spent nuclear fuel and radioactive waste storage facilities.</p> <p>Please provide the following up-to-date information: for which safety-important systems at Units 1 and 2 is the ageing management program being implemented? For which spent nuclear fuel management facilities and for which systems has the ageing management program been implemented?</p>	<p>Taking into account the progress of the decommissioning process of Units 1 and 2, Ignalina NPP implements and continuously updates an ageing management programme for safety-important structures, systems and components (SSCs), adapting it to the current status of nuclear and radiation safety. Safety-related systems of Unit 1 and Unit 2 for which the ageing management programme is currently implemented include systems such as: normal and standby power supply systems for plant own needs; emergency power supply system; instrumentation, control and automation systems; control systems for components of safety-important systems; stationary fire-fighting system; wastewater collection and pumping system; technical water supply system for safety systems.</p> <p>Spent nuclear fuel management systems for which the ageing management programme is currently implemented include systems such as the protective container handling system, radiation monitoring system, and power supply system.</p>
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33.	General	Summary, Reporting on Major Common Issues,4. Foster international peer review missions and timely addressing of findings, p. 8-9	The ARTEMIS mission identified a problem at the INPP: 74 fresh fuel assemblies that were not returned to the manufacturer and are stored in shipping containers in the fresh fuel storage facility. It is planned to store fresh fuel in a new temporary spent nuclear fuel storage facility (B-1 unit). Please provide up-to-date information on the licensing of fresh fuel handling at the INPP:1. Has a new license been obtained for storing fresh fuel in the new interim spent fuel storage facility (B-1)?2. Has the license for storing the 74 fresh fuel assemblies in the B-165 fresh fuel storage facility been renewed for the entire INPP decommissioning period?	Authorization of storage of fresh nuclear fuel was implemented through modification procedure and update of safety assessment of ISFSF-2. National legal framework does not require the issuance of a new licence in such a case. Validity of operation licence is dependent on engineering decisions of TDD and its safety assessment and originally safety assessment of ISFSF-2 is limited to 50 years.
34.	Article 19	Summary, Reporting on Major Common Issues, 4. Foster international peer review missions and timely addressing of findings, p. 9	Has Lithuania developed a national action plan to implement the recommendations of the ARTEMIS mission that took place in July 2023? What is the status of the recommendations' implementation?	The objective of the 2023 ARTEMIS mission was to provide an independent international evaluation of the studies carried out by Lithuania on the development of criteria for the selection of a deep geological repository (DGR) site. In addition to assessing the completed studies, the mission report also presented suggestions, recommendations, and identified good practices on site selection process. The ARTEMIS Mission report was made available to all stakeholder institutions involved in the DGR project. The report is publicly accessible on the IAEA website. Considering the priority of the mission to assess the activities already carried out within the DGR site selection process, as well as the nature of the provided suggestions and recommendations, a separate formalized national action plan was not prepared.

				<p>The mission’s proposals and recommendations, which will be considered in the amendment to the Radioactive Waste Management Act being prepared by the Ministry of Energy, where the DGR site selection process will be further detailed, specifying in more details the required decisions and the institutions responsible for making them, as well as clarifying the public information and participation process for the DGR project in Lithuania— amendment will be prepared until the end of 2026.</p> <p>However, further activities of the DGR project are planned and practically implemented taking into account the ARTEMIS mission recommendations. The following key actions by Ignalina NPP and Lithuanian institutions related to the implementation of the mission recommendations are following:</p> <p>15 March 2024 – the first public consultation on the DGR project was organised, during which the DGR project was presented to all Lithuanian municipalities and to the interested public;</p> <p>17 December 2024 – a DGR Megaproject was prepared, i.e. a strategic planning study for the implementation of the DGR development project in Lithuania, in which DGR site selection is planned based on the “narrowing down” principle;</p> <p>1 December 2025 – an environmental impact risk/significance assessment for the DGR was carried out for all potentially suitable DGR sites. This assessment evaluated the direct and indirect impacts of the DGR on environmental components of each potentially suitable area, as well as on material assets, immovable cultural and historical heritage values, and the interactions between these elements.</p> <p>In 2024 and 2025, public opinion surveys were conducted at the request of INPP regarding the DGR project and INPP activities;</p> <p>Summaries of all activities carried out under the DGR project are published on the website www.altra.lt for public access.</p>
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35.	Article 16	<p>Summary, Reporting on Major Common Issues,</p> <p>4. Foster international peer review missions and timely addressing of findings, p. 9</p>	<p>How are the recommendations of the IAEA ARTEMIS (2023) mission on public participation and transparency in the process of selecting the location of the waste disposal site taken into account?</p>	<p>The further activities of the DGR project are planned and implemented in practice taking into account the Mission’s recommendations, including those related to public information and participation in the project. The following significant actions taken by INPP and Lithuanian institutions in relation to the above mentioned recommendations should be noted:</p> <ul style="list-style-type: none"> • On 15 March 2024, the first public consultation on the DGR project was organized, during which the project was presented to all Lithuanian municipalities and the interested public; • In 2024 and 2025, public opinion surveys were conducted at the request of INPP regarding the DGR project and INPP activities; • In 2025, an assessment of environmental risks/significance of the DGR’s potential impact (covering all locations potentially suitable for hosting a DGR) was carried out at the request of INPP. During the assessment, a methodology for evaluating the environmental risks/significance of the DGR’s impact was developed and published for public consultation on 5 May 2025 on the INPP and contractor websites (with the aim of collecting public comments and feedback on the methodology content). No comments or feedback were received within the deadline set by INPP; • Summaries of all activities carried out under the DGR project are published on the website www.altra.lt for public access; • Active communication is carried out in the media, on the INPP website, and on INPP social media channels to inform the public about radioactive waste management and the DGR as the final disposal method for spent nuclear fuel and other long lived radioactive waste.
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36.	Article 7.2.1	Article 7(2)(i) – National safety requirements and regulations, Overview of regulations and guides issued by the regulatory body, p. 16	The National Report provides information that the new version of Nuclear Safety Requirements BSR-1.9.2-2018 “Determination and Application of Radionuclide Release Levels for Materials and Waste Generated during Nuclear Energy Activities Involving Ionizing Radiation Sources” (2024) establishes conditional clearance levels for radioactive waste accumulated at the Ignalina Nuclear Power Plant industrial waste landfill, as well as criteria and conditions for their assessment in order to remove such waste from regulatory control from the perspective of radiation protection. What volume of radioactive waste stored at the landfill is released from regulatory control using the conditional clearance levels established in 2024? Does the released from regulatory control waste remain at the landfill or is it removed for disposal elsewhere?	The volume of waste collected at the INPP industrial waste dump is approximately 30 000 m ³ . After the clearance the waste accumulated at the industrial waste dump will remain where it is.
37.	General	Summary, Challenge 2, p. 6	The section highlights the political aspect in terms of emergency response, Lithuania's attitude to events on the European continent with its assessments of radiation safety and possible threats from the Zaporizhzhia NPP and the Belarusian NPP. We consider the designation of the Belarusian NPP as a potential threat to radiation safety in the region unacceptable.	The Belarussian NPP is located merely 20 kilometers from the Lithuania's border and approximately 40 kilometers from the capital city of Vilnius. In the event of a nuclear accident, Lithuania would face a potentially overwhelming burden, given that the majority of national emergency preparedness and response capacities are concentrated in the capital, and the timeframe for effective response would be critically constrained. It should be noted that one of the sites for the new power reactor in Belarus is considered current Belarussian NPP Ostrovets site. Therefore, the emphasis lies on practical considerations rather than political ones.

38.	Article 16.3	Article 16(3) – Preparation and testing emergency plans with respect to nuclear installations in the vicinity of Lithuania, p. 47-49	<p>Comment. Subchapter «Preparation and testing emergency plans with respect to nuclear installations in the vicinity of Lithuania» is dedicated to describing Lithuania’s position regarding the Belarusian NPP. The information presented contains a negative assessment of activities related to ensuring the safety of the Belarusian NPP. In this regard, we note that nuclear and radiation safety issues have always been and will be a priority for the Republic of Belarus both in the national and transboundary context, including taking into account the fact that the Republic of Belarus is the most affected state as a result of the Chernobyl accident. Compliance with established international safety requirements has been repeatedly confirmed based on the results of international assessment missions and expert peer reviews. In this regard, we consider it incorrect and unjustified to present information regarding the safety of the Belarusian NPP in such a manner. We strongly encourage dialogue in the spirit of constructive professional interaction.</p>	<p>As mentioned in the CNS report, Lithuania until now continues to request the Republic of Belarus to provide the information necessary to evaluate and make Lithuania’s own assessment of the likely safety impact of the Belarusian NPP on the territory of Lithuania. Despite of prolonged communication since initial request in 2019, the major part of requested information is still not provided by Republic of Belarus. It should be noted that in 2020 and 2023 Parties to the Espoo Convention have unanimously reaffirmed Belarus's violations in the development of the nuclear power plant in Ostrovets. Hence the concerns raised by Lithuania are justified and Belarus is expected to provide responses to questions raised (also see answer to question above, ID 34738).</p>
39.	Article 15	Processes implemented and steps taken to	<p>Conducting an ALARA analysis is listed as one of the ALARA program implementation areas. Could you please clarify how the ALARA analysis is</p>	<p>Stages of performing an ALARA analysis:</p> <ol style="list-style-type: none"> 1. Description of the radiological situation – what sources cause exposure, distribution of the source and contamination, what type of exposure it is (external, internal, planned), and exposure duration.

		<p>ensure that radiation exposures are kept as low as reasonably achievable for all operations and maintenance activities, p. 35</p>	<p>conducted? What actions are being taken based on the results of the analysis?</p>	<p>2. Analysis of the specifics of the planned work and possible ways of performing the work.</p> <p>3. Identification of possible protective measures and decision options, such as: additional shielding; reduction of source activity; modification of technology or process automation (remote handling); reduction of working time; increase of distance; improvement of ventilation; additional barriers; additional training or instructions.</p> <p>4. Comparison of benefits and costs (optimisation). Evaluation of radiological benefits – the reduction of individual and collective doses. The financial, technical, organisational, and social costs are assessed.</p> <p>5. Selection of the optimal solution. - choosing the option that ensures exposures are kept as low as reasonably achievable, is technically feasible, is economically and socially acceptable; complies with regulatory requirements.</p> <p>6. Documentation of decisions – preparation of ALARA analyses and documentation of feedback and lessons learned.</p> <p>Actions taken based on the results of the ALARA analysis:</p> <p>1. Implementation of technical solutions – introduction of additional protective measures, equipment modernisation, modification of technological parameters, reduction of discharges and source activity.</p> <p>2. Application of organisational measures – updating work procedures, modification of work permit conditions and organisation, strengthening of training, and clearer allocation of responsibilities).</p> <p>3. Review of limits and conditions (stricter internal dose and discharge limits, adjustment of permit conditions, and establishment of additional dose constraints).</p> <p>Strengthening of monitoring and control (more frequent measurements, installation of additional dosimetry points, and refinement of monitoring programmes).</p>
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40.	Article 7.2.3	Basic features of inspection programs, p. 22	Figure 7.1 shows the number of inspections performed by VATESI, including unscheduled ones. Please indicate the criteria for assigning an unscheduled inspection.	<p>The legal basis for conducting unplanned inspections (announced and unannounced) is laid down in the Law on Public Administration and in the Law on Nuclear Safety.</p> <p>Law on Public Administration set these cases for unannounced inspections (relevant to all institutions performing inspections):</p> <ol style="list-style-type: none"> 1. upon receipt of a reasoned written request or an order to carry out an inspection of activities of the economic entity from another competent public administration entity or a request from a competent authority of another state; 2. after assessing the available information and in case of suspicions about the activities of the economic entity, which may endanger the values protected by the rule of law; 3. upon receipt of an anonymous complaint about the actions or omissions of a specific economic entity, where the assessment of the available information raises suspicions that the activities of the economic entity may endanger the values protected by the rule of law; 4. with a view to ensuring that infringements of legislation identified during a previous inspection of activities of the economic operator have been remedied and that decisions taken have been implemented; 5. where the grounds for carrying out a non-routine inspection are laid down by another law regulating the supervision of activities of economic entities. <p>Law on Nuclear Safety set these cases for unannounced inspections (relevant only for nuclear regulatory body):</p> <ol style="list-style-type: none"> 1. occurrence of an unusual event; 2. receipt of information on experiences of an economic entity or other persons operating in the sector of nuclear power, if such information creates a reasonable suspicion that an unusual event may occur in performance of the economic entity; 3. when inspection is carried out taking into account the operational timetable set by an economic entity but, in the light of the timetable, there is no possibility to inform the economic entity on the inspection within the time-limits specified in the Law on Public Administration for notifying economic entities on a planned inspection.
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41.	General	Reporting on Major Common Issues.1. Managing extraordinary circumstances impacting the safe operation of nuclear installations, p.7	The Report states that “VATESI has implemented several measures to ensure continuous oversight and the safety of nuclear installations during extraordinary circumstances, including the COVID-19 pandemic and potential extreme natural disasters.” Please provide examples of such regulatory requirements.	The report provides information on continuity of VATESI duties in case of pandemic situations and potential extreme natural disasters and provides list of corresponding measures. No specific regulatory requirements for licensees were issued concerning these aspects.
42.	Article 9	page 31 “...Article 16 of the Law on Nuclear Safety determines that full responsibility for the nuclear safety of a nuclear facility and for nuclear safety in carrying	For which categories of persons is it necessary to obtain the relevant licenses, permits and/or certificates?	As for the persons who can obtain licences and permits, they are defined in the law. In accordance with Paragraph 2 of the Article 23 of the Law on Nuclear Safety, licences and permits, that are established in the Law on Nuclear Safety, are issued only to legal entities. The Law on Nuclear Energy defines the „Legal entity“ as a legal entity or other organisation established in a Member State of the EU or a state of the European Economic Area or a subdivision thereof, carrying out economic and/or commercial activities in the Republic of Lithuania, in another Member State of the European Union, or in a State of the European Economic Area, in accordance with the procedure laid down by legislation. Certificates of approval for the transport of radioactive materials and certificates of approval for the design of radioactive materials, which are necessary for transport in cases specified in international agreements, shall be issued to the consignor (holder) for nuclear fuel cycle materials, nuclear and fissile materials specified in Annex 1 of the Nuclear Safety Law in specified quantities. Certificates of approval for radioactive material design may be obtained by individuals and legal entities seeking to approve the designs for nuclear fuel cycle materials, nuclear and fissile materials in the

		<p>out other activities with nuclear and/or nuclear fuel cycle and fissile materials shall solely fall on persons that are engaged in such activities and hold relevant licenses, permits and/or certificates .”</p>	<p>quantities specified in Annex 1 of the Nuclear Safety Law which also are necessary in cases specified in international agreements.</p> <p>Package design approval certificates may be obtained by designers and/or manufacturers of designs, if the country of origin of these designs is the Republic of Lithuania, seeking to approve packaging designs in cases specified in international agreements.</p> <p>Certificates recognizing the approval of the transport of radioactive materials and/or the approval of package design issued by the competent authorities of other countries are issued to holders of certificates issued by the competent authorities of other countries.</p> <p>When planning to carry out a specific activity, it is necessary to have a licence or permit. Paragraph 4 of the Article 22 of the Law on Nuclear Safety prohibits the performance of the activities referred to in Paragraph 1 and 2 of the Article 22 without an authorisation for these activities issued by VATESI. Paragraphs 1 and 2 of Article 22 of the Law on Nuclear Safety establishes types of licences and permits issued by VATESI:</p> <p>“1. The types of licences shall be as follows:</p> <ol style="list-style-type: none"> 1) for construction (to a builder (customer) of a nuclear installation (installations); 2) for operation of a nuclear installation (installations); 3) for construction (to a builder (customer) and operation of a nuclear installation (installations); 4) for decommissioning of a nuclear installation (installations); 5) for supervision of a closed radioactive waste repository (repositories); 6) for shipment of nuclear fuel cycle materials, and nuclear materials and fissile materials indicated in Annex 1 to this Law in established quantities; 7) for acquisition, possession and usage of specified nuclear materials and fissile materials in quantities established in Annex 1 to this Law. <p>2. The types of permits shall be as follows:</p> <ol style="list-style-type: none"> 1) for first delivery of nuclear fuel to the site of a nuclear power plant, a nuclear power plant unit, a research nuclear reactor for the first time;
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				<p>2) for delivery of nuclear and/or nuclear fuel cycle materials to the site of a nuclear installation, with the exception of a nuclear power plant unit and a research nuclear reactor, and/or for the first test while using nuclear and/or nuclear fuel cycle materials in such nuclear installations;</p> <p>3) for the first start-up of a nuclear power plant unit and a research nuclear reactor;</p> <p>4) for industrial operation of a nuclear installation;</p> <p>5) for start-up a nuclear reactor after its shut-down;</p> <p>6) for shipment (import, export and transit transportation) of radioactive waste generated during the nuclear fuel cycle;</p> <p>7) for shipment (import, export and transit transportation) of spent nuclear fuel.”</p>
43.	Article 7.2.2	page 18“After the examination of the application documents, the designated VATESI specialists shall prepare a review and evaluation report for each application document, which is necessary	Which employees may be involved in reviewing and assessing each document submitted to the application?	For each document responsible for review and assessment VATESI’s employee is assigned taking into account content of document and qualification of particular employee. Taking into account content of document further reviewers can be assigned for review and assessment as well if competence of them is needed. Detail process of assigning of VATESI’s employees for review and assessment is described in internal procedure.

		to support the VATESI decision on issuing an authorization”		
44.	Article 15	Processes implemented and steps taken to ensure that radiation exposures are kept as low as reasonably achievable for all operational and maintenance	<p>One of the criteria for separation of NPP premises by categories is the total volumetric activity (Bq/cm³).</p> <p>How is the total volumetric activity measurement organized? Which radioisotopes are considered when determining this parameter?</p>	During equipment dismantling, measurements are continuously performed at the site using mobile aerosol measurement devices such as the AirTrack-Mobile Alpha/Beta Monitor (BSI), iCAM™ Mobile Alpha Beta Particulate Monitor, and iSolo® Alpha/Beta Counting System (Mirion), which allow separate measurement of total alpha and beta nuclide activity in the air, compensating for radon and thoron decay products. If necessary, laboratory samples are taken for the measurement of gamma-emitting radionuclide activity using gamma spectrometry.

		activities, table 15.1, p.36		
45.	Article 8	Article 8 Regulatory Body	What motivational mechanisms are used to retain highly qualified personnel in the regulatory body?	The regulatory authority motivates employees by providing opportunities to improve their qualifications both in Lithuania and abroad, as well as by encouraging them to perform well financially and through other forms of recognition, for example, by providing additional days off. We also ensure excellent working conditions and possibilities to work remotely.
46.	Article 8	Article 8 Regulatory Body	What methods are used in the regulatory body to retain the knowledge of experienced and highly qualified specialists, as well as to transfer it to young specialists?	Experienced employees of the regulatory authority share their professional experience and expertise through internal training sessions and in the course of daily professional interactions.
47.	Article 8	Article 8 Regulatory Body	What activities are being carried out by the regulatory body to attract and retain young professionals?	Mentorship programmes and individual professional development plans are implemented for junior specialists. The Institution further provides opportunities to participate in internal and external training programmes, as well as in international projects, thereby promoting the continuous enhancement of professional qualifications. Due consideration is given to ensuring favorable working conditions and fostering a strong organisational culture, including the implementation of flexible work arrangements and the reinforcement of the Institution's standing as a professional and values-driven organisation.
48.	Article 7	Раздел 7(2)(iii), p. 20, p. 32	What regulatory requirements apply to licensee management systems? How does the regulatory body conduct audits of licensee management systems?	BSR-1.4.1-2016 "Management System" specify regulatory requirements for development, implementation and maintenance of an effective management system for the organizations operating nuclear facilities and require covering all activities and processes. VATESI carries out inspections of integrated management system at INPP. Inspections of integrated management system processes are planned, included in to VATESI annual plan and conducted in compliance with the Nuclear Safety Requirements BSR-1.1.3-2016 "Inspections Conducted by State Nuclear Power Safety Inspectorate" (see Article 7(2)(iii)). Also audits of

				integrated management system of INPP are conducted by the INPP personnel, who are qualified lead auditors/auditors (see Article 13. page 54).
49.	Article 15	p.34-38	How does Lithuania evaluate the effectiveness of the ALARA program during the ongoing decommissioning of Ignalina NPP, and are there any plans to update the program to address lessons learned from dismantling activities or new technologies?	<p>There are two main tools to evaluate the effectiveness of the ALARA programme.</p> <p>The first tool is the preparation of the ALARA analysis document and subsequent update of this document after completion of works. The ALARA analysis document shall be supplemented with information about the effectiveness of the measures applied, the exposure of workers during the work, and unforeseen circumstances that have affected the radiation safety of workers.</p> <p>This information shall be maintained and used for optimization of other radiation-hazardous works.</p> <p>Second important tool for evaluation of the effectiveness of the ALARA programme is the preparation of the decommissioning project report. All decommissioning activities are carried out according to projects developed for separate decommissioning activities and after the safety is assessed and justified. After the decommissioning project is implemented, a project implementation report shall be prepared, which shall also provide information on individual and collective doses and this information shall be compared with the dose estimation provided in the project. This assessment provides additional information on the effectiveness of the ALARA programme, since doses are estimated taking into account the ALARA measures. In case if occupational doses received would be higher than estimated in the decommissioning project, additional assessment shall be carried out to identify possible causes, which shall be addressed as lessons learned when developing other decommissioning projects.</p>

50.	Article 15	p.34-38	<p>Are the training, supervision, and dose monitoring measures for contractors fully aligned with those for permanent INPP personnel, and how is compliance ensured during complex decommissioning tasks?</p>	<p>Yes, the training, supervision and occupational dose monitoring measures applied to contractors working at the Ignalina Nuclear Power Plant are fully aligned with those applied to permanent INPP personnel. Contractors are trained under the same approved programmes in radiation protection, physical security and safety culture as INPP staff. Training, knowledge assessment and confirmation of competence are carried out in accordance with established procedures and are documented within the integrated management system. Where necessary, contractors are informed about relevant INPP operating experience and applicable experience from other nuclear facilities and international organisations, as relevant to their work and safety.</p> <p>INPP radiation protection regulations in force and individual dose control requirements are mandatory for contractors.</p> <p>For complex INPP decommissioning activities, a work plan or work implementation programme is prepared and approved by the regulator (VATESI). For premises where workplace radiological conditions meet the criteria established for Category I zones, a permit to work under radiologically hazardous conditions is issued together with the work order.</p>
51.	Article 15	p.34-38	<p>How are the results of ALARA evaluations systematically tracked, documented, and integrated into a formal continuous improvement process to ensure lessons learned from high-dose tasks are applied consistently across all activities?</p>	<p>ALARA results are managed in a structured way: a next-year list of high-dose tasks is maintained and reviewed annually. For each high-dose task, an ALARA analysis is prepared in advance to define optimisation measures. After the task, the effectiveness of ALARA measures is evaluated and the conclusions are fed back into planning and radiation protection arrangements for future work. This ensures lessons learned from high-dose jobs are applied consistently, not case by case.</p> <p>For radiologically hazardous work, the ALARA group issues a document - an ALARA analysis -in which the work is analysed in stages. Several work execution options are assessed, and the optimal one is selected.</p> <p>Upon completion of the work, the ALARA group prepares a document - ALARA analysis feedback - which records deficiencies (if any), develops measures to improve work performance, and recommends the application of positive experience when performing similar work.</p>

				The analysis includes a comparison of the actual and planned individual and collective radiation doses received by workers.
52.	General	Page 12	In responding to Major Common Issue (MCI.8) - Strengthening emergency preparedness and response arrangements and fostering cross border collaboration. Summary section reports that the Baltic States Plan to sign a Memorandum of Understanding (MoU) on cooperation in strengthening civil protection in the region in 2025 to strengthen regional co-operation during cross-border evacuations. Can you provide an update on the status of this MoU and the states involved in the work?	The Baltic States (Lithuania, Latvia and Estonia) have signed the memorandum of Understanding on co-operation in the strengthening of regional civil protection on 13 June 2025. On 28 October 2025 the Republic of Poland acceded the memorandum. The main focus of this memorandum is the cross-border evacuation.
53.	Article 8	N/A	Article 8 - Regulatory Body. Lithuania does not have any operating NPP, the two NPP located at Ignalina have moved from operations into decommissioning. Has there been any change in regulatory capability requirements during this transition period and any challenges retaining suitable qualified and experienced (SQEP) staff?	The number of staff does not significantly change in Regulatory Body after final shutdown of Ignalina NPP. There is relatively small turnover of staff in VATESI, which has positive impact on retaining qualification and experience for regulatory activities during decommissioning of Ignalina NPP.