

DS479 OPERATING EXPERIENCE FEEDBACK FOR NUCLEAR INSTALLATIONS

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: Nikolaus Müllner Page.1... of.2. Country/Organization: Austria / BMLFUW (Consultant) Date: 9 th of October 2015							
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1	2.5	The management system has to should ensure the promotion of a safety culture,	As a “safety guide” the document should contain “should” statements				
2	§2.9	Management should foster a ‘ just-culture ’ safety culture	§2.9 introduces the term “just-culture”, and this term is repeated in §2.29. A safety guide should not be used to introduce new terms. In this specific case, a just-culture is part and parcel of a proper safety culture. I would replace just-culture with safety culture.				
3	§2.12	Management should assure that sufficient”	“Management should assure sufficient”. This should read, “Management should assure <u>that</u> sufficient” (note that this is the wording in §2.13 through §2.17). The wording should be				

			consistent				
4	§2.22	<p>The sources of information on OE should comprise for instance operational records, maintenance records, results from reviews, installation walk-down, trending, surveillance programme, benchmarks, peer reviews, and self assessments, safety- and risk analyses</p> <p>.</p>	<p>§2.22 describes the type of information that should be included as sources of information on OE. I would argue that safety analyses and risk analyses should also be included. Although safety and risk analyses are not <u>directly</u> operating experience, revisions to safety and risk analyses often reflect operating experience in a way that individual events do not.</p>				
5	§3.10	<p>The management system has to should ensure...</p>	See comment 1				