| No | Article | Reference | Question | Answer |
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| 1 | General | A.1.1 | It is mentioned that the liquid waste is stored in four underground liquid wastetanks (VR1, VR2, VR3 and VR4). What provisions are in place for managing the liquid waste stored in these tanks? | Liquid radioactive waste stored in four underground tanks and a wet pool in the reactor building will be managed under the RA reactor decommissioning license and in accordance with the approved Waste Management Plan. Treatment technology will be selected after chemical and radiochemical characterization and will be subject to regulatory approval before implementation. |
| 2 | Article 7 | Section C.1.1–C.1.2, pages 10–12 | Given the recent repeal of the Law Banning the Construction of Nuclear Power Plants and the entry into Phase I of nuclear power programme development, could you clarify how Serbia plans to update or expand the existing secondary legislation and draft strategies (radiation safety, waste management, security, existing exposure situations) to fully align with CNS Article 7 requirements for a comprehensive regulatory framework for a future nuclear installation? | The Law on Amendments to the Law of Energy ("Official Gazette of RS", No. 94/24) repealed the Law on the Prohibition of Construction of Nuclear Power Plants in the Federal Republic of Yugoslavia ("Official Gazette of FRY", No. 12/95 and "Official Gazette of RS", No. 85/05 – other law), which enabled the Republic of Serbia to enter the Phase 1 of nuclear power programme development. The Law on Amendments to the Law of Energy regulates the process of the nuclear power programme implementation through three phases recommended by the International Atomic Energy Agency (hereinafter: MAAE), by applying the methodology for assessing 19 infrastructural issues designed to guide the countries considering or intending to construct their first nuclear power plant. In addition, the Law on Amendments to the Law of Energy prescribes that the professional and executive duties related to Phase 1 and Phase 2 of nuclear power programme development are to be carried out by the Ministry of Mining and Energy. The Ministry of Mining and Energy, at the onset of Phase 1, started with the establishment of the Nuclear Energy Programme Implementing Organization (NEPIO) within the Ministry of Mining and Energy, which will be comprised of the representatives of the ministry, other relevant state authorities and legal entities in the Republic of Serbia. The established responsibilities of the NEPIO are to plan, implement and monitor all activities related to the nuclear power programme development in the Republic of Serbia, which includes, among other things, carrying out and coordinating the preparation of studies, assessments and evaluations; coordinating the work of the relevant authorities, the regulatory body, industry, institutions and any |

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| | | | | other stakeholders, with the aim of aligning all national needs and activities with the international and other obligations assumed by the Republic of Serbia. In accordance with the established responsibilities, during the Phase 1, the NEPIO will conduct the analysis of the legislative and regulatory framework with respect to the IAEA standards; draft bills to amend the legislation; engage the stakeholders, develop strategies, assess needs, cooperate with the relevant universities and institutions, etc. Once the NEPIO completes its analysis of the legislative and regulatory framework, and in accordance with the guidelines and the analysis conclusions, the relevant authorities in the Republic of Serbia will embark on the legislative amendments, i.e, the alignment of the existing legislative and regulatory framework in this field. |

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| 3 | Article 8 | Section C.2 (Regulatory Body), pages 17–21; Section E.1 (HR challenge), page 31 | The report describes the Directorate's responsibilities and enforcement powers, but does not provide detailed information on staffing levels, technical capacities or long-term resourcing. Could you clarify whether a capacity-building plan exists to ensure the regulatory body maintains sufficient independence, competence and human/technical resources in accordance with CNS Article 8, especially considering Serbia's transition toward a newcomer nuclear programme? | The total number of systematized positions in SRBATOM is 48 positions, including the managerial position of Director. Currently, the total number of filled positions and the total number of permanent employees in SRBATOM is 40 employees (39 permanent employees and 1 fixed-term employee, in director positions). The Directorate's duty is to plan the appropriate number of persons with the necessary qualifications and to implement all activities related to strengthening the human resources capacity of the regulator, taking into account the lack of qualified personnel in this area. At the level of the Directorate, the Employment Plan for 2026, 2027, and 2028 has been approved. Through the new Employment Plan, the Directorate is implementing the state's strategy to maximally improve the field of radiation and nuclear safety and plans to systematize 80 positions, which would be distributed according to the new internal organization primarily to the radiation and nuclear safety and security sector, then to the radiation and nuclear safety and security inspection sector, and the sector for professional legal affairs. The dynamics of employment depends entirely on the possibility of financing employment, as well as on the approval of the Commission for New Employment. Planned measures to improve the capacity of employees in the Directorate, in addition to a significant increase in professional staff, are also through continuous training of employees through various forms of cooperation both at the international level and at the state level. |

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| 4 | Article 16 | Section C.6 & C.6.1, pages 24–26 | The report outlines ongoing implementation of JRodos and significant upgrades in environmental radioactivity monitoring. Could you clarify whether the current National Radiation Emergency Plan (NREP) has been updated since 2018 (the report mentions that the Plan should be updated every three years), and whether the enhanced monitoring networks and decision-support tools have been formally integrated and validated through national or international exercises, as required for benchmarking under CNS Article 16? | The National Radiation Emergency Plan (NREP) was adopted in 2018 and its revision is currently under preparation. Consequently, the JRODOS system and the upgraded environmental monitoring network have not yet been formally incorporated into the existing NREP. Their formal integration is planned within the forthcoming update of the Plan. Nevertheless, the operational functionality of these systems has already been tested and validated through participation in relevant international exercises. SRBATOM regularly participates in international nuclear and radiological emergency exercises, including IAEA ConvEx exercises, ECURIE exercises coordinated by the European Commission, and activities of the RODOS User Group (RUG). These exercises are used to test the JRODOS system and environmental monitoring capacities, and the experience gained contributes to the further development of internal operational procedures. |
| 5 | Article 19 | Section A.1.1 History and current status of nuclear facilities, pages 6–7 | For the RA research reactor, the report states that no decommissioning activities have taken place since spent fuel removal in 2010. Could you clarify whether Serbia intends to develop an updated decommissioning plan, schedule and funding mechanism, in order to meet CNS Article 19 expectations on safe decommissioning and | In accordance with Nuclear Low and the new regulations related to decommissioning, the nuclear operator is preparing a decommissioning strategy and licensing documentation for the preparatory phase of the RA research reactor decommissioning. The financing mechanism for decommissioning activities and the decision of end state will be determined by the Government of the Republic of Serbia at the proposal of operator. |

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| | | | management of associated radioactive waste? | |

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| 6 | Planned Activities | Section A.1.2 Nuclear Power Program Developments, page 8 | National infrastructure development for a future nuclear oower programme (CNS Article 7, Article 8 and General Safety Provisions): The Preliminary Technical Study by EDF (June 2025) and the MoU from July 2024 indicate pre-Phase 1 progress. Could you clarify how Serbia intends to structure its approach to the 19 IAEA Milestones infrastructure issues (NG-G-31), particularly siting, regulatory competence, safety assessment capability and stakeholder engagement? | Serbia intends to address the 19 IAEA Milestones infrastructure issues through the NEPIO, which consists of the Interdepartmental Expert Working Group and the Group for the Preparation and Implementation of the Nuclear Energy Programme within the Ministry of Mining and Energy. To support this process, NEPIO plans to carry out ten dedicated studies covering all 19 infrastructure issues. Regarding siting, Serbia foresees a structured screening and site-characterization process, in line with relevant IAEA standards, including both a nationwide review of potential locations and the assessment of existing thermal power plant sites for possible SMR deployment. In terms of regulatory competence, the Directorate will play an active role during Phase 1 as the existing autonomous regulatory body, while analyses will determine what further steps are to be undertaken about it. Regarding safety assessment capability, Serbia plans to identify existing gaps and, in Phase 2, develop a roadmap for transposing international safety standards into binding national regulations, as well as into licensing, oversight, and inspection procedures. Stakeholder engagement will be addressed through a dedicated interaction plan, public forums, and media communication, including engagement with neighboring countries. |

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| 7 | Article 16.3 | pg. 24 and 30 | What near-term priorities under the National Radiation Emergency Plan (NREP) is the Directorate focusing on (for example, exercises, stakeholder coordination, and cross border communication), and how frequently are national drills planned with relevant ministries and services? | Under the National Radiation Emergency Plan (NREP), the Directorate's priorities focus on maintaining preparedness through regular exercises, stakeholder coordination, training, and effective communication. SRBATOM participates in international exercises such as IAEA ConvEx, ECURIE, and exercises organized with countries with which Serbia has bilateral agreements, which support testing operational readiness and cross-border communication. Coordination with relevant ministries and institutions is ensured through regular meetings within the framework of the Republic Emergency Management Headquarters and through training and knowledge-exchange activities, often organized in cooperation with the IAEA. The NREP also foresees the organization of national emergency exercises involving relevant authorities at least once every five years. |

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| 8 | Article 16.3 | pg. 26 | Could you elaborate more in detail public communication activities carried out by the Directoriate in accordance with the established protocols for nuclear and radiological emergencies? | The Directorate for Radiation and Nuclear Safety and Security of Serbia conduct public communication activities in accordance with national emergency preparedness and response plans, nuclear and radiological emergency response arrangements, and established communication protocols. The main objective of these activities is to ensure timely, accurate and transparent information to the public in order to protect the population, prevent the spread of misinformation and maintain public confidence in the institutional system. Regulatory and operational documents define the responsibilities for information dissemination, the timelines for public notification, communication channels, and the mechanisms for coordination with other competent authorities. Within its mandate, the Directorate applies communication procedures covering public information in three phases: before, during and after a nuclear or radiological emergency. In the preparedness phase, preventive activities are carried out, including the development and updating of communication plans, preparation of information templates, training of staff and spokespersons for emergency and crisis communication, participation in national and international exercises, as well as public information and education activities on radiation safety and protective actions. During a nuclear or radiological emergency, the Directorate ensures timely public communication on the nature of the event, risk assessments and recommended protective actions, regularly updates information on the situation and radiation monitoring data, and coordinates communication with other competent institutions to ensure consistent and reliable public information. These activities are carried out in accordance with the Regulation on the Emergency Response Plan in Case of an Accident, Chapter IV. The document is available on the Directorate's website (www.srbatom.gov.rs). Following the termination of the emergency, communication continues through the publication of reports, monitoring data and additional information on potential radiological consequences, as well as through the evaluation of communication activities and the improvement of procedures based on lessons learned. |

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| 9 | Article 6 | pg. 6 | Are there any plans to develop decommissioning programme for RA and RB research reactors? | The RA research reactor is in the preparatory phase for decommissioning. Due to the absence of a national strategy for the future use and modernization of the RB research reactor (critical assembly), the decision on future use or final shutdown and decommissioning should be made by the Government of the Republic of Serbia on the proposal of the operator. |
| 10 | Article 6 | pg. 7 | Is there any plan on remediation activities on enhancing safety on the facility in the vicinity of uranium mine Kalna in Eastern Serbia? | PC NFS has prepared a remediation plan for the closed uranium mine Gabrovnica in Eastern Serbia. Remediation activities should be integrated with the results of decommissioning activities at the site. |

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| 11 | Article 6 | pg. 24 - 25 | Does Serbia carry out soil sampling - analysis of alpha, beta, gamma radioactivity? | According to the Regulation on the Establishment of the Programme for Systematic Environmental Radioactivity Monitoring (Official Gazette of the Republic of Serbia No. 100/10), soil radioactivity monitoring is carried out at locations contaminated with depleted uranium ammunition during the 1999 NATO military activities in Serbia. Following decontamination, these locations have been regularly monitored through gamma spectrometric analysis of soil samples, and the results are publicly available on the Directorate's website. In addition, soil radioactivity monitoring has been conducted over the past decade through specific projects covering both agricultural and non-agricultural land across Serbia, particularly in areas with potential industrial impact. The Regulation on Radioactivity Monitoring (Official Gazette of the Republic of Serbia No. 97/11) also provides for soil monitoring within the programme of the Public Enterprise Nuclear Facilities of Serbia, based on gamma spectrometric analysis of soil samples. |

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| 12 | Article 7.2 | pg. 15 | How do you apply a graded approach in inspection planning? | Inspection oversight is based on the systematic risk assessment and the analysis of the relevant parameters, which means that the Radiation and Nuclear Safety and Security Inspection make plans for its controls commensurate with the likelihood and gravity of possible harmful impact on the exposed persons, public and the environment. The inspection oversight is carried out at the inspected entities when there are reasons for urgent action, in emergency situations where an imminent threat to the life and health of people, property of significant value, the environment, or plant and animal life from the harmful effects of ionizing radiation is being eliminated, as well as when the inspected entity provides a written consent. Risk assessment for the inspected entities that perform radiation practices and nuclear activities is determined based on the previous instances of inspection oversight, as well as in coordination with the other sectors of Serbian Radiation and Nuclear Safety and Security Directorate, the IAEA standards and guidelines, as well as available data, information and previous experience. Basic parameters taken into account while assessing the risks are given as follows: type of ionizing radiation source being used (sealed radioactive sources, unsealed radioactive sources, x-ray devices), the manner and conditions of the use of sources, the assessment of the exposure of workers and the public, availability of protective equipment and protective measures efficiency, availability of a Radiation Protection Officer, staff trainings, implementation of operating procedures and maintaining of dose records. When conducting risk assessment, the results of previous instances of inspection oversight, as well as any irregularities or incidents when using the sources are also taken under consideration. The likelihood of accidental situations, such as loss of sources, damage to the equipment, uncontrolled radiation or inadequate handling are also taken under consideration. Based on the analysis of the aforementioned parameters, all radiation practices and nuclear activities are classified commensurate with the level of risk involved, which enables planning of the adequate protective measures and frequency of inspections. The Inspection can initiate oversight based |

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| | | | | on the citizens' petitions, information from the other institutions or media reports indicating possible irregularities. Based on the aforementioned parameters, risks are classified. The inspected entities are usually classified into low-risk, moderate-risk and high-risk categories. The frequency of inspections is dependent upon this assessment. High-risk entities are subject to control more frequently, and low-risk entities less frequently. Such approach enables more efficient inspections since, in this manner, the resources are directed to the areas posing the greatest threat to the public interest. At the same time, the system encourages the inspected entities to comply with the regulations, since proper conduct and conformity with the law result in less frequent inspections. |

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| 13 | General | pg. 5 | For the Vinča radioactive waste treatment facility that completed its trial run in July 2025, what remaining regulatory steps and expected schedule do you foresee for the full operation license, and how will acceptance of waste streams from Hangars H0/H3 be phased? | PC NFS submitted an application for the issuance of a operational license of the waste treatment facility on December 31, 2025. The review of the documentation is ongoing and the issuance of the license is expected in the next few months. The request for issuing a license for the decommissioning of Hangars H1 and H2 was submitted on November 7, 2025. The review and harmonization of documentation is nearing completion and the issuance of this license is expected soon. The sequence and phases of removal of waste streams from the old hangars H1 and H2 is described in detail in the safety report and decommissioning plan. |
| 14 | General | pg. 6 | In Section A.1.1, by what (physicochemical) processes was uranium extraction carried out? Did the country also have nuclear facility for uranium enrichment? | The hydrometallurgical process for extracting uranium used first crushed and ground, then uranium is leached using a sodium carbonate solution at about 90 °C, achieving over 90% uranium extraction. The uranium-bearing solution is separated from the waste by vacuum filtration, clarified through sand filters, and uranium is finally precipitated by hydrogen reduction as uranium dioxide ($UO_2$) containing about 70% uranium. The remaining solution is recycled back into the leaching process, making the method suitable for processing low-grade uranium ores. The Republic of Serbia does not have, nor has it ever had, a facility for uranium enrichment. |

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| 15 | General | pg. 8 | In what way does Serbia plan to increase the number of experts in nuclear energy field? | The first step in this effort is to pursue a Human Resource Development study in Phase 1. This study is intended to define a long-term strategy for identifying, training, recruiting and retaining qualified personnel across all areas relevant to a future nuclear programme, in line with IAEA guidance and the phased development of the programme. Since national capacities are currently limited, Serbia also plans to build on existing university courses, research institutes, and the expertise of Serbian professionals working abroad in the nuclear field. At the same time, particular emphasis is being placed on international training and knowledge transfer, including practical placements and professional exchanges in neighboring countries such as Slovenia and Hungary, as well as in partner countries with which Serbia has signed MoU, including France and the Republic of Korea. |

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| 16 | General | N/A | Will environmental impacts also be assessed with neighboring states as part of transboundary consultations? | The legal basis for conducting cross-border consultations is the ESPOO Convention (for projects) and the SEA Protocol (for plans and programs), as well as domestic legislation: the Law on Environmental Impact Assessment and the Law on Strategic Environmental Impact Assessment (both adopted in December 2024). Serbia ratified the ESPOO Convention in 2007, while the SEA Protocol was confirmed in 2010. The Law on Strategic Environmental Impact Assessment directly regulates cross-border consultations as one of the key stages in the decision-making process on plans and programs that may have a significant impact on the environment of another country. In Serbia, the Ministry of Environmental Protection is responsible for these processes. |

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| 17 | General | N/A | Could you shortly describe, how is Environmental Impact Assessment designed in Serbian legislation? Considering the accession process, is it in line with European Directive 2011/92/EU? | An Environmental Impact Assessment (EIA) is a crucial institutional mechanism intended to prevent negative impact on the environment and human health, while ensuring public participation in the process. The obligation to prepare the Environmental Impact Assessment is prescribed by law. The Law on Environmental Impact Assessment ("Official Gazette of RS", No. 94/2024) and the Law on Strategic Environmental Impact Assessment ("Official Gazette of RS", No. 94/2024) entered into force on 06 December 2024. The aforementioned laws were adopted to achieve a higher level of alignment between the national legislation and relevant EU Directives in the field of environmental protection, in particular with Directive 2011/92/EU as amended by Directive 2014/52/EU, and Directive 2001/42/EC, with the aim of strengthening environmental protection, enhancing public participation and improving administrative efficiency. The adoption of new legislation, namely the Law on Environmental Impact Assessment and the Law on Strategic Environmental Impact Assessment is a significant step forward towards the alignment with the EU acquis, as well as towards further enhancement of the environmental protection in Serbia. |
| 18 | Planned Activities | pg. 9 | Could you explain why the ORPAS Mission scheduled for May 2025 has been postponed? Is there any alternative term to hold ORPAS Mission in Serbia? | The ORPAS mission to the Republic of Serbia, originally planned for the period from 18 to 27 May 2025, was cancelled for technical reasons during the spring of 2025. The new mission date is 25 October – 3 November 2026. |

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| 19 | Planned Activities | pg. 8 | Could you elaborate more in detail the conclusions of the Preliminary Technical Study regarding the consideration of peaceful use of nuclear energy in the Republic of Serbia (pre-Phase 1 on 11 June 2025), including key considerations for development of a new Nuclear Power Program? At what stage will there be a preliminary decision on a type of nuclear reactor? | The Preliminary Technical Study concluded that nuclear energy could be a credible long-term option for the Republic of Serbia, as it could provide reliable low-carbon baseload electricity, support decarbonization, and strengthen energy security while complementing variable renewable sources. It emphasized that both large Generation III/III+ reactors and Small Modular Reactors (SMRs) should be considered, since large reactors may offer greater maturity and economies of scale, whereas SMRs may provide more flexibility and lower initial investment requirements. At the same time, the Study did not recommend any specific technology but instead provided an initial comparative screening of available reactor options in light of Serbia's grid characteristics, siting conditions, regulatory needs, and long-term infrastructure objectives. It also highlighted that the development of a new nuclear power programme would require parallel progress in the legal and regulatory framework, institutional and human resource capacity, site selection, grid readiness, financing arrangements, and stakeholder engagement. No preliminary decision was taken on the reactor type at this stage, as it is expected at a later stage, following more detailed feasibility studies, vendor engagement, and technology assessment, during Phase 2. |

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| 20 | Article 8 | C.2 | What measures are being taken to ensure independence and adequate resources for the Directorate, especially as Serbia transitions from a non-NPP country to a potential newcomer in nuclear energy? | According to Article 13 of the Law the Directorate is an independent and separate regulatory body with regulatory, expert and associated executive functions in the area of radiation and nuclear safety and security. Financial resources of the Directorate are provided from the budget of the Republic of Serbia, as proposed by the Directorate, and from the income the Directorate acquires from the activities within its remit, donations, grants and other sources pursuant to the Law. The budget and salary levels are sufficient to ensure the Directorate's proper functioning including inspectorate functions at this point, but regarding transition from non-NPP country to a potential newcomer in NE this budget would not be sufficient and adequate. |