

Från: **Johan Swahn** johan.swahn@mkg.se 

Ämne: Correction and follow-up comments (Fwd: Third input from MKG to the SSM quality assurance review of the SKB LOT project corrosion results (Dnr SSM2020-5740))

Datum: 17 december 2020 14:28

Till: Strålsäkerhetsmyndigheten registrator@ssm.se

Kopia: **Ansi Gerhardsson** ansi.gerhardsson@ssm.se, **Michael Egan** Michael.Egan@ssm.se, **Bo Strömberg** bo.stromberg@ssm.se, **Henrik Öberg** henrik.oberg@ssm.se, **Tim Hicks** tim.hicks@galson-sciences.co.uk, **Tamara Baldwin** tdb@galson-sciences.co.uk, **Christine Anvegård** christine.anvegard@mkg.se, **Joachim Stormvall** joachim.stormvall@mkg.se, **Mikaela Agri** mikaela.agri@mkg.se, **Oscar Alarik** oscar.alarik@naturskyddsforeningen.se

JS

Hej igen!

MKG would like to make a correction and provide follow-up comments to the third input sent December 11 regarding the SSM quality assurance review of the SKB LOT project corrosion results (Dnr SSM2020-5740).

MKG has realised that the SKB documents called "22932 - Analysis of corrosion samples from field trials (LOT), Rise Kimab AB" and "23867 - FIB and TEM on copper samples Swerim AB" are not reports from the respective consultants with results of completed work. The documents are in fact orders for the work, likely specifying the analysis to be done and how the reporting is to be made.

In addition, MKG has observed that Bo Strömberg and Henrik Öberg from SSM have made a visit to RISE/SWERIM on November 26 to make an interview with Andrew Gordon, head of the unit responsible for corrosion work, and to visit the research facilities. Present during the visit were also Johannes Johansson and Lotta Rubio-Lind from SKB.

The visit is documented in the enclosed document "Mötesanteckning". MKG find the following passage in the notes particularly interesting:

"På fråga från SSM om hur dokumentation och resultat från mätningar granskas internt [sic]. AG beskrev att det generella tillvägagångssättet är att en överordnad granskar framtagna dokument eller producerade resultat. I LOT-projektet är AG ansvarig i detta avseende. Vidare beskrev AG att resultat från beställda forskningsprojekt vid RISE generellt dokumenteras i en forskningsrapport som fastställs internt och skickas till kunden. I samband med LOT projektet skrevs slutrapporten i nära samarbete mellan SKB:s och RISE/SWERIM:s personal, och av detta skäl finns ingen särskild separat RISE-rapport fastställd för LOT-projektet."

This translates into English as follows (MKG:s translation):

"When asked by SSM about how documentation and results from measurements are reviewed internally [sic]. AG [=Andrew Gordon] described that the general approach is for a superior to review documents produced or produced results. In the LOT project, AG is responsible in this regard. AG further described that results from commissioned research projects at RISE are generally documented in a research report that is finalised internally and sent to the customer. In connection with the LOT project the final report was written in close collaboration between the staff of SKB and RISE/SWERIM, and for this reason, no specific separate RISE report has been established for the LOT project."

The notes have been reviewed on factual accuracy by RISE and SKB.

In order to assure that SKB and RISE have followed scientifically established routines for the corrosion studies reported in the SKB report TR-20-14, MKG still finds it very relevant that SSM acquires the SKB order documents above, that the company has refused to send to the regulator. It is not enough that only personel from SSM have had the opportunity to browse the documents, if this is the case.

MKG is worried that the close collaboration between the staff of SKB and RISE/SWERIM has endangered the scientific integrity of the reporting of copper corrosion in SKB report TR-20-14. As there has been no research report for internal review and quality control within RISE/SWERIM there would appear to be no way of implementing an of SKB independent quality assessment of the corrosion results. MKG finds this clearly scientifically lacking. SKB is not a research organisation but a private nuclear industry company. As such SKB has strong interests in only publishing results that support the company's views.

Best regards,

Johan Swahn

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Ämne: Third input from MKG to the SSM quality assurance review of the SKB LOT project corrosion results (Dnr SSM2020-5740)

Datum: 11 december 2020 11:14:07 CET

Till: Strålsäkerhetsmyndigheten <registrator@ssm.se>

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Hej!

Enclosed is a third input with three appendices from MKG to the SSM quality assurance review of the SKB LOT project corrosion results in the autumn of 2020. The SSM reference is SSM2020-5740.

Best regards,

Johan

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