

**INTEGRATED
REGULATORY
REVIEW SERVICE (IRRS)
MISSION
TO
THE REPUBLIC OF LITHUANIA**

Vilnius, Lithuania

18 to 29 May 2026

DEPARTMENT OF NUCLEAR SAFETY AND SECURITY



Integrated
Regulatory
Review Service
IRRS



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**REPORT OF THE
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Mission dates:	18 to 29 May 2026
Regulatory body visited:	State Nuclear Power Safety Inspectorate (VATESI) and Radiation Protection Centre (RSC)
Location:	Vilnius, Lithuania
Regulated facilities, activities, and exposure situations in the mission scope:	Radiation Sources in Industrial and Medical Facilities, Decommissioning facilities, Radioactive Waste Management facilities, Transport, Emergency Preparedness and Response, Medical Exposure, Occupational Exposure, Public Exposure, and Interfaces with Nuclear Security.
Organized by:	IAEA

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The number of recommendations, suggestions and good practices is in no way a measure of the status of the national infrastructure for nuclear and radiation safety. Comparisons of such numbers between IRRS reports from different countries should not be attempted.

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EXECUTIVE SUMMARY

At the request of the Government of the Republic of Lithuania, an international team of senior nuclear safety and radiation safety experts met with representatives of the State Nuclear Power Safety Inspectorate (VATESI) and the Radiation Protection Centre (RSC) from 18-29 May 2026 to conduct an Integrated Regulatory Review Service (IRRS) mission. The purpose of the IRRS mission was to perform a peer review of Lithuania's national regulatory framework for nuclear and radiation safety. The mission took place at the VATESI and RSC headquarters in Vilnius. Additional meetings were organized with the Office of the Government and the Ministry of Health.

The IRRS team consisted of 12 senior regulatory experts from 12 IAEA Member States, 1 observer, and 2 IAEA staff members. The IRRS team carried out the review in the following areas: responsibilities and functions of the government; the global nuclear safety regime; responsibilities and functions of each regulatory body; the management system of the regulatory body; the activities of the regulatory body including the relevant authorization, review and assessment, inspection and enforcement processes; development and content of regulations and guides; emergency preparedness and response; radiation sources; radioactive waste management facilities; transport of radioactive material; decommissioning; occupational, medical, and public exposure; and interfaces with nuclear security. In addition, a policy issue was discussed: regulatory oversight of distribution of duties and responsibilities between a licence holder and contractors in decommissioning and radioactive waste management.

The IRRS team members observed regulatory activities of both VATESI and RSC, including observation of inspections at: State Enterprise Ignalina NPP; UAB InMedica (a private clinic) radiology department; and UAB Polimaster Europe (a calibration facility).

In preparation for the IRRS mission, Lithuania conducted a self-assessment and prepared a preliminary action plan to address weaknesses that were identified. The results of the self-assessment and supporting documentation were provided to the team as advance reference material for the mission. Throughout the mission, all parties cooperated fully, openly, and transparently with the IRRS review team on regulatory, technical, and policy issues. The IRRS team observed that all Lithuanian counterparts were committed to ensuring that their regulatory functions provide effective oversight over the diverse range of facilities and activities in Lithuania.

The IRRS team did not identify significant challenges for the regulatory system in Lithuania and noted that this is likely due to the varied mechanisms used by both VATESI and RSC to continually improve their already mature and robust regulatory activities.

The IRRS team identified two good practices and made recommendations and suggestions that indicate where improvements are necessary or desirable to continue enhancing the effectiveness of regulatory functions in line with IAEA safety standards.

The good practices identified by the IRRS review team include:

1. The Government, through the Ministry of the Economy and Innovation, has established a programme for the periodic assessment of supervisory authorities, including VATESI and RSC, to ensure efficient and effective regulatory oversight across all of Lithuania.
2. RSC has undertaken several actions to make information and data readily available to the public through a comprehensive national strategic public information campaign and using technology to make data more accessible.

The IRRS team did identify certain areas where the regulatory system is not in line with the IAEA Safety Standards, and that implementation of the recommendations, or consideration of the suggestions, including for communication and cooperation between VATESI and RSC would enhance the overall performance of the regulatory system.

The IRRS review team findings are summarized in Appendix I.

An IAEA press release was issued at the end of the IRRS Mission.

I. INTRODUCTION

At the request of the Government of the Republic of Lithuania (Lithuania), an international team of senior safety experts met representatives of the regulatory bodies, the State Nuclear Power Safety Inspectorate (VATESI) and the Radiation Protection Centre (RSC), of Lithuania to conduct an Integrated Regulatory Review Service (IRRS) mission from 18-29 May 2026. The purpose of this peer review was to review Lithuania's governmental, legal and regulatory framework for nuclear and radiation safety. The review mission was formally requested by the Government of Lithuania in February 2024. A preparatory mission was conducted 21-22 October 2025 at VATESI headquarters in Vilnius to discuss the purpose, objectives, and detailed preparations of the review in connection with regulated facilities and activities in Lithuania and their related safety aspects and to agree the scope of the IRRS mission.

The IRRS team consisted of 12 senior regulatory experts from 12 IAEA Member States, 1 observer, and 2 IAEA staff members. The IRRS team carried out the review in the following areas: responsibilities and functions of the government; the global nuclear safety regime; responsibilities and functions of each regulatory body; the management system of each regulatory body; the activities of each regulatory body including the relevant authorization, review and assessment, inspection and enforcement processes; development and content of regulations and guides; emergency preparedness and response; radiation sources; radioactive waste management facilities; transport of radioactive material; decommissioning; occupational exposure; control of medical exposure and public exposure control; and interfaces with nuclear security. In addition, a policy issue was discussed: Regulatory oversight of distribution of duties and responsibilities between a license holder and contractors in decommissioning and radioactive waste management.

Both regulatory bodies, VATESI and RSC, coordinated the conduct of a self-assessment in preparation for the mission and prepared a preliminary Action Plan. The results of the self-assessment and supporting documentation were provided to the IRRS team as advance reference material for the mission. During the mission, the IRRS team performed a systematic review of all topics within the agreed scope through review of the advance reference material, conduct of interviews with management and staff, and also directly observed the performance of regulatory activities, of both VATESI and RSC, at relevant regulated facilities. Meetings with the Office of the Government and the Ministry of Health were also organized.

All through the mission the IRRS team received excellent support and cooperation from both VATESI and RSC management and counterparts.

II. OBJECTIVE AND SCOPE

The purpose of this IRRS mission was to review Lithuania's radiation and nuclear safety governmental, legal and regulatory framework and activities against the relevant IAEA safety standards, to report on effectiveness of the regulatory system, and to exchange information and experience in the areas covered by the IRRS. The agreed scope of this IRRS review included all facilities and activities regulated in Lithuania. It is expected this IRRS mission will facilitate regulatory improvements in Lithuania and other Member States, utilising the knowledge gained and experiences shared between VATESI, RSC, and IRRS reviewers and the evaluation of the Lithuanian regulatory framework for nuclear safety, including its good practices.

The key objectives of this mission were to enhance the national legal, governmental and regulatory framework for nuclear and radiation safety, the regulatory aspects of emergency preparedness and response, and evaluate the interfaces between safety and security through:

- providing an opportunity for continuous improvement of both VATESI and RSC through an integrated process of self-assessment and review;
- providing the host country (regulatory bodies and governmental authorities) with a review of its regulatory technical and policy issues;
- providing the host country (regulatory bodies and governmental authorities) with an objective evaluation of its regulatory infrastructure with respect to IAEA safety standards;
- promoting the sharing of experience and exchange of lessons learned among senior regulators;
- providing key staff in Lithuania with an opportunity to discuss regulatory practices with IRRS team members who have experience of other regulatory practices in the same field;
- providing the Lithuania with recommendations and suggestions for improvement;
- providing other states with information regarding good practices identified in the course of the review;
- providing reviewers from Member States and IAEA staff with opportunities to observe different approaches to regulatory oversight and to broaden knowledge in their own field (mutual learning process);
- contributing to the harmonization of regulatory approaches among states;
- promoting the application of IAEA safety requirements; and
- providing feedback on the use and application IAEA Safety Standards.

III. BASIS FOR THE REVIEW

A) PREPARATORY WORK AND IRRS TEAM

At the request of the Government of Lithuania, a preparatory meeting for the IRRS mission was conducted from 21 to 22 October 2025. The preparatory meeting was carried out by the appointed IRRS Team Leader, Mr Mika Markkanen (Finland), and the IAEA Coordinator, Ms Margaret Cervera.

The IRRS mission preparatory team had discussions regarding regulatory programmes and policy issues with the senior management of both VATESI and RSC represented by Mr Michail Demčenko, Head of VATESI, and Mr Ernestas Jasaitis, Director of RSC, and other senior management and staff of the respective organizations. It was agreed that the regulatory framework with respect to the following facilities and activities would be reviewed during the IRRS mission in terms of compliance with the applicable IAEA safety requirements and compatibility with the respective safety guides:

- Radiation sources in industrial and medical facilities,
- Decommissioning facilities,
- Radioactive waste management facilities,
- Transport,
- Emergency preparedness and response,
- Medical exposure,
- Occupational exposure,
- Public exposure,
- Safety-Security interface.

Representatives from both VATESI and RSC delivered presentations on the national context (including the relevant authority of each organization) and the self-assessment results to date.

IAEA staff presented the IRRS principles, process and methodology. This was followed by a discussion on the work plan for the implementation of the IRRS in Lithuania in May 2026.

Logistics including meeting and workplaces, counterparts and Liaison Officer (LO) identification, proposed site visits, lodging and transportation arrangements were also addressed.

The VATESI LO for the IRRS mission was confirmed as Mr Ovidijus Šeštokas and the LO for RSC was confirmed as Ms Rugilė Aganaukaitė.

The LOs provided IAEA with the advance reference material (ARM) for the review in March 2026. In preparation for the mission, the IAEA review team members reviewed the ARM and provided their initial impressions to the IAEA Coordinator prior to the commencement of the IRRS mission.

B) REFERENCES FOR THE REVIEW

The relevant IAEA Safety Standards and the Code of Conduct on the Safety and Security of Radioactive Sources were used as review criteria. The complete list of IAEA publications used as the references for this mission is provided in Appendix VII.

C) CONDUCT OF THE REVIEW

The initial IRRS team meeting took place on Sunday, 17 May 2026 in Vilnius, directed by the IRRS team leader and the IRRS IAEA Coordinator. Discussions encompassed the general overview, the scope and specific issues of the mission, clarified the bases for the review and the background, context and objectives of the IRRS programme. The understanding of the methodology for review was reinforced. The agenda for the mission was presented to the team. As required by the IRRS Guidelines, the reviewers presented their initial impressions of the ARM and highlighted potential issues to be addressed during the mission.

The host Liaison Officers were present at the initial IRRS team meeting, in accordance with the IRRS Guidelines, and presented logistical arrangements planned for the mission.

The IRRS entrance meeting was held on Monday, 18 May 2026, with the participation of senior management and staff of both VATESI and RSC. Additional invited guests at the meeting included: Mr Ramūnas Dilba, Chief Adviser to the President of the Republic of Lithuania, Head of the Environment and Infrastructure Group; Ms Šarūnė Navickaitė-Dulaitienė, Senior Advisor, Economic Policy Group, Office of the Government of the Republic of Lithuania; and, Ms Kornelija Bajelytė, Advisor to the Health Safety Division, Ministry of Health of the Republic of Lithuania. Opening remarks, and presentations of the national context, were made by Mr Michail Demčenko, Head of VATESI, and Mr Ernestas Jasaitis, Director of RSC. Mr Mika Markkanen, IRRS Team Leader, provided remarks on behalf of the IRRS Team and provided an overview of the IRRS process, preparations, and plan for the mission.

During the IRRS mission, a review was conducted for all review areas within the agreed scope with the objective of providing Lithuania and both VATESI and RSC with recommendations and suggestions for improvement and where appropriate, identifying good practice. The review was conducted through meetings, interviews and discussions, visits to facilities and direct observations regarding the national legal, governmental and regulatory framework for safety.

In addition to the review, discussions were held to share views, experience and lessons learned between VATESI and RSC and members of the IRRS team on the selected policy issue: *regulatory oversight of distribution of duties and responsibilities between a license holder and contractors in decommissioning and radioactive waste management*.

The IRRS team performed its review according to the mission programme given in Appendix IV.

The IRRS exit meeting was held on Friday, 29 May 2026. The opening remarks at the exit meeting were presented by Mr Michail Demčenko, Head of VATESI, and Mr Ernestas Jasaitis, Director of RSC, and were followed by the presentation of the results of the mission by the IRRS Team Leader Mr Mika Markkanen. Closing remarks were made by Ms Hildegard Vandenhove Director, IAEA Division of Radiation, Transport and Waste Safety.

An IAEA press release was issued at the end of the mission.

1. RESPONSIBILITIES AND FUNCTIONS OF THE GOVERNMENT

1.1. NATIONAL POLICY AND STRATEGY FOR SAFETY

The Republic of Lithuania has put in place a robust governmental, legal and regulatory safety framework that clearly defines and distributes responsibilities for nuclear and radiation safety. Its policy and strategy concerning nuclear safety and radiation protection are not laid out in a single document, however, they are laid down in primary legislation, which comprises the following legal acts:

- *Republic of Lithuania Law on Nuclear Energy (Law on Nuclear Energy)*
- *Republic of Lithuania Law on Nuclear Safety (Law on Nuclear Safety)*
- *Republic of Lithuania Law on Radiation Protection (Law on Radiation Protection)*
- *Republic of Lithuania Law on the Management of Radioactive Waste (Law on Radioactive Waste Management)*

As a member of the European Union, the Republic of Lithuania implemented all Euratom Directives and binding international agreements relating to nuclear and radiation safety into Lithuanian legislation. The basic provisions of a graded approach are set in the Law on Nuclear Safety and the Law on Radiation Protection. Additionally, the graded approach is achieved through underlying regulations and regulatory practice which seek to ensure that activities entailing greater risks are examined more thoroughly and inspected more frequently in accordance with more extensive rules than activities that involve lesser risks. The regulatory bodies allocate resources in support of authorization and inspection according to the safety significance of a facility or activity.

The Lithuanian laws require that all nuclear safety, radiation safety, physical security and related activities be based on the international treaties to which Lithuania is party (among others: Convention on Nuclear Safety, the Joint Convention on the Safety of Spent Fuel Management and on the Safety of Radioactive Waste Management, the Code of Conduct on the Safety and Security of Radioactive Sources and the International Labour Organization Convention No. 115 concerning the Protection of Workers against Ionising Radiation). Although the IAEA Safety Standards and Nuclear Security Series are not legally binding *per se*, they are routinely incorporated into Lithuanian legislation either verbatim or by reference, ensuring alignment with international standards.

The IRRS team observed that the radiation protection and nuclear safety policy in Lithuania has undergone considerable changes in the past. After the period of having an operating nuclear power plant, there was a transition to shutdown, decommissioning, and radioactive waste management. In parallel, political discussions arose again (noted in the 2016 IRRS mission to Lithuania) about pursuing “new build”. If Lithuania embarks on a “new build” programme, the national strategy would have to be reviewed and adapted accordingly to meet the evolving future needs.

1.2. ESTABLISHMENT OF A FRAMEWORK FOR SAFETY

The four main acts determine, *inter alia*, functions and responsibilities of governmental bodies, policy makers, state institutions and regulatory bodies. Safety principles, regulations and oversight of the activities in the field of nuclear and radiation safety are also addressed.

Strategic direction is set by the Parliament (Seimas), which decides on overall nuclear energy policy and enacts legislation. The Government (Cabinet) transforms that strategy into concrete programmes, drafts the necessary laws, and oversees the implementation of the national safety policy. The Ministry of Energy is

responsible for developing and coordinating the state nuclear energy policy and ensuring its alignment with the broader energy strategy. VATESI is the regulator for nuclear activities. Its tasks include issuing nuclear safety, radiation safety in the area of nuclear energy and physical security requirements, assessing the safety of nuclear facilities and other regulatory activities in this area.

The Ministry of Health formulates the state radiation protection policy (except for activities within the nuclear-energy sector). RSC is the regulator for all ionizing radiation activities that fall outside the nuclear energy domain. Its statutory basis is the Law on Radiation Protection and the implementing other legal acts.

Other bodies responsible for the non-regulatory aspects of nuclear and radiation safety include the Ministry of Environment, the Ministry of the Interior, the Environmental Protection Agency, the State Food and Veterinary Service, the State Border Guard Service, the Customs Department, and the Fire and Rescue Department.

The legal framework for safety applies to all stages of the lifetime of a nuclear or radiation facility or activity.

The IRRS team was informed that both regulatory authorities contribute to the development of national policies and strategies by providing technical and professional advice, and by preparing draft inputs within their respective mandates. The decision on policy issues rests exclusively with the government.

VATESI and RSC are participating in the national scoreboard assessment system, developed by the Ministry of the Economy and Innovation, which evaluates how supervisory authorities implement business supervision practices, transparency measures and modern operational methods. The mechanism allows for periodic measurement of institutional progress by assessing indicators related to supervision quality, risk-based oversight, administrative burden reduction and the use of modern regulatory tools, while also identifying systemic weaknesses and areas requiring improvement. In the 2024 scoreboard both VATESI and RSC achieved high scores for progress and performance.

RECOMMENDATIONS, SUGGESTIONS AND GOOD PRACTICES

Observation: The Government, through the Ministry of the Economy and Innovation of the Republic of Lithuania, has developed a national scoreboard assessment system that evaluates how supervisory authorities implement business supervision practices, transparency measures and modern operational methods. The scoreboard allows for periodic measurement of institutional progress by assessing indicators related to supervision quality, risk-based oversight, administrative burden reduction and the use of modern regulatory tools, while also identifying systemic weaknesses and areas requiring improvement. While this programme is not specific to nuclear and radiation safety it supports the continued efficient and effective functioning of both VATESI and RSC within Lithuania.

(1)

BASIS: SF-1 Requirement 2, para. 3.8 states: “...*The government is responsible for the adoption within its national legal system of such legislation, regulations, and other standards and measures as may be necessary to fulfil all its national responsibilities and international obligations effectively, and for the establishment of an independent regulatory body...*”

GPI

Good Practice: The Government, through the Ministry of the Economy and Innovation of the Republic of Lithuania, has established a programme for the periodic assessment of supervisory authorities, including VATESI and RSC, to ensure efficient and effective regulatory oversight across all of Lithuania.

1.3. ESTABLISHMENT OF A REGULATORY BODY AND ITS INDEPENDENCE

The responsibilities of VATESI are defined in the primary legislation identified in chapter 1.1. Its independence is accompanied by a clear description of the responsibilities and the areas of competencies of stakeholders, implementing entities, and other state institutions involved. The Head of VATESI is appointed by and exclusively reports to the President and the Government of the Republic of Lithuania.

According to the Law on Nuclear Energy VATESI has the right to provide services to interested persons on the basis of a fee, however the IRRS team was informed that this has not occurred.

The Law on Radiation Protection establishes the legal basis for regulatory activities in radiation protection, including the relevant objectives, principles and values, and provides for the independence of RSC in performing its regulatory functions. In accordance with this Law, RSC is the regulatory authority responsible for regulatory oversight of radiation facilities and activities, except those activities involving sources of ionizing radiation in the nuclear energy field. RSC, in addition to providing regulatory oversight for radiation facilities and activities in Lithuania, also provides technical services. In order to preserve the effective independence of its regulatory authority RSC has functionally separated the provision of services from the performance of its regulatory authority.

RSC reports to the Ministry of Health. Its functions as a regulatory body are described in the Law on Radiation Protection, Statute of the Radiation Protection Centre approved by Order of the Ministry of Health. The allocation of financial resources for RSC is provided on an annual basis by the Ministry of Health, based on the annual plan prepared by RSC.

The IRRS team observed that RSC is financed by the Ministry of Health and at the same time, the Ministry, in addition to other tasks, also finances undertakings (e.g. hospitals) of the regulatory authority.

The IRRS team has been informed that the financing of RSC (through state budget) and other entities (mainly through National Health Insurance Fund) are strictly separated. Furthermore, the only position in

the ministry where both responsibilities converge is the Minister of Health. The IRRS team were satisfied, that this arrangement currently does not constitute a conflict of interest.

1.4. RESPONSIBILITY FOR SAFETY AND COMPLIANCE WITH REGULATIONS

The Law on Nuclear Safety assigns the primary responsibility for the nuclear safety of a nuclear installation and for nuclear safety when carrying out other activities involving nuclear fuel cycle materials and/or fissile materials to persons that are conducting such activities and holding the relevant licenses, permits and/or certificates.

Similarly, the Law on Radiation Protection assigns the prime responsibility for radiation safety to the authorized party.

In both cases this responsibility cannot be delegated to another person.

1.5. COORDINATION OF AUTHORITIES WITH RESPONSIBILITIES FOR SAFETY WITHIN THE REGULATORY FRAMEWORK

VATESI is the regulatory state body responsible for nuclear power safety in Lithuania. RSC is the regulatory body for all activities in the field of radiation protection excluding the nuclear power sector. Other authorities contribute within their competences: the State Territorial Planning and Construction Inspectorate (Ministry of Environment) supervises civil construction of nuclear buildings, while the Fire and Rescue Department (Ministry of the Interior) oversees fire safety, emergency preparedness, civil protection and fire-extinguishing measures. RSC collaborates with VATESI on environmental monitoring.

The detailed competences of these bodies are set out in the four sectoral laws listed in 1.1. Draft legal acts and design other documents listed in the acts must be circulated to all relevant ministries and agencies such as the Hydrometeorological Service, Ministry of Health, Transport Safety Administration, Geological Survey and the Fire and Rescue Department, for comments before approval. Coordination procedures are codified in Government Orders, and VATESI has formal cooperation agreements with the Environmental Protection Agency and the State Territorial Planning and Construction Inspectorate.

The responsibilities of VATESI and RSC are set out in Lithuanian legislation, and there are some legislative requirements for VATESI and RSC to coordinate for examples such as: the verification of the control of discharges of radionuclides into the environment and materials and waste for free release from nuclear facilities, and on information exchange during a nuclear or radiological accident. However, several functional interfaces demonstrate a practical need for cooperation to ensure consistent approaches to areas within their respective authorities. In this respect, VATESI and RSC have entered into formalized agreements for some of these interfaces.

Similarly, the IRRS team observed that RSC cooperates in practice with relevant national authorities involved in the security of radioactive sources, including the Police Department, the State Security Department, the State Border Guard Service, the Customs Department and emergency response organizations. This cooperation supports personnel reliability checks, border and customs radiation control, notification of orphan sources or contaminated objects, and response to incidents involving radioactive sources. The IRRS team was informed that there is further cooperation between RSC and other institutions. The Government Resolution on Rules for the Management of Orphan Sources, Orphan Nuclear Fuel Cycle Materials, Orphaned Nuclear and Fissile Materials, and Objects Contaminated with Radioactive Substances establishes the actions required of relevant national authorities (including VATESI and RSC), the radioactive waste manager, and other legal or natural persons upon the discovery, identification, detention, melting, or suspicion of the discovery of orphan sources, contaminated materials, consumer products

containing radionuclides, and upon the detection in or on the body of a person of radiation exceeding background levels. Institutions required to participate in personnel checks are identified in the Law on Radiation Protection. According to Lithuanian Hygiene Norm (HN) 73:2018 “Basic Radiation Protection Standards”, the licensee is required to provide their emergency management plan to the police commissariat, the fire and rescue board, and the nearest emergency medical service station.

RECOMMENDATIONS, SUGGESTIONS AND GOOD PRACTICES	
Observation: There are cooperation and coordination arrangements between VATESI and RSC for specific topics such as the transport of radioactive materials, the verification of the control of discharges of radionuclides into the environment and materials and waste cleared from nuclear facilities, on the discovery, detection or detention of orphan sources, and on information exchange during a nuclear or radiological accident. VATESI and RSC do not have established formal cooperation and coordination arrangements for topics such as the usage of radioactive sources, that could be carried out both outside and inside nuclear facilities.	
(1)	BASIS: GSR Part 1 (Rev. 1) Requirement 7 states that <i>“Where several authorities have responsibilities for safety within the regulatory framework for safety, the government shall make provision for the effective coordination of their regulatory functions, to avoid any omissions or undue duplication and to avoid conflicting requirements being placed on authorized parties”.</i>
(2)	BASIS: GSR Part 1 (Rev. 1) Requirement 7, para 2.18 states that <i>“... coordination assists in achieving consistency and in enabling authorities to benefit from each other’s experience”.</i>
(3)	BASIS: GSG 12, para 2.10 states that <i>“The various regulatory authorities should formally establish a system of liaison and working arrangements and procedures so as to ensure an appropriate degree of coordination and cooperation.”</i>
(4)	BASIS: COC, para 20 (m) states that: <i>“Every state should ensure the regulatory body established by its legislation has the authority to liaise and co-ordinate with the other governmental bodies and with relevant non-governmental bodies in all areas relating to the safety and security of radioactive sources.”</i>
S1	Suggestion: VATESI and RSC should consider examining the need for coordination and cooperation arrangements in, for example, the areas of usage of radioactive sources, that could be carried out both outside and inside nuclear facilities.

1.6 SYSTEM FOR PROTECTIVE ACTIONS TO REDUCE EXISTING OR UNREGULATED RADIATION RISKS

The system for protective actions to reduce existing or unregulated radiation risks in Lithuania is founded on the Law on Radiation Protection. Under Article 8 (1) RSC is mandated to organise and exercise national regulation and radiation protection supervision of persons and activities that are not subject to authorization but may expose the population or the environment, or may lead to the discovery of orphan radioactive sources or radionuclide-contaminated objects. The Law on Radiation Protection also sets reference levels for radon in dwellings and workplaces, for natural gamma dose rates in premises, and for activity-index

values of building materials; these levels are incorporated into national legislation and are the basis for protective measures.

RSC implements search campaigns for orphan sources - targeting legacy military, factories, waste facilities and other sites. RSC also implements a comprehensive indoor radon monitoring programme covering kindergartens, schools, dwellings and workplaces. Where practices involve naturally-occurring radioactive material (NORM) that could give rise to exposures, RSC identifies the issue, investigates it and, where necessary, integrates it into a Management Programme.

When an existing exposure situation is identified (e.g., radon-rich areas, residues from past activities, or post-emergency contaminated zones), RSC evaluates the dose levels, declares the existing exposure situation if public doses reach the reference levels established in the regulations, and coordinates the development of a Management Programme (approved by the municipal mayor or the Government). The programme defines dose objectives, protective and corrective actions, monitoring procedures, public information and consultation pathways, and, for contaminated territories, zoning, access control and living restriction measures.

Although there are no contaminated areas from past nuclear activities or accidents in Lithuania within the jurisdiction of VATESI (remediation and release from oversight control of site and buildings of Ignalina NPP (INPP) are part of decommissioning activities), the IRRS team has been informed that there are similar arrangements in the radiation protection regime of nuclear installations in place to prevent radioactive sources from becoming lost/orphaned.

1.7. PROVISIONS FOR THE DECOMMISSIONING OF FACILITIES AND THE MANAGEMENT OF RADIOACTIVE WASTE AND OF SPENT FUEL

Lithuania's national policy and strategy for the decommissioning of nuclear facilities and the management of radioactive waste and spent fuel are codified in the series of laws listed in 1.1 which together assign responsibilities to VATESI, the Ministry of Environment, the Ministry of Health, the Ministry of Energy, the Ministry of Social Security and Labour, and the designated radioactive waste manager.

Decommissioning must follow the specific law for power plant units or a government decree for other reactors and nuclear facilities and may commence only after licenses are issued by VATESI, whose head approves the safety requirements. The decommissioning strategy of Ignalina NPP units - selected during initial decommissioning planning stage - is obliged to give priority to immediate dismantling; any alternative must be justified and aligned with the National Energy Strategy and the Radioactive Waste Management Programme adopted by the Seimas or the Government. The operator must draft a final decommissioning plan at least two years before shutdown.

Radioactive waste management is governed by the Law on Radioactive Waste Management, which defines (including spent fuel) and sets seven principles aimed at protecting people, society and the environment, minimizing waste generation, ensuring safety through a graded approach, and guaranteeing disposal within Lithuanian territory or, where allowed, abroad. The waste producer bears all costs from generation to final disposal, while the State finances management of orphan sources and illegal waste. Funding comes primarily from the Ignalina Programme (EU) and the International Ignalina Decommissioning Support Fund, supplemented by the State budget a dedicated Reserve Fund account for the deep-geological repository project. Research and development, especially site-selection studies for the repository, are supported by government programmes, with the repository expected to be operational by the late 2060s.

The IRRS team was informed that financial provisions for INPP decommissioning, including all waste facilities onsite (solid radioactive waste management and storage facility, interim spent nuclear fuel storage facility) and future deep geological repository (DGR), are reflected in the Law on the Decommissioning of Ignalina NPP and in the Development Programme for Decommissioning of Nuclear Power Facilities and Radioactive Waste Management for 2021-2030 which was last updated in 2021.

There is a dependence on European Union financial assistance and supervision of this funding mechanism is performed by the Lithuanian government (Ministry of Energy), supported and administrated by a Central Project Management Agency and European Bank for Reconstruction and Development (EBRD).

At this stage, uncertainties remain for this funding, especially for long-term waste management and DGR. Thus, consideration will have to be made to ensure the long-term availability of financial resources for the INPP decommissioning project, including waste management, taking into consideration the very long timeframe for implementation of the project.

The IRRS team was informed that medium-term plans and fallback options also exist should third-party funding no longer be available at the current level in the future. Nevertheless, the importance of external support was emphasised, as was the need for its continued existence.

1.8. COMPETENCE FOR SAFETY

The Law on Nuclear Energy mandates that VATESI employ qualified staff with the necessary experience and specialised knowledge, and that it continuously develops these competences to assess the safety of nuclear installations and ionizing radiation sources within nuclear installations against legal and technical standards. It further establishes the basis for international cooperation, enabling bilateral and multilateral information exchange, training assistance, and regular meetings with neighbouring states and international organisations. VATESI's internal regulations also govern criteria for staff qualifications. Similar requirements for the provision and maintenance of competencies in radiation protection are stipulated in the Law on Radiation Protection as well as in the Minister of Health Order No. V-1001 On the Approval of the Description of the Procedure for Training and Instruction in the Physical Protection of Radiation and Radioactive Sources", that apply to RSC staff.

According to the Law on Nuclear Energy, the Ministry of Education and Science shall organise development and introduction of education and science programmes as well as curricula and other measures to train nuclear power specialists, including the specialists with functions pertaining to safety of a nuclear installation, inter alia, with the aim of maintaining and increasing the competence and knowledge in the field of nuclear safety.

VATESI license holders must ensure a strong safety culture and staff competence, as detailed in the relevant Nuclear Safety Requirements (BSR) BSR-1.4.1-2016 "Management system" and BSR-1.4.3-2017 "Human resources of organisations carrying out licensed activities in the sphere of nuclear power".

The RSC supervises compliance with requirements for the compulsory radiation protection training and instruction at a national level. According to The Radiation Protection and Physical Protection of Radioactive Sources Training and Instruction Procedure, approved by the Minister of Health, RSC coordinates the curricula of institutions providing training in radiation protection; carries out supervision of institutions providing training in radiation protection and persons authorised to teach radiation protection; organizes meetings of the Attestation Commission and issues certificates to teach radiation protection, etc.

The Law on Radiation Protection and HN 73:2018 "Basic Radiation Protection Standards" impose a mandatory duty on both the regulatory authority and all authorized parties to maintain a sufficient number of suitably qualified and experienced staff. Operators must demonstrate that their workforce possesses the

required qualifications and has completed specific radiation protection training before commencing work with new methods or sources.

For RSC staff competence for safety is ensured by compulsory continuous professional development with annual training plans prepared each year. Quality assurance programmes must embed qualification improvement, and experts, certified trainers, and dosimetry services must demonstrate qualification updates every five years.

IAEA-provided technical training projects further support all actors involved in nuclear safety and radiation protection.

1.9. PROVISION OF TECHNICAL SERVICES

Technical services are provided in Lithuania by both public and private organizations. There is no dedicated external Technical Support Organization, the safety-related technical services in Lithuania are defined by several national statutes and international standards. Personal and workplace dosimetry, environmental monitoring, and the metrological acceptance (calibration) of equipment are available in Lithuania and are mandated by the Law on Radiation Protection and the Law on Environmental Monitoring, as appropriate. Authorization of technical services is carried out by competent authorities appointed by the Government, principally the VATESI and RSC. Under the Law on Radiation Protection, dosimetry services must be recognised by VATESI (in case of nuclear facility dosimetry service) and RSC (all other dosimetry services outside the nuclear facility). The dosimetry services shall have a certificate of recognition. The laboratories performing measurements and analysis of the pollutants discharged to the environment by sources of pollution and pollutants in elements of the environment (air, water, soil) must hold authorisations (recognition) for performance of these measurements and analysis or must be accredited in accordance with the procedure laid down by legal acts.

Approximately 6,000 radiation workers in Lithuania are monitored for occupational exposure to radiation. There are currently three accredited external dosimetry providers and all three meet ISO/IEC 17025:2017 requirements and are recognised by the relevant regulatory body (VATESI or RSC). All dosimetry service providers participate in international intercomparisons at least once every five years.

1.10. SUMMARY

Lithuania has built a comprehensive nuclear and radiation safety system that is anchored in four primary statutes - the Law on Nuclear Energy, Law on Nuclear Safety, Law on Radiation Protection and Law on Radioactive Waste Management - and in the full set of Euratom directives and international conventions to which the country is party.

The Government of Lithuania is party to all relevant conventions and treaties relevant to radiation and nuclear safety and has also made political commitment to the non-legally binding Code of Conduct on the Safety and Security of Radioactive Sources and its supplemental Guidance documents.

The IRRS team identified a **good practice** related to the Government initiative to periodically assess the institutional progress using a scoreboard and making publicly available its results.

An area for improvement identified by the IRRS team for VATESI and RSC is to examine the need for additional formalized coordination and cooperation arrangements in, for example, the areas of usage of radioactive sources that could be carried out both outside and inside nuclear facilities and to ensure the interfaces between safety and security.

2. THE GLOBAL SAFETY REGIME

2.1. INTERNATIONAL OBLIGATIONS AND ARRANGEMENTS FOR INTERNATIONAL COOPERATION

Lithuania has ratified or acceded to a comprehensive set of international instruments that create common obligations and mechanisms for the safe use of nuclear energy and radiation for peaceful purposes, and that ensure an effective, coordinated response to nuclear or radiological emergencies. These include the Convention on Nuclear Safety, the Joint Convention on the Safety of Spent Fuel and on Safety of Radioactive Waste Management, the Convention on Assistance in the Case of a Nuclear Accident or Radiological Emergency, the International Convention for the Suppression of Acts of Nuclear Terrorism, the Non-Proliferation Treaty, the Comprehensive Nuclear Test Ban Treaty, the Vienna Convention on Civil Liability for Nuclear Damage and its amendments, the Convention on Physical Protection of Nuclear Material and its amendment, the Convention on Early Notification of a Nuclear Accident, the IAEA Privileges and Immunities Agreement, the Joint Protocol linking the Vienna and Paris Conventions, the European agreement for the road transport of dangerous goods, and several related rail and maritime transport agreements. Lithuania has signed, but not yet ratified, the Convention on Supplementary Compensation for Nuclear Damage and the 1963 Vienna Convention amendment on civil liability.

In the field of radiation protection, Lithuania ratified the Convention on the Protection of Workers against Ionising Radiations and made political commitment to the Code of Conduct on the Safety and Security of Radioactive Sources, and the supplementary Guidance document Guidance on the Import and Export of Radioactive Sources, with RSC being contact point for the purpose of facilitating the export and/or import of radioactive sources in accordance with the Code and the Guidance on the Import and Export of Radioactive Sources. The IRRS team was informed that Lithuania is in the process of expressing political commitment to the Guidance on the Management of Disused Radioactive Sources. Lithuanian experts actively contribute to the IAEA's Commission on Safety Standards, the Nuclear Safety Standards Committee, the Nuclear Security Guidance Committee, the Radiation Safety Standards Committee, the Transport Safety Standards Committee, the Radioactive Waste Safety Standards Committee, the Emergency Preparedness and Response Standards Committee.

Lithuania has hosted numerous international IAEA missions since 1989. National legislation, grounded in EU Nuclear Safety Directive, mandates periodic self-assessments and external expert evaluations at least every ten years, reinforcing a systematic improvement cycle for nuclear safety and radioactive waste management.

The IRRS team observed that Lithuania takes an active role in numerous international organisations, working groups and committees. It has also hosted a variety of peer review assignments, training courses and workshops for professionals from abroad, particularly in the field of radiation protection, to foster international cooperation and contribute to the enhancement of global safety.

2.2. SHARING OF OPERATING EXPERIENCE AND REGULATORY EXPERIENCE

The Law on Nuclear Safety creates a framework for collecting, analysing and sharing operating experience to prevent nuclear and radiological accidents and to continuously improve safety. Recognising the value of international exchange, Lithuania participates in several international networks and the European Clearinghouse on Operational Experience Feedback, with VATESI serving as the national contact point and nominating a coordinator for these systems.

VATESI's management system procedure defines how both domestic and foreign experience is gathered, analysed and transformed into lessons-learned. Relevant information is disseminated to license holders and other stakeholders, accompanied by recommendations or required actions. When appropriate, events are reported to international feedback systems following relevant IAEA guidelines, and VATESI's experts share the operating and regulatory experience at international forums, workshops and Western European Nuclear Regulators Association (WENRA) and European Nuclear Safety Regulators Group (ENSREG) working groups. Bilateral agreements with the United States, Japan, Ukraine and other states guarantee an effective mechanism for bilateral exchange of safety experience.

Regulatory responses to identified lessons are documented in VATESI's annual reports and incorporated into Lithuania's submissions to the Convention on Nuclear Safety and the Joint Convention on Spent Fuel and Radioactive Waste Management. Experience is also fed back into the drafting of nuclear safety regulations.

In radiation protection, RSC follows a similar approach. Participation in international events and networks and other missions allows RSC to both learn best practice and to share its own experience. RSC operates the Radiation Protection Information System (RSIS), recording incidents, orphan sources, trafficking cases and other events. Data is analysed to refine legislation, internal procedures and protective measures, and are communicated to licensees via letters, emails, workshops and the RSC website. RSC also fulfils its legal duty under the Law on Radiation Protection to inform the public through annual reports, bulletins and other outreach material.

Both VATESI and RSC provide resources to ensure the systematic processing of operating and regulatory experience, regular dissemination of lessons learned, and continual adaptation of the regulatory framework, thereby strengthening Lithuania's nuclear safety and radiation protection regime and contributing to global safety cooperation.

2.3. SUMMARY

Lithuania has ratified or acceded to a broad suite of international treaties that establish common obligations for the peaceful use of nuclear energy and for nuclear safety, security and radiation protection and ensure coordinated responses to nuclear or radiological emergencies. Lithuanian experts contribute actively to IAEA Safety Standards committees, while VATESI and RSC monitor and aligns national regulations with these standards. The country has hosted numerous IAEA peer review missions since 1989 and, through EU-based legislation, conducts periodic self-assessments and external expert evaluations. VATESI and RSC systematically collect, analyse and share operating and regulatory experience - both domestically and via international networks - issuing lessons learned to license holders, updating legislation, and informing the public. Cooperation agreements with the regulatory authorities of US, Japan, Ukraine further strengthen bilateral safety information exchange, reinforcing Lithuania's nuclear safety and radiation protection regime and its contribution to global safety cooperation.

3. RESPONSIBILITIES AND FUNCTIONS OF THE REGULATORY BODY

3.1. ORGANIZATIONAL STRUCTURE OF THE REGULATORY BODY AND ALLOCATION OF RESOURCES

Both regulatory bodies have an organizational structure and allocate resources appropriate to their mandates as established in the relevant laws.

VATESI reports directly to the President and the Government. The responsibilities of VATESI are established in the Law on Nuclear Energy, Law on Nuclear Safety, Law on Radioactive Waste Management, and Law on Radiation Protection. VATESI is responsible for the state regulation and supervision of nuclear safety, radiation safety in the field of nuclear power, physical security of nuclear facilities and nuclear materials, and activities involving nuclear materials and other sources of ionizing radiation used in the field of nuclear power.

The organisational structure of VATESI is approved by the Head of VATESI. VATESI is a budgetary institution financed from the state budget of the Republic of Lithuania and other legally obtained funds under direct subordination of the Government of the Republic of Lithuania. The VATESI budget is planned based on its three-year Strategic Action Plan. VATESI has 64 approved positions, of which 55 are currently filled. VATESI functions are established by law and its statute, and the functions of deputy heads, divisions, and other employees are defined in internal orders, division statutes, and job descriptions.

RSC is subordinated to the Ministry of Health. RSC is responsible for the regulatory control of human and environmental exposure, as well as activities involving sources of ionizing radiation, except for activities in the field of nuclear power. The responsibilities of RSC are established in the Law on Radiation Protection. The functions of RSC as the regulatory body in the field of radiation protection are defined in the Statute of the Radiation Protection Centre. RSC's organisational structure is approved by the Minister of Health, upon RSC proposal. RSC is a state budget institution financed through the budget of the Ministry of Health and other state funds and currently has 60 employees.

3.2. EFFECTIVE INDEPENDENCE IN THE PERFORMANCE OF REGULATORY FUNCTIONS

Both regulatory bodies employ civil servants as well as staff working under employment contracts. The Law on the Adjustment of Public and Private Interests establishes restrictions for civil servants after leaving public service. For a period of one year after leaving office, a person may not be employed by a legal entity if, during the last year of service, their duties were directly related to the supervision or control of that entity, or if the person participated in drafting, considering, or adopting decisions concerning state orders or financial assistance granted to that entity. Additionally, the Law on the Coordination of Public and Private Interests a person who has ceased to work in the civil service may not represent natural persons or legal persons in institutions and establishments on matters that were assigned to his official duties, for one year.

All VATESI employees have to sign a Confidentiality Commitment referring to confidential information that cannot be disclosed or transferred to unauthorized persons or institutions. For RSC, the management's commitment to impartiality and confidentiality is set out in a dedicated form and is published on the RSC website. Employees who are subject to such an obligation, for example inspectors, shall also periodically sign a Declaration of Impartiality. However, for employees working under employment contracts, there are no procedures in place to prevent their employment by a licensee, after leaving the regulatory body.

According to the Law on the Adjustment of Public and Private Interests, a Declaration of Private Interests must be submitted by civil servants and other employees having power of decision within their respective organisation within 30 days of their employment. VATESI and RSC have established additional measures that apply to all personnel, measures regarding the maintaining of the confidentiality of information.

According to the Law on Nuclear Energy, VATESI, has the right to provide services to interested parties, upon their request on the following topics: nuclear safety, radiation safety, physical security, nuclear material activities, other nuclear power activities involving sources of ionizing radiation, investigations, testing, training and expertise, based on a fee established by VATESI and other authorities. Until now VATESI has not provided any such services.

According to the Law of Radiation Protection, RSC is the regulatory body responsible for the regulatory control of human and environmental exposure, as well as activities involving sources of ionizing radiation. RSC also provides dosimetry laboratory services in Lithuania. RSC performs processes personal dosimetry badges, for around 2,600 persons (of a national total of about 6,000 radiation workers) for industrial, medical, education and research activities of Lithuania.

As a result, under its regulatory authority RSC is ensuring that the measures implemented by licensees to meet occupational exposure and workplace monitoring regulatory requirements could potentially conflict if RSC was also verifying its own work paid for by the licensee to prevent such a conflict of interest RSC has provided for organization separation of the administration of the services from the regulatory oversight functions. Additionally, the IRRS team was informed that a risk and opportunity analysis regarding the risk of the impartiality of RSC staff is performed periodically during the Management System Review.

3.3. STAFFING AND COMPETENCE OF THE REGULATORY BODY

Both VATESI and RSC plan for and ensure the competence of their staff.

Within VATESI, the process for training is described in the Rules of Training of the Staff of State Nuclear Power Safety Inspectorate, and the process for evaluating and planning the needs of human resources is described in the Procedure Document for Personnel and Knowledge Management, PR-14. The steps indicated are continuous evaluation of functions and workload of employees done by the heads of divisions. Currently there are procedures in place describing the training process within VATESI and a series of documents implementing the procedures, like for example: job descriptions that contain the responsibilities and functions of each position, an annual training plan and a matrix of responsibilities. According to the procedure Regulations for the Training of Employees of VATESI, employee training is carried out by applying a systematic approach.

Within RSC the human resource management is governed by the Procedure for planning of staff needs, and the Procedure for the development, training and recognition of the professional qualifications of civil servants and employees of RSC that establishes training requirements and development of professional qualifications. Annual training plans are established by 1 March each year that take into account individual performance evaluations.

3.4. LIAISON WITH ADVISORY BODIES AND SUPPORT ORGANIZATIONS

According to the Law on Nuclear Safety, VATESI can use the services of experts, consultants, scientific and technical support organisations, and other independent suppliers that are not related to applicants, licensees or persons involved in activities related to nuclear and nuclear fuel cycle materials. Where external support is required, procurement is carried out in accordance with the Law on Public Procurement.

Within VATESI, each member of the procurement commission, initiator or expert, before starting procurement procedures or evaluating bids, must sign a declaration that he/she is not related in any way to the suppliers. Declaration of Impartiality and Confidentiality Commitment are signed. In the procurement documents, suppliers are required to declare that they do not provide similar consulting or design services to economic entities controlled by VATESI.

The Law on Radiation Protection allows RSC to use the services of experts, consultants, and scientific or technical support organisations that are independent from applicants, authorised parties, and persons involved in activities with sources of ionising radiation.

An Advisory Committee on Radiation Protection also provides independent advice to RSC when needed. The Committee may include experienced representatives of research institutions, professional societies, governmental organisations, and other relevant bodies. However, the IRRS team was unable to confirm arrangements are in place to prevent a potential conflict of interest when using the advice of the advisory committee.

RECOMMENDATIONS, SUGGESTIONS AND GOOD PRACTICES	
Observation: RSC does not have arrangements to ensure that there is no conflict of interest for the advisory committee that provides them with advice.	
(1)	BASIS: GSR Part 1, rev. 1, Requirement 20, para. 4.20 states that <i>“Arrangements shall be made to ensure that there is no conflict of interest for those organizations that provide the regulatory body with advice or services. If this is not possible domestically, then the necessary advice or assistance shall be sought from organizations in other States or, as and where appropriate, from international organizations which have no such conflicts of interest”</i>
S2	Suggestion: RSC should consider making arrangements to ensure that there is no conflict of interest for the advisory committee providing it advice.

3.5. LIAISON BETWEEN THE REGULATORY BODY AND AUTHORIZED PARTIES

VATESI and RSC have established mechanisms of communication with authorized parties, either in the internal documents of the management system, as is the case of VATESI or in legal acts, as is the case of RSC. VATESI and RSC regulatory decisions are justified in accordance with the principles in the Law on Public Administration. This includes requiring that administrative decisions are based on objective data and facts, and that each individual administrative act must be lawful and justified, and it must clearly indicate the legal and factual grounds and motives for the decision.

Meetings between the State Enterprise Ignalina Nuclear Power Plant (SE INPP) management, which is the authorized party for all nuclear facilities in Lithuania, and VATESI management are organized quarterly. During these meetings, potential safety issues, status of the planned activities and cooperation between VATESI and the licensee are systematically discussed. Progress on specific projects such as INPP decommissioning and associated authorization processes are also included on the agenda of such meetings.

Apart from these management meetings, formal orders and permits, communication with VATESI and authorized parties takes place as needed when questions arise. During the site visit to INPP, IRRS team

members were informed by the representative of SE INPP that communication works well with VATESI and one reason that was mentioned is that VATESI personnel have good insights into INPP.

Regarding regulatory requirements, drafts of new or changes to existing BSRs proposed by VATESI are sent to authorized parties to collect their opinions.

RSC regulatory decisions are based on legal requirements, and the principle of justification is observed. RSC maintains a professional and transparent relationship with authorized parties through both formal and informal communication mechanisms. Communication is ensured through regular consultations, annual seminars and workshops, meetings and round table discussions, written correspondence, online portals, newsletters, publications, website information, social media channels and daily expert support.

3.6. STABILITY AND CONSISTENCY OF REGULATORY CONTROL

VATESI responsibilities are established in the Law on Nuclear Energy, the Law on Nuclear Safety, the Statute of the State Nuclear Power Safety Inspectorate and are further detailed in the regulatory processes (i.e. the management, core and support processes) of VATESI integrated management system that provide the tools for regulatory control.

RSC responsibilities are established in the Law on Radiation Protection, the Regulations of Radiation Protection Supervision and other legal provisions regulating radiation protection and physical security of radiation sources and further detailed in internal RSC administrative legal acts.

3.7. SAFETY RELATED RECORDS

The regulatory framework established by VATESI and RSC provides for the management of the safety related records of the authorized parties. Both VATESI and RSC manage their own safety related records according to internal rules and procedures.

VATESI has established legal provisions in its regulations for the development and management of records related to the safety of facilities and activities. According to the regulations, licensees are legally required to maintain detailed records on the design, operation, maintenance, and safety of their facilities and activities. Nuclear safety requirements specify general regulatory requirements to establish procedures for managing safety-related records, ensuring their proper preparation, approval, retention, and protection against unauthorized access or destruction.

RSC has established legal provisions in its regulations for the development and management of records related to the safe operation of facilities and the safe conduct of activities, including inventories of radioactive sources and radioactive waste, as well as records of occupational exposure.

VATESI and RSC have unrestricted access to the records of authorized parties in support of their oversight functions. VATESI and RSC have the right to access the licensee documentation during on-site inspections and to receive mandatory periodic reports, in support of the regulatory, independent oversight of the safety performance of the licensee.

RSC manages the State Register of Sources of Ionising Radiation and Exposure of Workers and the Radiation Protection Information System (RSIS). Both systems combined allows for the storage of data related to authorization, the shutdown and decommissioning of facilities, information necessary for the safe operation of facilities and conduct of activities, data on inspection findings, non-compliances, and enforcement measures. It includes also a dedicated module for the registration of various events involving sources of ionizing radiation, detection of orphan sources, events at the state border, illicit trafficking, and

others. The IRRS team considers the integration of external sources and use of information within RSIS to support the regulatory process as described in sections 5.1, 7.3 and 8.2 to be an area of **good performance**.

3.8. COMMUNICATION AND CONSULTATION WITH INTERESTED PARTIES

VATESI has identified interested parties and their needs and expectations in the Manual of Integrated Management System. VATESI has established a process for public communications that defines the principles for communication with the media and interested parties. The process also includes public participation in the decision-making process. VATESI has defined the main principles and responsibilities for informing the public in Procedure document for public communication, PR-11. VATESI has established a process for interested parties monitoring that sets out the measures, principles and procedures including how feedback information is obtained and whether the activities of VATESI meet the needs of the stakeholders.

When deemed necessary by VATESI management, communications strategy can be developed for a specific objective. To achieve the objectives set out in the strategy, communication plans are developed and updated as needed. An example is the VATESI communications plan for January-June 2026 that includes topics related to monitoring the situation regarding nuclear facilities in Ukraine and Belarus to determine, whether a response is necessary and to share this information with interested parties and to ensure the public receive reliable information.

VATESI serves as the national contact point for the European Commission in the area of emergency preparedness and the IAEA. VATESI is responsible for reporting incidents involving orphan radioactive sources or nuclear materials to the IAEA's Incident and Trafficking Database (ITDB) and ensuring proper accounting of recovered nuclear materials. VATESI is also the National Warning Point (NWP), Competent Authority for Emergencies Abroad, Competent Authority for Domestic Emergencies under the IAEA's Unified System for Information Exchange, USIE.

RSC manages the RSIS database that includes a dedicated module for the registration of various events. These include incidents and accidents involving sources of ionizing radiation, detection of orphan sources, events at the state border, illicit trafficking, and others.

The public information process is documented within RSC, and communication plans are drafted. The main information dissemination source is the RSC website that contains information about authorized parties, inspection plans, legal acts regulating radiation protection, RSC activities and reports, and a page "For Public" that allows interaction with the interested parties.

RSC used the outcomes from a public opinion survey in 2023 to inform a strategic nationwide public information campaign "Radiation Protection for the Public of Lithuania". During 2024 information on topics such as natural and artificial sources of radiation and radiation emergency preparedness was disseminated using different types of media (TV, radio, newspaper and social media) and targeted to specific groups (gender, age and location) at different times of the day. Information was also presented using visual infographics and sign-language interpretation for video materials to target those with disabilities. Eight different videos covering various aspects of radiation safety were prepared for national TV and broadcast before the evening news programmes and major sporting events. In addition, ten radiation-related quizzes were prepared for the 15min.lt news portal and Facebook to test user's knowledge about radiation.

This information campaign reached half a million people and a follow-up survey in 2025 showed an increase in public awareness of RSC as well as an increase in knowledge about ionizing radiation and radiation emergency preparedness. An important outcome of the project was the creation of sustainable

educational resources on radiation safety that remain usable after the campaign. In addition, to promote clear, timely and effective communication during emergencies and reduce public anxiety, seminars on crisis communication were organized in 2023 and 2024 for media representatives and communication specialists during which experts from the IAEA, Lithuania, Norway and Greece shared their knowledge and experience.

The IRRS team observed that RSC is very committed to making information and data easily accessible to the public through the introduction of a new mobile application “Radiation Protection Centre” which provides the public with easy access to data from the Early Radiological Warning Network (RADIS). In addition to the radon and gamma dose rate maps, RSC is also developing an online interactive map for environmental radiological monitoring data.

RECOMMENDATIONS, SUGGESTIONS AND GOOD PRACTICES	
Observation: RSC has implemented many initiatives to make information and data readily available to the public including conducting a comprehensive national strategic public information campaign to increase public knowledge about many aspects of radiation safety, strengthening communications in a radiation emergency and making the data available both online in interactive maps and through a mobile application.	
(1)	BASIS: GSG-14, para. 3.171 states that <i>“The system for putting radiological health hazards in perspective should be developed with the involvement of relevant technical experts as well as professionals in public communication.”</i>
GP2	Good Practice: RSC has undertaken several actions to make information and data readily available to the public through a comprehensive national strategic public information campaign and using technology to make data more accessible.

3.9. SUMMARY

The legal responsibilities of VATESI and RSC are defined in Lithuania’s legal framework, and their organizational structures support the regulation and oversight of nuclear safety, radiation protection and activities involving ionizing radiation sources. Both organizations are state funded and have established arrangements for staffing, resource planning, training and competence management.

Both regulatory bodies may use external experts and technical support organizations under procurement and impartiality requirements. However, RSC has not yet established formal measures to prevent potential conflicts of interest related to advice provided by the advisory committee.

Communication with authorized parties is in place and regulatory processes and information management systems provide a basis for regulatory oversight and the management of safety related record. The integration of information systems and event reporting supports effective regulatory activities and demonstrates good performance.

VATESI and RSC have established effective arrangements for communication and consultation with interested parties, including public participation in decision making.

The IRRS team identified one **good performance** related to the integration of external sources and use of information within RSIS to support the regulatory process and one good practice related to RSC’s public communications, namely, to make information and data readily available to the public through a comprehensive national strategic public information campaign using technology to make data more accessible.

4. MANAGEMENT OF THE REGULATORY BODY

4.1. RESPONSIBILITY

VATESI senior management is responsible for establishment, implementation, maintenance, effectiveness and continuous improvement of management system. Senior management established, and maintains, VATESI Policy which is the management system policy that includes the safety policy and the basis for its goals. The integrated management system covers all VATESI state regulation and supervision functions.

The Strategic Action Plan is the main document, where goals, strategies, plans and objectives of VATESI are set, developed and approved annually. Further, the strategic planning system consists of Strategic Action Plan, Annual Action Plan and Annual work plans of divisions. Monitoring indicators to measure the achievement and the performance of goals are established in the Strategic Action Plan and Annual Action Plan. VATESI measures performance goals which are linked to the performance goal set out in the Strategic Action Plan with the general objectives of the VATESI management system.

The senior management supports the management system by declaring their commitment in VATESI policy, allocating adequate resources to fulfil management system requirements.

VATESI evaluates annually the internal and external influences affecting the achievement of its performance objectives and the performance of the management system, including an assessment of the needs and expectations of interested parties. Deviations identified through performance monitoring, internal audits, and management reviews are analysed and appropriate corrective actions are defined and implemented to restore compliance with established requirements.

RSC senior management established and implemented the management system and measures for applying, sustaining and continuous improving the management system. RSC's management system integrates radiation safety, environmental protection, quality, occupational radiation safety in one system that combines all elements of organizational management and places radiation safety as the organization's priority. The management system policy, which includes safety policy, is reviewed and evaluated annually to ensure continued suitability.

RSC has strategies, organizational goals and objectives in the Statute of RSC, which was approved by the Minister of Health of the Republic of Lithuania. Annual plans and measurable safety goals are developed by RSC and approved annually by the Minister of Health as RSC Annual Action Plan. The management system of RSC demonstrates senior management commitment to the establishment, implementation, assessment and continual improvement of the management system. According to the RSC management system manual, the senior management is responsible for the management system, which is personally committed to implementing, adhering, evaluating and developing the management system, to continuously improving its performance. The senior management of RSC is involved in the development of the organizational policy, objectives and processes. The senior management of RSC provides adequate resources for the development of the management system. Measurable safety goals are reviewed and updated to ensure they are in line with RSC strategies, plans and objectives. RSC reports the management system annual performance to the Ministry of Health. To eliminate identified deviations responsible people are appointed to different actions and deadlines are specified. Actions of identifying, isolating, and

rectifying deviation, investigation and root cause analysis, corrective actions, preventive actions, effectiveness check are carried out according to the procedure for non-conformity management.

4.2. THE MANAGEMENT SYSTEM

VATESI has established an integrated management system that brings together all regulatory requirements in a coherent manner and supports their implementation. Procedures, functions and responsibilities are defined and communicated, and staff understand how they contribute with their knowledge and experience to the effectiveness of management system, the achievement of the VATESI mission and the performance goals.

Senior management of VATESI provides the necessary resources needed for the maintenance and continual improvement of management system and the effectiveness of the system is reviewed and evaluated annually. For VATESI's activities, the management system is developed and maintained using a graded approach, taking into account the importance of safety, complexity, hazards and potential risks, possible consequences, etc.

VATESI has defined its organizational structure, internal and external interfaces, processes, responsibilities, accountabilities, levels of authority and cooperation among the staff performing work that can affect quality and safety.

The process of organizational change takes place in a coordinated manner where the change is prepared, its potential effects are assessed, and the change is monitored and evaluated.

The process for documents and records management is established and described. VATESI has developed and uses an internal document management system “VAIS”, where VATESI specialists develop drafts of documents and coordinate them with other divisions. Therefore, VATESI uses the national General Document Management Information System (DBSIS) for managing incoming, outgoing, and internal documents.

The IRRS team was informed that a record of a review of management system document is made when the document involves a modification. Process owners report the fact of review of the management system document during the annual self-assessment, but if there is no modification in the document the review is not checked and documented.

RECOMMENDATIONS, SUGGESTIONS AND GOOD PRACTICES

Observation: VATESI does not properly document and check the review of management system document if the review does not require a modification.

(1)	BASIS: GSR Part 2 Requirement 8 states that “... <i>The management system shall be documented. The documentation of the management system shall be controlled, usable, readable, clearly identified and readily available at the point of use.</i>
(2)	BASIS: GSR Part 2 Requirement 4.18. states that “Revisions to documents shall be controlled, reviewed and recorded...”
S3	Suggestion: VATESI should consider revising the management system document review process to ensure that reviews are properly documented and checked.

RSC has an integrated management system covering radiation protection, environmental protection, quality, occupational safety and health protection. The management system is established so that it encompasses the interaction of people, technology and the organization, and combines economics and elements of organizational management, while placing safety as the organization's priority goal.

Senior management of RSC declared a management system policy and established in the management system manual on how to provide appropriate resources for the development, maintenance and continually improvement of management system. The IRRS team was informed that RSC has adequate resources, including staff, facilities, services, logistic support, documentation and software.

Interfaces within RSC and with external organizations are specified in the management system. Identified interested parties and external organizations are for example: licensees; Ministry of Health; VATESI; SE INPP; external suppliers and service providers; and RSC staff. The analysis of the needs and expectations of interested parties and external organizations is carried out during the management system review. Contracts between RSC and licensees, suppliers, public institutions are concluded and maintained in accordance with the procedure.

RSC applies graded approach in management system documents and devotes more attention and resources to areas of greater importance in terms of radiation protection.

The organizational structure of RSC is approved by the order of Minister of Health and is included in the management system manual as an annex.

Organizational changes are the responsibility of the Ministry of Health within the general rules of the state institutions. The IRRS team was informed that RSC can suggest and review the planned organizational changes, but RSC has no mandate for its own organizational changes. Senior staff performs management of organizational changes after analysis of situation – due to additional functions approved or discharged, due to additional work amount that is foreseen, due to national budget institutional rules changes or other reasons. Based on RSC proposal, the Minister of Health approves a new organizational structure.

Arrangements are established in the management system for an independent review to be carried out before significant decisions for safety are made. Important decisions are made and discussed during management system review, at RSC director and the heads of units' meetings.

RSC management system includes descriptions for the control of documents and requirements for preparation, revision, review and approval of documents, responsibility and competence of staff. Staff should use only appropriate and correct documents that are approved in process descriptions and working instructions by the Director of RSC.

RSC is using a documents and records management information system called “DBSIS”, where copies of all documents and records received and sent are stored.

4.3. MANAGEMENT OF PROCESSES AND ACTIVITIES

VATESI has established and implemented an integrated management system, aligned with the safety goals and corresponding to the requirements of ISO 9001:2015 standard and IAEA Safety Standards.

VATESI identified and grouped 29 processes into core, management and support processes for the implementation of the regulatory functions. The management system ensures that all processes, as well as any modifications to existing ones, follow a structured management system framework that prioritizes safety and is aligned with the VATESI strategies and goals. VATESI has established and maintains structured documented information that describes how processes and activities are performed and controlled. Methods for identification, development and modification of processes, including interfaces and

interactions are also described. Each process and its management is described in detail in the procedure document. VATESI identified its processes through a systematic review of working practices to ensure alignment with regulatory requirements, performance goals, and the delivery of services. Decisions on incorporation a new process or modification existing processes are made during management review. Each new or modified process undergoes a comprehensive design and verification phase during coordination with concerned employees and divisions and approval by the Head of VATESI. Control of outsourced processes, products and activities is ensured through contractual agreements that clearly specify expectations and requirements according to the process for management of procurement.

RSC's management system is in line with the requirements of the ISO 9001:2015 and IAEA Safety Standards. The RSC laboratory that performs radiological investigation and measurements is accredited and has its own quality management system compliant according with the standard ISO/IEC 17025. RSC's Radiation Protection Supervision Division, in order to strengthen the supervision of the implementation of radiation protection requirements, has been accredited as a type C inspection body for compliance with the standard ISO/IEC 17020.

The management system policy, which includes the safety policy, is reviewed and evaluated annually to ensure continued suitability. RSC's management system has 3 levels and contains 33 processes with procedures and 70 working instructions that explain how work is to be prepared, reviewed, carried out, recorded, assessed and improved. Management system documents are prepared and verified according to the procedure which describes the role of preparation, review and approval.

RSC performs all functions entrusted by laws by itself. RSC does not use subcontractors to carry out management system processes.

4.4. MEASUREMENT, ASSESSMENT AND IMPROVEMENT

VATESI has established and implemented arrangements to monitor, analyse and evaluate all processes. Process evaluation is ensured through internal management system audits, external audits, internal control and the use of process performance indicators. The process performance indicators are established and analyzed during the management review. Regular evaluations verify that processes are suitable, effective and consistently support the fulfilment of its statutory regulatory functions and safety goals. Responsibility for conducting independent assessments of the management system is assigned to internal auditors.

VATESI has established the process for management of non-conformities and corrective actions. All potential risks of regulatory activities and processes are identified, evaluated, periodically reviewed and managed to mitigate significant risks and prevent the occurrence of non-conformities according to the risk management process.

The review of management system is conducted annually through management review meetings. Results of the management review are disseminated and discussed with staff.

The internal communication within VATESI is carried out using a variety of channels, including face-to-face communication among the staff, meetings of managers, heads of divisions and individual staff members, email and intranet, official letters, training and educational events, as well as mobile and stationary communication tools.

RSC has developed performance indicators to monitor the effectiveness of the management system and uses the results of external audits, internal audits, and the assessment activities (for example: management system review, service quality assessments, complaints assessments, safety culture assessment, management system documents review, risk assessment and daily work review) to verify/improve the integrated management system.

The IRRS team was informed that there is no defined method for evaluating the results of the previous year's inspections, assessing their adequacy and effectiveness. The inspection programme is prepared based on the results of the risk assessment taking into account risk, nature of hazards etc. This is the bases of the annual inspection plan, which determine the number, frequency and resources of inspection. When preparing the annual inspection plan, the results of the previous year are taken into account in practice, however this method of evaluation and taking into account the results and its safety aspects is not determined. This shows a shortcoming of the management system, as evaluation of the processes for their effectiveness is not implemented in cases of inspections.

RECOMMENDATIONS, SUGGESTIONS AND GOOD PRACTICES

Observation: The methods and criteria for evaluating the effectiveness of the inspection process are not fully defined in the RSC management system.

(1)	BASIS: GSR Part 2 Requirement 6.2 states that “All processes shall be regularly evaluated for their effectiveness and for their ability to ensure safety.”
(2)	BASIS: GSR Part 2 Requirement 6.4 states that “Independent assessments and self-assessments of the management system shall be regularly conducted to evaluate its effectiveness and to identify opportunities for its improvement...”
S4	Suggestion: RSC should consider defining supplementary methods for evaluating the effectiveness of inspection process.

4.5. LEADERSHIP AND CULTURE FOR SAFETY

4.5.1. FOSTERING AND SUSTAINING LEADERSHIP AND CULTURE FOR SAFETY

VATESI promotes an organizational culture that incorporates safety culture, security culture, and other related aspects. The IRRS team was informed that the managers foster an open, transparent and ‘no blame’ safety culture by encouraging employees to report on safety concerns without fear. They promote questioning attitudes, support learning from both successes and failures, and take timely actions to address risks and conditions that could compromise safety. VATESI senior management demonstrates and promotes clear understanding of the key characteristics and attributes of a strong safety culture and recognizes its responsibility to ensure that attributes are clearly defined, communicated, understood and consistently reinforced. VATESI established and maintains a working environment in which personal accountability for safety is clearly defined, communicated, and expected from all employees at all levels.

RSC senior management demonstrates leadership for safety in management system policy, manual and procedures. One of the objectives is strengthening safety culture that ensures that the protection of people and the environment take precedence over operational goals. Senior management and all RSC staff are responsible for strengthening the safety culture at RSC and management promotes safety culture through their behaviour, actions and statements and they also encourage staff to raise safety and quality issues and problems, seek and find solutions to them, and encourage staff to perform tasks in such a way that safety is not compromised.

The safety culture in RSC is established, regularly evaluated, and systematically improved in accordance with the procedure “Formation of a Safety Culture”. Senior management and all managers support questioning attitude. The personal accountability of senior managers, at all levels of managers and all staff in relation to safety, is clearly established in the management system manual.

The IRRS team was informed that RSC uses experiences from events and information from international cooperation and shares it with all RSC staff at regular meetings.

4.5.2. MEASUREMENT, ASSESSMENT AND IMPROVEMENT OF LEADERSHIP AND CULTURE FOR SAFETY

VATESI has established arrangements for the regular assessment and self-assessment of leadership for safety and safety culture across all levels and functions. Senior management ensures that an independent assessment of leadership for safety and of safety culture is conducted. A questionnaire for safety culture assessment, based on IAEA recommendations, is conducted annually. This activity provides all employees with the opportunity to strengthen their understanding of safety culture attributes, promote active involvement in enhancing safety culture and stimulate open discussion on organizational strengths and areas for improvement. The assessment results are discussed by senior management and documented with those actions that are to be taken. The effectiveness of these actions is evaluated during management review to ensure continual enhancement of leadership for safety and safety culture. The results of assessments related to leadership for safety and safety culture are communicated within VATESI in order to promote transparency, learning and staff engagement.

RSC has regular self-assessments of safety culture. Self-assessment processes are performed, according to a procedure “Formation of safety culture”, at least once every two years through anonymous surveys of RSC employees. The review results are communicated during staff meetings and reports are distributed within the organization.

4.6. SUMMARY

VATESI and RSC have implemented and are continuously improving their management systems in accordance with IAEA Safety Standards and ISO 9001:2015 standard requirements and for RSC also according to ISO/IEC 17025:2017 and ISO/IEC 17020:2012 standards requirements. Both organizations define processes, responsibilities, and document control management through approved procedures and use of electronic systems. Audits and management reviews are used to evaluate performance and improve effectiveness of the management system. In both organisations, senior management is responsible for maintaining these systems, setting objectives and monitoring performances. The management system emphasises safety, development and improvement of a safety culture through planning, measurement and evaluation.

The IRRS team identified improvements related to the management system document review process for VATESI and for RSC to define methods for evaluating the effectiveness of processes.

5. AUTHORIZATION

5.1. GENERIC ISSUES

The Law on Public Administration sets out the common law for authorisation process in Lithuania. The Law on Radiation Protection designates RSC as the regulatory authority responsible for regulatory control over sources of ionising radiation and radioactive waste management in non-nuclear power field and VATESI as the regulatory authority responsible for regulatory control over sources of ionising radiation in nuclear power field. Practices involving radiation sources must be justified, and persons intending to undertake such practices are required to notify RSC, except for practices in the field of nuclear power. A separate notification is not required if the person is already submitting an application for registration, a license, or a temporary permit. The Law on Nuclear Safety establishes the authorisations needed for nuclear installations and related activities as well as for nuclear and fissile materials in established quantities.

VATESI is responsible for authorisation of practices within the field of nuclear power while all other practices are authorized by RSC. RSC authorises facilities and activities through registration, licensing and temporary permits in line with a graded approach. VATESI authorises activities related to nuclear facilities or that are using nuclear materials, fissile materials and nuclear fuel cycle materials through licenses and permits. Licenses, from VATESI and RSC, are issued for an indefinite period.

Applications for authorisation must be accompanied with supporting documents to demonstrate compliance with regulatory requirements. The documents to be submitted for different application types are set out in the Rules on the Issue of Licenses and Permits in Nuclear Power Activities and the Rules on Authorization the Practices with Sources of Ionizing Radiation. Conditions and restrictions can be imposed on authorisations under the Law on Radiation Protection. For authorisations under the Law on Nuclear Safety, requirements imposed by VATESI are set out in legislation and VATESI can require technical measures to be incorporated into documents that the licensee is legally bound to implement. Applicants and licensees can appeal against RSC and VATESI decisions to an administrative disputes commission or a competent court.

RSC maintains records related to authorisations in RSIS. Authorised persons can access RSIS to upload updated documentation, submit required reports, and view records relevant to their organisation, including worker dose records. Training providers can submit certification records directly into the system, enabling RSC to retrieve and review worker radiation protection and/or physical protection training information as part of the authorisation process.

The IRRS team was informed that RSIS receives information from the national Population Register, enabling RSC to be notified of deaths or name changes involving workers, radiation protection officers, or heads of registered or licensed entities. The system also receives information from the national Register of Legal Entities regarding changes to registered addresses, entity codes, management, and entity status, including insolvency or bankruptcy. This enables RSC to undertake timely follow-up actions on authorisations issued to maintain regulatory oversight and ensure safety.

5.2. AUTHORIZATION OF RADIOACTIVE WASTE MANAGEMENT FACILITIES

The requirements regarding licenses and permits in the area of nuclear power defined in the Law of Nuclear Safety and in the Law on Nuclear Energy are applicable to radioactive waste management facilities including pre-disposal facilities and disposal facilities. The requirements cover all stages of lifecycle of predisposal management facilities as well as for disposal facilities (including closure and post-closure surveillance). In addition, the Law on Radioactive Waste Management requires that “the decision regarding

closure of a disposal facility shall be adopted by the Government on the proposal by the Ministry of Energy”. The Rules on Issue of Licenses and Permits in Nuclear Power Activities includes lists of the documents to be submitted for issuance of licenses and permits, with some addition in the Law on Radioactive Waste Management.

The different nuclear safety requirements for radioactive waste management facilities includes, in Annex, the typical content of site safety assessment report, facility safety analysis report and periodic safety report (evaluation).

Public participation in decision making is ensured by the Law on Nuclear Safety, and BSR-1.1.5-2017.

5.3. AUTHORIZATION OF RADIATION SOURCES FACILITIES AND ACTIVITIES

Radiation sources are subject to notification, registration, licensing and temporary permits in line with a graded approach. Criteria for exemptions from notification and authorisation are specified in HN 73:2018 “Basic Radiation Protection Standards”.

Registration is required for practices in the List of Practices Subject to Registration set out in the Law on Radiation Protection, while other non-exempt practices are subject to licensing. The List of Practices Subject to Registration includes practices involving radioactive sources of specified risk categories. The risk categorisation scheme is set out in HN 73:2018 “Basic Radiation Protection Standards, where radioactive sources are assigned a category based on their application/type (e.g. teletherapy sealed radioactive sources are assigned to Category 1). Sources can also be assigned a category based on the ratio of A/D for radionuclides where a D-value is provided in HN 73:2018 “Basic Radiation Protection Standards. However, not all applications/types of radiation sources are provided for in the scheme and D-values are only provided for a limited number of radionuclides, which may result in lack of clarity on which authorisation requirements should apply to a source that is not covered by the scheme.

RECOMMENDATIONS, SUGGESTIONS AND GOOD PRACTICES	
Observation: Under HN 73:2018 “Basic Radiation Protection Standards, risk categories of radioactive sources are determined based on its application/type or using the ratio of A to D for radionuclides with D-values specified. However, the risk categorisation scheme is not fully aligned with the IAEA Safety Standards.	
(1)	BASIS: GSR Part 3 Requirement 17, para. 3.56 states that <i>“Registrants and licensees shall ensure that sealed sources are categorized in accordance with the categorization scheme set out in Schedule II, and in accordance with the requirements of the regulatory body.”</i>
(2)	BASIS: RS-G-1.9 para. 3.3 states that <i>“The regulatory body should use the data in Table 1 and Appendix I to categorize sources.”</i>
S5	Suggestion: The RSC should consider enhancing the risk categorization scheme to ensure that all radioactive sources are covered by the categorization scheme.

Practices involving naturally occurring radioactive materials (NORM) in quantities that are controlled are also registrable activities. The IRRS team was informed that there was currently no NORM activities authorised. A license from RSC is required for reuse and recycling (processing) of radioactive materials. Licensees must provide annual inventory data, including information on any sources sold or transferred for reuse or processing, to RSC.

RSC regulates the import and export of sealed radioactive sources through a two-tiered framework: a person must first obtain authorisation of the business activity before they can apply for the issuance of specific permits or documents for individual shipments. RSC has established internal procedures (P-12) for obtaining non-EU countries' consent for receipt of exporting of Category 1 and 2 sources in line with the Code of Conduct on the Safety and Security of Radioactive Sources, and the supplementary Guidance on the Import and Export of Radioactive Sources.

RSC and VATESI process authorisation applications and issue licenses in accordance with internal procedures P-9 and PR-3, respectively.

5.4. AUTHORIZATION OF DECOMMISSIONING OF FACILITIES

The Law on Nuclear Safety together with the Rules on Issue of Licenses and Permits in Nuclear Power Activities contain requirements for licensing and approval for decommissioning of nuclear facilities. These regulations are supplemented by BSR-1.5.1-2019 "Decommissioning of Nuclear Facilities". According to this regulatory framework, planning for decommissioning must be prepared when planning the construction of nuclear facilities with elaboration of an initial decommissioning plan, including selection of a decommissioning strategy. Updating of this plan, and if so decommissioning strategy, is expected during the operation of the facility, but not less frequently than every 10 years (periodic safety reviews). When planning the final shutdown of a nuclear facility, authorized parties are required to elaborate a final decommissioning plan, based on the selected decommissioning strategy, including a safety assessment of the whole decommissioning project and a defined "end state" for the nuclear facility on site to be released from regulatory control at the end of the decommissioning. This final decommissioning plan must be updated when needed during the decommissioning project. Documents and associated information that need to be submitted for approval to VATESI in the authorization process for decommissioning and release of nuclear sites from regulatory controls, are detailed in regulations.

VATESI has issued a decommissioning license in October 2024 to SE INPP for the overall decommissioning project of the two reactor units of the INPP and has issued permits to carry out subsequent operations. The latest permit was issued in March 2026 for dismantling and decontamination of the main circulation loop equipment and structures of the upper and lower reactor sections of the second power unit.

VATESI approved the completion of decommissioning of Maišiagala radioactive waste storage facility in 2026. Based on the final decommissioning report elaborated by the licensee in accordance with regulations, VATESI has confirmed the release from regulatory control of the nuclear facility with no restriction on its future use, though with institutional controls on the monitoring of groundwater at least for the next two years.

The authorization regulatory framework for radiation sources and activities also includes provisions for decommissioning. The Description of the procedure for Decommissioning of the facilities using radiation sources outlines detailed requirements including planning for decommissioning, conduct of decommissioning actions and completion of decommissioning with or without restrictions. These requirements are set through a graded approach considering the complexity for the decommissioning of activities.

5.5. AUTHORIZATION OF TRANSPORT

The transport of radioactive material in Lithuania is primarily via road, with some transport by air for medical applications. Shipment volumes remain relatively low, with less than fifty shipments per year, including imports, exports, and domestic transport. There are currently no companies in Lithuania involved

in the design, manufacture, or maintenance of radioactive material transport packages, and no package design certificates have been issued.

The regulatory responsibilities for transport are divided between VATESI and the RSC which are legally responsible for issuing the approvals specified in paragraph 802 of SSR-6.

VATESI oversees transport activities involving fissile and nuclear material more than 5 g and nuclear fuel cycle material, while the RSC is responsible for licensing and regulating all other transport of radioactive material across all transport modes.

Coordination and cooperation mechanisms between VATESI and the RSC exist for two specific transport scenarios:

1. transport of fissile and nuclear material of less than 5 g for use outside the nuclear power plant;
2. transport of radioactive material for use in the nuclear power plant.

These cooperation mechanisms are established in Rules on the Import, Export, Transit and Transport of Radioactive Material, Radioactive Waste and Spent Nuclear Fuel.

Authorization arrangements include general licenses for transport activities, shipment-specific permits, registrations for Category 5 radioactive sources and temporary permits for specific activities. A graded approach is applied depending on the category and characteristics of the radioactive material transported. For instance, excepted packages shipments do not require licenses, temporary permits or registration.

The IRRS team observed that the classification system of IAEA SSR-6 is incorporated into shipment permits, but it is not fully reflected in licenses. Specifically, radioactive material is not assigned to the United Nations (UN) numbers specified in Table 1 of SSR-6, in accordance with paras 408–434 of the Regulations.

RECOMMENDATIONS, SUGGESTIONS AND GOOD PRACTICES	
Observation: When issuing a transport license, the competent authorities do not assign any of the United Nations (UN) numbers listed in Table 1 of SSR-6 to the radioactive material covered by that license.	
(1)	BASIS: SSR-6 (Rev.1) para 401 states that <i>“Radioactive material shall be assigned to one of the United Nations (UN) numbers specified in Table 1 in accordance with paras 408–434”.</i>
S6	Suggestion: When issuing a transport license, the competent authorities should consider including the assignment of the radioactive material covered by the license to one or more of the United Nations (UN) numbers specified in SSR-6.

VATESI and RSC maintain information systems for regulatory oversight of transport, including databases that store shipment data, licenses and permits related to transport activities.

There are currently no companies in Lithuania involved in the design, manufacture, or maintenance of radioactive material transport packages, and no domestic package design certificates have been issued. Foreign certificates are validated through endorsement or recognition procedures by verifying conformity with national requirements. The conformity of packages that do not require approval by the competent authorities is verified as part of the process of granting shipment-specific permits as well as during inspections, through the verification of *certificates of compliance*, and by checking the maintenance records, measurements of dose rates, checks for contamination and operating practices.

5.6. AUTHORIZATION ISSUES FOR OCCUPATIONAL EXPOSURE

For activities in the nuclear power field, VATESI's authorization process includes requirements and submissions specific to occupational exposure including the appointment of responsible coordinators and the assessment of safety and radiation protection documents.

The main occupational radiation protection document submitted and assessed during authorization is the radiation protection programme and must include the radiation protection assurance system, responsibilities, radiation monitoring programme, optimization programme, internal procedures, workplace classification, local rules, work permits, personal protective equipment, decontamination arrangements, health surveillance and training arrangements. VATESI requirements for authorization require the license or permit holder to ensure radiation protection of workers, other persons and visitors, to apply the ALARA principle and to comply with dose limits.

For activities in the non-nuclear-power field, the authorization process is provided in the Law on Radiation Protection, the Rules on Authorization of Practices with Sources of Ionizing Radiation, and the Description of the Procedure for Preparing Documents Required for the Authorization of Activities Involving Sources of Ionizing Radiation. These documents require applicants to submit evidence of the radiation protection management system, organizational responsibilities, appointment of the radiation protection officer, worker competence, operating procedures, individual and workplace monitoring, health surveillance of Category A workers, classification of controlled and supervised areas, personal protective equipment and emergency arrangements.

The monitoring of workers and workplaces is ensured by the Rules on the Performance of Monitoring of Workers for Occupational Exposure and Workplace Monitoring. These rules describe external and internal exposure monitoring, workplace monitoring, measuring instruments, and requirements for recognized dosimetry services or qualified persons carrying out measurements and dose assessments. The IRRS team also observed that the framework includes specific arrangements for female workers.

For existing exposure situations, the framework addresses occupational exposure due to radon in workplaces and aircrew exposure due to cosmic radiation. Aircrew protection is implemented through a radiation protection programme for aircrew, including dose assessment and protective measures. Lithuania indicated that no regulatory framework for space crew is established because such activities are not conducted in the country.

The IRRS team was informed that VATESI had identified a need to amend the occupational exposure requirements (the amendments are scheduled to go into effect in November 2026) for nuclear facilities to include explicit provisions requiring the license or permit holder to communicate and cooperate with relevant individuals or parties, and to encourage suitable alternative employment where a worker can no longer continue radiation work for health reasons. This issue was already identified by Lithuania in the Action Plan prepared for the mission.

5.7. AUTHORIZATION ISSUES FOR MEDICAL EXPOSURE

The authorization process for practices that use sources of ionizing radiation for medical exposure is the same as for other practices using ionizing radiation.

The requirements for submittals to the regulatory body for the authorization of activities involving ionizing radiation sources are defined by the Law on Radiation Protection and the Rules on Authorization the Practices with Sources of Ionizing Radiation. Additionally, RSC has issued requirements for the documents

necessary for authorization in Order No. V-62 – “The Description of the Procedure for the Preparation of Documents Required for the Authorization of Activities Involving Sources of Ionizing Radiation”.

RSC does not have a specific application form for authorization of practices involving medical exposures, nevertheless, the applicant is required to identify its exposed workers, including their classification and professional role, such as the medical physicists and medical physics expert. RSC issues three types of authorizations for practices involving medical exposures: registration, licensing and temporary permits, thus applying a graded approach according to the risk of each kind of medical exposure. This graded approach is also evidenced in the definition of the content of the documents supporting the authorization request according to the specific risks of each kind of medical exposure. Authorizations do not have an expiry date, but compliance with the regulatory requirements is ensured by conducting planned inspections periodically according to the risk of each type of medical exposure.

The RSC also requires applicants for authorization to provide evidence that health professionals in medical exposure area are trained and competent in radiation protection. Radiation protection officers (designated persons responsible for radiation safety) must have appropriate technical competence and training in radiation protection, and possess the professional qualifications established by the Minister of Health of the Republic of Lithuania (Order V-1001). According to legislation, medical physics experts must be recognized in the adequate area of medical exposures to perform their duties and responsibilities regarding optimization of exposures, patient dosimetry and commissioning of medical equipment.

Licensees are required to provide evidence that they have developed procedures for justification of individual medical exposures which ensure that it is carried out by means of consultation between the radiological medical practitioner and the referring medical practitioner, as appropriate, with account taken, in particular for patients who are pregnant or breast-feeding or are paediatric.

Licensees are also required to provide evidence that medical exposures have been optimized, specifically by using diagnostic reference levels, and dose constraints.

RSC requires applicants to provide evidence on the use of diagnostic reference levels, dose constraints for carers and comforters, and criteria for the release of patients who have undergone therapy with radiopharmaceuticals or low activity sealed sources.

Licensees must compare the average dose for the standard person with the established diagnostic reference levels (DRLs) and ensure that those values do not exceed or fall substantially below the DRLs, every 5 years.

National DRLs have been established by RSC’s Division of Expertise and Medical Exposure Monitoring and approved by the MoH and reviews them each 5 years. The data used to establish DRLs are provided by hospitals. DRL revision is also based on data collected from hospitals about patient dose assessments in all Lithuania hospitals. RSC director approves program for each 5 years to ensure that all hospitals perform patient dose evaluation in timely manner according to requirements. To ensure proper data collection each hospital has 3-6 month to collect data about patient dose for each radiodiagnostic and interventional radiology procedure and sent this information to RSC. RSC has developed guidelines to help licensees in submitting the correct data and results of patient exposure dose assessments (Order No. V-135).

RSC also requires applicants to provide evidence that there are arrangements in place for appropriate radiation protection in cases where a female patient is or might be pregnant or is breast-feeding, minimization of unintended or accidental medical exposure (including flaws in design, operational failures, failures and errors in software, human errors) and corresponding reporting.

Additionally, RSC requires, according to HN 77:2018, that applicants include evidence that there are arrangements in place to ensure appropriate radiation protection for members of the public and for family members, carers and comforters before a patient is released following radionuclide therapy.

The RSC further requires documented evidence demonstrating that licensees maintain records of patients' radiation doses from medical exposures for a minimum period of ten years. Additionally, patients' dose records are retained for the duration of their lifetime within the national Electronic Health Services and Cooperation Infrastructure Information System, together with associated medical imaging data that substantiate clinical findings.

Prior to issuing an authorization, RSC conducts an inspection to ensure the adequate implementation of radiation protection measures described in the documents supporting the application for authorization.

5.8. AUTHORIZATION ISSUES FOR PUBLIC EXPOSURE

Facilities (except nuclear installations) that plan to discharge radionuclides to the environment must submit a Plan for Radioactive Discharges into the Environment to the RSC as part of their authorization. In addition, they must submit periodic reports on their discharges to the RSC. If the discharges exceed those set out in the plan, this acts as a trigger for the RSC to conduct an unplanned inspection.

Annual effective doses to the representative person must be less than the dose constraints for members of the public set down in HN 73:2018 "Basic Radiation Protection Standards". The representative person for nuclear medicine facilities is a sewage sludge worker. Calculations of annual effective dose performed by the applicant for authorization or the licensee are verified by staff in the RSC Division of Public Exposure Monitoring. If any changes are planned to the specific radionuclides being discharged or their activities, the Plan for Radioactive Discharges into the Environment must be updated and approved.

For nuclear facilities a Plan for Radioactive Discharges into the Environment is sent by the operator to the RSC for comment before it is sent to VATESI for approval. These plans set out details of radioactive substances that will be discharged into the environment (air and water), the activities that will be discharged and the annual effective dose to the representative person of the public. For the nuclear facility the representative person is a person who lives close to the facility and eats locally sourced food.

As part of their authorization, the nuclear facility operator is required to implement a radiological environmental monitoring programme for public radiation protection purposes. At present, SE INPP is the only licensed entity performing radiological environmental monitoring in Lithuania.

The RSC order V-60 provides a list of the types of justified activities with ionizing radiation sources, except for activities with ionizing radiation sources in the field of nuclear power including the production, import and intended use of consumer products. Justified activities related to consumer products include the use of sealed radioactive sources in smoke detectors and the use of small quantities of radioactive materials in lamps and optical devices. To date the RSC has not received any authorization applications for the supply of consumer goods that exceed the exemption levels.

The RSC order V-60 also lists the activities where medical radiology equipment can be used for non-medical human imaging purposes such as age determination and detection of objects hidden in the human body. Each year hospitals in Lithuania report the number of non-medical human imaging procedures performed by them under their license conditions to the RSC. Apart from procedures performed in medical facilities, the RSC has not received any applications for authorization of non-medical human imaging.

The national reference level for external exposure to gamma radiation from building materials is 1 mSv per year. Manufacturers, importers and distributors of building materials must ensure that building materials

listed in HN 73:2018 “Basic Radiation Protection Standards” are radiologically tested prior to placing them on the market. An activity concentration index is calculated from the activity concentrations of radionuclides in the building materials and if it is greater than 1 then the materials can only be used in limited circumstances.

The requirements for radioactivity in water are set in HN 24:2023 “*Requirements for Safety and Quality of Drinking Water*”. The maximum permitted level for both tritium and radon is 100 Bq/l and the annual effective dose must be less than 0.1 mSv. Gross alpha and gross beta screening is used to determine if the dose is exceeded. Gross alpha and gross beta thresholds are rarely exceeded but if they are then the activity concentrations of individual radionuclides are determined so that the dose can be calculated.

The reference level for the average annual radon concentration in both homes and workplaces is 300 Bq/m³. Apart from radon there are no other existing exposure situations in Lithuania.

5.9. SUMMARY

The system for authorization of facilities and activities, including medical, public and occupational exposures and decommissioning is comprehensive. VATESI is responsible for authorisation of practices within the field of nuclear power, while all other practices are subject to the authority of the RSC. When applying for authorization, an applicant is required to submit documentation to demonstrate compliance with regulatory requirements. Although the system is well established, the IRRS team identified the following areas for improvement:

- Enhancing the risk categorization scheme to ensure that all radioactive sources are covered by the categorization scheme,
- Assignment of the radioactive material to one or more of the United Nations (UN) numbers specified in SSR-6 in transport licenses.

6. REVIEW AND ASSESSMENT

6.1. GENERIC ISSUES

For authorisation of practices involving ionizing radiation sources, RSC and VATESI review and assess applications and supporting documents in accordance with a graded approach.

For radiation sources, VATESI's internal procedure PR-3-2 "Description of the procedure for authorisation of activities with sources of ionising radiation in the nuclear power field" sets out detailed procedures for the review and assessment of documents for all practices involving sources of ionising radiation in the nuclear power field, including an approved review report form.

VATESI's internal procedure PR-5 "Procedure document for review and assessment of safety justification documents," describes the regulatory process for review and assessment and reviews are performed in accordance with a graded approach. The procedure PR-5 was last updated in 2019 and the IRRS team was informed that this procedure was undergoing revision. VATESI can be supported by external experts during its review.

RSC carries out its review and assessment in accordance with internal procedure P-9 on "Registration of activities with ionizing radiation sources, issuance of licenses and temporary permits to carry out activities with ionizing radiation sources", refers to practice-specific evaluation protocols, including templates for recording the review and assessment. RSC Order V-62 provides detailed guidance to applicants on the specific formatting and content requirements for safety assessments to be submitted as part of authorisation applications.

6.2. REVIEW AND ASSESSMENT FOR WASTE MANAGEMENT FACILITIES

Review and assessment for radioactive waste management facilities, predisposal facilities and disposal facilities, follows the regulatory review and assessment processes for facilities and activities as indicated in Law on Nuclear Safety. The safety cases for each stage of the life cycle of nuclear facility are established in "Rules on the Issue of Licenses and Permits in Nuclear Power Activities" and are applicable to radioactive waste management facilities and also includes the documents that are used in the review and assessment performed by VATESI. The procedure of VATESI (PR-5) describe the regulatory process for review and assessment. The procedures include references on how graded the approach should be applied in the review-process. A sub-process describes how periodic safety reviews are conducted. Typical content of a Periodic Safety Review (a periodic safety evaluation report) is defined by specific nuclear safety requirements for different types of facilities (Radioactive waste disposal facilities BSR-3.2.2-2016, Pre-disposal management of radioactive waste at nuclear installations" BSR-3.1.2-2017, Management of spent nuclear fuel in dry-type storage facilities" BSR-3.1.1-2016).

According to "Pre-disposal management of radioactive waste at nuclear installations" and "Management of spent nuclear fuel in dry-type storage facilities", the safety case for the predisposal management (including storage) of radioactive waste should cover siting, design, construction, commissioning and operation of a radioactive waste management facility. Furthermore, the regulation "Radioactive waste disposal facilities" covers site selection, design, construction and closure of the disposal facility, safety of the disposal facility has to be demonstrated through a combination of characteristics of the site, technical solutions of the disposal facility's design, procedures and actions of operation and post-closure surveillance of disposal facilities, radioactive waste characteristics and treatment method.

Requirements in "Radioactive waste disposal" specify that the post-closure surveillance shall commence immediately after closure of the disposal facility. The safety analysis and justification of the post-closure

of a disposal facility shall consider the likely impact of human actions on the safety of the disposal facility including an inadvertent human intrusion into the disposal facility after termination of its post-closure surveillance, by minimising the likelihood of an inadvertent human intrusion into the disposal facility and possible consequences. Additionally, the safety analysis report has to analyse the adequacy of the actions of surveillance of the disposal facility to ensure safety of the disposal facility and the duration of separate periods of surveillance of the disposal facility.

6.3. REVIEW AND ASSESSMENT FOR RADIATION SOURCES FACILITIES AND ACTIVITIES

For authorisation of practices involving radiation sources, RSC and VATESI review and assess the applications and supporting documents in accordance with a graded approach.

For radiation sources, VATESI's internal procedure PR-3-2 "Description of the procedure for Authorisation of activities with sources of ionising radiation in the nuclear power field" sets detailed procedures for the review and assessment of the documents for all practices with sources of ionising radiation in the nuclear power field, including an approved review report form.

RSC carries out review and assessment in accordance with internal procedure P-9 on authorisation. P-9 refers to practice-specific evaluation protocols including templates for recording of review and assessment. RSC Order No. V-62 provides detailed guidance to applicants on the specific format and content requirements for safety assessments that have to be submitted for review and assessment as part of authorisation applications. RSC is granted legal rights to access other state registers such as the Register of Legal Entities or Population Register to verify the data provided by applicants. RSC may consult with independent radiation safety experts, medical physics experts, and scientific-technical support organizations during the assessment process.

After authorizations have been issued, RSC reviews and assesses authorized parties' documentation if there has been a request for change of operational conditions or if a non-compliance was found after an inspection and the authorized party is expected to provide documented evidence that the non-conformity has been adequately corrected.

6.4. REVIEW AND ASSESSMENT FOR DECOMMISSIONING ACTIVITIES

Documents to be reviewed by VATESI during the authorization process for decommissioning of nuclear facilities are set in the regulatory framework. In accordance with these requirements, VATESI performs the review of the initial, updated and final decommissioning plans of nuclear facilities, including the safety analysis report of the decontamination and dismantling operations.

VATESI implements the procedure PR-5 "Procedure document for review and assessment of safety justification documents" which was last updated in 2019. The IRRS team was informed that this procedure was undergoing a revision.

VATESI can be supported by external national and international experts during its review. The IRRS team was informed that VATESI required technical support from RSC during the review of the final decommissioning report of Maišiagala radioactive waste storage facility to perform independent sampling and analysis of soil and groundwater to confirm the end state of the site presented by the SE Ignalina NPP in its final report.

Regarding review and assessment for decommissioning of radiation facilities and activities, the IRRS team confirmed that RSC staff participated in IAEA training related to cyclotron activities, covering aspects related to decommissioning, prior to the licensing of such an activity in nuclear medicine research centre

of Kaunas. As required by Lithuania regulation, RSC then performed review and assessment of the initial decommissioning plan of this new activity during its authorization process.

6.5. REVIEW AND ASSESSMENT FOR TRANSPORT

Applications related to the transport of radioactive material are reviewed and assessed according to general internal procedures.

- Review and assessment activities include evaluation of:
- radiation protection programmes;
- emergency arrangements;
- management systems;
- worker training and competence.

Checklists and guidance documents are used during review and assessment activities, including forms established by the competent authorities and available to operators to assist them in filling the application with the necessary safety justification documents.

In this context, VATESI identified the need to broaden the scope of internal procedure PR-5 to include regulatory review and the assessment of documentation relating to transport approvals (issue of certificates). The issue was already identified by Lithuania in the Action Plan prepared for the mission.

Given the extremely limited scale of transport operations in the country, the IRRS team noted that competent authorities' staff have the necessary expertise to carry out activities relating to the review and assessment of transport of radioactive material. The IRRS team further noted the participation of the RSC staff in IAEA training activities and international committees, including TRANSSC.

The IRRS team observed that, although the current staff of VATESI involved in transport review and assessment activities have a sufficient level of transport expertise there's no process to develop and maintain the necessary skills and capabilities of staff in the field of the transport, particularly in view of the potential future transport of spent fuel or radioactive waste currently stored at the INPP to another site or disposal facility.

RECOMMENDATIONS, SUGGESTIONS AND GOOD PRACTICES

Observation: VATESI has not established a proper process to further develop and maintain the necessary competence and skills of staff in the field of transport.

(1)	BASIS: GSR Part 1 (Rev. 1) Requirement 18 para 4.13 states that <i>"A process shall be established to develop and maintain the necessary competence and skills of staff of the regulatory body, as an element of knowledge management"</i> .
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S7	Suggestion: VATESI should consider establishing a proper process to further develop and maintain the necessary competence and skills of staff in the field of transport.
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6.6. REVIEW AND ASSESSMENT FOR OCCUPATIONAL EXPOSURE

VATESI's procedures PR-5 and PR-3-2 are applicable for occupational exposure. These procedures establish responsibilities, timelines, quality control, application of the graded approach, and the possibility to request additional information where submitted documentation is incomplete or does not demonstrate

compliance. During authorization, VATESI reviews the Radiation Protection Programme (RPP) against the requirements in BSR-1.9.3-2016. After the issuing of the authorization, review and assessment continues through periodic review of safety documentation, including the Programme for Monitoring Workers' Exposure and Workplaces, occupational exposure reports, safety analysis reports for modified practices, and other radiation protection documents.

Optimization of occupational exposure is reviewed through the ALARA Programme, which is part of the RPP. BSR-1.9.3-2016 requires the license holder to establish organizational arrangements for optimization, such as an ALARA committee, working group or designated responsible persons. The ALARA Programme is required to include optimization objectives, dose constraints, responsibilities, training and briefing arrangements, planned radiation-dangerous works, methods for dose reduction, and arrangements for assessing effectiveness and applying corrective actions. The programme is reviewed annually.

VATESI reviews the Programme for Monitoring Workers' Exposure and Workplaces. In accordance with BSR-1.9.3-2016, the license or permit holder is required to review this programme annually and update it if radiological conditions or planned activities change. The updated programme must be submitted to VATESI for approval, and VATESI decides on approval within the prescribed timeframe if the programme complies with the requirements.

VATESI also reviews annual occupational exposure reports. According to BSR-1.9.3-2016, the license or permit holder must submit an annual report on implementation of the occupational exposure monitoring programme for the previous year. VATESI reviews the report to analyse individual and collective dose trends, verify compliance with dose limits and investigation levels, and request additional information or corrective measures where necessary. The IRRS team noted that not all the areas related to occupational exposure are covered and inspected in the current the Procedure Document for Inspections, PR-6, are inspected. **Suggestion S8 in section 7.6 addresses this issue.**

For RSC-regulated practices, review and assessment are supported by the Law on Radiation Protection, the Rules on Authorization of Practices with Sources of Ionizing Radiation, the Description of the Procedure for Preparing Documents Required for the Authorization of Activities Involving Sources of Ionizing Radiation, HN 73:2018 "Basic Radiation Protection Standards" and the Rules on the Performance of Monitoring of Workers for Occupational Exposure and Workplace Monitoring. RSC reviews the radiation protection programme which includes, organizational structure, quality assurance programme, worker competence and training, appointment of the radiation protection officer, monitoring arrangements, workplace classification, health surveillance, and emergency management plan.

The review and assessment also address specific situations, including temporary or outside workers and emergency preparedness. HN73:2018 "Basic Radiation Protection Standards" requires arrangements for temporary workers, including verification of exposure dose passports where applicable, while the authorization documentation requires an emergency management plan describing potential accident scenarios, exposed groups and predicted exposure levels. For aircrew exposure due to cosmic radiation, RSC reviews the radiation protection programme for aircrew, including organizational arrangements, internal procedures, dose assessment methodology and monitoring of compliance. The programme is reviewed at least annually, and recognized calculation tools are used or referenced for dose assessment.

6.7. REVIEW AND ASSESSMENT FOR MEDICAL EXPOSURE

Documents submitted to RSC in support of authorization applications are reviewed according to RSC procedure P-9, the Law on Radiation Protection and HN73:2018. Additionally, RSC reviews different types of medical exposures according to the regulatory requirements defined in other hygiene norms (HN31:2021, HN77:2015, HN78:2009 and HN95:2015) which contain specific requirements for radiodiagnostic and

interventional radiology, nuclear medicine and radiotherapy. If there are missing support documents or gaps in the submitted content, RSC writes a formal letter requesting the applicant to address them. If all documents are approved, RSC conducts an inspection to confirm that all radiation protection measures have been adequately implemented before issuing an authorization.

RSC reviews supporting documentation and assesses their implementation specifically considering issues such as justification of individual medical exposures and optimization of patients, carers, and volunteers in biomedical research. RSC also reviews optimization measures regarding design of installations and shielding, source calibration, dosimetry of patients, diagnostic reference levels, and dose constraints of carers and comforters.

Ministry of Health has established rules for conducting of clinical audits which covers general requirements, requirements for institutions organizing clinical audits, requirements for composition of audit team, requirements for auditors, questionnaires and other administrative issues. The authorized parties order the clinical audit according to Ministry of Health established rules. The audit team perform clinical audit and prepare the clinical audit report with recommendations and suggestions. Audited authorised party according to clinical audit report shall prepare implementation plan of recommendations. RSC reviews implementation plans during inspections and plans implementation of measures to address such non-conformities.

After authorizations have been issued, RSC reviews and assesses operators' documentation if there has been a request for change of operational conditions, or if a non-compliance was found after a periodic planned inspection, (included in the inspection's report), the operator is expected to provide documented evidence that the non-conformity has been adequately corrected.

6.8. REVIEW AND ASSESSMENT FOR PUBLIC EXPOSURE

VATESI requires the performance of a comprehensive safety analysis and the submission of a periodic safety review report at least once every 10 years. Several VATESI staff are involved in the review of these reports. If a new practice is planned such as the transport of radioactive waste, then a safety analysis report must be prepared which includes information on justification and effective doses to the public.

In accordance with an Order of the Minister of Health No. V-900, undertakings (except nuclear installations) are required to conduct environmental monitoring if the annual effective dose to the representative person as detailed in the Plan for Radioactive Discharges into the Environment is greater than 0.1 mSv. At present there are no licensees required to carry out an environmental monitoring programme except in the nuclear power field. If the annual effective dose exceeds 10 µSv, a report of discharges must be submitted to the RSC on a quarterly basis. Where the annual effective dose is less than 10 µSv, an annual report is required. The RSC reviews this data to ensure that discharges are less than those in the Plan for Radioactive Discharges into the Environment.

SE INPP submits data on discharges to the air and water every month to VATESI who check that discharges are in compliance with discharge limits. This data is also sent to the RSC because the RSC is responsible for public exposure. The RSC checks the annual effective dose calculations performed by the operator. The data on public exposure is made publicly available on the operator's and the RSC's website. In 2024, the dose to the representative person from these discharges was 5.2 µSv (approximately 2% of the dose constraint).

The RSC supports VATESI on the verification of discharges under a Cooperation Agreement. Under this agreement, a member of the laboratory staff from RSC accompanies VATESI to collect samples (air filters and water) from either the Ignalina NPP or the Maišiagala storage facility (when it was still in operation)

for gamma analysis. Since VATESI does not have its own gamma spectrometry measurement capability, the analyses performed by the RSC are used to verify data provided by the operator to VATESI. In 2025, the RSC carried out a study on tritium in water at the Maišiagala site on behalf of VATESI, as part of the review of the final decommissioning report.

6.9. SUMMARY

Both VATESI and the RSC have well-established procedures for reviewing and assessing of support documents for authorization applications of practices involving radiation sources in accordance with a graded approach. These procedures ensure detailed review and assessment of documents and also support authorizations and the efficient identification of non-compliances.

To further improve review and assessment the IRRS team suggests that VATESI plan for future expertise for transport activities.

7. INSPECTION

7.1. GENERIC ISSUES

VATESI conducts regulatory inspections in accordance with BSR-1.1.3-2016. Also VATESI has on-site inspectors who are performing permanent surveillance (performing walkdowns etc.) at Ignalina NPP site in accordance with Law on Nuclear Safety and BSR-1.1.7-2023. These requirements establish also the roles and responsibilities of VATESI on-site inspectors stationed at the INPP site.

VATESI prepares a five-year inspection programme from which an annual inspection plan is derived and published on the VATESI website. The programme includes inspections of all nuclear facilities at INPP, as well as inspections of licensees conducting activities with radiation sources in the nuclear power field and other legal persons owning nuclear material for forthcoming five-year period. At the end of each annual inspection cycle, VATESI prepares an internal report evaluating inspection performance against pre-defined criteria and checklists. VATESI also reviews overall performance at the end of each three or five-year cycle depending on the type of the license to support the preparation of the subsequent inspection programme.

The VATESI five-year inspection programme and annual inspection plan include regular inspections, special inspections and technical inspections. In response to gained information, situations or events, VATESI may also conduct unplanned inspections, either announced or unannounced, as provided for in the Law on Public Administration, the Law on Nuclear Safety and the Law on Radiation Protection.

RSC prepares an annual inspection plan that is reviewed quarterly. The plan includes approximately 600 inspections annually, including both announced and unannounced inspections, which are carried out by RSC inspectors based in Vilnius, Kaunas and Klaipėda. Team meetings are regularly held to exchange inspection experience and discuss inspection findings. Inspection frequencies are established using a graded approach in accordance with the Radiation Protection Supervision Regulations. Following the COVID-19 pandemic, remote inspections continue to be used for low-risk practices, such as dental radiography. Inspection activities have been accredited to ISO/IEC 17020:2012 by the Lithuanian National Accreditation Bureau since 2024.

Each year, RSC organises three to five seminars for Radiation Protection Officers (RPO), medical physicists and other relevant staff from the dental, industrial and medical sectors to provide feedback and training on common non-compliances identified during inspections. Certificates of attendance are issued and contribute towards continuing professional development. RSC also communicates relevant safety information to licensees, including information received from the IAEA ITDB via VATESI (the Lithuania ITDB contact point).

Inspection activities include the review of documentation, observation of the conduct of the practice, performance of instrumental measurements, and assessment of monitoring records and operational practices. Inspection reports are systematically prepared and formally followed up to verify the implementation of corrective actions, where necessary.

7.2. INSPECTION OF WASTE MANAGEMENT FACILITIES

VATESI conducts inspections at radioactive waste management facilities in accordance with BSR-1.1.3-2016 and follow the VATESI procedure “Procedure document for inspections” (PR-6). The inspection is documented in a report according to the VATESI procedures.

VATESI inspections conducted at radioactive waste management facilities, pre-disposal facilities and disposal facilities, have specific focus on:

- Maintenance and *testing* (ensuring structures, systems, and components important to safety are operated and maintained according to design specifications.)
- Storage and *disposal*: (verifying storage capacity, adherence to waste acceptance criteria, and the integrity/tightness of waste packages).
- Operational *conditions*: (compliance with operational limits and conditions and the quality of packages.)

RSC performs inspections of radioactive waste management at small radioactive waste producers according to internal procedures (P-10 and P-33), which describe the procedure for conducting, organizing and executing inspections. RSC inspects compliance with HN 89:2022. According to these procedures, the inspection is documented in a report.

The IRRS team was informed that approximately every second year a joint inspection by the two authorities is carried out at SE INPP (radioactive waste manager), with different focus areas based on their mandate.

7.3. INSPECTION OF RADIATION SOURCES FACILITIES AND ACTIVITIES

The IRRS team was informed that VATESI had only one inspector responsible for radiation sources used for activities in the field of nuclear power, which was considered adequate given that only one license and one registration for the possession and use of radiation sources had been issued by VATESI. Nevertheless, supervisory personnel and other cross-trained staff were available to conduct inspections if the designated inspector was unavailable.

VATESI conducts inspections in accordance with the annual inspection plan, BSR-1.1.3-2016, internal procedure PR-6 and questionnaires (checklists). For radiation sources, inspections are conducted at least once every two years. During inspections, VATESI verifies that radiation sources are accurately recorded in the State Register for Ionizing Radiation Sources.

The IRRS team was informed that RSC had nine inspectors responsible for radiation source oversight. RSC conducts inspections in accordance with Order V-285, “Radiation Safety Supervision Regulations”, RSC P-33, and questionnaires established under Order V-155. Order V-285 establishes inspection frequencies based on a graded approach, with increased inspection frequency applied in cases of non-compliance. Unplanned and unannounced inspections are conducted in response to information regarding potential unauthorised activities. For activities and facilities involving very low-risk radiation sources, inspections may be conducted remotely. The IRRS team was also informed that inspections may be carried out at field sites for practices such as industrial radiography.

Although registration and licensing are not required for generators that are not in use, notification remains mandatory. RSC maintains records of such notifications and conducts inspections to verify the status of the generators. RSC also conducts inspections of scrap metal processing facilities, based on lists obtained from the environmental authority, as well as antique shops and fairs identified through internet searches, to verify compliance with radiation protection requirements despite these facilities not being licensed.

RSC additionally conducts inspections in response to incidents involving contaminated scrap metal, orphan sources, and expected radiation detections at borders in accordance with internal procedure P-23. Laboratory personnel may accompany inspectors to provide technical support, including measurement and testing services.

RSC inspectors are required to fulfil minimum training requirements before they are allowed to start on-the-job training to carry out inspections. The IRRS team was informed that inspector assignments are based on training and competency, with all inspectors intended to be trained to be eligible to conduct “universal”

inspections and specialised inspectors assigned to more specialised inspections. RSC also applies an internal requirement for rotation of inspectors during planned inspections. For certain inspection types, RSC procedure P-33 requires that inspections be conducted by at least two inspectors.

For non-compliances found during inspections, the RSIS supports inspectors in monitoring the implementation of corrective actions within established deadlines. Authorised parties are similarly able to access the system to review identified non-compliances and associated corrective action deadlines. RSIS also supports risk-informed regulatory planning. Using information captured within the system — including the categorisation of radioactive materials, the nature of the practice or application, compliance history, and previous enforcement actions — RSC can categorise authorised persons according to risk. RSC uses the system's risk profiling capability to generate an initial draft of the annual inspection plan, which inspectors may review and revise before submission to the Director of RSC for approval.

Site visit to a calibration facility

The IRRS team observed a planned inspection conducted by RSC at a calibration facility. The inspection commenced with an entry meeting between facility representatives and the inspection team. It was conducted in accordance with an inspection plan approved by the Head of RSC's Division of Radiation Supervision, which defined the inspection objectives, with the use of relevant inspection questionnaires and checklists. The inspection included verification of documentary evidence, a walkdown of the facility with dose rate measurements. Inspectors also verified the implementation of corrective measures arising from findings identified during the previous inspection. The inspection concluded with a discussion of the inspection results, a reminder to maintain timely updates to the national source register and license documentation, and an invitation for the licensee to contact RSC regarding any future questions or issues. The IRRS team observed that the inspection was conducted in a professional manner and characterised by constructive engagement between inspectors and the licensee.

The IRRS team also met with the RPO, who considered RSC inspectors to be competent and noted that inspectors provided useful information regarding new or forthcoming regulatory requirements requiring action by the licensee. The RPO welcomed the introduction of the new online authorization system, noting that it had improved the efficiency of application submission and status tracking, and commented that licenses were issued in a timely manner.

7.4. INSPECTION OF DECOMMISSIONING ACTIVITIES

Inspections at facilities under decommissioning are carried out in accordance with BSR-1.1.3-2016 and following the VATESI procedure "Procedure document for inspection" (PR-6). The inspection is documented accordingly the VATESI procedures in a report.

During decommissioning inspections, that now are only performed on unit 1 and 2 of INPP, VATESI inspectors focus on safety requirements related with maintenance of permanently shut-down unit's systems and components important to safety, works under projects of dismantling and decontamination and management of radioactive waste. These inspections are supported by a specific control questionnaire and report integrated in the management system of VATESI.

During the mission, the IRRS team observed an inspection conducted by VATESI inspectors at the INPP site. Inspectors controlled the completion of dismantling and decontamination activities in reactor unit 2 to check compliance with permits approved by VATESI, as well as the management of waste generated by previous decommissioning activities.

As part of the authorization process for decommissioning, VATESI inspectors systematically perform inspections to support issuance of license and permits.

Regarding, radiation sources and activities, the RSC inspection checklists include specific questions related to decommissioning during inspection conducted for license application and before revoking a license for facilities for which a final decommissioning report is requested by regulation.

7.5. INSPECTION OF TRANSPORT

Inspections are carried out in accordance with a multi-year (5-year) inspection programme and an annual plan, which also cover activities relating to the transport of radioactive material.

Inspection of transport activities are carried out by both VATESI and the RSC. Specifically,

- VATESI carries out inspections in accordance with procedures PR-6 and BSR-1.1.3-2016 to verify compliance with license conditions, safety documentation and regulatory requirements.
- The RSC carries out scheduled and unscheduled inspections in accordance with the Regulation on Radiation Protection Supervision, using checklists relating to transport requirements, compliance with the ADR, radiation protection programmes, security measures and emergency preparedness.

Given the extremely limited scale of transport operations in the country, the IRRS team noted that inspectors have the necessary expertise to carry out inspections relating to the transport of radioactive material and use appropriate equipment, including dosimeters and contamination monitoring instruments.

The IRRS team further noted the participation of RSC staff in IAEA training activities and international committees.

The IRRS team further noted that joint inspections with other national administrations having a role in the oversight of radioactive material transport (e.g. Lithuanian Transport Safety Administration, Lithuanian Customs) can be conducted in practice to optimise regulatory activities, although no formal cooperation agreements have been established.

7.6. INSPECTION OF OCCUPATIONAL EXPOSURE

VATESI conducts inspections of occupational radiation protection in accordance with BSR-1.1.3-2016 and internal inspection procedure PR-6. According to the procedures inspectors verify the physical status of radiation monitoring systems and radiation protection means, including the organizational and technical arrangements described in the RPP. For occupational radiation protection the inspection areas include elements of the RPP, but the self-assessment prepared in preparation for the mission identified the need to establish additional provisions in PR-6 to assure that all areas of the RPP are inspected during the inspection cycle.

This issue is relevant to the effectiveness and completeness of regulatory inspection. The RPP is the principal licensee document through which arrangements for occupational exposure control are implemented. If PR-6 does not explicitly require systematic coverage of all relevant areas of the programme, there is a risk that some important elements, such as classification of areas, workplace monitoring, individual monitoring, dose constraints, investigation levels, control of outside workers, training, health surveillance, contamination control and optimization arrangements, may not be inspected in a consistent and traceable manner.

RECOMMENDATIONS, SUGGESTIONS AND GOOD PRACTICES

Observation: VATESI inspection procedure PR-6 does not cover the systematic inspection of all areas of occupational radiation protection within the Radiation Protection Programme. The issue was already identified by Lithuania in the Action Plan prepared for the mission.

(1)	BASIS: GSR Part 1 (Rev. 1) Requirement 29, para. 4.50 states that: <i>“the regulatory body shall develop and implement a programme of inspection of facilities and activities, to confirm compliance with regulatory requirements and with any conditions specified in the authorization.</i>
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S8	Suggestion: VATESI should consider updating its inspection procedure to cover the systematic inspection of all areas for occupational exposure in the Radiation Protection Programme.
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RSC conducts inspections of occupational radiation protection for practices outside the nuclear energy sector. During inspections, RSC verifies the implementation of radiation protection requirements, including arrangements for occupational exposure control, workplace and individual monitoring, training, controlled and supervised areas, health surveillance, and implementation of the radiation protection programme. Where non-compliances are identified during inspections, RSC requires the authorized party to provide documented evidence demonstrating that corrective measures have been implemented and reviews this evidence before closing the inspection finding.

7.7. INSPECTION OF MEDICAL EXPOSURE

RSC's inspection programme covers medical exposures.

Approximately 600 to 700 inspections are conducted each year by RSC, of which 100 concern practices involving medical exposures (except dental practices). RSC has nine inspectors, of which six have the necessary competence to conduct inspections in practices that include medical exposures.

Inspections are planned using a graded approach regarding frequency (ranging from 1 inspection per year for practices which give high doses to patients, such as nuclear medicine, brachytherapy and radiotherapy, to 1 inspection in 5 years, for dental practices using X-Ray generators), according to requirements defined in the “Radiation Safety Supervision Regulations”. RSC's inspections may be announced or unannounced, planned or unplanned and carried out remotely or at the registrants and licensees' installations.

RSC is required to notify registrants and licensees of inspections in writing at least 10 working days before the scheduled inspection. This notification must include information regarding the questionnaires (checklists) that will be used during the inspection, and which are publicly available on RSC's website. These questionnaires help registrants and licensees in preparing for the inspection.

The inspection of licensees which conduct multiple types of practices (e.g. hospitals which provide nuclear medicine, radiotherapy and radiology and interventional radiology, blood irradiators) is planned so that each kind of practice is inspected in different years, but in accordance with the practice specific inspection frequency.

Additionally, RSC conducts inspections prior to issuing registrations, licenses or temporary permits of practices, or before alteration of the operating conditions specified in such authorization documents.

Site visit to a radiology department of a hospital

The IRRS team members observed the conduct of an inspection at the radiology department of UAB InMedica (MELIVA Clinic) hospital. RSC inspectors conducted a scheduled inspection, for which the objective, scope of the inspection, areas of focus to be verified, and the areas to be visited, had been communicated to the licensee 10 days prior. Hence, both the RSC inspectors and the licensee had ample time to prepare for inspection. There were two RSC inspectors and the facility's RPO present during the inspection.

The RSC inspectors used a check list during the inspection, and they carried out measurements to check the shielding of the X-Ray room, and of the radiographer's room. Additionally, the inspectors checked if the records of patient doses contained the necessary information. The IRRS team concluded that the inspection was conducted very professionally, and thoroughly.

During discussion with the facility representatives the IRRS team was informed that cooperation and communication with RSC is good.

7.8. INSPECTION OF PUBLIC EXPOSURE

Inspections of the nuclear facilities by VATESI include elements that relate to protection of the public such as checking that discharges are in line with those in the relevant Plan for Radioactive Discharges into the Environment and checking that the operator's monitoring equipment is properly calibrated.

The RSC uses checklists for inspections that also include questions related to public exposure. These include verifying arrangements for access to controlled and supervised areas by members of the public and checking that information is provided to patients undergoing procedures involving radiopharmaceuticals.

This information is provided verbally if the half-life of the radionuclide is less than six hours and it is provided in written form if the half-life of the radionuclide is more than six hours.

7.9. SUMMARY

The regulatory inspection framework, as implemented by both VATESI and the RSC, is structured and supported by risk-informed regulatory planning, multi-year inspection programmes, documented procedures, and effective follow-up mechanisms.

To strengthen the inspection regime further, opportunities for improvement include expanding enhancing VATESI's PR-6 to ensure comprehensive occupational radiation protection oversight.

8. ENFORCEMENT

8.1. ENFORCEMENT POLICY AND PROCESS

Lithuania's regulatory framework for enforcement pertaining to nuclear and radiation safety establishes legal powers for both VATESI and RSC to apply graded enforcement measures. The framework is provided by the Law on Nuclear Safety, the Law on Radiation Protection, the Law on Public Administration, the Code of Administrative Offences, and associated Orders and internal procedures. Available enforcement actions range from verbal and written warnings to mandatory corrective requirements, suspension or revocation of authorisation, penalties and referral of criminal matters to law enforcement authorities. Both VATESI and RSC apply a graded approach that considers the severity, safety significance, complexity, and intentionality of non-compliances, with enforcement closely linked to inspection oversight activities.

The enforcement systems of both authorities incorporate structured processes for documenting non-compliances, monitoring implementation of corrective actions and imposing of penalties. For VATESI, the enforcement process is defined in BSR-1.1.4-2017 "Rules of Procedure for Applying Enforcement Measures" and internal procedure PR-7 "Procedure document for application of enforcement measures". For RSC, the enforcement process is defined in Radiation Protection Supervision Regulations, RSC QMS Procedure P-10 "Radiation Protection Supervision" and its supplementary instruction DI-14 "Drawing up administrative offense protocols and consideration of administrative offense cases at the Radiation Protection Centre". Both RSC and VATESI provide mechanisms for appeal. If necessary, VATESI can cooperate with other state institutions, including law enforcement, in order to ensure legal regulation and compliance with nuclear safety requirements.

Enforcement actions in the event of non-compliance may include warnings, corrective actions within specified timeframes, follow-up inspections, administrative penalties, suspension of licenses and referral to the judicial authorities, as appropriate.

8.2. ENFORCEMENT IMPLEMENTATION

VATESI and the RSC have established enforcement processes for addressing non-compliances with regulatory requirements and authorization conditions. Enforcement actions may include verbal remarks, written instructions, administrative penalties, suspension of work with a source, and suspension or revocation of an authorization, depending on the safety significance of the non-compliance.

The RSC procedures require inspectors to input into the RSIS information on non-compliances including whether any non-compliance is minor or major based on the criteria set out in "Radiation Protection Supervision Regulations", along with the deadline for implementation of corrective actions. Authorised parties are able to access the system to view this information. RSC also publishes an overview on the number of non-compliances found and penalties imposed. The IRRS team was informed of an example of enforcement action implemented by RSC related to the attempted postal shipment of antique devices containing radium-226. Following the activation of radiation alarms at an airport cargo terminal, customs authorities informed RSC, who responded and carried out measurements and spectrometric analysis. The radioactive items were temporarily stored in an authorised dangerous goods storage area and subsequently transferred to the INPP for radioactive waste management. Administrative penalties were applied to the individual responsible for the shipment in accordance with national legislation.

VATESI's decision-making process for the enforcement of corrective actions is formalised in the procedure PR-7 where the enforcement actions are listed as well as the stepwise procedure on how non-compliances should be handled after identification. If inspections identified non-compliances with requirements during

an inspection, firstly a verbal requirement could be given to the authorized party as preliminary outcome of the inspection which may eliminate insignificant violations. Nevertheless, all non-compliances are made official by the report from inspection together with formal order from VATESI. The corrective actions are recorded in the VATESI internal document systems and stored according to National Archive's regulations.

In 2025, RSC found 261 cases of non-compliances across inspections of 162 entities. Non-compliances included: employees working with ionizing radiation were not trained in radiation safety in a timely manner; improper compliance with radiation safety requirements for patients; improperly submitted data to the State Register of Ionizing Radiation Sources and Exposure of Workers; changes in the conditions of authorisations were not reported; employee exposure and workplace monitoring. Thirty non-compliances were classified as significant, including illegal activities with ionizing radiation sources. Illegal activities included cases where workers performed work with X-ray diagnostic equipment without authorization, or the entity generally carried out its activities without authorization. For all significant violations, administrative offences were drawn and monetary fines of various amounts were imposed.

8.3. SUMMARY

The existing legal framework provides adequate enforcement powers to regulatory body. Requirements and procedures include and describe graded actions for non-compliances, ranging from those of minor safety significance to those requiring strong enforcement measures.

9. REGULATIONS AND GUIDES

9.1. GENERIC ISSUES

Lithuania has regulations and guides in place for planned, existing and emergency exposure situations. The Law on Legislative Framework sets out the process for drafting and reviewing legislation in Lithuania. Legislation which is being updated can be viewed by the public and interested parties on a national online “*Legal Act Information System*”. This portal can also be used to submit comments on draft legislation.

VATESI has a programme in place covering the period 2025 to 2029 which sets out the regulations which will be reviewed each year (in accordance with annual plan) and the staff member with lead responsibility for the review. VATESI internal procedure PR-1 “Procedure document for drafting legal acts” supports the review and drafting of legislation.

The RSC has a plan covering the period 2026 to 2030 for reviewing regulations. This plan sets out review dates and responsibilities for performing the review. The RSC procedure P-15 supports these reviews.

9.2. REGULATIONS AND GUIDES FOR WASTE MANAGEMENT FACILITIES

In Lithuania there is a set of regulations developed under the acts that specify the regulation of safety relevant aspects for the predisposal management of radioactive waste and the disposal of radioactive waste:

- Management of Spent Nuclear Fuel in Dry-type Storage Facilities (BSR-3.1.1-2016)
- Pre-disposal Management of Radioactive Waste at Nuclear Installations (BSR-3.1.2-2017)
- Radioactive Waste Disposal Facilities (BSR-3.2.2-2016)
- Radioactive Waste Acceptance Criteria for Near Surface Disposal Facilities (BSR-3.2.1-2015)
- Management of Radioactive Waste (HN 89:2022)

The existing acts and regulations are detailed and take into consideration the different stages of the licensing process. The IRRS team was informed that the level of detail has increased based on experience and input from the licensee. For BSR-3.1.1-2016, BSR-3.1.2-2017 and BSR-3.2.2-2016 updates have taken place in 2026 according to the VATESI plan and the IRRS team was informed that drafts will include some new specific paragraphs that have been identified after inspections. The safety requirements related to pre-disposal management of radioactive waste at nuclear installations will, after revision, include more specific requirements related to the degradation of the waste packages. This is of special concern when long-term storage is foreseen. The safety requirements related to the management of spent fuel in dry-type storage facilities will include some specific parts related to the programme for ageing management since the dry-storage is foreseen to have a longer lifetime than originally planned since the deep geological repository will not be in place for a number of decades.

9.3. REGULATIONS AND GUIDES FOR RADIATION SOURCES FACILITIES AND ACTIVITIES

Under the Law on Radiation Protection, the subsequent provisions for radiation sources facilities and activities are set out in the following Hygiene Standards:

- HN 73:2018 “Basic Safety Standards for Protection Against Ionising Radiation”
- HN 31:2021 “Radiation Protection Requirements in Medical X-ray Diagnostics”

- HN 52:2012 “Radiation Protection in Industrial Radiography”
- HN 77:2015 “Radiation Protection in Nuclear Medicine”
- HN 78:2009 “Quality Control Requirements and Assessment Criteria in Medical X-ray Diagnostics”
- HN 86:2023 “Radiation Protection of Non-Medical Ionising Radiation Generators and Sealed Radioactive Sources”
- HN 95:2015 “Radiation Protection and Quality Assurance in Radiotherapy”

Further provisions are also set in:

- Procedure Description for preparing documents necessary for licensing activities with ionizing radiation
- Rules on Import, Export, Transit and Transport in the Republic of Lithuania of Radioactive Material, Radioactive Waste and Spent Nuclear Fuel
- Radiation Protection Rules in Veterinary Medicine
- Procedure for Control of Radioactive Contamination of Scrap Metal, Waste and Metal Products Obtained by Recycling Them at Procurement and Processing Sites
- Procedure Description for Submission of Documents Necessary for Verification of Suitability to Hold Positions Responsible for Radiation Protection and/or Physical Protection of Category I, II, III Radioactive Sources, or to Work with Category I, II, III Radioactive Sources, and for Organisation of Suitability Verification.

Further guidance is also published on the RSC website. The RSC has also developed infographics for different applications of radiation sources to provide guidance on licensing and requirements.

The RSC has plans for reviewing legislation and the IRRS team was informed that lessons learnt from experience and feedback are incorporated into review of these provisions. The IRRS team was informed that since both VATESI and the RSC have roles in control of radiation sources, each authority is required under the Law on Public Administration to consult the other on any draft legislation or amendments that is relevant to both.

9.4. REGULATIONS AND GUIDES FOR DECOMMISSIONING ACTIVITIES

In accordance with the legal framework of Lithuania, regulation of safety relevant aspects of decommissioning are covered by the following requirements and rules of VATESI:

- Decommissioning of Nuclear Facilities (BSR-1.5.1-2019)
- The evaluation of compliance with free release criteria of buildings, engineering structures and site of nuclear facilities (BST-1.5.1-2020)

The IRRS team consider that the details of these documents are adequate regarding decommissioning safety standards, in the context of nuclear facilities in Lithuania.

As identified in the action plan of the self-assessment, VATESI confirmed to the IRRS team that BSR-1.5.1 should be revised to incorporate regulatory experience gained with the completion of decommissioning of Maišiagala radioactive waste storage facility.

Regarding radiation sources and activities, specific requirements related to decommissioning are set in a procedure for decommissioning of the facilities using radiation sources which was last updated in 2020.

9.5. REGULATIONS AND GUIDES FOR TRANSPORT

Lithuania's regulatory framework for the transport of radioactive material incorporates international transport instruments. Lithuania implements the requirements of SSR-6 primarily through its binding participation in international modal transport instruments, which incorporate the SSR-6 requirements into directly applicable technical rules. National legislation does not duplicate these technical provisions but ensures their enforcement by establishing competent authorities, licensing and shipment approval systems, package certification procedures, radiation protection requirements, and inspection.

Guidance material for transport operators is available through dedicated booklets published on the RSC's website.

The IRRS team observed that certain regulatory provisions have not yet been formally incorporated into the regulatory framework. These include, with particular reference to VATESI's area of competence, the absence of requirements for the notification and registration of serial numbers of packages manufactured in accordance with an approved design, and the lack of approval procedures for the calculation of radionuclide values not listed in SSR-6 and for the calculation of alternative activity limits for exempt consignments.

RECOMMENDATIONS, SUGGESTIONS AND GOOD PRACTICES

Observation: VATESI has not established requirements for notification and registration of serial numbers of each packaging manufactured to a design approved under paras 808, 811, 814 and 820 of SSR-6 being transported in Lithuania. The issue was already identified by Lithuania in the Action Plan prepared for the mission.

(1)	BASIS: SSR-6 (Rev.1) para 824 states that <i>“The competent authority shall be informed of the serial number of each packaging manufactured to a design approved under paras 808, 811, 814 and 820.”</i>
R1	Recommendation: VATESI should establish regulatory requirements for the notification and registration of the serial numbers of each packaging manufactured in accordance with package designs approved under SSR-6 and transported within Lithuania.

RECOMMENDATIONS, SUGGESTIONS AND GOOD PRACTICES

Observation: VATESI has not established regulatory provisions for the approval of the calculation of radionuclide values not listed in SSR-6 and the calculation of alternative activity limits for exempt consignments. The issue was already identified by Lithuania in the Action Plan prepared for the mission.

(1)	BASIS: SSR-6 (Rev.1) para 802 states that <i>“802. Competent authority approval shall be required for the following: [...] (e) Calculation of radionuclide values that are not listed in Table 2 (see para. 403(a)). (f) Calculation of alternative activity limits for an exempt consignment of instruments or articles (see para. 403(b)).”.</i>
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R2	Recommendation: VATESI should establish regulatory provisions for the approval of calculation of radionuclide values not specified in IAEA SSR-6 Regulations, as well as for the calculation of alternative activity limits for exempt consignments.
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9.6. REGULATIONS AND GUIDES FOR OCCUPATIONAL EXPOSURE

The regulatory framework and guides relevant to occupational exposure have been described in Sections 9.1, 9.2 and 9.3 of this report. These sections address the overall legal and regulatory framework, the development and review of regulations and guides, and the regulatory basis applicable to radiation protection and safety. The specific observations and findings related to occupational exposure are presented in Section 6.6, where the issues concerning the completeness of occupational radiation protection requirements and their implementation through regulatory oversight are addressed.

For practices under the RSC's responsibility, occupational radiation protection requirements are mainly established through the Hygiene Standards approved by the Ministry of Health, in particular HN 73:2018 "Basic Radiation Protection Standards". These requirements address key elements such as occupational dose limits, classification of exposed workers, individual monitoring, workplace monitoring, medical surveillance, radiation protection training and the responsibilities of employers, licensees and workers. Additional Hygiene Standards provide more specific requirements for practices, including diagnostic radiology, nuclear medicine, radiotherapy and industrial radiography.

For the nuclear energy sector, the main regulatory instrument is Nuclear Safety Requirements BSR-1.9.3-2016, "Radiation Protection at Nuclear Facilities". BSR-1.9.3-2016 establishes requirements for the radiation protection of workers at nuclear facilities, including the responsibilities of licensees and permit holders, the radiation protection programme, planning of work under optimized radiological conditions, individual monitoring, occupational dose constraints, medical examinations and training.

The IRRS team noted that the regulatory framework provides the main requirements necessary for controlling occupational exposure in both nuclear and non-nuclear practices.

9.7. REGULATIONS AND GUIDES FOR MEDICAL EXPOSURE

The regulatory framework for medical exposures is described in section 9.3.

All legal documents containing requirements for medical exposure are developed in collaboration with professional societies. These societies provide their comments and suggestions regarding the requirements and prepare recommendations on significant matters within their areas of expertise.

The RSC has developed regulations requiring specific education, training and competences for medical physicists and medical physics experts.

The RSC has also developed regulations on how hospitals should establish local diagnostic reference levels, and how these should be used. Each hospital then reports its local diagnostic reference levels to the RSC for the establishment of national diagnostic reference levels.

Although national referral guidelines have not been developed in Lithuania, the RSC has adopted internationally approved guidelines such as "*ESR IGUIDE*".

The Hygiene Norms include requirements for the minimal quality control tests required for different types of medical exposure equipment. When these are lacking from the Hygiene Norms or there are no minimum quality control guidelines available for particular equipment, the RSC has adopted internationally approved guidelines such as Radiation Protection Publication No. 162 of the European Commission.

The RSC has developed criteria for the release of patients who have undergone therapeutic radiological procedures using unsealed sources or patients who still retain implanted sealed sources, however the guides are missing especially for new radiopharmaceuticals such as Lu-177.

RECOMMENDATIONS, SUGGESTIONS AND GOOD PRACTICES	
Observation: RSC has not established guides for the release of patients who have undergone therapeutic radiological procedures using unsealed sources or patients who still retain implanted sealed sources.	
(1)	BASIS: GSR Part 3 Requirement 34, para. 3.149 states that <i>“The government shall ensure that, as a result of consultation between the health authority, relevant professional bodies and the regulatory body, the following are established:</i> (...) <i>(b) Criteria and guidelines for the release of patients who have undergone therapeutic radiological procedures using unsealed sources or patients who still retain implanted sealed sources.”</i>
R3	Recommendation: RSC should establish guides for the release of patients who have undergone therapeutic radiological procedures using unsealed sources or patients who still retain implanted sealed sources.

9.8. REGULATIONS AND GUIDES FOR PUBLIC EXPOSURE

Dose limits and constraints for members of the public and requirements for consumer products are defined in the Lithuanian hygiene standard HN 73:2018 “Basic Radiation Protection Standards”. VATESI and the RSC both have five-year plans in place to review and revise, if necessary, regulations within their remits. In 2026 VATESI plans to amend BSR-1.9.1-2017 to include a legal requirement for economic entities to maintain appropriate records of results of monitoring of nuclear power plants and estimated doses to members of the public (the issue was already identified by Lithuania in the Action Plan prepared for the mission). While these records are currently being maintained, updating the requirements will provide a legal basis for future records.

The RSC has produced guidance documents for the public and employers to provide them with information about radon, how to measure it and what they need to do if the concentrations exceed the reference level (300 Bq/m³ for homes and workplaces). These documents, in addition to the Lithuanian Radon Risk Management Action Plan (2024-2030) and the Radon map of Lithuania, are available on the RSC’s website.

9.9. SUMMARY

Lithuania has regulations and guides in place for planned, existing and emergency exposure situations. Both VATESI and the RSC have five-year plans for reviewing regulations pertaining to them. In accordance with these plans, revisions are currently being made to key regulations relating to predisposal radioactive waste management and the disposal of radioactive waste. In addition, updates to other legislation such as BSR-1.5.1-2019, BSR-1.9.1-2017 and BSR-1.9.3-2016 which were already identified by Lithuania in the Action Plan prepared for the mission are planned or are already underway.

The IRRS team observed that certain regulatory provisions for transport of radioactive material have not yet been formally incorporated into the regulatory framework. In addition, the RSC has not established

guides for the release of patients who have undergone therapeutic radiological procedures using unsealed sources or patients who still retain implanted sealed sources.

10. EMERGENCY PREPAREDNESS AND RESPONSE – REGULATORY ASPECTS

10.1. AUTHORITY AND RESPONSIBILITIES FOR REGULATING ON-SITE EPR OF OPERATING ORGANIZATIONS

The Lithuanian Government, through the legal system, confers to VATESI and RSC legal authority to regulate the on-site Emergency Preparedness and Response (EPR) of facilities and activities. Functions and responsibilities of VATESI and RSC related to EPR have been clearly assigned and specified through the Law on Nuclear Safety, Law on Nuclear Energy, Law on Radiation Protection, Law on Crisis Management and Civil Protection, State Emergency Management Plan and State Plan of Public Protection in Case of Nuclear or Radiological Accident. VATESI has been assigned the responsibility to regulate EPR arrangements for nuclear installations, decommissioning facilities, radioactive waste disposal facilities. RSC has been assigned to regulate EPR for facilities and activities, except those activities involving sources of ionizing radiation in the nuclear power field. Regulating on-site EPR of operating organizations of facilities and activities includes developing or adopting requirements and guidance and verification of compliance to these are confirmed through review and assessment before issuing a license, regulatory inspections and enforcement actions. The IRRS team observed that VATESI and RSC have adequate resources and organizational structure to fulfil its responsibilities in regulating the EPR of operating organizations as defined in the Law of Nuclear Energy and the Law on Radiation Protection respectively.

Roles and responsibility of all response agencies including VATESI and RSC are clearly defined in The State Emergency Management Plan and State Plan of Public Protection in Case of Nuclear or Radiological Accident.

10.2. REGULATIONS AND GUIDES ON ON-SITE EPR OF OPERATING ORGANIZATIONS

VATESI has prepared requirements related to EPR for the operating organizations under their regulatory authority in BSR 1.3.1 and BSR 1.8.10. These requirements also address EPR regulatory aspects of decommissioning of nuclear installations and radioactive waste disposal facilities.

RSC has established provisions for the protection of emergency workers and the public in case of an emergency in HN 73:2018 and HN 99:2019. These requirements and standards are revised, updated and amended (if required) regularly.

VATESI has established comprehensive regulatory requirements for nuclear facilities and RSC – for facilities and activities, except those activities involving sources of ionizing radiation in the nuclear power field on general goals of EPR, general requirements including, emergency managements system, roles and responsibilities, hazard assessment, functional requirements (managing operations in an emergency response, declaration of emergency and notification for response, mitigatory action, protective actions, generic criteria, protection of emergency worker, communication and coordination, termination of emergency, emergency action level, operational intervention levels, etc.) and infrastructure (authority of EPR, organization and staffing, EPR plans and procedures, training and exercises).

The IRRS team observed that majority of the requirements and criteria of VATESI and RSC are in line with IAEA safety standards. However, HN 73:2018 does not fully align with IAEA safety standards. As per HN 73:2018, emergency workers who are liable to be assigned to undertake emergency response actions which could result in an effective dose more than 100 mSv shall be additionally informed in advance of the associated health risks and available radiation protection measures and should undertake these actions voluntarily, whereas, the IAEA standards require a value 50 mSv to be used for this purpose.

RECOMMENDATIONS, SUGGESTIONS AND GOOD PRACTICES

Observation: HN 73:2018 specifies 100 mSv as the effective dose criteria which should not be exceeded by emergency workers except when undertaking emergency response actions on a voluntary basis. This aligns with the criteria of the Council Directive 2013/59/Euratom but is not in line with the IAEA Safety Standards.

(1)

BASIS: GSR Part 7 para. 5.57 states that *“The operating organization and response organizations shall ensure that emergency workers who undertake emergency response actions in which doses received might exceed an effective dose of 50 mSv do so voluntarily....”*

R4

Recommendation: RSC should align the criteria for emergency workers to the IAEA Safety Standards to ensure that emergency workers who undertake emergency response actions in which doses received might exceed an effective dose of 50 mSv do so voluntarily.

10.3. VERIFYING THE ADEQUACY OF ON-SITE EPR OF OPERATING ORGANIZATIONS

EPR plans for nuclear installations, including activities related to decommissioning and radioactive waste disposal facilities, are prepared by the licensee and submitted to VATESI for review and assessment. Following incorporation of VATESI’s review findings, the plans are tested through emergency exercises. The licensee then revises the plan to address the improvements identified during these exercises, after which VATESI confirms that the EPR plans comply with all applicable requirements.

This final EPR plan is an integral part of submissions of license holder for authorization. EPR plans are revised every three years considering the results of hazard assessment for nuclear and radiological emergencies at nuclear installations (NIs), the updated outcomes of safety analysis and justification, NI technical specification, design modifications performed during construction works of NI and according to the results of construction. It is also required that no modification is allowed in the EPR plan without knowledge of VATESI. Integration of on-site emergency arrangements of operating organizations with those of relevant off-site response organizations and with other plans (such as security plans, contingency plans, etc.) are also reviewed. Relevant clauses on EPR are also included in technical specifications of operation.

Review of EPR plans for facilities and activities, except those activities involving sources of ionizing radiation in the nuclear power field, are done by RSC as part of the review and assessment of submissions for license application.

Inspections to verify the adequacy of on-site emergency preparedness arrangements at nuclear installations are conducted by VATESI, typically two to three regulatory inspections per year at INPP. Inspections are carried out as per the process identified in section 7 of this report.

On-site emergency exercises (nuclear or radiological emergency) are carried out once in a year at the NPP site where all the NIs are located. Large-scale exercise involving national agencies are carried out every three years. Reports on the emergency exercises are submitted to regulatory body for review and review findings are communicated to operators for corrective actions. Corrective actions of the operator are confirmed by resident site inspector and/or inspection team.

Radiological emergency exercises for either facilities and activities or for the activity of transport of radioactive materials or emergency in the public involving radiation sources are done at the frequency of once a year following a graded approach. Such exercises are evaluated by RSC.

First responders (police, firefighters and rescue brigades, ambulance services, etc.) also participate in radiological emergency exercises. In addition, officials of VATESI and RSC also participate in IAEA and European Commission emergency preparedness exercises and drills.

The IRRS team noted that VATESI has not established specific requirements on criteria for evaluating the response actions of operating organizations during emergency exercises to verify that EPR arrangements are adequate and effective for responding to emergencies. This evaluation should also assess that the operator's emergency arrangements are coordinated with those of other organizations and integrated with contingency plans.

For effective response to an emergency, aspects related to the wide range of functional requirements specified in chapter 5 of GSR part 7 should be regularly rehearsed during the emergency preparedness exercise. However, it may not be possible to cover all these functions in every exercise and hence, each function should be practiced at certain intervals such that all functions are tested over a certain period. The IRRS team observed that this aspect is not covered under the training and exercise section of EPR requirement of VATESI for nuclear installation.

RECOMMENDATIONS, SUGGESTIONS AND GOOD PRACTICES

Observation: VATESI does not have a mechanism to ensure that all specified functions required to be performed for emergency response are tested during emergency exercises by the operating organization and that some of these exercises are evaluated by VATESI using pre-defined criteria. The issue was already identified by Lithuania in the Action Plan prepared for the mission.

(1)	BASIS: GSR Part 7 Requirement 25, para. 6.30 states that <i>“Exercise programmes shall be developed and implemented to ensure that all specified functions required to be performed for emergency response, all organizational interfaces for facilities in category I, II or III, and the national level programmes for category IV or V are tested at suitable intervals. These programmes shall include the participation in some exercises of, as appropriate and feasible, all the organizations concerned, people who are potentially affected, and representatives of news media. The exercises shall be systematically evaluated (see para. 4.10(h)) and some exercises shall be evaluated by the regulatory body. Programmes shall be subject to review and revision in the light of experience gained (see paras 6.36 and 6.38).”</i>
(2)	BASIS: GSR Part 7 para 6.33 states that <i>“The conduct of exercises shall be evaluated against pre-established objectives of emergency response to demonstrate that identification, notification, activation and response actions can be performed effectively to achieve the goals of emergency response”</i>
R5	Recommendation: VATESI should establish a mechanism to ensure that all specified functions required to be performed for emergency response are tested during emergency exercises by the operating organization and that some of these exercises are evaluated by VATESI using pre-defined criteria.

10.4 ROLE OF THE RB IN NUCLEAR OR RADIOLOGICAL EMERGENCY

VATESI has been recognised as response organization and the following role has been assigned during a nuclear and radiological emergency:

- assessing the dangers arising from nuclear installations due to nuclear or radiological accidents, as the national contact point,
- providing information to the public about the nuclear or radiological accident at the NI within its jurisdiction,
- estimating the source term during nuclear or radiological emergencies for Emergency Preparedness Categories II, III, and V, and for transmitting this information to the RSC for dispersion modelling and dose projection,
- transmitting and receiving information under the IAEA Convention on Early Notification of a Nuclear Accident,
- providing information to the interested international and national institutions and agencies about the technical circumstances of the accident, projected course of its development and applicable mitigatory actions, characteristics or forecasts of release of radionuclides from the NI to the environment, also other information relating to a nuclear or radiological accident at the NI,
- establishing procedures for communicating notifications for early notification, and finalizing event classifications done by license holders in accordance with the IAEA Nuclear and Radiological Event Scale (INES),
- informing the Prime Minister office for the emergency and to initiate the meeting of the National Crisis Management Centre when there is a threat of the national level emergency or there is an actual national level emergency,
- informing European Commission and neighbouring countries having bilateral agreement on assessment of plant conditions, based on actual information received from the plant and estimated prognosis with computational tools.

VATESI has established its emergency response centre and have approved plans and procedures to carry out above assigned functions. Emergency response centre of VATESI is well equipped with validated computation tools for the source term estimation and manpower arrangements.

RSC is responsible institution for managing radiological emergency and supporting institution in case of nuclear emergency and transportation emergencies involving a sea or inland waterway vessel, aviation, railways, or roads, as well as emergencies involving the transportation of dangerous goods.

The RSC's responsibilities include evaluating monitoring data and providing recommendations to the National Crisis Management Centre regarding urgent and early protective actions. The RSC is also responsible for environmental radiological monitoring, prognosis of radionuclide dispersion, coordinating laboratory networks, assessing radiation exposure among the public and emergency workers (including through biological dosimetry, when necessary), providing reports on radiation protection situations to national authorities, etc.

RSC has also established a dedicated Emergency Situations Operations Centre to ensure the RSC could effectively fulfil its functions in response to a nuclear or radiological emergency.

As per VATESI requirement (BSR:1.3.1), NI is responsible to provide preliminary recommendations for the application of urgent protective actions for the public to the State Emergency Management Centre and the municipalities.

RSC administers the Radiation Early Warning System (RADIS) and operates GIS-based tools for the provision and visualization of radiological monitoring data to the RSC Emergency Operations Centre and decision makers. RSC has a robust arrangement to initiate aerial radiation survey followed by sending a ground-based radiation survey teams to the affected area.

Radiation protection of the public and emergency workers is one of the functions of RSC, are assigned to RSC, which has established robust and well-proven EPR arrangements.

Radiation protection training for first responders is comprehensive and covers a wide range of aspects related to radiological emergencies affecting the public.

RSC is fully prepared for providing recommendations on required protective actions for the public in the case of nuclear or radiological emergency.

10.5. SUMMARY

The IRRS team observed that Lithuanian basic radiation protections standards for emergency worker and the public and safety requirements related to EPR for operating organization of facilities and activities are in general consistent with IAEA safety standards, and that regulatory processes review, inspection, enforcement for verification of their adequate implementation are well defined and implemented. Both VATESI and RSC are recognised as response institutions during a nuclear or radiological emergency and both have robust arrangements in place to effectively respond with approved and established plan, procedures and validated computational tools.

The IRRS team identified the need for RSC to revise the dose criteria for emergency workers to ensure compliance with IAEA safety standards, requiring that emergency response actions which may result in an effective dose exceeding 50 mSv be performed on a voluntary basis.

The IRRS team also identified that VATESI should establish requirements for the evaluation of emergency exercise for the response action of operating organisation during exercise and requirements for ensuring testing of all specified functions required for effective response are completed at certain intervals.

11. INTERFACE WITH NUCLEAR SECURITY

11.1. LEGAL BASIS

Lithuania has established two regulatory bodies with clearly separated responsibilities for safety and security interfaces. VATESI is responsible for physical security of nuclear facilities and nuclear materials, and nuclear material accounting and control. VATESI is the single state institution responsible for both nuclear safety and physical security in the nuclear energy sector. RSC is responsible for physical security of radioactive sources outside the nuclear energy sector.

For the nuclear energy sector, the legal basis for regulatory control of physical security is mainly provided by the Law on Nuclear Energy, the Law on Nuclear Safety and the Law on Radioactive Waste Management. These laws assign VATESI the responsibility to establish regulatory requirements, assess safety and security documentation, issue authorizations, conduct inspections and apply enforcement measures.

The safety-security interface is not documented in one legal document. Instead, it is incorporated into several nuclear safety regulatory documents and processes covering construction, site evaluation, design, safety analysis reports, spent fuel storage, radioactive waste management, commissioning, decommissioning, ageing management, modification control and maintenance of structures, systems and components important to safety.

VATESI elaborated the requirement for physical security BSR-1.6.1-2025 that are based on a graded approach depending on the category of nuclear material and the potential radiological consequences of sabotage affecting safety systems or radioactive materials. Safety experts of VATESI participate in the assessment of licensees' security documents, which strengthens the practical interface between nuclear safety and physical security.

The regulatory framework, under RSC's authority, for physical protection of radioactive sources includes the Law on Radiation Protection and related subordinate regulations, including the Rules on Authorization of Practices with Sources of Ionizing Radiation, HN 73:2018, the Rules for the physical protection of radioactive sources, provisions on orphan sources and contaminated objects, and administrative and criminal provisions relevant to the unlawful handling of sources. The interface between safety and security for radioactive sources is therefore established through RSC authorization, inspection, enforcement and management system processes. These processes allow RSC to assess radiation safety and physical security together, particularly for the use, storage, transport and management of radioactive sources, including high-risk sealed sources.

11.2. REGULATORY OVERSIGHT ACTIVITIES

VATESI's oversight activities include authorization, review and assessment, inspections, enforcement, operational experience feedback and modification control. Since VATESI is responsible for both nuclear safety and physical security in the nuclear energy sector, safety and security experts can be involved jointly in regulatory review and inspections. In this regard, security documents may be reviewed by VATESI safety experts, and safety documents may be reviewed by VATESI security experts where needed. Joint inspections may also be conducted. Modification control is used to ensure that proposed changes do not negatively affect either nuclear safety or physical security.

Lithuanian arrangements also recognize that a nuclear or radiological incident may be initiated by a security event and the emergency response plan is integrated with the contingency arrangements under the security plan.

For physical security of radioactive sources outside the nuclear energy sector, RSC's regulatory oversight includes authorization, inspections, enforcement, personnel reliability arrangements, threat assessment and protection of sensitive information. RSC inspectors verify both radiation safety and physical protection requirements for the use, storage, transport and management of radioactive sources, especially Category 1-3 sealed sources.

11.3. INTERFACE AMONG AUTHORITIES

VATESI is the central regulatory authority for the safety-security interface in the nuclear energy sector. The licensee has the primary responsibility for nuclear safety and physical security. For INPP, some physical protection and response functions are carried out by the Public Security Service, authorized by the Ministry of the Interior. The roles of the licensee and the Public Security Service are defined in a formal agreement.

The IRRS team observed that emergency and security response arrangements for nuclear facilities and nuclear materials are coordinated through the approval of emergency response plans and security plans and are supported by interagency tactical exercises required by Government Resolution No. 670 of 3 July 2019. The most recent exercise, "Security Chain" (Parts 1 and 2), conducted in 2025, involved INPP, VATESI, emergency services, law enforcement, the State Border Guard Service, the military, medical services, and other relevant organizations. "Security Chain" Part 3 is planned for 2026 to further evaluate inter-institutional cooperation.

The IRRS team was informed that there are cooperation arrangements in place between RSC and other relevant national entities and authorities involved in activities related to the physical protection of radioactive sources, such as the State Border Guard Service, the Customs Department and the State Security Department.

11.4. SUMMARY

Lithuania has established an effective safety-security interface through two regulatory bodies with complementary responsibilities. VATESI covers the nuclear power sector, including nuclear and radiation safety, physical security and nuclear material accounting and control. RSC covers radiation protection and physical security of radioactive sources outside the nuclear power sector.

The regulatory framework for security of nuclear facilities is notably based on BSR-1.6.1-2025 and includes safety-security cross-review of documents, joint inspections, modification control, coordination between emergency and contingency plans. The coordination has been tested during the 2025 "Security Chain" exercise.

For radioactive sources outside the nuclear power sector, the safety-security interface is maintained by RSC through authorization, inspection, enforcement, personnel reliability checks, threat assessment, protection of sensitive information and cooperation with relevant national authorities.

The IRRS team observed that the interface between safety and nuclear security is adequately addressed for both regulatory bodies and is consistent with the relevant IAEA Safety Standards and security recommendations.

13. POLICY DISCUSSION

13.1. Regulatory oversight of distribution of duties and responsibilities between a license holder and contractors in decommissioning and radioactive waste management

Lithuania expressed interest in convening a policy discussion on regulatory oversight of distribution of duties and responsibilities between a license holder and contractors in decommissioning and radioactive waste management.

The objective was to gather information on how other IRRS team members, coming from regulatory bodies around the world, are addressing challenges such as the distribution of duties and responsibilities of the license and contractors; appropriate regulatory policy for oversight of the distribution of duties and responsibilities of the licensee and contractors; and regulatory supervision of the activities performed by contractors on behalf of licensees.

VATESI described the current status and future plans for the decommissioning and waste management activities at INPP. VATESI underlined that limited activities are currently being performed by contractors at INPP but that the licensee plans to progressively increase contracted work in the near future based on available and forecasted human resources.

Specific details were then provided on the requirements implemented by VATESI to ensure the supervision by the licensee of contractors performing activities related to ionizing radiation.

Several IRRS team members confirmed that according to their national legislation the full liability for ensuring nuclear safety falls on the licensee that is responsible for the facilities and activities and that responsibility cannot be delegated to contractors.

Most regulators have established similar policies and strategies for the control by the licensee of the activities of contractors and contract workers relying mainly on management system requirements, documented procedures and supervision.

The discussion highlighted a broadly shared regulatory approach in which the licensee retains overall responsibility for safety, oversight, and compliance, including the supervision of contractors and subcontractors. Regulators generally expect the licensee to maintain effective management and quality assurance systems, and possess sufficient technical competence and, where required, specific authorizations. It is notable though that in some countries the regulatory body may need specific legal authority for regulatory oversight over a licensee's use of non-licensed contractors.

Several IRRS team members emphasized that regulators increasingly perform direct inspections and audits of contractors and subcontractors, particularly for safety-significant activities such as decommissioning. These inspections may include reviews of technical documentation, inspection and test plans, and contractor quality management systems. In some cases, regulatory bodies maintain direct exchanges with contractors when closer interaction is necessary, even though the formal relationship remains primarily with the licensee.

Some frameworks also allow regulatory enforcement actions to be directed both at the licensee and at contractors responsible for non-compliance.

The discussion also highlighted practical challenges in contractor oversight. Participants observed that contractors may sometimes possess greater technical expertise than the licensee creating situations where contractors seek to interact more directly with regulators. At the same time, there was agreement that the licensee must remain accountable for coordination, oversight, and safety outcomes throughout the supply chain.

Finally, the importance of continuous monitoring, clear allocation of responsibilities, and further development of regulatory criteria and guidance for contractor and subcontractor management, especially in complex activities such as decommissioning and large dismantling projects, was highlighted.

It was noted that the exchange of international experience and regulatory practices is therefore highly valuable in identifying whether further refinements to the regulatory framework could enhance clarity, consistency, and effectiveness in the supervision of contractor involvement during nuclear decommissioning and radioactive waste management activities.

APPENDIX I – RECOMMENDATIONS (R), SUGGESTIONS (S) AND GOOD PRACTICES (GP)

MODULE	R: Recommendation S: Suggestion G: Good Practice	Recommendations, Suggestions or Good Practices
1. LEGISLATIVE AND GOVERNMENTAL RESPONSIBILITIES	GP1	The Government, through the Ministry of the Economy and Innovation of the Republic of Lithuania, has established a programme for the periodic assessment of supervisory authorities, including VATESI and RSC, to ensure efficient and effective regulatory oversight across all of Lithuania.
	S1	VATESI and RSC should consider examining the need for coordination and cooperation arrangements in, for example, the areas of usage of radioactive sources, that could be carried out both outside and inside nuclear facilities.
2. THE GLOBAL SAFETY REGIME		
3. RESPONSIBILITIES AND FUNCTIONS OF THE REGULATORY BODY	S2	RSC should consider making arrangements to ensure that there is no conflict of interest for the advisory committee providing it advice.
	GP2	RSC has undertaken several actions to make information and data readily available to the public through a comprehensive national strategic public information campaign and using technology to make data more accessible.
4. MANAGEMENT SYSTEM OF THE REGULATORY BODY	S3	VATESI should consider revising the management system document review process to ensure that reviews are properly documented and checked.
	S4	RSC should consider defining supplementary methods for evaluating the effectiveness of inspection process.
5. AUTHORIZATION	S5	The RSC should consider enhancing the risk categorization scheme to ensure that all radioactive sources are covered by the categorization scheme.

MODULE	R: Recommendation S: Suggestion G: Good Practice	Recommendations, Suggestions or Good Practices
	S6	When issuing a transport license, the competent authorities should consider including the assignment of the radioactive material covered by the license to one or more of the United Nations (UN) numbers specified in SSR-6.
6. REVIEW AND ASSESSMENT	S7	VATESI should consider establishing a proper process to further develop and maintain the necessary competence and skills of staff in the field of transport.
7. INSPECTION	S8	VATESI should consider updating its inspection procedure to cover the systematic inspection of all areas for occupational exposure in the Radiation Protection Programme.
8. ENFORCEMENT		
9. REGULATIONS AND GUIDES	R1	VATESI should establish regulatory requirements for the notification and registration of the serial numbers of each packaging manufactured in accordance with package designs approved under SSR-6 and transported within Lithuania.
	R2	VATESI should establish regulatory provisions for the approval of calculation of radionuclide values not specified in IAEA SSR-6 Regulations, as well as for the calculation of alternative activity limits for exempt consignments.
	R3	RSC should establish guides for the release of patients who have undergone therapeutic radiological procedures using unsealed sources or patients who still retain implanted sealed sources.
10. EMERGENCY PREPAREDNESS AND RESPONSE – REGULATORY ASPECTS	R4	RSC should align the criteria for emergency workers to the IAEA Safety Standards to ensure that emergency workers who undertake emergency response actions in which doses received might exceed an effective dose of 50 mSv do so voluntarily.

MODULE	R: Recommendation S: Suggestion G: Good Practice	Recommendations, Suggestions or Good Practices
	R5	VATESI should establish a mechanism to ensure that all specified functions required to be performed for emergency response are tested during emergency exercises by the operating organization and that some of these exercises are evaluated by VATESI using pre-defined criteria.
11. INTERFACE WITH NUCLEAR SECURITY		

APPENDIX II – LIST OF PARTICIPANTS

INTERNATIONAL EXPERTS		
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GROUP PHOTO



APPENDIX III – LIST OF IRRS REVIEWERS AND COUNTERPARTS

MODULES	IRRS EXPERTS	VATESI COUNTERPART	RSC COUNTERPART
1.	LEGISLATIVE AND GOVERNMENTAL RESPONSIBILITIES		
	Lars Schnelzer	Sigitas Šlepavičius	Julius Žiliukas
2.	GLOBAL NUCLEAR SAFETY REGIME		
	Lars Schnelzer	Dainius Brandišauskas	Julius Žiliukas
3.	RESPONSIBILITIES AND FUNCTIONS OF THE REGULATORY BODY		
	Maria Oprisescu	Laura Razgutė-Povilavičienė	Rugilė Aganaukaitė
4.	MANAGEMENT SYSTEM OF THE REGULATORY BODY		
	Laszlo Juhasz	Vida Jakimavičienė	Auksė Tankevičiūtė
5.	AUTHORIZATION		
	See topical areas (below)	Birutė Purlienė	Rugilė Aganaukaitė
6.	REVIEW AND ASSESSMENT		
	See topical areas (below)	Evaldas Kimtys	Rugilė Aganaukaitė
7.	INSPECTION		
	See topical areas (below)	Evaldas Kimtys	Dovilė Šerėnaitė Pečiulė
8.	ENFORCEMENT		
	See topical areas (below)	Laura Razgutė-Povilavičienė	Dovilė Šerėnaitė Pečiulė
9.	REGULATIONS AND GUIDES		
	See topical areas (below)	Laura Razgutė-Povilavičienė	Julius Žiliukas
5. – 9.	RADIATION SOURCES FACILITIES AND ACTIVITIES		
	Wendy Su	Asta Nekrasovaitė	Dovilė Šerėnaitė Pečiulė
5. – 9.	RADIOACTIVE WASTE MANAGEMENT FACILITIES		
	Åsa Zazzi	Vidas Paulikas	Rugilė Aganaukaitė
5. – 9.	DECOMMISSIONING		
	Dominique Tafani	Marius Dekaminavičius	Rugilė Aganaukaitė
5. – 9.	TRANSPORT		
	Paolo Alvano	Agnė Čepulienė	Rugilė Aganaukaitė
5. – 9.	OCCUPATIONAL EXPOSURE		
	Moustafa Ahmed	Vladimir Achmedov	Aušra Urbonienė
5. – 9.	PUBLIC EXPOSURE		

MODULES	IRRS EXPERTS	VATESI COUNTERPART	RSC COUNTERPART
	Veronica Smith	Audrius Pašiškevičius	Asta Orentienė
5. – 9.	MEDICAL EXPOSURE		
	Paula de Almeida Santos	N/A	Dovilė Šerėnaitė Pečiulė
10.	EMERGENCY PREPAREDNESS AND RESPONSE		
	Dubey Santosh	Emilis Baškys	Paulius Ruželė
11.	INTERFACE WITH NUCLEAR SECURITY		
	Moustafa Ahmed	Renaldas Sabas	Rugilė Aganauškaitė

APPENDIX IV – MISSION SCHEDULE

Initial Mission First Week

Time	SAT	SUN ^[17]	MON ^[18]	TUE ^[19]	WED ^[20]			THU ^[21]		FRI ^[22]	SAT ^[23]	SUN ^[24]		
Early call	Arrival of Team Members													
9:00-10:00			Start at 0930 Entrance Meeting	Interviews	Interviews	0930 - 1000 Gov't Office (VATESI) MM, LS, MC	Visits (VATESI)	Interviews	Visits (RSC)	Follow-up interviews (as needed)	Cross-reading by Team Members	Social Tour		
10:00-11:00										Finalize observations and boxes				
11:00-12:00										TL and TC review introductory parts				
12:00-13:00		Lunch	Standing lunch											
13:00-16:50		Team Building: – Welcome – 5 minutes each self-intro – Refresher training Initial Team Meeting: – Meet host liaison officer	Interviews Stop at 17:00	Interviews Stop at 17:00	Interviews Stop at 17:00	1400 - 1430 MoH (RSC) MM, LS, MC	Visits (VATESI)	Interviews	Visits (RSC)	Policy discussion	Team finalize observations and boxes (in plenary)			
16:50-17:00		Logistics	Preparation of IRRS team members for the daily team meeting											
17:00-18:30		Discussion of first impressions Closing	Daily Team Meeting	Daily Team Meeting	Daily Team Meeting		Daily Team Meeting: discuss findings (propose boxes)		Daily Team Meeting: discuss findings (discuss boxes)					
18:30-20:00		Team Dinner	Dinner	Dinner	Dinner		Dinner		Dinner		Dinner			
20:00-24:00				Report writing	Report writing	Report writing		Report writing		Cross-reading by Team Members		TL and TC read report		

Initial Mission Second Week

	MON ^[25]	TUE ^[26]	WED ^[27]			THU ^[28]	FRI ^[29]	
9:00-10:00	Discussion of Observations (Rec., Sug. and GP) with counterparts	Finalisation of the report by the Team	TL finalises Executive Summary and exit presentation			Team reviews host comments and finalizes report	Submission of the preliminary report to LOs (NLT 1000)	
10:00-12:00		Submission of the draft report to LOs (NLT 1300)					Exit meeting (press release issued upon completion)	
12:00-13:00	Standing lunch	Standing lunch		Standing lunch		Standing Lunch		
13:00-15:00	If necessary, the discussions of observations will continue (Team and LOs) Finalization of the body texts	TL drafts Executive Summary and exit presentation	Host reads draft report – written comments to TL and TC (NLT 1500)	TL finalises Executive Summary and exit presentation	TC drafts the press release	Plenary - report finalization (LOs, counterparts, Team)		
15:00-17:00		TC drafts press release				Team discusses the mission and provides IAEA with feedback		
17:00-18:30	Daily Team Meeting (to endorse changes in boxes only)	Daily Team Meeting				Team reviews host comments and finalizes report		Brief the IAEA senior manager Finalize the press release Finalize the preliminary report
18:30-20:00	Dinner	Dinner				Dinner		Farewell Dinner
20:00-21:00	Secretariat updates report	Free				TL and TC finalize editing		Free
21:00-24:00								

APPENDIX V – SITE VISITS

- Decommissioning activities at State Enterprise Ignalina NPP
- Private clinic: UAB InMedica, Radiology Department;
- Industrial facility (calibration facility): UAB “Polimaster Europe”

APPENDIX VI – LITHUANIA’S REFERENCE MATERIAL USED FOR THE REVIEW

No.	Title of legal act
Acts of the Parliament of the Republic of Lithuania	
1.	Law on Nuclear Safety, 28 June 2011, No XI-1539
2.	Law on Radiation Protection, 21 June 2018, No XIII-1283
3.	Law on Nuclear Energy, 14 November 1996, No. I-1613
4.	Law on Radioactive Waste Management, 20 May 1999, No. VIII-1190
5.	Code of Administrative Offences, 25 June, 2015, No. XII-1869
6.	Criminal Code, 26 September 2000, No. VIII-1968
7.	Law on Carriage of Dangerous Goods by Road, Rail and Inland Waterways, 24 May 2011, No. XI-1401
8.	Law on Control of Strategic Goods, 11 October 2011, No. XI-1616
9.	Law on Crisis Management and Civil Protection, 15 December 1998 No. VIII-971
10.	Law on Environmental Impact Assessment of the Proposed Economic Activity, 15 August 1996, No. I-1495
11.	Law on Environmental Monitoring, 20 November 1997, No. VIII-529
12.	Law on Public Administration, 17 June 1999 No. VIII-1234
13.	Law on Legislative Framework, 18 September 2012, No XI-2220
14.	Law on the Coordination of Public and Private Interests 2 July 1997, No. VIII-371
15.	Law on the Health System 19 July 1994, No. I-552
16.	Law on Health Care Institutions June 6 1996, No. I-1367
17.	Law on Public Health, May 16 2002, No. IX-886
Resolutions of the Government of the Republic of Lithuania	
18.	Description of the Procedure for Conducting the Analysis of Threats to Radioactive Sources, approved by Resolution No. 1249, 25 th of December 2018, of the Government of the Republic of Lithuania
19.	Description of the Procedure for Crisis Management And Civil Protection Training, 13 December 2023 No. 971
20.	Description of the Procedure for Notification and Exchange of Information, approved by Resolution No. 1317 of the Government of the Republic of Lithuania, 29th December 2022
21.	Description of the Procedure for the Establishment, Organisation, Convening, Tasks and Functions of Emergency Operations Centres
22.	Procedure for the Certification of the Management Personnel of a Nuclear Facility
23.	National Plan for Protection of Population in Case of a Nuclear or Radiological Accident, approved by Resolution No. 1085, 31st of October 2018, of the Government of the Republic of Lithuania

24.	Radioactive Waste Management Development Programme, approved by Resolution No. 1427, 23 of December 2015, of the Government of the Republic of Lithuania
25.	Rules on the Issue of Licences and Permits for Nuclear Power Activities, approved by Resolution No 283 of 28 April 2021, of the Government of the Republic of Lithuania
26.	Resolution of the Government of the Republic of Lithuania No. 704, 21st of May 2002, On Granting the Authorisation for Carriage of Dangerous Goods by Road and Rail and Related Activities
27.	Rules on Authorising Activities with Sources of Ionising Radiation, approved by Resolution No. 918, 12 of September 2018, of the Government of the Republic of Lithuania
28.	Resolution No. 651 of the Government of the Republic of Lithuania of 25 May 1999 “On the Approval of the Regulations on the State Register of Ionizing Radiation Sources and Exposure of Workers”
29.	Rules on Handling of Orphan Radioactive Sources, Substances of Orphan Nuclear Fuel Cycle, Orphan Nuclear and Fissile Substances and Objects Contaminated by Radionuclides, approved by Resolution No. 918, 12 of September 2018, of the Government of the Republic of Lithuania
30.	State Emergency Management Plan, approved by Resolution No. 1503, 20th of October 2010, of the Government of the Republic of Lithuania
31.	Statute of the State Nuclear Power Safety Inspectorate, approved by Resolution No. 1406, 21st of November 2012, of the Government of the Republic of Lithuania
32.	The State Plan of Public Protection in Case of Nuclear or Radiological Accident, approved by Resolution No. 99, 18th of January 2012, of the Government of the Republic of Lithuania;
33.	The Resolution of the Government of the Republic of Lithuania of 29 December 2022 on the Implementation of the Law of the Republic of Lithuania on Crisis Management and Civil Protection;
34.	National Environmental Monitoring Programme 2024-2029, approved by Resolution No. 527, 26th of June 2024, of the Government of the Republic of Lithuania
Legal acts approved by Orders of the Head of State Nuclear Power Safety Inspectorate (VATESI)	
35.	BSR-1.1.1-2014, Nuclear Safety Requirements “Rules of Procedure for Drafting Nuclear Safety Requirements and Nuclear Safety Rules”, approved by Order No. 22.3-58, 15th of June 2009, of the Head of VATESI
36.	BSR-1.1.3-2016, Nuclear Safety Requirements “Inspections Conducted by the State Nuclear Power Safety Inspectorate”, approved by Order No. 22.3-82, 25th of August 2012, of the Head of VATESI
37.	BSR-1.1.4-2017, Nuclear Safety Requirements “Rules of Procedure for Applying the Enforcement Measures Set by the State Nuclear Power Inspectorate”, approved by Order No. 22.3-115, 4th of July 2017, of the Head of VATESI
38.	BSR-1.1.5-2017, Nuclear Safety Requirements “Rules of Procedure for Public Participation in Decision-making in the Area of Nuclear Power”, approved by Order No. 22.3-182, 23 of October 2017, of the Head of VATESI
39.	BSR-1.1.7-2023, Nuclear Safety Requirements “Continuous supervision of Nuclear Power Facilities by Authorised Staff of the VATESI”, approved by Order No. 22.3-12, 2 February 2023, of the Head of VATESI

40.	BSR-1.8.8-2020 “Important to the Safety Lifting Equipment and Their Components of Nuclear Facilities “, approved by Order No. 22.3-7, 13th of January 2020, of the Head of VATESI
41.	BSR-1.3.1-2020, Nuclear Safety Requirements “Ensuring of Emergency Preparedness in Nuclear installations”, approved by Order No. 22.3-18, 21st of January 2020, of the Head of VATESI
42.	BSR-1.4.1-2016, Nuclear Safety Requirements “Management System”, approved by Order No. 22.3-13, 29th of January 2016, of the Head of VATESI
43.	BSR-1.4.2-2014, Nuclear Safety Requirements “Management of Construction for Nuclear Installation”, approved by Order No. 22.3-22, 29th of January 2014, of the Head of VATESI
44.	BSR-1.4.3-2017, Nuclear Safety Requirements “Human Resources of Organisations Carrying Out Licensed Activities in the Sphere of Nuclear Power”, approved by Order No. 22.3-160, 20th of September 2017, of the Head of VATESI
45.	BSR-1.4.4-2019, Nuclear Safety Requirements “Use of Operating Experience in the Field of Nuclear Power”, approved by Order No. 22.3-148, 4th of July 2019, of the Head of VATESI
46.	BSR-1.5.1-2019, Nuclear Safety Requirements “Decommissioning of Nuclear Facilities”, approved by Order No. 22.3-19, 24th of January 2019, of the Head of VATESI
47.	BSR-1.6.1-2025, Nuclear Safety Requirements “Physical Security of Nuclear Facilities, Nuclear Power Sites, Nuclear Material and Nuclear Fuel Cycle Material”, approved by Order No. 22.3-37, 4th of April 2012, of the Head of VATESI
48.	BSR-1.6.2-2022, Nuclear Safety Requirements “Physical Security of Radioactive Sources Used in Activities in the Nuclear Power Sector Involving Sources Of Ionising Radiation”, approved by Order No. 22.3-109, 10th of June 2016, of the Head of VATESI
49.	BSR-1.6.3-2024, Nuclear Safety Requirements “Cyber Security Assurance at Nuclear Facilities Order”, approved by Order No. 22.3-11, 15 January 2024, of the Head of VATESI
50.	BSR-1.7.1-2014, Nuclear Safety Requirements “Fire Safety of Structures, Systems and Components Important to Safety of Nuclear Facility”, approved by Order No. 22.3-57, 10th of April 2014, of the Head of VATESI
51.	BSR-1.8.2-2015, Nuclear Safety Requirements “Modification Categories of a Nuclear Facility and Description of the Modification Procedure”, approved by Order No. 22.3-99, 7th of October 2011, of the Head of VATESI
52.	BSR-1.8.3-2017, Nuclear Safety Requirements “Technical specification of a Nuclear Facility” approved by Order No. 22.3-222, 24th of November 2017, of the Head of VATESI.
53.	BSR-1.8.4-2018, Nuclear Safety Requirements “Ageing Management of Structures, Systems and Components Important to Safety of a Nuclear Facility”, approved by order No. 22.3-169, 25 July 2018, of the Head of the VATESI
54.	BSR-1.8.5-2018, Nuclear Safety Requirements “Commissioning of a Nuclear Installation”, approved by order No. 22.3-295, 4 December 2018, of the Head of the VATESI
55.	BSR-1.8.6-2019, Nuclear Safety Requirements “Maintenance, Surveillance and Inspection of Structures, Systems and Components Important to Safety of a Nuclear Facility, approved by order No. 22.3-133, 3 July 2019, of the Head of the VATESI
56.	BSR-1.8.7-2020, Nuclear Safety Requirements “Safety of Licensed Activities with Nuclear and Fissile Materials Regulated by VATESI”, approved by order No. 22.3-15, 17 January 2020, of the Head of the VATESI

57.	BSR-1.8.10-2021, Nuclear Safety Requirements “Analysis of Consequences of Hypothetical Nuclear and Radiological Accidents at Nuclear Installation”, approved by order No. 22.3-124, 27 July 2021, of the Head of the VATESI
58.	BSR-1.9.1-2017, Nuclear Safety Requirements “Standards of Release of Radionuclides from Nuclear Installations and Requirements for the Plan on Release of Radionuclides”, approved by Order No. 22.3-198, 31st of October 2017, of the Head of VATESI
59.	BSR-1.9.2-2018, Nuclear Safety Requirements “Establishment and Application of Clearance Levels of Radionuclides for the Materials and Waste Generated During the Activities in the Area of Nuclear Power”, approved by Order No. 22.3-34, 7th of February 2018, of the Head of VATESI
60.	BSR-1.9.3-2016, Nuclear Safety Requirements “Radiation Protection at Nuclear Facilities”, approved by Order No. 22.3-95, 6th of October 2016, of the Head of VATESI
61.	BSR-1.9.4-2019, Nuclear Safety Requirements “Rules of Procedure for the Radiation Protection Training and Briefing of Radiation Workers, Radiation Protection Officers and Physical Security Officers Involved in Activities with Sources of Ionising Radiation in the Nuclear Power Area, and for of the Certification of Natural Persons Seeking to Obtain the Right to Teach Radiation Protection”, approved by Order No. 22.3-230, 25th of September 2019, of the Head of VATESI
62.	BSR-1.9.5-2016, Nuclear Safety Requirements “Justification of Activities with Sources of Ionising Radiation in the Nuclear Power Area”, approved by Order No. 22.3-182, 8th of August 2018, of the Head of VATESI
63.	BSR-1.9.6-2018, Nuclear Safety Requirements “Recognition of Radiation Protection Expert for Activities with Sources of Ionising Radiation in Nuclear Power Area”, approved by Order No. 22.3-204, 30th of August 2018, of the Head of VATESI
64.	BSR-1.9.7-2018, Nuclear Safety Requirements “Rules of Procedure for Recognition of Nuclear Facilities’ Dosimetry Services”, approved by Order No. 22.3-203, 30th of August 2018 of the Head of VATESI
65.	BSR-2.1.2-2010 “General Requirements for Ensuring the Safety of Nuclear Power Plant with RBMK-1500 Type Reactor”, approved by Order No. 22.3-16, 5th of February, 2010, of the Head of VATESI
66.	BSR-3.1.1-2016, Nuclear Safety Requirements “Management of Spent Nuclear Fuel in Dry-Type Storage Facilities”, approved by Order No. 22.3-130, 22nd July 2016, of the Head of VATESI
67.	BSR-3.1.2-2017, Nuclear Safety Requirements “Pre-Disposal Management of Radioactive Waste at Nuclear Installations”, approved by Order No. 22.3-132, 31 st July 2017, of the Head of VATESI
68.	BSR-3.2.1-2015, Nuclear Safety Requirements “Radioactive Waste Acceptance Criteria for Near Surface Disposal Facilities”, approved by Order No. 22.3-103, 27th May 2015, of the Head of VATESI
69.	BSR-3.2.2-2016, Nuclear Safety Requirements “Radioactive Waste Disposal Facilities”, approved by Order No. 22.3-188, 30th November 2016, of the Head of VATESI
70.	BSR-4.1.1-2017, Nuclear Safety Requirements “Rules on the Issue of Certificates for Transport of Nuclear Fuel Cycle, Nuclear and Fissionable Materials”, approved by Order No. 22.3-133, 31st July 2017, of the Head of VATESI
71.	BSR-4.1.2-2019, Nuclear Safety Requirements “Requirements for Documents Accompanying Application for Issuance of Licence to Transport Nuclear Fuel Cycle, Nuclear and Fissile Materials”, approved by Order No. 22.3-169, 19th July 2019, of the Head of VATESI

72.	BST-1.5.1-2016, Nuclear Safety Rules “The Evaluation of Compliance with Free Release Criteria of Buildings and Site of Nuclear Facilities”, approved by Order No. 22.3-18, 23rd January 2016, of the Head of VATESI
73.	List of types of Justified Activities with Sources of Ionising Radiation in the Nuclear Power Area, approved by Order No. 22.3-263, 5 th of November 2018, of the Head of VATESI
Orders of the Minister of Health of the Republic of Lithuania	
74.	Description of the Procedure for Decommissioning of the Facilities Using Radiation Sources, approved by Order No. V-712, 5th of December 2003, of the Minister of Health of the Republic of Lithuania
75.	Lithuanian Hygiene Standard HN 24:2023 “Requirements for Safety and Quality of Drinking Water”, approved by Order No. V-455, 23rd of July 2003, of the Minister of Health of the Republic of Lithuania
76.	HN 73:2018 “Basic Radiation Protection Standards”, approved by Order No. V-886, 3rd of August 2018, of the Minister of Health of the Republic of Lithuania
77.	HN 99:2019 “Protective Actions of the Public in Case of Nuclear or Radiological Emergency”, approved by the Order No. V-1398, 5 December 2019, of the Minister of Health of the Republic of Lithuania
78.	Lithuanian Hygiene Standard HN 31:2021 “Radiation Safety Requirements in Medical X-ray Diagnostics”, approved by Order No. V-995, 14 February 2008, the Minister of Health of the Republic of Lithuania
79.	Lithuanian Hygiene Standard HN 77:2015 “Radiation Safety in Nuclear Medicine”, approved by Order No. 642, of the Minister of Health of the Republic of Lithuania of 17 December 2002
80.	Lithuanian Hygiene Standard HN 78:2009 “Quality Control Requirements and Evaluation Criteria in Medical X-ray Diagnostics”, approved by Order No. V-922 of the Minister of Health of the Republic of Lithuania of 12 November 2009
81.	Lithuanian Hygiene Standard HN 95:2015 “Radiation Safety and Quality Assurance in Radiation Therapy”, approved by Order No. V-759 of the Minister of Health of the Republic of Lithuania of 10 October 2005
82.	Regulation on State Radiation Protection Supervision, approved by the Order No. 285 of 25 May 2000 of the Minister of Health of the Republic of Lithuania
83.	HN 112:2019 “Requirements for Internal Exposure Monitoring”, approved by Order No. 389 of 17 July 2001 of the Minister of Health of the Republic of Lithuania
84.	Statute of the Radiation Protection Centre approved by Order No V-612 of 22 July 2005 of the Minister of Health of the Republic of Lithuania
85.	Procedure for the Organization and Conduct of Clinical Audits in Medical Radiology, approved by the Order No. V-2390 of the Minister of Health of the Republic of Lithuania of 28 October 2020
86.	Procedure for the Recognition of Radiation Protection Experts, with the Exception of Radiation Protection Experts in the Field of Nuclear Power Activities with Ionizing Radiation Sources, approved by the Order No. V-1059 of the Minister of Health of the Republic of Lithuania of 1 October 2018
87.	Approval of Diagnostic Reference Levels Applied During Radiation Diagnostic and Interventional Radiology Procedures, approved by the Order No. V-952, 27 August 2018, of the Minister of Health of the Republic of Lithuania

88.	Approval of the Requirements for the Activities of Medical Physicists, approved by the Order No. V-901, 24 July 2017, of the Minister of Health of the Republic of Lithuania
89.	Approval of the Procedure for Submitting Data to the State Register of Ionizing Radiation Sources and Exposure of Workers, approved by the Order No. V-675 of 24 August 2009, of the Minister of Health of the Republic of Lithuania
90.	Description of the Procedure for Recognition of the Persons, Including the Dosimetry Services, Seeking to Perform Measurements of Human Radiation Doses and/or Dose Rates and/or Activity, and/or Assessment of Radiation Doses, and/or Investigations of Radionuclides Released into the Environment and/or Present in Environmental Components (Air, Water, Soil), and/or to Take Samples for these Investigations” approved by Order No. V-965 of 30 th August 2018, of the Minister of Health of the Republic of Lithuania
91.	Approval of the Rules on Radiation Protection in Veterinary Medicine, approved by the Order No. V-740, 12 December 2003, of the Minister of Health of the Republic of Lithuania
92.	Description of Procedure for the Issuing the Permissions for the Discharges from the Medical, Industrial, Except Nuclear Energy Installations, Agricultural and Scientific Facilities, approved by Order No V-900, 13 of October 2011, of the Minister of Health of the Republic of Lithuania
93.	Determination and Application of Procedure of Clearance Levels of Radionuclides Resulting from Activities with Sources of Ionizing Radiation, Except for the Field of Nuclear Energy, approved by Order No. V-892 7 of October 2011, of the Minister of Health of the Republic of Lithuania
94.	Order of Organization, Implementation of National Radiological Monitoring and Notification of the State and Autonomous Institutions, European Commission and Public, approved by Order No. V-3003, 23rd of December 2020, of the Minister of Health of the Republic of Lithuania
95.	On Approval of Regulation of Environmental Monitoring of Economic Entities, approved by Order No. V-3028, 26th of December, of the Minister of Health of the Republic of Lithuania
96.	On the Approval of the Public and Occupational Exposure Monitoring Program for the Years 2024-2029, approved by Order No. V-1153, 7 November 2023, of the Minister of Health of the Republic of Lithuania
97.	Lithuanian Radon Risk Management Action Plan for 2024–2030, approved by Order No. V-945, 29 August 2023, of the Minister of Health of the Republic of Lithuania
98.	Order No. V-687 of the Minister of Health of the Republic of Lithuania of 7 September 2005 “On the Approval of the Rules for the Physical Protection of Radioactive Sources, Except for Radioactive Sources Used in Nuclear Energy Activities with Sources of Ionizing Radiation”
99.	Procedure on the Compulsory Radiation and Physical Protection Training and Instruction, approved by the Order No V-1001 of the Minister of Health of the Republic of Lithuania on 2011 November 22
Orders of other state institutions	
100.	Action Plan for the Implementation of Recommendations and Suggestions of the IRRS Mission Report on the Regulatory and Supervisory Framework for the Nuclear and Radiation Safety of Lithuania, approved By Order No 1-283/V-1281/V-865/22.3-208 of the Minister of Energy of the Republic of Lithuania, the Minister of Health of the Republic of Lithuania, the Minister of Education and Science of the Republic of Lithuania and the Head of the State Nuclear Power Safety Inspectorate of 9 November 2017

101.	Recommendations for Determining Criteria for Emergency Preparedness Categories in Preparedness for Radiological Emergencies that Could Occur in Activities with Radiation Sources, Except for Activities with Radiation Sources in the Field of Nuclear Power, approved by Order No. V-156, 23rd of December 2016, of the Director of Radiation Protection
102.	Regulations on the Environmental Monitoring of Operators, approved by Order No. D1-546, 19th of September 2009, of the Minister of Environment of the Republic of Lithuania
103.	Rules on Import, Export, Transit and Transport of Radioactive Material, Radioactive Waste and Spent Nuclear Fuel, approved by Order No. V-1271/22.3-139, 24th of December 2008, of the Minister of Health of the Republic of Lithuania and the Head of State Nuclear Power Safety Inspectorate
Internal administrative documents of VATESI	
104.	VATESI Management System Policy, approved by Order No. 22.3-18, 20 of January 2015, of the Head of VATESI
105.	VATESI Manual of Integrated Management System, approved by Order No. 22.3-17, 20 of January 2015, of the Head of VATESI
106.	Procedure Document for Drafting Legal Acts, PR-1, approved by Order No. 22.3-44, 28 of February 2014, of the Head of VATESI
107.	Procedure Document for Providing Consultations, PR-2, approved by Order No. 22.3-104, 16 of June 2014, of the Head of VATESI
108.	Procedure Document for Licensing, PR-3, approved by Order No. 22.3-113, 23 of June 2014, of the Head of VATESI
109.	Description of the Procedure for Issuing Permits and Standard Documents for the Transportation of Nuclear Fuel Cycle Materials, PR-3-1, approved by Order No. 22.3-244, 25 October 2018, of the Head of VATESI
110.	Description of the Procedure for Authorisation of Activities with Sources of Ionising Radiation in the Nuclear Power Field, PR-3-2, approved by Order No. 22.3-180, 30 October 2019, of the Head of VATESI
111.	Description of the Procedure for Issuing Licenses and Permits for Nuclear Power Activities, PR-3-3, approved by Order No. 22.3-40, 2 March 2022, of the Head of VATESI
112.	VATESI Procedure Document for Review and Assessment of Safety Justification Documents, PR-5, approved by Order No. 22.3-25, 27 of January 2015, of the Head of VATESI
113.	Procedure Document for Inspections, PR-6, approved by Order No. 22.3-193, 6 November 2014, of the Head of VATESI
114.	Inspection program of the State Nuclear Power Safety Inspectorate for 2024–2028, approved by Order No. 22.3-86, 20 June 2024, of the Head of VATESI
115.	Procedure Document for the Application of Enforcement Measures, PR-7, approved by Order No. 22.3-79, 19 May 2014, of the Head of VATESI
116.	Procedure Document the Public Information Procedure, PR-11, approved by Order No. 22.3-61, 23 March 2015, of the Head of VATESI
117.	Internal Procedure Rules of State Nuclear Power Safety Inspectorate, approved by Order No. 22.3-67, 16 October 2007, of the Head of VATESI
118.	Procedure Document for Personnel and Knowledge Management, PR-14, approved by Order No. 22.3-89, 2 June 2014, of the Head of VATESI
119.	Provisions for Training of Staff of the State Nuclear Power Safety Inspectorate, PR-14-1, approved by Order No. 22.3-22, 1 March 2013, of the Head of VATESI
120.	Description of the Procedure for Planning Staffing Needs, PR-14-3, approved by Order No. 22.3-201, 16 December 2016, of the Head of VATESI

121.	Procedure Document for Development of Organisational Culture, PR-15, approved by Order No. 22.3-135, 25 June 2020, of the Head of VATESI
122.	Procedure Document for Strategic Management, PR-21, approved by Order No. 22.3-162, 27 July 2020, of the Head of VATESI
123.	Procedure Document for Monitoring of Interested Parties, PR-25, approved by Order No. 22.3-57, 12 March 2020, of the Head of VATESI
124.	Internal Training Program for Employees of the State Nuclear Power Safety Inspectorate for 2026-2030, approved on 3 March 2026 by Head of VATESI.
125.	Internal Training Plan for Employees of the State Nuclear Power Safety Inspectorate for 2026, approved on 7 April 2026 by Head of VATESI.
Internal administrative documents of RSC	
126.	RSC Management System Manual approved by director of RSC (10 May 2026 No. VS-9)
127.	RSC Management System Procedure P-10 “Radiation Protection Supervision” approved by director of RSC (26 March 2026 No. VS-14)
128.	RSC Management System Procedure P-33 “Conducting inspections” approved by director of RSC (15 May 2025 No. VS-22)
129.	RSC Management System Work instruction DI-14 (P-10) “Drawing up Administrative Offense Protocols and Consideration of Administrative Offense Cases at the Radiation Protection Centre” approved by director of RSC (13 May 2025, No. VS-16)
130.	RSC Management System Work instruction DI-01 (P-18) “Recruitment of Civil Servants and Employees, Working Under Employment Contracts. Improvement of Qualifications” approved by director of RSC (16 May 2025, No. VS-23)
131.	RSC Management System Work instruction DI-02 (P-18) “Evaluation of the performance of civil servants and employees working under an employment contract. Promotion and responsibility of civil servants and employees working under an employment contract” approved by director of RSC (16 May 2025, No. VS-24)
132.	RSC Management System Procedure P-15 “Preparation of Draft Legislative Acts” approved by director of RSC (13 May 2025, No. VS-14)
133.	Description of the Procedure for Planning Needs of Staff, approved by Order No V-113 of 28 December 2017 of director of RSC
134.	The Strategy of Planning of Human Resources in RSC approved by the Order No 28 of 30 April 2008 of director of RSC
135.	Description of Professional Qualification Development, Training and Recognition to Work Independently for Civil Servants and Employees Working Under Employment Contracts, approved by Order No 22 of 18 April 2008 of the Director of the RSC
136.	RSC Rules of Procedure, approved by Order No V-13 of 13 March 2014 of the Director of the RSC
137.	Plan for Review of Legislation Regulating the Activities of the RSC and Establishing the Requirements for the Area of Supervision assigned to the RSC in 2026–2030, approved by Order No V-31 of 23 April 2026 of the Director of the RSC
138.	Description of the RSC Payment System, approved by Order No V-4 of 12 January 2024 of the Director of the RSC
139.	17 December 2020 Cooperation Agreement No. RSC/2020 12-17 between VATESI and RSC
140.	The Procedure for the Exchange of Information on an Imminent or Occurring Nuclear or Radiological Accident approved by Order No. V-84/V-109/22.3-177 of 7 December 2022 of the Director of the Lithuanian Hydrometeorological Service under the Ministry of the Environment, the Director of the Radiation Protection Centre and the Head of the State Nuclear Power Safety Inspectorate.
141.	Procedure of Preparation the Documents to be Presented for Authorization of Practices with the Radiation Sources, approved by Order No V-62 of the Director of the RSC in October 2018

142.	Crisis and Emergency Management Plan of Radiation Protection Centre, approved by Order V-36 of the Director of the RSC in 15th of May 2026
143.	Order No. V-62 of the Director of the Radiation Protection Centre of 19 October 2018 “On Approval of the Description of the Procedure for Preparing Documents Necessary for Legalizing Activities with Ionizing Radiation Sources”
144.	Order No. 73 of the Director of the Radiation Protection Centre of 7 November 2008 “On the Approval of the Description of the Procedure for the Recognition of the Certificate of Conformity of the Design of the Package for the Transport of Radioactive Materials and Radioactive Waste, Issued by a Competent Authority of a Foreign State”

APPENDIX VII – IAEA REFERENCE MATERIAL USED FOR THE REVIEW

1. INTERNATIONAL ATOMIC ENERGY AGENCY - Fundamental Safety Principles, No SF-1, IAEA, Vienna (2006)
2. INTERNATIONAL ATOMIC ENERGY AGENCY - Governmental, Legal and Regulatory Framework for Safety, General Safety Requirements Part 1, No GSR Part 1 (Rev. 1), IAEA, Vienna (2016)
3. INTERNATIONAL ATOMIC ENERGY AGENCY – Leadership and Management for Safety, General Safety Requirements Part 2, No GSR Part 2, IAEA, Vienna (2016)
4. INTERNATIONAL ATOMIC ENERGY AGENCY - Radiation Protection and Safety of Radiation Sources: International Basic Safety Standards, General Safety Requirements Part 3, No GSR Part 3, IAEA, Vienna (2014).
5. INTERNATIONAL ATOMIC ENERGY AGENCY - Safety Assessment for Facilities and Activities, General Safety Requirements Part 4, No GSR Part 4 (Rev. 1), IAEA, Vienna (2016)
6. INTERNATIONAL ATOMIC ENERGY AGENCY - Predisposal Management of Radioactive Waste, General Safety Requirements Part 5, No GSR Part 5, IAEA, Vienna (2009)
7. INTERNATIONAL ATOMIC ENERGY AGENCY - Decommissioning of Facilities, General Safety Requirements No GSR Part 6, IAEA, Vienna (2014)
8. INTERNATIONAL ATOMIC ENERGY AGENCY - Preparedness and Response for Nuclear or Radiological Emergency, General Safety Requirements No GSR Part 7, IAEA, Vienna (2015)
9. INTERNATIONAL ATOMIC ENERGY AGENCY - Site Evaluation for Nuclear Installations, Specific Safety Requirements No SSR-1, IAEA, Vienna (2003)
10. INTERNATIONAL ATOMIC ENERGY AGENCY – Code of Conduct on the Safety and Security of Radioactive Sources, Vienna (2004)
11. INTERNATIONAL ATOMIC ENERGY AGENCY – Guidance on the Import and Export of Radioactive Sources, Vienna (2014)
12. INTERNATIONAL ATOMIC ENERGY AGENCY - Safety of Nuclear Fuel Cycle Facilities, Specific Safety Requirements No SSR-4, IAEA, Vienna (2017)
13. INTERNATIONAL ATOMIC ENERGY AGENCY - Disposal of Radioactive Waste, Specific Safety Requirements No SSR-5, IAEA, Vienna (2011)
14. INTERNATIONAL ATOMIC ENERGY AGENCY - Regulations for the Safe Transport of Radioactive Material, 2025 Edition, Specific Safety Requirements No SSR-6 (Rev. 2), IAEA, Vienna (2025)
15. INTERNATIONAL ATOMIC ENERGY AGENCY - Classification of Radioactive Waste, General Safety Guide No GSG-1, IAEA, Vienna (2009)
16. INTERNATIONAL ATOMIC ENERGY AGENCY - Criteria for use in Preparedness and Response for a Nuclear or Radiological Emergency, General Safety Guide No GSG-2, IAEA, Vienna 2011)
17. INTERNATIONAL ATOMIC ENERGY AGENCY - Communication and Consultation with Interested Parties by the Regulatory Body, General Safety Guide No GSG-6, IAEA, Vienna (2017)
18. INTERNATIONAL ATOMIC ENERGY AGENCY - Occupational Radiation Protection, Safety Guide No GSG-7, IAEA, Vienna (2018)
19. INTERNATIONAL ATOMIC ENERGY AGENCY - Regulatory Control of Radioactive Discharges to the Environment, Safety Guide No GSG-9, IAEA, Vienna (2018)

20. INTERNATIONAL ATOMIC ENERGY AGENCY - Organization, Management and Staffing of the Regulatory Body for Safety, General Safety Guide No GSG-12, IAEA, Vienna (2018)
21. INTERNATIONAL ATOMIC ENERGY AGENCY - Functions and Processes of the Regulatory Body for Safety, General Safety Guide No GSG-13, IAEA, Vienna (2018)
22. INTERNATIONAL ATOMIC ENERGY AGENCY – Arrangements for Public Communication in Preparedness and Response for a Nuclear or Radiological Emergency, General Safety Guide No GSG-14, IAEA, Vienna (2020)
23. INTERNATIONAL ATOMIC ENERGY AGENCY Leadership, Management and Culture for Safety in Radioactive Waste Management, Safety Guide No GSG-16, IAEA, Vienna (2022)
24. INTERNATIONAL ATOMIC ENERGY AGENCY - Arrangements for Preparedness for a Nuclear or Radiological Emergency, Safety Guide No GS-G-2.1, IAEA, Vienna (2007)
25. INTERNATIONAL ATOMIC ENERGY AGENCY - Environmental and Source Monitoring for Purposes of Radiation Protection, Safety Guide No RS-G-1.8, IAEA, Vienna (2005)
26. INTERNATIONAL ATOMIC ENERGY AGENCY - Categorization of Radioactive Sources, Safety Guide No RS-G-1.9, IAEA, Vienna (2008)
27. INTERNATIONAL ATOMIC ENERGY AGENCY - Borehole Disposal Facilities for Radioactive Waste, Safety Guide No SSG-1, IAEA, Vienna (2009)
28. INTERNATIONAL ATOMIC ENERGY AGENCY - Licensing Process for Nuclear Installations, Specific Safety Guide No SSG-12, IAEA, Vienna (2010)
29. INTERNATIONAL ATOMIC ENERGY AGENCY - Geological Disposal Facilities for Radioactive Waste Specific Safety Guide No SSG-14, IAEA, Vienna (2011)
30. INTERNATIONAL ATOMIC ENERGY AGENCY - Storage of Spent Nuclear Fuel, Safety Guide No SSG-15 (Rev. 1), IAEA, Vienna (2020)
31. INTERNATIONAL ATOMIC ENERGY AGENCY - Periodic Safety Review for Nuclear Power Plants, Safety Guide No SSG-25, IAEA, Vienna (2013)
32. INTERNATIONAL ATOMIC ENERGY AGENCY - Advisory Material for the IAEA Regulations for the Safe Transport of Radioactive Material Specific Safety Guide (2018 Edition) No SSG-26 (Rev.1), IAEA, Vienna (2022)
33. INTERNATIONAL ATOMIC ENERGY AGENCY - Predisposal Management of Radioactive Waste from Nuclear Power Plants and Research Reactors, Safety Guide No SSG-40, IAEA, Vienna (2016)
34. INTERNATIONAL ATOMIC ENERGY AGENCY - Predisposal Management of Radioactive Waste from Nuclear Fuel Cycle Facilities, Safety Guide No SSG-41, IAEA, Vienna (2016)
35. INTERNATIONAL ATOMIC ENERGY AGENCY - Management of Waste from the Use of Radioactive Material in Medicine, Industry, Agriculture, Research and Education, Safety Guide No SSG-45, IAEA, Vienna (2019)
36. INTERNATIONAL ATOMIC ENERGY AGENCY - Radiation Protection and Safety in Medical Uses of Ionizing Radiation, Safety Guide No SSG-46, IAEA, Vienna (2018)
37. INTERNATIONAL ATOMIC ENERGY AGENCY - Decommissioning of Nuclear Power Plants, Research Reactors and Other Nuclear Fuel Cycle Facilities, Safety Guide No SSG-47, IAEA, Vienna (2018)
38. INTERNATIONAL ATOMIC ENERGY AGENCY –Decommissioning of Medical, Industrial and Research Facilities, Safety Guide No SSG-49, IAEA, Vienna (2019)
39. INTERNATIONAL ATOMIC ENERGY AGENCY – Operating Experience Feedback for Nuclear Installations, Safety Guide No SSG-50, IAEA, Vienna (2018)
40. INTERNATIONAL ATOMIC ENERGY AGENCY - Accident Management Programmes for Nuclear Power Plants, Safety Guide No SSG-54, IAEA, Vienna (2019)

41.	INTERNATIONAL ATOMIC ENERGY AGENCY - Preparedness and Response for a Nuclear or Radiological Emergency Involving the Transport of Radioactive Material, Safety Guide No SSG-65, IAEA, Vienna (2022)
42.	INTERNATIONAL ATOMIC ENERGY AGENCY - Radiation Protection Programmes for the Transport of Radioactive Material, Safety Guide No SSG-86, IAEA, Vienna, (2023)
43.	INTERNATIONAL ATOMIC ENERGY AGENCY - The Management System for the Safe Transport of Radioactive Material Safety Guide No TS-G-1.4, IAEA, Vienna (2008)
44.	INTERNATIONAL ATOMIC ENERGY AGENCY - Compliance Assurance for the Safe Transport of Radioactive Material, Safety Guide No SSG-78, IAEA, Vienna (2023)
45.	INTERNATIONAL ATOMIC ENERGY AGENCY - Schedules of Provisions of the IAEA Regulations for the Safe Transport of Radioactive Material (2018 Edition), Specific Safety Guide No SSG-33 (Rev.1) IAEA, Vienna (2021)
46.	INTERNATIONAL ATOMIC ENERGY AGENCY - Storage of Radioactive Waste, Safety Guide No WS-G-6.1, IAEA, Vienna (2006)
47.	INTERNATIONAL ATOMIC ENERGY AGENCY – Release of Sites from Regulatory Control on Termination of Practices, Safety Guide No WS-G-5.1, IAEA, Vienna (2006)
48.	INTERNATIONAL ATOMIC ENERGY AGENCY - Safety Assessment for the Decommissioning of Facilities Using Radioactive Material, Safety Guide No WS-G-5.2, IAEA, Vienna (2009)
49.	INTERNATIONAL ATOMIC ENERGY AGENCY - Storage of Radioactive Waste, Safety Guide No WS-G-6.1, IAEA, Vienna (2006)
50.	INTERNATIONAL ATOMIC ENERGY AGENCY - Format and Content of the Package Design Safety Report for the Transport of Radioactive Material, Safety Guide No SSG-66, IAEA, Vienna (2022)
51.	INTERNATIONAL ATOMIC ENERGY AGENCY - Ageing Management and Maintenance of Packages for the Transport of Radioactive Material No SSG-94, IAEA, Vienna (2026)

APPENDIX VIII – ORGANIZATIONAL CHART OF VATESI AND RSC

