

## Title: DS460 Communication and Consultation with Interested Parties by the Regulatory Body (Comments on version dated 2014-07)

These tables of resolution compile the 156 comments posted by Member States. The comments are addressed in the DS460 content order. They have been provided by:

Austria (12/01/2015)	3 Comments	Japan (09/02/2015)	20 Comments
Canada (12/01/2015)	3 Comments	Luxembourg (13/01/2015)	3 Comments
China (19/12/2014)	1 Comment	Mexico (13/01/2015)	2 Comments
Egypt	1 Comment	Russia (02/02/2015)	14 Comments
Germany (15/12/2014)	41 Comments	Sweden (02/02/2015)	0 Comment
Iran (02/12/2014)	5 Comments	Switzerland (29/01/2015)	1 Comment
Ireland (30/01/2015)	11 Comments	USA (30/01/2015)	51 Comments
		WANO (21/01/2015)	0 Comment

COMMENTS				RESOLUTION			
No.	Para/Line	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
<b>GENERAL</b>							
1.		<b>1. USA:</b> This document provides comprehensive guidance for stakeholder engagement with regulatory body processes. It is well written and attempts to address all aspects of engagement with stakeholders impacted by nuclear safety decisions.		X			
2.		<b>1. Russia General Comment:</b> It is necessary to elaborate all aspects of interaction and communication with interested parties in a very thorough and careful manner so the independence of the regulatory body in its decision-making is not affected or violated		X			The independence should be a key characteristic of the regulatory body which has underlined the development of DS460. There is a dedicated sub-section 'Independence' under 'Overarching Recommendations'. In addition, caveats and recommendations have been incorporated, where necessary, in the text (E.g., 4.12, 4.31, etc.)
3.		<b>2. USA:</b> Consider addressing communications resources demands.			To add in para 4.34: For the effective <b>and efficient</b> implementation of the communication and consultation process...		Even if 'resources' are already and extensively covered (2.13, 4.33), it can be stressed further in 4.34 adding 'efficient', meaning using resources optimally.
4.		<b>3. USA:</b> While this document does a good job encouraging regulating bodies to make public communications a priority, it does not emphasize enough the regulating agency's primary mission. Regulatory bodies should have the flexibility to encourage and explore ways to enhance communications in a cost-effective manner.			Ditto		Ditto and There is no need to recall the core RB functions and missions given that it is developed under the IAEA Safety Requirements, including GSR Part 1.

COMMENTS				RESOLUTION			
No.	Para/Line	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
<b>GENERAL</b>							
5.		<b>1. Germany:</b> The current draft still seems to contain several unnecessary repetitions. Furthermore, the level of detail seems to vary considerably (e. g. see comment to para 4.18). Streamlining of the text in both regards should be taken into consideration.	To further optimize the legibility of the document.		<p>A. Have been deleted:</p> <ul style="list-style-type: none"> <li>- 1.9, now para 1.12, last sentence</li> <li>- 1.13, now para 1.12, first sentence</li> <li>- 1.14, now 1.15, first sentence</li> <li>- 2.17 the whole para except the part on regulatory body evaluation moved under 4.30 (former 4.32)</li> <li>- 4.2, now 4.2, last sentence</li> <li>- 4.3, now 4.2, last sentence</li> <li>- 4.7, now 4.5, last sentence</li> <li>- 4.15, now 4.14, last sentence</li> <li>- 4.11 part of the sentence after the last semi-colon</li> <li>- 4.23, now 4.21, last sentence</li> <li>- 5.4, the whole paragraph</li> </ul> <p>B. Have been removed:</p> <ul style="list-style-type: none"> <li>- 3.1 couple of words within the brackets</li> <li>- 4.18, the whole paragraph</li> <li>- 4.25, now 4.23, last sentence</li> <li>- 5.3, last sentence</li> </ul> <p>C. Have been modified:</p> <ul style="list-style-type: none"> <li>- 1.14 first 3 sentences, now 1.2</li> <li>- 1.12 and 1.13 merged, now 1.14</li> <li>- 2.13, now 2.6 (except sentences 3 &amp; 4 moved under 5.17, now 5.16)</li> <li>- 2.14, now 2.7</li> <li>- 2.15, now 2.8</li> <li>- 4.2 and 4.3 merged, now 4.2</li> </ul>		<p>In addition to the improvement stemming from Member states' comments, the text has been streamlined and enhanced as described beside in order to:</p> <p>A. Delete the unnecessary repetitions (duplications)</p> <p>B. Remove too detailed information.</p> <p>C. Ensure a better flow and structure of the overall document in a more logical manner.</p>
6.	Note by the Secretariat	<b>4. USA:</b> Presume that the feedback and experience, referred to in paragraph 2, will be updated to refer to 2014.		X			
7.	Page 6, fig 1	<b>1. Egypt:</b> Figure 1 needs to be more contrasted.		X			Figure has been replaced
8.		<b>41. Germany:</b> Please check spelling in the whole document: <ul style="list-style-type: none"> <li>- 'organize' versus 'organise',</li> <li>- 'organization' versus 'organisation'.</li> </ul>	Harmonization of spelling and consistent usage of either British English or American English throughout the document is recommended.	X			Corrected: the "IAEA" English requires the use of "z".

COMMENTS BY REVIEWER				RESOLUTION (Tentatively)			
No.	Para/Line	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
<b>1. INTRODUCTION</b>							
9.	1.1, line 6	<b>5. USA:</b> <del>However, some members of the public usually may have incomplete knowledge and a great deal of uncertainty regarding any issues involving nuclear and radiation safety, because of the complexity of the topic. The perceived risk associated with nuclear energy, radioactive waste, and the use of ionizing radiation sources.</del>	Some stakeholders may be more knowledgeable.		Members of the public usually have incomplete knowledge and a great deal of uncertainty regarding any issue involving nuclear and radiation safety because of the complexity of this topic. <b>These influence the perception of the radiation risks</b> associated with nuclear energy, radioactive waste and the use of ionizing radiation sources.		Some interested parties (also called stakeholders) may be more knowledgeable. However, the general public has incomplete knowledge and information. The sentence is proposed to be improved as proposed beside.
10.	1.2	<b>2. Germany:</b> “[...] - Set up appropriate means of informing parties in the vicinity, the public and other interested parties, and the <b>information news</b> media about the safety aspects (including health and environmental aspects) of facilities and activities and about regulatory processes; [...]”	The content of this para seems to refer to “traditional” media such as newspapers, television, etc. Throughout the rest of the draft, media in this sense are referred to as “news media”.			X	This text is an exact quotation from the Safety Fundamental Principle 2.

COMMENTS BY REVIEWER			RESOLUTION (Tentatively)				
No.	Para/Line	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
<b>1. INTRODUCTION</b>							
11.	New para. after para.1.5	<p><b>2. Japan:</b> Add flowing paragraph after para.1.5.</p> <p><u>The IAEA Safety Standard Series No. GSR Part 6 [13] on decommissioning of facilities states in Requirement 5 as “The responsibilities of the regulatory body shall include providing interested parties with an opportunity to comment on the final decommissioning plan and supporting documents before their approval on the basis of national regulations.”</u></p> <p><u>The IAEA Safety Standard Series No. GSR Part 3 [5] states in para.5.3 as “The government, in the legal and regulatory framework, as appropriate: (d) Shall provide for the involvement of interested parties in decisions regarding the development and implementation of protection strategies, as appropriate.” And the IAEA Safety Standard Series No. WS-G-3.1 [X] on remediation also states in para.2.9 as “Its responsibilities should include: (j) Ensuring public participation in all activities associated with the remediation process”</u></p> <p><u>The IAEA Safety Standard Series No. SSR-5 [11] states in para.3.9 as “The regulatory body has to engage in dialogue with waste producers, the operators of the disposal facility and interested parties to ensure that the regulatory requirements are appropriate and practicable.”</u></p>	In decommissioning, remediation and waste disposal, communication and consultation are also relevant.		<p>To add the following new para 1.6: The IAEA Safety Standard Series No. GSR Part 6 [13] on decommissioning of facilities states in Requirement 5: “The responsibilities of the regulatory body shall include providing interested parties with an opportunity to comment on the final decommissioning plan and supporting documents before their approval on the basis of national regulations.”</p> <p>This sentence to be incorporated in (former) 1.6: The IAEA Safety Standard Series No. SSR-5 [11] states in para.3.9 “The regulatory body has to engage in dialogue with waste producers, the operators of the disposal facility and interested parties to ensure that the regulatory requirements are appropriate and practicable.”</p>		GSR Part 3 is already quoted in para 1.4 and 1.8.
12.	1.6./1	<b>3. Japan:</b> The role of safety assessment <del>and the safety ease</del> in communication	GSR Part 4 does not refer to “safety case.”		The role of <del>the results from</del> the safety assessment <del>and the safety ease</del> ...		To comply with the wording of GSR part 4 para 5.9
13.	1.6./11	<b>4. Japan:</b> <del>GSG-3 GS-G-3</del>	Typo.	X			
14.	1.6 4 <sup>th</sup> sentence	<b>3. Germany:</b> “Furthermore, the IAEA General Safety Guide No. <del>GSG-3 GS-G-3</del> on The Safety Case and Safety Assessment for the Predisposal Management of Radioactive Waste [19] states in paragraph 1.2. that ...”	Correct numbering of the corresponding Safety Guide. The Safety Guides GS-G-3.x deal with management systems.	X			
15.	1.8.	<b>5. Japan:</b> Move this paragraph to Section 2.	This paragraph is suitable for Section 2. And ‘accountability’ is very important term and should be mentioned as a subsection.			X	Para 1.8 does not provide overarching recommendations but explanations and rationales with regards the importance of communication.

COMMENTS BY REVIEWER				RESOLUTION (Tentatively)			
No.	Para/Line	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
<b>1. INTRODUCTION</b>							
16.	1.8 1 <sup>st</sup> sentence	<b>4. Germany:</b> “The legitimate concerns of interested parties in <del>radiation and</del> nuclear <u>and radiation</u> safety matters are best addressed by the participation of all concerned at the appropriate level.”	Editorial correction to be in line with the usual order in IAEA Safety Standards Series publications.	X			
17.	1.8	<b>5. Germany:</b> “[...] - Independence: <del>being more open and transparent implementing a high level of transparency and openness</del> allows a regulatory body to effectively demonstrate its ability to make independent judgments and decisions, and its freedom from undue influences that might adversely affect safety. [...]”	Using only the comparative term “more” without providing a respective standard, the given wording could cause misperceptions with regard to the efforts needed to demonstrate the said qualities (in other words: one could think that, starting from a level of zero openness, even minor improvements could lead to the aspired result). Instead, the wording also used in para 2.5 and para 4.2 should be used.	X			
18.	1.8	<b>1. Iran:</b> After last bullet, that is, Independence it may be added: - Leadership and management: Transparency and openness in the Regulatory Body without incoherent and proactive leadership and management could not be received	It is recommended for completeness			X	Leadership and Management are important for efficient and effective communication. However para 1.8 does not refer to prerequisites but provides rationales for implementing open and transparent communication and consultation. Leadership and management are dealt with section 4
19.	1.8	<b>6. USA: Accountability:</b> transparency and openness promote accountability which is a key contributor to safety culture as stated in Requirement 5: Management for protection and safety of GSR Part 3 [5]. Accountability should enhance public confidence in the regulatory body <del>as well as confidence within the regulatory body</del> , and increases the confidence of interested parties that their views are properly taken into account by the regulatory body;	Meaning of deleted text is unclear		Accountability enhances interested parties’ confidence in the regulatory body... and increases the confidence of interested parties that their views are properly taken into account by the regulatory body;		Provide clarity given Staff of the Regulatory Body is also defined as an interested party.
20.	1.8, line 26	<b>7. USA:</b> At the same time, this is an opportunity for interested parties to express their concerns and opinions, allowing the regulatory body to better understand and, therefore, better consider these concerns, <del>thereby promoting safety culture</del> ;	The safety culture aspects of open/transparent communications should be emphasized, where appropriate, throughout the document.			X	Safety culture is already addressed under para 1.4. There is no obvious connection here with Safety Culture.

COMMENTS BY REVIEWER				RESOLUTION (Tentatively)			
No.	Para/Line	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
<b>1. INTRODUCTION</b>							
21.	1.9 Para 1 /line2	<b>1. Russia Rosatom:</b> Depending on culture, history government philosophy as well as legal framework  Proposed new text: Depending on culture, mentality, history government philosophy as well as legal framework				X	Culture covers mentality
22.	1.10 General comment.	<b>8. USA:</b> The paragraph states that “There is no...best practice on communication and consultation.” However, Paragraph 4.50 specifically addresses the need to “Benchmark against other experiences...” Isn’t this a de facto search for best practices? There must be many lessons-learned, regarding engagement with stakeholders stemming from the events at Fukushima, Chernobyl, TMI, etc.	The availability and need to need to benchmark against best practices should be consistently discussed throughout the document.			X	The idea of benchmarking with regards to specific elements and tools lay down in para 4.50 does not contradict the general statement: <i>There is no a single best way to communicate.</i>
23.	1.10, line 3	<b>8. USA:</b> “...given that it fits within an overall regulatory <u>and societal</u> structure.”	Best practices for communicating and engaging the public are largely predicated on societal norms.		...given that it fits within an overall <b>legal and regulatory</b> structure.		Whatever your practices for communication, they should comply with existing legal and regulatory requirements.
24.		<b>3. Iran:</b> It is recommended the “Use of Terms” immediately after Introduction in the document is mentioned.	In the “Use of Terms”, exact definition of the interested parties and others was introduced.	X			A USE OF TERMS section is added after REFERENCES section, in coherence with other IAEA safety standards e.g., GS-G-1.3 or SSR-2/1
25.	Page 3 USE OF TERMS	<b>1. Japan:</b> Move this paragraph to APPENDIX.	USE OF TERMS is usually stated in the APPENDIX.	X			Ditto
26.	1.11	<b>1. Canada:</b> “...to inform and consult with interested parties. It encourages communication....”	A strategy cannot consist of a corporate culture.	X			
27.	1.11, 4 <sup>th</sup> bullet	<b>6. Germany:</b> “[...] - Consultation refers to processes through which the regulatory <u>body</u> seeks <u>or, according to the national legal framework, has to seek</u> the views of <u>interested parties</u> <del>individuals or groups</del> on regulatory matters that affect the decision making process, affect them directly or in which they have a significant interest. [...]”	Clarification and completeness. In many countries, the national legal framework indeed requires the consultation of interested parties on regulatory matters that affect the decision making process.	X			
28.	1.11	<b>1. Russia FSUEVO:</b> - Communication plan... -Communication strategy...	Put the terms in alphabetical order.	X			

COMMENTS BY REVIEWER				RESOLUTION (Tentatively)			
No.	Para/Line	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
<b>1. INTRODUCTION</b>							
29.	1.11	<b>2. Russia FSUEVO:</b> - Communication strategy is a long term framework of policies and arrangements for the regulatory body to inform and consult with interested parties. It consists of a <u>safety culture</u> that encourages communication and consultation as important for the success of the regulatory body's efforts to ensure the protection of people and environment.	Safety Culture is a more appropriate and common term in the field of nuclear and radiation safety		"...to inform and consult with interested parties. It encourages communication...."		Simplified wording provided by 1. Canada.
30.	1.11/ Last	<b>1. Mexico:</b> Therefore, the "Engage, Interact and Cooperate" model should prevail"	To emphasize the use of such model.			X	This model is very well known but this is not the only one which could be promoted.
31.	1.12	<b>10. USA:</b> Modify Para 1.12 to read: 1.12. This guide provides practical guidance and recommendations for regulatory bodies concerning communication and consultation with the public and other interested parties about the possible radiation risks as well as safety aspects and protection of the public and the environment associated with regulatory development or with licensing or authorization actions on facilities and activities. It also involves elucidation of the processes and basis of decisions of the regulatory body.	Clarification: - Communications by regulatory bodies with interested parties typically conducted for regulatory development or when licensing or authorization actions are to be undertaken. - Communications with interested parties are conducted as well to elucidate safety aspects and radiation protection of the public and the environment.			X	This is the exact wording use for GSR part 1, requirement 36. Processes and decisions as mentioned here cover already the core functions of the regulatory body.
32.	1.13	<b>11. USA:</b> 1.13. <del>This document provides guidance and recommendations whatever the facility or activity in question. This document provides general guidance and recommendations.</del> When necessary, guidance and recommendations specific to a facility or an activity may be provided in a complementary manner by other safety guides.	The text is confusing and the objective is unclear. Consider deleting the first sentence, combining with 1.12 or clarifying the meaning.		Para 1.13 and 1.14 are merged .13. This guide provides general guidance and recommendations for regulatory bodies concerning communication and consultation with the public and other interested parties about the possible radiation risks associated with facilities and activities, and about processes and decisions of the regulatory body. When necessary, guidance and recommendations specific to a facility or an activity may be provided in a complementary manner by other Safety Guides.		To remove duplication, see also 1. Germany Comment

COMMENTS BY REVIEWER				RESOLUTION (Tentatively)			
No.	Para/Line	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
<b>1. INTRODUCTION</b>							
33.	1.13 2 <sup>nd</sup> sentence	<b>7. Germany:</b> “When necessary, guidance and recommendations specific to a facility or an activity may be provided in a complementary manner by other sSafety gGuides.”	In conjunction with the publications issued in the IAEA Safety Standards Series, ‘Safety Guide’ should be used as capitalized term consistently throughout the document (compare with the front section on the IAEA Safety Standards).	X			
34.	1.14 4 <sup>th</sup> line	<b>2. Iran:</b> Delete the whole sentence from beginning of “It may be also used... Interested Parties”	The sentence is not clear: which organization or individuals?			X	This has been added following Safety Standards Committees’ review in 2013. This expresses a possibility not a recommendation and recalls that the IAEA safety standards, especially that one, are mainly used by regulatory bodies but can also be used by others. See also resolution No 5.
35.	1.15	<b>12. USA:</b> This paragraph states “This document provides guidance neither on communication and consultation on emergency preparedness and responses, nor on security issues.” Yet Paragraph 1.16 is dedicated to safety/security interface, including the need to give due consideration for security principles to ensure that they not create adverse effects to the security system.	Need to clarify that providing clear communications and consultation, regarding matters of safety/security interface, is vital, understanding, of course, that some security-related information is not appropriate for public consumption.		It is added to para 1.15: “In implementing the recommended measures contained in this Safety Guide, consideration for security principles should be taken to avoid adverse effects to the security system.” The para 1.16 is deleted.		The expert review showed that para 1.16. provides unnecessary level of details.
36.	1.15	<b>13. USA:</b> “...effective communication and consultation with the public and other interested parties generally involve knowledge in all three areas of safety, security and emergency preparedness and response.”	Comment: Consideration should be given to how best to integrate safety, security and emergency preparedness and response into one communications safety guide.			X	As spelt out in the DPP and approved by the CCS, DS460 deals with only safety. However, it provides recommendations on how to deal with restricted information. Para 4.40 recalls the importance to coordinate communication activities (e.g., with COM emergency plan, dealt with other IAEA publications).
37.	1.16	<b>1. Russia Rostechnadzor:</b> Add following text after the second sentence: “For example, informing of community and social organizations about implementation of the effective security measures to protect nuclear material, nuclear and associated facilities is one of the elements for deterrence (decrease of intention of unauthorized actions involving such materials and facilities)”.	Proposed text demonstrates that recommendations in the reviewed safety guide have interface with security aspects.			X	This proposal goes beyond the scope of DS460 provided a guidance on security-related communication.



COMMENTS BY REVIEWER				RESOLUTION (Tentatively)			
No.	Para/Line	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
<b>1. INTRODUCTION</b>							
38.	1.16 Penultimate sentence	<b>8. Germany:</b> “In implementing the recommended measures contained in this <del>s</del> Safety <del>g</del> Guide, due consideration for security principles ...”	See our related comment on Para 1.13.	X			
39.	1.16	<b>2. Russia Rostechnadzor:</b> Add following text in the end of para: “Regulatory body should use national systems for classification information to define that disclosed information is sensitive of not. The IAEA’s recommendations on protection and confidentiality of sensitive information in nuclear security are contained in Nuclear Security Series [NST022 Protection and confidentiality of sensitive information in nuclear security]”.	From our point of view it will be useful for purposes of the draft safety guide to add a reference to the new Nuclear Security Series publication.		The reference of NST022 will be added to the list of reference mentioned in 1.15 when this document will be published.		Only published documentations may be referenced in IAEA safety standards.
40.	1.17 1 <sup>st</sup> bullet	<b>9. Germany:</b> “Section 1 is an introduction, which presents the background, use of terms, objective, scope and structure of the <del>s</del> Safety <del>g</del> Guide;”	See our related comment on Para 1.13.	X			

COMMENTS BY REVIEWER				RESOLUTION			
No.	Para/Line	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
<b>2. OVERARCHING RECOMMENDATIONS</b>							
41.	2.2	<b>2. Canada:</b> “...independence is a key....”	It is not the only key factor, there are many.	X			
42.	2.5 4 <sup>th</sup> line	<b>4. Iran:</b> after as well “general public”	Genuine public may be conceived the racism and it is better to replace on with general public		Genuine participation of the public.		To clarify the wording and avoid any misunderstanding.
43.	2.7	<b>10. Germany:</b> “For any process of participation to be legitimate, there needs to be a certain degree of trust among those affected, those participating and <del>citizens</del> <del>at large</del> the public. [...]”	Assuming an identical meaning, the term “public” should be used, as given in the characterisation of the “interested parties” in para. 4.14 ff.	X	2.10. For any process of participation to be legitimate, there needs to be a certain degree of trust among interested parties. If....		To be consistent with the second part of the paragraph. The paragraph numbering has changed.
44.	2.8./3	<b>6. Japan:</b> Consultation with interested parties should be an integral part of the regulatory processes. Interested parties should be regarded as an asset that contributes knowledge to those processes. <u>The asset of interested parties should be used to ensure the most informed decisions and best possible outcomes by the regulatory body.</u> The role of interested parties...	Clarification of the role of regulatory body. The role of interested parties may not be to ensure the decisions and outcomes. The role of the consultation should reside in the regulatory body. The paragraphs 4.15 through 4.28 describe the role of interested parties and the above sentence of paragraph 2.8 explaining the role of the interested parties is somewhat different from the description of the paragraphs 4.15 through 4.28.			X	This proposal is already properly covered by the previous para. It is reminded in 1.1 and 2.2 that the final regulatory decision lies with the regulatory body.

COMMENTS BY REVIEWER				RESOLUTION			
No.	Para/Line	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
<b>2. OVERARCHING RECOMMENDATIONS</b>							
45.	2.10./1	<b>7. Japan:</b> Within its budget, the regulatory body should allocate <u>appropriate</u> resources to support communication and consultation with interested parties.	The allocation of appropriate amount of resources is important.	X			
46.	2.11./1st indent	<b>1. Austria:</b> Provide interested parties timely with reliable, comprehensive, understandable and easily accessible information on safety, <del>radiation</del> risks and regulatory issues;	Information on all – not only radiation – risks possible that could occur in operating nuclear facilities should be made available.			X	The wording is in compliance with SF-1: ‘ <i>The prime responsibility for safety must rest with the person or organization responsible for facilities and activities that give rise to radiation risks.</i> ’
47.	2.11./first bullet point	<b>1. Luxembourg:</b> Provide interested parties timely with reliable, comprehensive, understandable and easily accessible information on safety, <del>radiation</del> risks and regulatory issues;	We believe that all possible risks that can result from the operation of nuclear facilities should be communicated.			X	Ditto
48.	2.11./3rd indent	<b>1. Ireland:</b> - Consider international relations and in particular transboundary relations with neighbouring countries. In this respect, together with the competent national authorities, the regulatory body should <del>explore the possibilities of involving</del> <b>communicate and consult</b> the interested parties of neighbouring States <del>as much as practical</del> <b>at a level commensurate with equivalent national stakeholders.</b>	Which side of a national border someone lives on should not determine their level of access information and consultation on a nuclear facility in their vicinity. They should have access to the same information and mechanisms for consultation as someone living the same distance away, just in another direction / within the country.			X	There are contradictory views among the Member States regarding the participation of interested parties of neighbouring countries as shown by this resolution table. The current wording is the result of discussions in several instances, it is consensus based.
49.	2.11./3rd indent	<b>2. Austria:</b> Consider international relations and in particular transboundary relations with neighbouring countries. In this respect, together with the competent national authorities, the regulatory body should <del>explore the possibilities of involving</del> <b>involve</b> the interested parties of neighbouring States <del>as much as practical</del> <b>at the same level as national stakeholders.</b>	In considering international relations in particular transboundary relations with neighbouring countries the involvement of their interested parties on a non-discriminatory basis should be the standard and is an example of best practice (see Aarhus and Espoo conventions).			X	The current wording is the result of discussions in several instances, it is consensus based.
50.	2.11./third bullet point	<b>2. Luxembourg:</b> Consider international relations and in particular transboundary relations with neighbouring countries. In this respect, together with the competent national authorities, the regulatory body should <del>explore the possibilities of involving</del> <b>involve</b> the interested parties of neighbouring States <del>as much as practical</del> <b>at the same level as national stakeholders.</b>	Communication with the public and public consultation should be done in a non-discriminatory manner in case of transboundary impact.			X	The current wording is the result of discussions in several instances, it is consensus based.

COMMENTS BY REVIEWER				RESOLUTION			
No.	Para/Line	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
<b>2. OVERARCHING RECOMMENDATIONS</b>							
51.	2.11/3 <sup>rd</sup> bullet/3 <sup>rd</sup> line	<b>8. Japan:</b> -Consider international relations and in particular transboundary relations with neighbouring countries. In this respect, together with the competent national authorities, the regulatory body should explore the possibilities of involving the <del>interested parties</del> <u>appropriate authorities</u> of neighbouring States...	Clarification of the role of regulatory body. It may be too much to ask the regulatory body to setup communication and consultation with all groups that belong to the interested parties of neighbouring State. (cf. definition of Interested Parties in the paragraph 1.11)			X	The current wording provides flexibility in this area keeping in mind that foreign authorities and organizations can be also interested parties.
52.	2.11, line 12	<b>14. USA:</b> "...the regulatory body should explore the possibilities of involving the interested parties of neighboring States <u>as appropriate.</u> "	Stating that regulators should engage the public in foreign nations "as much as practical" could be resource intensive for some countries.	X			
53.	2.11/Last line, 3 <sup>rd</sup> bullet	<b>9. Japan:</b> ...of neighbouring States <del>as much as practical</del> <u>with reasonably available methods.</u>	More concrete expression is preferable.			X	The way to possibly involve the interested parties of neighboring States should be discussed and agreed with competent national authorities. See also 14. USA.
54.	2.12, line 4	<b>15. USA:</b> "...concerns and interests of <u>stakeholders.</u> "	Eliminate duplicative use of "interests"			X	For avoiding any potential misunderstanding and following discussion with SSCs, it has been decided to use only 'interested parties' throughout the document.
55.	2.12	<b>11. Germany:</b> "The regulatory body should adapt its methods for communication and consultation to the objectives, the expected interested parties and in accordance with a graded approach <sup>3</sup> . <del>Also it and</del> should <del>be used</del> <u>them</u> in accordance with national circumstances, concerns and interests of interested parties."	It does not seem to be clear to which term the pronoun "it" in the second sentence refers – to the "regulatory body", to the "method(s)" or to the "graded approach". Our proposal for clarification is provided here.		These methods should also be used in accordance with national circumstances...		For clarification purpose
56.	2.12	<b>19. USA:</b> The regulatory body should adapt its methods for communication and consultation to the objectives, the expected interested parties and in accordance with a graded approach <sup>1</sup> Also <del>it</del> <u>these objectives</u> should be used in accordance with national circumstances, concerns and interests of interested parties.	The meaning of the pronoun "it" is unclear here. Is the "it" referring to the guidance, the methods, or the objectives? Please clarify.		These methods should also be used in accordance with national circumstances...		For clarification purpose

<sup>1</sup> GSR part 1, Requirement 36, paragraph 4.69; "Public information activities shall reflect the radiation risks associated with facilities and activities with a graded approach"

COMMENTS BY REVIEWER				RESOLUTION			
No.	Para/Line	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
<b>2. OVERARCHING RECOMMENDATIONS</b>							
57.	2.13, line 8	<b>16. USA:</b> “-It provides an early <del>warning system</del> <u>insight</u> for potential conflict ....”	Involving stakeholders early in the process provides better insight vs. a “warning system”	X			
58.	2.13, line 12	<b>17. USA:</b> “Early involvement provides perspectives that could make the entire process more effective, <del>thereby saving financial resources and time.</del> ”	The conclusion: “thereby saving financial resources and time” may not necessarily be an outcome.	X			
59.	2.13	<b>12. Germany:</b> When necessary, the regulatory body should ensure that interested parties are involved at the earliest opportunity, even in certain situations before the formal regulatory activity is launched, e.g., review and assessment relating to radioactive waste <u>management</u> facilities [19, 20].	Clarification. According to the IAEA Safety Glossary (2007), the term “radioactive waste management facilities” includes all facilities specifically designated to handle, treat, condition, store or dispose of radioactive waste.	X			
60.	2.16./1	<b>10. Japan:</b> As a general objective, the regulatory body should continuously <del>enhance arrangements for improve and promote</del> communication and consultation taking into consideration other experiences at the national and international level, feedback from the interested parties, and evaluation of activities conducted to communicate and consult.	The regulatory bodies of all Member States do not necessarily sign the arrangements for communication and consultation with interested parties. Continuous improvement of communication and consultation is essential, so that it is appropriate to change to the wording of “improve and promote”.		As a general objective, the regulatory body should continuously <u>improve</u> communication and consultation		The objective here is to enhance communication and consultation.
61.	2.17 Line 3-7	<b>1. China:</b> Revising to be “It should be acknowledged that some sensitive information cannot be disclosed (e.g., with regards to nuclear security, physical protection proprietary information and <u>commercial secrets</u> ) but any restriction on information should be minimized and fully justified on the basis of national legislative criteria.”	Commercial secrets should be included in sensitive information.			X	Commercial secrets are already addressed by ‘Proprietary information’.
62.	2.18 (add last para)	<b>2. Mexico:</b> (Add last para) In the case of national assessments, the corresponding legal frame on transparency and accountability should be properly considered always taking into account openness and maximum publicity principles.	National and domestic assessments are frequent and as important as international external assessments.			X	External assessments include international as well as national assessment.

COMMENTS BY REVIEWER				RESOLUTION			
No.	Para/Line	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
<b>2. OVERARCHING RECOMMENDATIONS</b>							
63.	2.19	<b>13. Germany:</b> “The regulatory body should ensure that information on access to administrative and judicial review procedures is available to any interested party. <del>This particularly applies to those parties who consider that their request for information has been ignored, wrongfully refused, whether in part or in full, inadequately answered, or otherwise not dealt with in accordance with applicable provisions.</del> ”	The first sentence of this paragraph demands the availability of information to all interested parties. There is no need to prioritize one party. Moreover, if a party feels to be ignored etc., it will be difficult to convince it that it has been supplied with sufficient information. Hence the second sentence in the paragraph should be deleted.	X			
64.	2.19, line 2	<b>18. USA:</b> Delete sentence starting with “This particularly applies to....”	Information should be accessible to all stakeholders equally, not to any parties in particular.	X			

COMMENTS BY REVIEWER				RESOLUTION			
No.	Para/Line	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
<b>3. REGULATORY FRAMEWORK</b>							
65.	3.3./2	<b>11. Japan:</b> in order to evaluate the possible impact on the existing <del>arrangements</del> <u>frameworks</u> to communicate and consult with	“Framework” is better wording to cover broad area.		in order to evaluate the possible impact on the existing <u>regulatory framework</u> to communicate and consult with		For clarity purpose and to use the same wording as GSR Part 1.
66.	3.5	<b>20. USA:</b> Modify Para 3.5 to read: 3.5. The regulatory body should make available safety related information [4], <del>such as safety case documents, safety evaluation reports, and environmental impacts analysis reports,</del> with exceptions allowed by national law.	Clarity and completeness			X	The main purpose here is to take care properly of the information, restricted on legal basis not about what kind of documentation that should be available to the public. This is considered elsewhere in DS460.
67.	3.6 / 4	<b>2. Ireland:</b> The refusal should be made as soon as possible and within regulatory limits.	It was not clear what is meant by ‘within regulatory limits’. My interpretation may not be correct but in either case, the ‘should’ be clarified.		The refusal should be made as soon as possible and within regulatory <u>time</u> limits.		For clarity purpose.
68.	3.7./1	<b>12. Japan:</b> The regulatory decision making processes should be <del>regularly</del> <u>timely</u> reviewed to identify	When the word «regularly» is used in this paragraph, the specific periodic review is required once every few years. «Timely» is appropriate.			X	In accordance with GS-R-3 section 6, the review should be conducted regularly.

COMMENTS BY REVIEWER				RESOLUTION			
No.	Para/Line	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
<b>4. IMPLEMENTATION BY REGULATORY BODY</b>							
69.	4.2, line 4	<b>21. USA:</b> Merely following the minimum legal and regulatory requirements in an administrative way can result in a low level of meaningful public participation. <del>without true transparency and openness.</del>	The message here (I believe) should be that engagement with stakeholders should be thoughtful and empathetic in order to have meaning.	X			
70.	4.2./2	<b>13. Japan:</b> transparency and openness in regulatory activities <u>while ensuring compliance with legislation and regulation.</u> <del>going beyond, when possible, the minimum level imposed by laws and regulations whilst ensuring compliance with legislation and regulation.</del> Merely following the minimum legal...	Better wording. "going beyond .... the minimum level imposed by laws and regulations" still sounds violation of compliance.		Merely following the minimum legal and regulatory requirements in an administrative way can result in a low level of meaningful public participation.		For clarity purpose and as proposed by 21. USA comment.
71.	4.3	<b>3. Russia FSUEVO:</b> Efforts should be made to promote the importance of, and to support, an <b>organizational culture</b> of transparency and openness among the regulatory body's own staff. It should also lead to proactive, open and clear communications with interested parties and their meaningful participation.	"Organization culture" is a more appropriate term than "in-house culture"	X			
72.	4.6	<b>3. Ireland</b>	This paragraph should be clarified – it is not clear what Is meant by assisting interested parties to develop processes of communication (with the regulatory body? With other stakeholders?)		Paragraph 4.6 is deleted		This recommendation goes beyond the requirement 36 of GSR part 1 4.66.: <i>"The regulatory body shall establish, either directly or through authorized parties, provision for effective mechanisms of communication, and it shall hold meetings to inform interested parties and the public and for informing the decision making process."</i>
73.	4.6, line 1	<b>22. USA:</b> Rewrite as: "The regulatory body, where appropriate, should develop processes of communication that assist interested parties to understand safety issues."	As written sentence implies it is the interested parties' responsibility to develop communication processes, which is the regulator's responsibility.		Paragraph 4.6 is deleted		Ditto
74.	4.7	<b>23. USA:</b> Is there an appropriate reference describing/defining the term "integrated management system"?	A definition should be added for clarity and common understanding, or reference to GS-R-3.		Arrangements for communication and consultation with interested parties should be part of the regulatory body's <b>integrated</b> management system		There is no need to specify the management system should be integrated. This is covered by other IAEA safety standards, e.g., GS-R-3

COMMENTS BY REVIEWER				RESOLUTION			
No.	Para/Line	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
<b>4. IMPLEMENTATION BY REGULATORY BODY</b>							
75.	4.7-4.13	<b>1. Russia SEC NRS:</b> The section “System of administrative management and competence” should be complemented with the following wording: “The regulatory body shall develop procedure to identify incorrect (corrupted) interpretation of information by the interested parties, related to the regulatory body activity and systematically respond to it”.				X	Decision to correct an “incorrect (corrupted) interpretation of information” should be left on decision on case-by-case basis by the regulatory body of each member states considering that the proposal can be resource-consuming.
76.	4.10	<b>2. Russia SEC NRS:</b> To add the following working: “To develop the evaluation system of information interaction with interested parties to improve its effectiveness”				X	Monitoring and evaluation are already covered by para 4.47 to 4.49.
77.	4.10/2	<b>24. USA:</b> Modify Para 4.10 to read: 4.10. The regulatory body should develop and maintain its competence in order to communicate and consult with interested parties in an efficient <b>and professional</b> manner.	Professionalism in communication is of importance to establish trust and confidence in regulatory decision-making.	X			
78.	Par. 4.10	<b>24B. USA:</b> <del>All relevant</del> staff members <del>who might be</del> involved in communicating with interested parties should be trained accordingly, including <del>in</del> public outreach techniques	Editorial	X			
79.	Par. 4.11	<b>25. USA:</b> An information and knowledge management system should be established to allow staff easy access to historic information on past incidents and emergencies, annual reports, information brochures, fact sheets and <del>all</del> other relevant publications and information	Editorial	X			
80.	4.12	<b>14. Germany:</b> “Procedures should be developed regarding: (a) types of information that should be released to the public; (b) the way in which information should be made available to interested parties (use of media, the Internet and other channels, schedules for releasing information, use of easily understandable information, choice of languages in multilingual countries, etc.); and (c) the use of specific tools such as the <a href="#">joint IAEA and OECD/NEA International Nuclear and Radiological Event Scale (INES)</a> .”	Include consecutive numbering in order to support structuring of the procedures to be developed, with the aim to improve the readability of the entire sentence. Item (c): Amendment for completeness; compare with Para 5.16 of the Draft Safety Requirements DS457 (future GSR Part 7; Rev. 10 dated 6 November 2014).	X			

COMMENTS BY REVIEWER				RESOLUTION			
No.	Para/Line	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
<b>4. IMPLEMENTATION BY REGULATORY BODY</b>							
81.	4.14	<b>15. Germany:</b> “Interested parties can be national or from other countries. Different interested parties may have different needs or agendas. Therefore, it is important to identify interested parties, and to determine their interests, needs, expectations and concerns. This <del>helps in selecting</del> <u>is essential in order to be able to select effective</u> options from a variety of strategies and approaches to communicate and consult. [...]”	From the perspective of communication professionals, a precise identification of relevant target groups (in this context: interested parties) is fundamental as the use of a certain strategy, method or tool may be effective with regard to one individual group but not to others.		<u>This is essential to select effective...</u>		Better wording.
82.	Para 4.14 – 4.28	<b>26. USA:</b> Shouldn't this section reinforce the importance of the regulated industry's engagement with local stakeholders? The regulatory body is certainly not solely responsible for developing public trust.	To reinforce the important role of the regulated industry in routine, daily communications with local officials and the community.			X	DS460 is about communication and consultation by the regulatory body. It should seek to build up public trust in the regulatory system but it should not be biased for or against nuclear or radiation uses (2.3)
83.	4.15	<b>16. Germany:</b> “[...] News media, especially television, <u>nationwide press and respective online magazines and the Internet</u> , have the greatest reach and influence in framing how people perceive issues. <u>In a growing number of countries, social media play an increasing role, in particular among younger people.</u> [...]”	<p>“The Internet” is not part of what seems to be meant by the term “news media”. It is basically a technical platform that is also used by broadcasters/publishing companies/journalists etc.</p> <p>The reference to the role of social media seems to be indicated due to their ever growing impact (surveys have shown that in some countries social media have become one of the primary sources of information for young people). In this regard, social media should not be regarded as being the same or similar to “traditional” news media (including online magazines) as they significantly differ in various aspects (e.g. the absence of the so-called “gatekeeping function” of professional and trained journalists).</p>		4.15. The public relies on various sources of information to form its opinion. News media, especially television, printed and online press have a great reach and influence in framing how people perceive issues. Social media play also an increasing role.		Better wording.



COMMENTS BY REVIEWER				RESOLUTION			
No.	Para/Line	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
<b>4. IMPLEMENTATION BY REGULATORY BODY</b>							
84.	4.17 (incl. headline)	<b>17. Germany:</b> “News <del>and social</del> media 4.17. Journalists, <del>and</del> news <del>and social</del> media are important channels for the regulatory body to communicate with interested parties. [...]”	News media and journalists, respectively, should surely be regarded as an “interested party” (or part thereof). Accordingly, they should be part of the section “INTERESTED PARTIES” (Paras 4.14 to 4.28). In contrast, the term “social media” represents a variety of technical platforms on the internet, inter alia used by news media and journalists, but also by individual members of the public, NGOs, enterprises etc. Therefore, social media may be well described as “channels” to communicate but should not be regarded and described as an “interested party” (as is the content of this section of the draft).		<b>News and social media</b> 4.17. Journalists, news and social media are important for the regulatory body to communicate with interested parties.		Better wording.
85.	4.18	<b>18. Germany:</b> “ <del>Different mechanisms could be used to proactively interact with the media, including:</del> <del>– Direct contact in person or by telephone;</del> <del>– Written documents: brochures, magazines, reports, press releases, etc.;</del> <del>– Regulatory and other websites;</del> <del>– Press conferences;</del> <del>– Invitation to public consultation events; and</del> <del>– Invitation to observe and participate in specific activities (e.g., inspections, emergency exercises).”</del>	Compared to most parts of the draft, this para seems to be going too much into operational details (see also comment no. 1). Furthermore, some of the “mechanisms” mentioned seem rather self-evident (e. g. the consideration that media/journalists indeed can be contacted via telephone calls – one could as well include the use of e-mails) and are surely known to trained communication professionals working for regulatory bodies. Instead, it could be considered to insert a new para dealing with the benefits of using such professionals to work on (and ideally to foster) media contacts.	X			This section is to describe some key interested parties. It does not intent to explain how to interact with them which is the objective of section 5.
86.	4.18/4	<b>27. USA:</b> - Press <b>releases and</b> conferences;	Completeness: press releases do not need formal press conferences.		X		See comment 18. Germany resolution
87.	4.18 7th line	<b>5. Iran:</b> Invitation to observe in specific activities (e.g., emergency exercises)	Inspection has to be deleted as, this is serious activity and results of some inspections are considered as confidential and make cause damage to people.	X			See comment 18. Germany resolution

COMMENTS BY REVIEWER			RESOLUTION				
No.	Para/Line	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
<b>4. IMPLEMENTATION BY REGULATORY BODY</b>							
88.	4.19/1	<b>4. Ireland:</b> An important role for the development of societal trust is played by local communities	Currently not clear what is meant		4.19. An important role for societal trust is played by communities residing in the vicinity of authorized facilities and activities.		For clarity purpose
89.	4.20	<b>4. Russia FSUEVO:</b> “Special interest groups” are suggested to be removed from the Interested parties.	“Special interest groups” are already mentioned in public: “Among the public, several interested groups exist with different expectations and needs” (DS 460, p.4.16)		4.16 to be modified <del>Among the public, several interested groups exist with different expectations and needs.</del> People living in the vicinity		For clarity purpose. Special Interest Groups are different to ‘public’ described in 4.16.
90.	4.20	<b>1. Switzerland:</b> Add to last sentence: In special situations, their early involvement in the communication and consultation process may be advantageous. <del>decreases the likelihood of technical experts not taking into account all possible relevant aspects that later on may jeopardize the decision making process.</del>	Regulatory bodies are not dependent on NGOs to be able to recognize all technical aspects of a specific issue. Their involvement in some cases can be advantageous. Therefore we propose to make this amendment to para. 4.20.		To delete the whole sentence		To delete a duplication. Indeed, the early involvement in a process of any interested parties is already recommended when promoting the transparency and openness concept as described in paragraph 1.11.
91.	4.20	<b>28. USA:</b> Their early involvement in the communication and consultation process decreases the likelihood of technical experts not taking into account <del>all possible</del> relevant aspects that later on may jeopardize the decision-making process.			X		Ditto
92.	4.23	<b>29. USA:</b> Elected officials <del>at all levels</del> should be kept informed of...	Editorial	X			
93.	4.26	<b>19. Germany:</b> “Academics, teachers and researchers in the relevant fields (nuclear, medical, etc.), <del>technical support organizations</del> and other third party experts who are not involved in the commercial uses of nuclear technologies and other applications using ionizing radiation can help provide information to the news media and the public as experts. <u>This applies in particular to technical and scientific support organizations (TSOs) which provide expert opinion or conduct research on behalf of the regulatory body.</u> ”	Emphasizing the potential role of TSOs in this regard seems to be adequate due to the close relationship between them and the regulatory body, especially in cases where the regulatory body openly bases a decision on expert opinions or research conducted by the TSO.		This applies in particular to advisory bodies and support organizations which provide the regulatory body with technical and other expert opinion and advice.		New wording To comply with the text of GSR Part 1 requirement 20, 4.18.

COMMENTS BY REVIEWER				RESOLUTION			
No.	Para/Line	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
<b>4. IMPLEMENTATION BY REGULATORY BODY</b>							
94.	4.28	<b>30. USA:</b> The regulatory body's own staff routinely communicates with the public both formally and also informally, in their daily life. Therefore they should <del>stay abreast of</del> <del>be kept informed</del> <del>out</del> the regulatory decisions and activities, and other relevant safety-related information.			To add: 'They should be aware that their communication might affect the public perception of the regulatory body, particularly when using large audience channels (e.g., statements to journalists, letters to websites and social media).'		Staff is an interested party and should be kept informed. However they should know that their communication might affect the public perception of the regulatory body.
95.	4.28	<b>20. Germany:</b> "The regulatory body's own staff routinely communicates with the public both formally and also informally, in their daily life. Therefore they should be kept informed about the regulatory decisions and activities, and other relevant safety related information. <u>They should also be sensitized to the fact that their communication might affect the public perception of the regulatory body, in particular in case they use channels accessible to a larger public (e.g., letters to the editor or private websites and social media).</u> "	In corporate communications, the role of an individual employee as an "ambassador of the company" is regarded as self-evident – in particular with the ever increasing use of social media. This applies also to regulatory bodies: It is for instance highly probable that a high-ranking senior official who publicly expresses himself against or in favour of nuclear energy could cause negative effects on the public's perception of the regulatory body's neutrality.		They should be aware that their communication might affect the public perception of the regulatory body, particularly when using large audience channels (e.g., statements to journalists, letters to websites and social media).		Better wording.
96.	4.14 to 4.28	<b>21. Germany:</b> In our opinion, the party "schools" should be added in the section "INTERESTED PARTIES".	Teachers and pupils are usually interested in nuclear developments and should also be considered in the communication process.			X	'Educational parties' are already addressed in 4.26 and 5.11.
97.	4.14 to 4.28	<b>22. Germany:</b> In the section "INTERESTED PARTIES", a dedicated subsection/paragraph on plant operators and plant designers is missing.	The paragraphs describing the interested parties with whom the regulatory bodies should cooperate in communication processes do not encompass plant operators and plant designers. How can a communication strategy that does not include these parties develop trust etc.?		4.24. The regulatory body should contribute to providing safety related information to professional bodies, e.g., <b>facility designers, radiation source users, and medical societies.</b>		DS460 is a general safety guide applicable to all radiation and nuclear facilities and activities. Like the others, these specific nuclear professionals are covered by 4.24.
98.	4.27	<b>5. Russia FSUEVO:</b> Regulatory body should establish links with other national regulatory bodies and international nuclear and radiation safety organizations such as the IAEA. It is beneficial to share all relevant information to support regulatory activities, including operating experience and regulatory experience, with these organizations.	The regulatory body shall promote the establishment of appropriate means of informing and consulting interested parties and the public about the possible radiation risks associated with facilities and activities (IAEA GSR Part 1, requirement 36.)		4.27. Regulatory bodies should establish links with other national regulatory bodies and international organizations such as the IAEA. It is beneficial to <b>communicate with regard to</b> all relevant information		The comment is not clear. It is important to emphasize the need to have dialogue when sharing information at international level to ensure common understanding.

COMMENTS BY REVIEWER				RESOLUTION			
No.	Para/Line	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
<b>4. IMPLEMENTATION BY REGULATORY BODY</b>							
99.	4.29/1	<b>5. Ireland:</b> 4.29. As shown in figure 3, a communication and consultation process should include <del>different</del> <b>a series of</b> steps, from identifying the objective to evaluating the consultation process and identifying areas for improvement	I understood the point to be that the consultation process is more than a one-step process – it is a series of steps that are linked.	X			
100.	4.30	<b>31. USA:</b> Before initiating any communication or consultation process, <u>the regulatory body should develop a clear, written, public policy which summarizes its primary role and functions, it is important to be clear about the role and functions of the regulatory body,</u> its independence, and its strategy to interact with interested parties. The legal and regulatory requirements should also be <del>identified</del> <u>stated in the policy document for to define a</u> the communication and consultation process, including requirements applicable to restriction of information disclosure.	The meaning of section 4.30 is not clear. The first sentence has been modified to state that the regulatory body should develop a public written strategy. This may be different than the intended meaning, which is unclear as originally written. The intent of the second sentence is also unclear.			X	Para 4.4 already recommends to establish a clear strategy for communication, see also appendix I. This paragraph intends to recall the prerequisites before communicating and consulting.
101.	4.31	<b>32. USA:</b> <del>At all points in</del> <b>During</b> the communication and consultation process, the limits of what the regulatory body can or cannot do should be made clear.	Editorial	X			
102.	4.32./3	<b>14. Japan:</b> regulatory body to, <i>inter alia</i> [2, 4, 5, 7, <u>10, 13</u> ]:	SSR-5 and GSR Part 6 are also relevant.	X			
103.	4.32	<b>33. USA:</b> Add last bullet: - Obtain information and views useful to safety that may only be obtained from stakeholder(s) or specific member(s) of the public.	Completeness: - During the communication process, significant information and views related to safety may be obtained from stakeholders.		Communicate of such documents and opinions from interested parties to the regulatory body as may be considered necessary and appropriate.		Wording to be in line with paragraph 4.66 of GSR part 1
104.	4.32 2 <sup>nd</sup> bullet	<b>23. Germany:</b> “Disseminate information on safety to interested parties, including information about abnormal occurrences, incidents and accidents in facilities and activities, <u>as well as</u> radiation risks associated with facilities and activities;”	Missing words.	X			
105.	4.32	<b>6. Ireland:</b> - <del>Improve cooperation</del> <b>Cooperate</b> and <b>coordinate</b> <del>coordination</del> with other authorities and governmental organizations; - <del>Improve cooperation</del> <b>Cooperate</b> with other countries and with international organizations.	As written it suggests that there is automatically a problem with this coordination	X			
106.	4.33	<b>7. Ireland</b>	Check that the paragraph referred to is correct – I do not see any rationale in para. 1.7	X			

COMMENTS BY REVIEWER				RESOLUTION			
No.	Para/Line	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
<b>4. IMPLEMENTATION BY REGULATORY BODY</b>							
107.	4.33	<b>24. Germany:</b> “The overall objective of the communication and consultation process should be established by use of the rationales mentioned in paragraph <del>1.8.</del> <del>4.7.</del> concerning accountability, credibility and legitimacy, high quality in decision making, and independence.”	Wrong paragraph is cited.	X			
108.	4.39	<b>34. USA:</b> It is important when developing a communication plan to identify <del>all possible</del> groups that could be affected by or interested in the issue. These groups may have conflicting agendas, priorities, sensibilities, needs and expectations, <del>all of</del> which should be accounted for by the communication plan.	Editorial	X			
109.	4.40 line 3	<b>35. USA:</b> “The development of these different communication plans <u>by the regulator</u> should be <u>effectively</u> coordinated <del>and approved by senior management. This coordination is essential so as</del> to optimize the use of...”	Specifying what level of a regulatory organization should be “coordinating” communication plans may be too prescriptive.		The development of these different communication plans <u>by the regulatory body</u> should be <u>effectively</u> coordinated <u>and approved so as</u> to optimize the use of...		Use of regulatory body instead of regulator for consistency purpose.
110.	4.40	<b>25. Germany:</b> “Consistent use of communication plans <u>helps</u> ensure an efficient implementation of the communication strategy.”	Grammar.	X			
111.	4.41	<b>26. Germany:</b> “Communication plans vary depending on their purpose. For some issues, simply providing information may be sufficient, whereas for a more complex and major issue (e.g., licence to construct a new nuclear installation, siting of a radioactive waste repository), the regulatory body may decide, <u>in addition to the regulations of the national legal framework</u> , to implement a specific process to give interested parties the possibility to participate actively and to be involved, where appropriate, from the very beginning of the decision making process.”	Clarification and completeness. There might be cases where the existing regulations of the national legal framework do not cover a certain issue considered to be complex and challenging. In such cases, the implementation of a specific process for communication and consultation with interested parties could provide a solution.			X	This proposal would introduce a duplication given this is already stated in, e.g., 4.30 and 4.37
112.	4.42	<b>36. USA:</b> The needs of interested parties range from active participation and consultation to only requiring information. Some may be reluctant to participate fully in the consultation in order to preserve their independence and autonomy. <del>All</del> <b>The</b> needs <b>of interested parties</b> should be considered when developing a communication plan.	Editorial	X			

COMMENTS BY REVIEWER				RESOLUTION			
No.	Para/Line	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
<b>4. IMPLEMENTATION BY REGULATORY BODY</b>							
113.	4.44, line 1	<b>37. USA:</b> “The senior management should be responsible <del>for the</del> <u>to</u> ensure implementation....”	Directing that senior management is responsible “for the” implementation may be too prescriptive.	X			
114.	4.44	<b>38. USA:</b> The senior management should be responsible for the implementation of the regulatory body’s communication plan. <del>All</del> <del>p</del> Persons involved should understand the purposes of the plan, their own functions and responsibilities, and how various organizations will interact.	Editorial	X			
115.	4.44	<b>3. Canada:</b> “Those responsible for the implementation of the regulatory body’s communication must have support from senior management, and at times may include senior management.”	Senior management is not always the implementers; normally it is at a staff level.		X		To use the 37. USA proposal in order to avoid too much detail.
116.	4.45./1-2	<b>15. Japan:</b> Activities implemented should be recorded. <del>Regular reviews of the plan’s progress should be carried out, identifying</del> The progress status of the communication plan should be evaluated in a timely manner to identify any difficulties with implementation and making any necessary adjustments.	When the word «regular» is used in this paragraph, the specific periodic review is required once every few years. «In a timely manner» is preferable.			X	A review should be regularly performed to ensure the plan is still fully relevant according to GS-R-3 section 6.
117.	4.46	<b>39. USA:</b> Modify Para 4.46 to read: 4.46. The use of communication plans should be flexible as their content may evolve during the process. Events may necessitate amending a communication plan’s schedule or key messages as the regulatory body’s priorities change. <del>Development and implementation of communication plans may be enhanced by use of an independent professional facilitator who understands key issues and means of reconciliation of different views, meanwhile keeping mutual respect and effective communication.</del>	Completeness to consider use of a professional facilitator to ensure effective and successful communication.		To add a new para after 4.9: 4.10. The regulatory body may use external professional support for communication and consultation (e.g., communication experts, translators, web-site designers, facilitators, meeting moderators). Such support could complement the regulatory body’s human resources and competence and provide new ideas and methods to make communication and consultation more effective. To delete para 5.21 <i>The regulatory body may consider the benefits...</i>		For avoiding duplication, the use of external support is addressed in the new paragraph 4.10 whereas the paragraph 5.21. has been deleted.

COMMENTS BY REVIEWER				RESOLUTION			
No.	Para/Line	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
<b>4. IMPLEMENTATION BY REGULATORY BODY</b>							
118.	4.48 2nd sentence	<b>3. Russia SEC NRS:</b> To change the wording in the following way: “Information about expectations and opinions of the interested parties can be collected by means of web-site of the regulatory body, e-mail, systematic monitoring of Mass Media publication or by means of other more complex tools such as public opinion survey”			The expectations and opinions of interested parties may be collected in a variety of ways, including the regulatory body’s website, emailing campaigns or more sophisticated tools, for example public surveys, <b>mass media monitoring</b> or satisfaction committees.		This list provides examples of ways for doing so.

COMMENTS BY REVIEWER				RESOLUTION			
No.	Para/Line	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
<b>5. COMMUNICATION AND CONSULTATION METHODS</b>							
119.	5.6	<b>27. Germany:</b> 1 <sup>st</sup> sentence: “The regulatory body should ensure that relevant parts of the safety case and supporting safety assessment <u>for a facility or activity</u> are easily understandable.”	Completeness.	X			
120.	5.6./2-4	<b>16. Japan:</b> safety assessment <b>which are provided by the operator</b> are easily understandable [7, 10]. This means that they should be written in such a way that the interested parties for whom the documents are intended can gain a good understanding of the safety arguments and their bases [7, 10].	Clarification and appropriate description, because the term ‘safety case’ is provided by the operator and relevant to radioactive waste management.		5.6. The regulatory body should ensure that relevant parts of the safety case and supporting safety assessment <b>provided by the authorized party</b> are easily		DS460 is a general Safety Guide not only applicable to nuclear facilities. Therefore the wording ‘authorised parties’ should be used.
121.	5.7	<b>28. Germany:</b> “The regulatory body should publish an annual report on safety to provide interested parties with, as much as is possible, a comprehensive picture of the national safety infrastructure and the actual status of <b>radiation and nuclear and radiation</b> safety as well as on regulatory activities, decisions and judgments.”	Editorial correction to be in line with the usual order in IAEA Safety Standards Series publications.	X			
122.	5.11, line 2	<b>40. USA:</b> “... (e.g., seminars, educational films on <b>the</b> Internet...”	Editorial comment	X			
123.	5.11	<b>41. USA:</b> Shouldn’t there be an expectation that the regulated industry to engage in educational activities with local stakeholders?	To reinforce the important role of the regulated industry in educating local officials and the community on the safe civilian use of nuclear materials.			X	This document addresses the communication and consultation by the Regulatory Body only. There is also an issue regarding the Independence of the RB.

COMMENTS BY REVIEWER			RESOLUTION				
No.	Para/Line	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
<b>5. COMMUNICATION AND CONSULTATION METHODS</b>							
124.	5.14	<b>29. Germany:</b> “The Internet is a very effective channel of communication. Large quantities of focused information can be made widely accessible and delivered through this channel. <del>Furthermore, the information is easily kept updated and may be accessible in many languages.</del> The regulatory body should use websites as one of the key tools to communicate with the public and other interested parties. This facilitates dissemination of updated information and collection of concerns, questions and comments. <del>The regulatory body should also consider using other Internet tools such as social networks and forums.</del> ”	Whether information is “easily” kept updated depends, inter alia, on the quantity of information and the resources at hand (actually, it can require significant human resources to professionally maintain a large website). Therefore, such a very general statement does not seem to be helpful and maybe even misleading. Moreover, providing information in different languages is neither for free (meaning it takes resources and is not “easy”) nor it is a specific feature of web-based tools (also information brochures could be issued in different languages). With regard to the deletion of the last sentence, see our comment on Para 4.28.		The Internet is a very effective channel of communication. Large quantities of focused information can be made widely accessible and delivered through this channel, when necessary, in different languages. The regulatory body should use websites as one of the key tools to communicate with the public and other interested parties. This facilitates dissemination of updated information and collection of concerns, questions and comments. The regulatory body should also consider using other Internet tools such as social networks and forums.”		In addition to be able to communicate at international level (Internet is accessible in all countries), in many countries, several languages are used. Social media are getting more and more important.
125.	New para. after 5.14	<b>30. Germany:</b> “ <u>With regard to their increasing importance in communication, the regulatory body should also consider using social networks. In this regard, the regulatory body should be aware of the specific characteristics of these tools (e.g. expectations of users regarding speediness/frequency in which content is published, and willingness to respond to comments) and the resources needed.</u> ”	The reason to introduce an own paragraph to the use of social media is given in the proposed text; see also our comment on Para 2.19.		To be added to 5.14 ... of concerns, questions and comments. The regulatory body should also consider using other Internet tools such as social networks and forums bearing in mind the specific characteristics of these tools (e.g. user expectations regarding speediness and frequency in which content is published) and the resources needed.		There is no need to draft a new paragraph addressing only details.
126.	5.15 / 4	<b>8. Ireland:</b> When using the web-based tools, it is important to enable interested parties to efficiently retrieve information, <b>submit questions</b> and provide comments.	There should be a mechanism for interested parties to get their specific questions answered also.	X			
127.	5.21 / 4	<b>9. Ireland:</b> The regulatory body should <del>be aware of</del> <b>consider</b> different approaches and should define its own purpose with the process of participation in order to be able to choose the best approach for the situation at hand.	Just requiring the regulatory body to be aware of different approaches is very vague – something more active like ‘consider’ or ‘use’		External support is now covered by the new paragraph 4.10. The regulatory body may use external professional (...) consultation more effective. The last para of 5.21 <i>The regulatory body may consider the benefits...</i> is deleted		The modification for addressing the 39. USA Comment avoids duplication.



COMMENTS BY REVIEWER				RESOLUTION			
No.	Para/Line	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
<b>5. COMMUNICATION AND CONSULTATION METHODS</b>							
128.	5.23.	<b>3. Austria:</b> The possibility to form new initiatives and to take part in processes of participation may be dependent on resources of interested parties. Therefore, the regulatory body <del>may</del> <b>should</b> consider the possibility of providing some support to enable them to contribute.	Decisions should be taken on the broadest possible basis. In this regard the regulatory body and stakeholders should cooperate on a level playing field. For that reason stakeholders could need support by the regulatory body. Therefore, the wording should be more strengthened.	X			
129.	5.23.	<b>3. Luxembourg:</b> The possibility to form new initiatives and to take part in processes of participation may be dependent on resources of interested parties. Therefore, the regulatory body <del>may</del> <b>should</b> consider the possibility of providing some support to enable them to contribute	With this slight strengthening of the wording, support is given to regulatory bodies who voluntarily choose supporting these interested participants.	X			
130.	5.23 / 3	<b>10. Ireland:</b> Therefore, the regulatory body <del>may</del> <b>should</b> consider the possibility of providing some support to enable them to contribute.	The wording needs to be strengthened to make it a recommendation to at least consider it – as reflected elsewhere in the document, decisions taken on the broadest possible basis are better so the means for this to occur should be provided as far as possible.	X			
131.	5.23	<b>42. USA:</b> The possibility to form new initiatives and to take part in processes of participation may be dependent on resources of interested parties. Therefore, the regulatory body <del>may-should</del> consider <del>the possibility of providing some support</del> <b>multiple, alternative methods (e.g. Share Point sites, conference calls, etc.)</b> to enable them to contribute.	Completeness		Therefore, the regulatory body <del>may</del> <b>should</b> consider the possibility of providing some support to enable them to contribute.		This provides too much detail. As proposed by Austria, Ireland and Luxembourg.
132.	5.24 / 6	<b>11. Ireland:</b> According to the complexity or <del>sensibility</del> <b>sensitivity</b> of the issue	Incorrect English	X			
133.	5.25./3	<b>17. Japan:</b> parties can participate without <del>obstructive behavior and</del> fear of reprisal or without committing themselves to any kind	For fruitful and meaningful participation in dialogue for interested parties, it is important to remove the obstructive behavior (sabotage) as well as fear of reprisal.			X	The focus here is to provide relevant forum/facility for dialogue purpose where people can discuss and exchange ‘freely’.
134.	5.26	<b>43. USA:</b> Specific arrangements for dialogue should be agreed <del>upon</del> by participants and <del>should be adhered to</del> <b>followed at all times.</b>	Editorial	X			

COMMENTS BY REVIEWER				RESOLUTION			
No.	Para/Line	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
<b>5. COMMUNICATION AND CONSULTATION METHODS</b>							
135.	5.27	<b>31. Germany:</b> “[...] It is also important to pay attention to the conduct of the meeting to ensure fruitful dialogue between participants. <u>The representatives of the regulatory body being in charge of conducting public meetings should be well trained and experienced. They should be entrusted to perform this task permanently, thus contributing to enhance public confidence in the regulatory body.</u> ”	A well trained and experienced staff is an essential prerequisite for an effective and successful dialogue between the regulatory body and interested parties.			X	To avoid duplication given paragraph 4.9 touches upon already this aspect.
136.	5.28	<b>44. USA:</b> Modify Para 5.28 as follows: 5.28. In accordance with national legal and regulatory provisions such as those related to licensing process [22] or the development and implementation of protection strategies for existing exposure situations [5], the regulatory body should consult interested parties. In addition, the regulatory body should also consider asking for inputs on other issues such as complex or major topics (e.g., when drafting legislation or regulations). <b>Further, the regulatory body may solicit independent expert elicitation about certain issues from professional or high level academic organizations, such as national academies.</b>	Completeness. Asking for inputs and views on complex issues can be implemented through expert elicitation or solicitation of support from professional or academic organizations.		To add in the new para after 4.9 4.10. The regulatory body may use external professional supports for communication and consultation (e.g., communication experts, translators, web-site designers, facilitators, meeting moderators, <b>and academic representative</b> ). Such supports could complement the regulatory body’s human resources and competence and provide new ideas and methods to make communication and consultation more effective. To delete para 5.21 <i>The regulatory body may consider the benefits...</i>		The new para 4.10 is the right place to address this question without duplication.
137.	5.29	<b>45. USA:</b> Add a sentence as marked: 5.29. For each of the different stages of consultation, appropriate communication channels and tools should be used. The Internet and meetings are two specific channels which seem particularly adapted to consultation. <b>Other communication means may include questionnaires to interested parties to solicit inputs and views.</b> Whatever the channel used, the roles and responsibilities of each interested party should be explained to all the participants.	Completeness: Questionnaires to interested parties and stakeholders could be a powerful tool to solicit inputs and views.			X	Only the most common tools used are mentioned here. It does not exclude any other ways for consultation.
138.	5.30./1	<b>18. Japan:</b> 5.30.	Typo	X			
139.	5.30	<b>32. Germany:</b> Number of paragraph: “5.30. ...”	Typo (missing dot).	X			

COMMENTS BY REVIEWER				RESOLUTION			
No.	Para/Line	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
<b>5. COMMUNICATION AND CONSULTATION METHODS</b>							
140.	5.31	<b>46. USA:</b> Rewrite paragraph as: When necessary, for clarification and mutual understanding purposes, the regulatory body should meet with the concerned applicants or authorized parties, relevant governmental authorities and agency early in the process. Meetings should be open to interested parties as feasible.	Having a pre-meeting with applicants before “officially” launching consultation (i.e. not open to all stakeholders) is contrary to the objective of openness and transparency.		When necessary, the regulatory body should meet with the concerned applicants or authorized parties, relevant governmental authorities and agencies early in the process <b>for ensuring the proper organization and effective conduct of the consultation.</b>		Opening such a working meeting is often considered by member states in different ways. The decision may be made on case by case basis taking into account benefits and drawbacks to open or not the meeting.
141.	5.33	<b>47. USA:</b> Interested parties should have <del>the possibility to access all</del> <b>to</b> relevant information related to the consultation, free of charge at designated locations.	Editorial	X			
142.	5.38	<b>48. USA:</b> Those mechanisms should encourage interaction among participants to develop a mutual understanding and to give them the opportunity to provide, discuss and debate <del>their</del> <b>ir</b> perspectives <del>of all</del> <b>participants.</b>	Editorial	X			

COMMENTS BY REVIEWER				RESOLUTION			
No.	Para/Line	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
<b>REFERENCES AND OTHERS</b>							
143.	App I COM strategy line 7	<b>49. USA:</b> “...participation <u>in</u> industrial forums and establishment of international relations <u>s</u> with relevant organizations.”	Editorial	X			
144.	Appendices	<b>4. Russia SEC NRS:</b> The provision of the point “evaluation” in the Appendix II does not comply with the point “Evaluation” in Appendix I				X	The differences are because of the kind of evaluation: one at strategic level the other one at working level.
145.	references	<b>50. USA:</b> References 8, 9, 11, 12, 13, 14, 15, 16, 17, 18, 21, 23, 24, 25, 26, and 30 are not referred to in the document.				X	Reference documents are not to be systematically quoted in the text, they are documents which have been consulted and served as a base to develop the draft. Part of these references have been added upon request of SSCs.

COMMENTS BY REVIEWER			RESOLUTION				
No.	Para/Line	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
<b>REFERENCES AND OTHERS</b>							
146.	List of references	<b>33. Germany:</b> Note: The references No. 8, 9, 11 to 18, 21, 23 to 26, and 30 are not cited in the text of the draft document.	Either insert the references in the text or delete them in the list. Those documents which have been consulted and served as a base to develop the draft but are not quoted systemically in the text should be moved into an Annex entitled "Bibliography". Note that such an approach has already been implemented e.g. in the Draft Safety Guide DS452 "Decommissioning of Nuclear Installations". Annex VI of DS452 provides a list of publications which contain additional information on specific organizational, technical and safety topics related to decommissioning. These publications are not part of the list of references following the main text of the draft.			X	Ditto
147.	REFERE NCES	<b>19. Japan:</b> Delete [12] and [30]	They are not referenced in this DS.				Ditto
148.	Ref	<b>2B. Japan:</b> ※Add followings to the reference. <u><a href="#">[X] INTERNATIONAL ATOMIC ENERGY AGENCY, Remediation Process for Areas Affected by Past Activities and Accidents, IAEA Safety Standards Series No. WS-G-3.1, Vienna, 2007.</a></u>		X			
149.	Ref. [3]	<b>34. Germany:</b> "INTERNATIONAL ATOMIC ENERGY AGENCY, Preparedness and Response for a Nuclear or Radiological Emergency, IAEA Safety Standards Series No. <del>GS-R-2</del> <u>GSR Part 7</u> , Vienna ( <del>2002</del> ) (2015)."	The Draft Safety Requirements DS457 (future GSR Part 7; revision of GS-R-2) have been endorsed at the 36 <sup>th</sup> CSS meeting held in November 2014. GSR Part 7 will likely be published in 2015, i.e. much earlier than DS460.		If actually published when DS460 is published		Only published documentations may be referenced in IAEA safety standards. But, just before DS460 is published, the references will be checked and updated if necessary.
150.	Ref. [5]	<b>35. Germany:</b> "INTERNATIONAL ATOMIC ENERGY AGENCY, Radiation Protection and Safety of Radiation Sources, IAEA Safety Standards Series No. GSR Part 3 ( <del>Interim</del> ), Vienna ( <del>2011</del> ) (2014)."	The final version of GSR Part 3 has been published in July 2014. Therefore, an update is required.	X			
151.	Ref. [8]	<b>36. Germany:</b> "INTERNATIONAL ATOMIC ENERGY AGENCY, Safety of Research Reactors <u>Safety Requirements</u> , IAEA Safety Standards Series No. NS-R-4, Vienna (2005)."	Uniform citation of publications issued in the IAEA Safety Standards Series.	X			

COMMENTS BY REVIEWER				RESOLUTION			
No.	Para/Line	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
<b>REFERENCES AND OTHERS</b>							
152.	Ref. [9]	<b>37. Germany:</b> “INTERNATIONAL ATOMIC ENERGY AGENCY, Safety of Nuclear Fuel Cycle Facilities <del>Safety Requirements</del> , IAEA Safety Standards Series No. NS-R-5, Vienna (2008).”	Uniform citation of publications issued in the IAEA Safety Standards Series.	X			
153.	Ref. [10]	<b>38. Germany:</b> “INTERNATIONAL ATOMIC ENERGY AGENCY, Disposal of Radioactive Waste <del>Specific Safety Requirements</del> , IAEA Safety Standards Series No. SSR-5, Vienna (2011).”	Uniform citation of publications issued in the IAEA Safety Standards Series.	X			
154.	Ref. [17]	<b>39. Germany:</b> “INTERNATIONAL ATOMIC ENERGY AGENCY, Documentation for Use in Regulating Nuclear Facilities <del>Safety Guide</del> , IAEA Safety Standards Series No. GS-G-1.4, Vienna, 2002.”	Uniform citation of publications issued in the IAEA Safety Standards Series.	X			
155.	Ref. [22]	<b>40. Germany:</b> “INTERNATIONAL ATOMIC ENERGY AGENCY, Licensing Process for Nuclear Installations <del>Specific Safety Guide</del> , IAEA Safety Standards Series No. SSG-12, Vienna (2010).”	Uniform citation of publications issued in the IAEA Safety Standards Series.	X			
156.	Contribute or to draft...	<b>3. Russia Rostechnadzor:</b> Replace “Russia Federation” by “Russian Federation”.	Editorial remark	X			

This table compiles the modifications made to address final coordination committee’s comments (5 March 2015).

No.	Para/Line	Modifications
1.	1.2	Added at the end of the paragraph: “by the regulatory body”
2.	1.16	(...) consideration should be given to protecting the confidentiality of sensitive (...) nuclear security [41, 42].
3.	1.16	Updated: References related to emergency in the first brackets
4.	1.16	Added at the end of the paragraph: “In order to have an effective public communication to an emergency, the need for coordination between different organizations involved in the preparedness and response of an emergency, including the regulatory body, should be acknowledged [3].”
5.	2.17	Because it is a subset of nuclear security, deleted: “physical protection”
6.	3.5	Added to the first bullet: “including nuclear security [40, 41, 42]”
7.	4.11	Removed: the last part of the sentence (after last ;) considering the paragraph 5.3 (duplication)
8.	4.23	Removed: second sentence
9.	4.38	Removed: Emergencies
10.	5.3	Rewritten as follow, considering also the removed part of 4.11: 5.3. The regulatory body should communicate on events which might affect safety. For promptly and consistently communicating to interested parties the safety significance of events, it is advisable to use specific tools. For instance, a Member State may decide to use the joint IAEA and OECD/NEA International Nuclear and Radiological Event Scale (INES <sup>6</sup> ).” Added to the foot note 6: “INES should be used in accordance with the relevant IAEA publications [3, 30, 31, 39].”
11.	5.30	Removed: Emergency preparedness and response.
12.	Ref. 19	Added: Criteria for Use in Preparedness and Response for a Nuclear or Radiological Emergency, IAEA Safety Standards Series No. GSG-2, Vienna, 2011.
13.	Ref. 31	Added: The Use of the International Nuclear and Radiological Event Scale (INES) for Event Communication, Guidelines and Good Practices for Setting up a National Framework on the Effective Use of INES for Event Communication, Vienna (2014)
14.	Ref. 34	Added: EPR-Public Communications, Communication with the Public in a Nuclear or Radiological Emergency, IAEA, Vienna, 2012.
15.	Ref. 35	Added: EPR-Public Communications, EPR Methods for development of communication strategy and plan for nuclear and radiological emergency.
16.	Ref. 38	Added: IAEA Report on Preparedness and Response for a Nuclear or Radiological Emergency in the Light of the Accident at the Fukushima Daiichi Nuclear Power Plant, Vienna (2013).
17.	Ref. 40	Modified: former ref. [35] (now 40) to NSS No. 23-G* on information security, which is more relevant than the guide on nuclear security culture