

## TITLE: DS460 Communication and Consultation with Interested Parties by the Regulatory Body (2014-04-01)

This table of resolution compiles the 63 comments posted by Committees' members. The comments are addressed in the order of the DS460 content. They have been provided by:

Germany WASSC/RASSC (22/5/2014)	25 Comments	USA NUSSC WASSC (24/5/2014)	13 Comments (Comment 2 is split into 3)
Japan NUSSC (26/05/2014)	11 Comments	Korea KINS (27/05/2014)	6 comments
France MEDDE NSGC (03/06/2014)	4 Comments	Pakistan PNRA (03/06/2014)	4 Comments

COMMENTS BY REVIEWER				RESOLUTION			
No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1.		<b>1. USA NUSSC /WASSC</b> Front section on “THE IAEA SAFETY STANDARDS”: The Safety Fundamentals SF-1 presents the fundamental safety objective and principles of protection and safety. <del>And</del> It provides the basis for the safety requirements.	Editorial. For Clarity	X			
<b>GENERAL</b>							
2.	Para: 2.3 2.6, 2.17 and 4.32.	<b>2. USA NUSSC /WASSC</b> The document scope and objectives, as well as implementation aspects and communication and consultation methods lacked significant areas of communication as described below: 1. Communication aspects regarding protection of the environment and ecology. In this regard, a great deal of discussion, deliberation, debate, and interaction with certain groups focus on this topical area. Therefore, in addition to safety and security communication topics, the scope and objectives should also include <u>environmental protection</u> . 2. Add “ <b>as well as environmental protection</b> ” to Para: 2.3 2.6, 2.17 and 4.32.	Completeness: The document should address communication issues involving environmental protection and ecology.		2.3 The regulatory body is responsible for the regulatory oversight of <del>nuclear</del> <del>and radiation</del> safety and should not be biased for or against nuclear <del>and radiation</del> uses.		- For clarity purpose, it is proposed to modify 2.3 as beside. - However, it is important to note that the concept of safety covers already the protection of the environment as stated in SF-1: <i>the Fundamental Safety Objective is to protect people and the environment from harmful effects of ionizing radiation.</i> Therefore, protection of the environment is indicated (e.g., 1.2; 1.3; 2.9; and 4.32) when ‘safety’ is not used. - Ecology is an important contributor to safety, e.g., through an EIA, but numerous other sciences are also important (Geology, geography, history, material science, engineering, etc.). So, it does not look appropriate to touch upon specifically the ecology here. - As reminder: DS460 focusses on safety and not on security (1.15).

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No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
3.	Para: 2.3 2.6, 2.17 and 4.32.	<b>2. USA NUSSC /WASSC (cont'd)</b> 3. The document lacks aspects of educating the public about radiological risks and potential environmental impacts. In this context, the public may be misled due to lack of understanding of radiological risk and hazards and therefore may be influenced by groups of specific interest or with specific agenda. Therefore, public seminars and use website to educate the public in a transparent and honest communication fashion could enhance public trust and effective dialogue with the public.	Completeness The document should discuss responsibility of the regulator to educate the public about radiological risk and environmental protection.		To delete in 5.9. 'educational film' and to add para 5.10bis: "The regulatory body should consider using or participating in educational activities (e.g., seminars, educational films on Internet, university courses, etc.) in order to provide, explain and discuss factual, independent and non-biased information on radiation risks associated with facilities and activities, and about its processes and decisions. This approach is recognized as an effective way to increase knowledge and understanding of interested parties on those topics."		There is no basis from IAEA Safety Requirements to ask the regulatory body to <u>educate</u> the public but rather to inform and consult it. However, participation of education programmes is effective for informing the public and improved its understanding on risks and regulatory issues. It should be considered as part of the strategy of the regulatory body. It is proposed to address this issue under section 5.
4.	Para: 2.3 2.6, 2.17 and 4.32.	<b>2. USA NUSSC /WASSC (cont'd)</b> 4. The document lacks use of a " <u>facilitator</u> " concept to interact with stakeholders and the public. We believe having a "facilitator" at a public meeting could enhance communication, avoid direct confrontation, and lead to successful public meeting.	Completeness The document should discuss using the "facilitator" concept and approach to communicate with the public and stakeholders.	X			Agree but this is already addressed in para 5.20.
5.	Para 1.6 on Safety Case	<b>3. USA NUSSC /WASSC</b> Para 1.6 (Page 2) stated: "The safety case will also be the main basis on which dialogue with interested parties will be conducted and on which confidence in the safety of the facility or activity will be developed." We agree with the statement and suggest to refer to PRISM project and Figure (use as an Appendix) to show example of dialogue and decisions and public interaction during safety case development. We also suggest referring to IAEA PRISM Figure to illustrate different stages of the decision making process and different parties involved to address communication and consultation. Further, the document should refer to IAEA SSG-23 Standard, "The Safety Case and Safety Assessment for the Disposal of Radioactive Waste."	Completeness and clarity to illustrate the importance of communication during development of the safety case and its use as the main basis of communication to establish dialogue.	X			Even if the point is already illustrated by the quotation from GS-G-3, it is added as well in para 1.6: "The IAEA Specific Safety Guide No. SSG-23 on The Safety Case and Safety Assessment for the Disposal of Radioactive Waste [20] also states in paragraph 1.3: "The safety case will also be the main basis on which dialogue with interested parties will be conducted and on which confidence in the safety of the disposal facility will be developed"

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<b>1. INTRODUCTION</b>							
6.	1.2	<b>1. Germany WASSC/RASSC</b> “Safety fundamental principle 2 <a href="#">established in the Safety Fundamentals SF-1 [1]</a> says <b>††</b> in paragraph 3.10. that, amongst others, ...”	Include full citation for completeness.	X			
7.	1.4	<b>1. Pakistan PNRA</b> Communication and consultation are strategic instruments to support the regulatory body in <b>timely</b> discharging its regulatory functions	This para is relevant to the effective communication and consultation with the interested parties. The information will not be effective if it won't be communicated timely.		2.11... Provide interested parties <b>timely</b> with reliable, comprehensive, understandable and easily accessible information...		The intention of this paragraph is to explain Communication and consultation are strategic instruments to support its function. But this is true that communication in timely manner is key. It is proposed to add it in para 2.11, 1 <sup>st</sup> bullet.
8.	1.6	<b>2. Germany WASSC/RASSC</b> 2 <sup>nd</sup> sentence: “... under Requirements 22, 23 and 24 of the IAEA Standard Series No. GSR Part 4 on Safety Assessment for Facilities and Activities [6]. A regulatory requirement on those responsible for performing the safety assessment is stated <a href="#">in paragraph 5.9</a> as ...”	Include full citation for completeness.	X			
9.	1.6	<b>3. Germany WASSC/RASSC</b> Last sentence: “Furthermore, the IAEA General Safety Guide No. GSG-3 <a href="#">on</a> The Safety Case and Safety Assessment for the Predisposal Management of Radioactive Waste [19] states <a href="#">in paragraph 1.2</a> that ...”	Include full citation for completeness.	X			
10.	1.8	<b>4. Germany WASSC/RASSC</b> “The involvement of interested parties is now a mandatory component of various international conventions and treaties that detail the role of governments. This includes, but is not limited to, nuclear facilities <a href="#">[29]</a> . ...”	This topic is addressed in more detail in Section 2.2 of the IAEA Nuclear Energy Series No. NG-T-1.4. In this section, the relevant international conventions and treaties are mentioned as well (such as Espoo 1991, Aarhus 1998, and Article 37 of the EURATOM Treaty). A reference to this publication is therefore recommended. Please note that Ref. [29] is not cited elsewhere in the document.	X			

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<b>1. INTRODUCTION</b>							
11.	1.11	<b>4. USA NUSSC /WASSC</b> Modify Bullet 1 to read: <b>Communication</b> is the exchange of information between one or more organization and interested parties for the purpose to inform, influence, persuade or develop a common understanding in pursuit of achieving long term objectives and to serve public safety and to protect the environment.	Clarity, language, and Completeness to address environmental protection			X	The proposed wording modifies the meaning of the sentence. The meaning is not <i>stricto sensu</i> 'to protect people and the environment' but is 'to serve the interest of the public.'
12.	1.11	<b>5. USA NUSSC /WASSC</b> “Communication Strategy” -Modify bullet #2, 2 <sup>nd</sup> sentence to read: It consists of a corporate culture that encourages communication and consultation as important for the success of the regulatory body’s efforts to ensure public safety and protection of the environment. Modify Bullet #2, 3 <sup>rd</sup> sentence to read: The communication strategy helps ensure openness and transparency by guiding the regulatory body’s interactions with interested parties during the course of various regulatory actions, including regulatory development, licensing reviews, inspections and enforcement.	Completeness to address environmental protection, and emphasize interactions with stakeholders during regulatory development.	X	for the success of the regulatory body’s efforts to ensure the protection of people and the environment		To be consistent with the fundamental objective
13.	1.11	<b>6. USA NUSSC/WASSC</b> “Communication Plan” Modify Bullet #3 to read: It may be relatively short-term, regarding an emerging issue such as a licensing review, or cover routine regulatory activities such as transportation of radioactive materials or management of radioactive waste. It may also be long-term to continue exchange of information and communication regarding new regulatory policy development.	Completeness to indicate that there also long-term communication strategies involving regulatory developments.		It may also be long-term, e.g., to continue exchange of information and communication regarding new regulatory policy development.		Other issues may request long-term communication plan.
14.	1.11	<b>7. USA NUSSC/WASSC</b> “Consultation” Modify Bullet #4 to read: ...refers to processes through which the regulator seeks the views of individuals or groups on regulatory matters that affect the decision making process or affect them directly or in which they have a significant interest.	Completeness to refer to the decision-making process.	X			
15.	§1.11	<b>2. Korea KINS</b> Interested Parties, also known as stakeholders ...elected officials and governmental authorities at the international, national, regional and local level;	According to the Page 13, interested parties include international organizations as well.		...Interested parties include, among others, the general public		For clarification; the list of interested parties in 1.11 is not exhaustive. It provides examples.

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<b>1. INTRODUCTION</b>							
16.	1.11	<b>5. Germany WASSC/RASSC</b> Include new last sentence: “... These concepts refer to the model based on an involvement of interested parties as early as possible in a decision-making process (e.g., “Engage, Interact and Cooperate” model), which in most countries has been replacing the traditional model which undertakes communication with the public and other interested parties late in the process or even after having made the decision (e.g., “Decide, Announce and Defend” model). <u>A challenge to implement these concepts is the natural tension between the aim of achieving transparency and openness, on the one hand, and restrictions in disclosure of information which may arise for security reasons, on the other hand (see also Para 3.5).”</u> ”	This is an important aspect which is worth mentioning in the context of this paragraph.		<u>One of the most important challenges</u> to implement these concepts is the natural tension between the aim of achieving transparency and openness, and <u>legally required</u> restrictions in disclosure of information.		This natural tension is not the unique important challenge. Moreover, security is not the only reasons to legally restrict information disclosure. Several paragraphs refer to this issue (2.17, 3.5, 4.30, etc.). It is not so much relevant to refer <u>only</u> to para 3.5.
17.	1.11	<b>1. Korea KINS</b> <i>(comments)The definition of regulatory body should be included in the use of terms</i>	Agency to communicate with interested parties should be defined.			X	The definition of ‘regulatory body’ is in the IAEA Safety Glossary (2007) and already well-accepted and used.
18.	1.13	<b>8. USA NUSSC/WASSC</b> This document provides guidance and recommendations for the regulatory body <del>whatever the facility or activity in question</del> . When necessary, guidance and recommendations specific to a facility or an activity may be provided in a complementary manner by other safety guides.	Editorial.		This document provides guidance and recommendations <del>for the regulatory body whatever the facility or activity in question</del> . When necessary, guidance and recommendations specific to a facility or an activity may be provided in a complementary manner by other safety guides.		From the discussion during the last SSCs’ meeting, it is important to clarify that DS460, applicable whatever the facility or activity, may be complemented, when necessary, with guidance specific to a facility or an activity. On the other hand, we propose to delete "for regulatory body", redundant with 1.12.
19.	1.14, line 4	<b>9. USA NUSSC/WASSC</b> Modify sentence to read: it may also be used by <del>operators, licensees, or</del> other organizations or individuals considering their responsibilities for communication and consultation with interested parties.	Completeness: Emphasize use of the guide by operators and licensees.		Footnote 4 (under 3.2) is moved up under 1.14 as footnote 2.		A licensee is an authorised party (see GSR Part 1 definition recalled in footnote 2 (former 4)), therefore already covered. Operator is very specific to nuclear sector and covered by other organizations and individuals.

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<b>1. INTRODUCTION</b>							
20.	1.15	<b>6. Germany WASSC/RASSC</b> 1 <sup>st</sup> sentence: “This document does <del>not</del> <u>neither</u> provide guidance on communication and consultation on emergency preparedness and responses, <u>nor</u> on security issues.”	Wording.		“This document does <del>not</del> <u>neither</u> provide guidance <u>neither</u> on communication and consultation on emergency preparedness and responses, <u>nor</u> on security issues.”		Wording
21.	1.16	<b>1. France MEDDE / IRSN</b> Safety and security have a common purpose: the protection of people and the environment. Many of the principles to ensure protection are common, including communication and consultation with interested parties, although their implementation may differ. Moreover, many elements or actions serve to enhance both safety and security simultaneously. Likewise, there are also circumstances in which actions to serve one objective can be detrimental to the achievement of the other. In implementing the recommended measures contained in this safety guide, <u>where possible</u> , due consideration for security principles should be taken to ensure that they should not create adverse effects to the security system. For example, certain sensitive information may not be able to be publicly disclosed.	It should be acknowledged that nuclear security needs to be given the same consideration as nuclear safety.	X			
22.	1.17	<b>7. Germany WASSC/RASSC</b> 1 <sup>st</sup> sentence: “This General Safety Guide consists of <del>5</del> <u>five</u> sections <u>and two appendices</u> : ...” Include new last bullet: “ <u>Appendix I and Appendix II present examples of a communication strategy template and a communication plan template, respectively.</u> ”	Brief information on the appendices is missing in this paragraph.	X			

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<b>2. OVERARCHING RECOMMENDATIONS</b>							
23.	2.8bis	<b>10. USA NUSSC /WASSC</b> After Para 2.8 add a new Para (2.9) <b>The regulatory body should strive to educate the public and interested parties of radiological risks and associated issues for the decisions to be made. Explanation and elucidation of potential risk impacts should be communicated in a simple and understandable manner.</b>	Completeness & Clarity of Communication: risk-informing the public in a simple understandable language is of paramount importance for a successful communication.		Add para 5.10bis  (See 2. USA NUSSC/WASSC)		Even if there is no IAEA safety requirement basis for public education, participation or using of education programmes should be considered by the regulatory body for informing parties in the vicinity and other interested parties about the safety (including health and environmental aspects) and about regulatory processes. Consequently, it is proposed to address this under section 5 and not as an overarching recommendation.
24.	2.10	<b>8. Germany WASSC/RASSC</b> “Within its budget, the regulatory body should allocate <u>financial and human</u> resources to support communication and consultation with interested parties.”	Clarification.			X	The issue here is about the budget only then obviously about financial resources.
25.	2.11	<b>9. Germany WASSC/RASSC</b> Last bullet: “... involving the interested parties of neighbouring <del>s</del> States at the same level as national interested parties.”	Editorial.	X			
26.	2.11 (3 <sup>rd</sup> bullet)	<b>1. Japan NUSSC</b> Consider international relations and in particular transboundary relations with neighboring countries. In this respect, together with the competent national authorities, the regulatory body should explore the possibilities of involving the interested parties of neighbouring states <del>at the same level as national interested parties as much as practical.</del>	Does «the same level» mean to give voting rights at the public meeting or the referendum to the public of neighboring countries? This expression is NOT acceptable. Instead of this expression, «as much as practical» is much better.	X			
27.	2.12	<b>2. Japan NUSSC</b> The regulatory body should adapt its methods for communication <u>and consultation with interested parties and with expected interested parties to</u> the communication objectives. <u>The communication and consultation should be</u> in accordance with a graded approach.	Better wording.		The regulatory body should adapt its methods for communication and consultation to the <del>communication with interested parties</del> objectives, the expected interested parties and in accordance with a graded...		The current wording is confusing. Actually the sentence should be understood as follow: the methods should be adapted to the objective, to the interested parties to be reached, and in accordance with a graded approach.

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<b>2. OVERARCHING RECOMMENDATIONS</b>							
28.	2.15	<b>3. Korea KINS</b> The outcomes of communicate and consultation with interested parties should be documented <u>and open to the public.</u>	The result of dialogue with interested parties is to be made public.		...documented <b>and made available to the interested parties.</b>		Better wording
29.	2.19	<b>10. Germany WASSC/RASSC</b> “The regulatory body should ensure that information on access to administrative and judicial review procedures is available to any interested party. <u>This particularly applies to those parties who</u> <del>which</del> consider* that <u>their</u> <del>its</del> 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.”	The meaning of the statement is not quite clear due to the vague link between the two parts of the sentence. Two separate sentences could make the intention more clear. The proposal provided at the left is based on our assumption what is meant.	X			

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<b>3. REGULATORY FRAMEWORK</b>							
30.	3.5	<b>2. France MEDDE /IRSN</b> Add - nuclear security regulation				X	The bullets provide the reasons for non-disclosure, including already the security aspects. By “national law” used in 3.5, relevant legislation and subsequent regulations are already included. It is proposed to maintain the current wording.

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<b>4. IMPLEMENTATION BY REGULATORY BODY</b>							
31.	4.1/3	<b>2. Pakistan PNRA</b> The provisions include leadership, <b>safety culture</b> , strategy and a management system for effective implementation.	Safety Culture should also added			X	The provisions in this section are those for ensuring effective communication, and do not address safety culture as such.
32.	4.1/5	<b>3. Pakistan PNRA</b> This section also addresses important elements <u>such as objective, targeted parties, context, legal and regulatory requirements</u> that should be considered when developing any communication and consultation process and defines the boundaries of key interested parties generically. <u>It will provide guidance on evaluation and improvement of the effectiveness of communication and consultation strategy.</u>	To define which type of elements should include			X	The para 4.1 describes the objective of this chapter, meaning to provide practical provisions for communication and consultation. The intention is not to detail the whole content. It is also noted that the proposed list is not fully correct, e.g., regulatory requirements are covered in previous chapter.
33.	4.5	<b>11. USA NUSSC /WASSC</b> (page 10) Modify Para to read: Clear responsibilities should be established within the regulatory body to deal with communication and consultation activities; <b>including educating the public</b> of key technical issues pertaining to the decision making process.	Completeness: Emphasize informing the public of key technical issues in a simple language they can understand.			X	A new paragraph has been added in section 5 (See <b>2. USA NUSSC/WASSC</b> ) to address this education aspect. Here, the point is about the establishment of clear responsibilities in the organisation much broader than public education. In addition, the issue to inform the public on key technical issues in a simple language they can understand is already covered in different places (e.g., sections 1 and 5).
34.	4.11	<b>12. USA NUSSC /WASSC</b> line 2, after and emergencies insert: Emergencies, inspection and audit reports, ...	Completeness to include in in knowledge management system inspection and audit reports.		to add in the para 4.11 'Inspection reports'		The list is not (and cannot be) exhaustive. The types of reports and publications are very specific to a country; this is why we have written <i>and all other relevant publications and information</i> . Nevertheless, 'inspection reports' (recommended by GS-G-1.3) may be added.
35.	4.17	<b>12. Germany WASSC/RASSC</b> 2 <sup>nd</sup> sentence: "Usually there is no way to control how a message is eventually disseminated through the media; ..."	In some States, censorship may control the dissemination of information ...	X			

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<b>4. IMPLEMENTATION BY REGULATORY BODY</b>							
36.	4.19	<b>13. Germany WASSC/RASSC</b> Last sentence: “The regulatory body should use these local liaison groups to provide the local people with independent information <a href="#">as a low-threshold service</a> , in addition to the information provided by authorized parties.”	Low-threshold service, as a term of social pedagogy, means to keep barriers to get a service (here: provision of information) as low as possible.			X	The use of this jargon can be misinterpreted and does not bring real added value here. Easy access to plain, jargon-free, unambiguous information is largely covered in the document (e.g., section 2).
37.	4.19	<b>3. Japan NUSSC</b> The regulatory body <del>may should</del> use these local liaison groups to provide the local people with independent information in addition to the information provided by authorized parties.	«should» is unsuitable.	X			
38.	4.28	<b>4. Japan NUSSC</b> The regulatory body’s own staff <a href="#">should</a> routinely communicate 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.	Better wording.			X	This sentence describes an actual situation which explained why the RB should keep its staff informed.
39.	4.32	<b>3. France MEDDE /IRSN</b> Add: - identify which information cannot be disclosed.				X	4.32 reminds the objective of communication as stated by safety requirements. Non-disclosure of information is addressed in several places in the document, e.g., - 3.5, where the reasons for non-disclosure are listed; - 4.7, which recommends “At all times, sensitive information should be properly protected according to national rules on protection of information”. This proposal would introduce unnecessary duplication.
40.	4.33	<b>14. Germany WASSC/RASSC</b> “The overall objective of the communication and consultation process should be established by use of the rationales mentioned in <del>section</del> <a href="#">paragraph 1.7</a> concerning accountability, credibility and legitimacy, high quality in decision-making, and independence.”	In order to be more specific, the relevant paragraph should be referred to.	X			

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<b>4. IMPLEMENTATION BY REGULATORY BODY</b>							
41.	4.33	<b>4. France MEDDE /IRSN</b> “The overall objective of the communication and consultation process should be established by use of the rationales mentioned in section 1 concerning accountability, credibility and legitimacy, high quality in decision-making, and independence <u>duly taking into account the protection of sensitive information.</u> ”				X	Again, this proposal aims at introducing unnecessary duplication. Indeed, this issue is already covered by 4.7 and others.
42.	4.37	<b>5. Japan NUSSC</b> Effective communication and consultation <u>should implement</u> <del>require implementation of</del> specific and adapted methods and organization according to:	Better wording.		For an effective communication and consultations, specific and adapted methods and organization should be implemented according to:		For avoiding confusion
43.	4.38	<b>4. Korea KINS</b> A communication plan should include the overall objectives, appropriate timing and resources to engage interested parties, list of interested parties to be reached, their <u>nature and</u> concerns, expectations and perspectives...	It is important to figure out the nature of interested parties when developing a communication plan.			X	The purpose of a communication plan is to convert objectives and strategy into actions. Therefore, for clarity purpose and efficient implementation, it does not look so much relevant to recommend inputting such details in the plan.
44.	4.43	<b>5. Korea KINS</b> A communication plan may combine different approaches and methods according to the <u>purposes</u> , issues, people and groups involved. ...		X			
45.	4.46	<b>16. Germany WASSC/RASSC</b> “The <del>implementation of the</del> communication plans should be <u>implemented to remain</u> flexible <u>during the full process</u> . Events may necessitate amending a communication plan’s schedule or key messages as the regulatory body’s priorities change.”	We guess that the intention of the author was to say that the communication plan itself should be flexible, rather than its implementation.		The <del>use implementation of the</del> communication plans should be flexible <u>as their content may evolve during the process</u> .		Clearer wording.
46.	Footnote No. 5 to 4.48	<b>17. Germany WASSC/RASSC</b> “A satisfaction committee consists of <u>representatives</u> of regulatory body staff, the public and other relevant interested parties, ...”	Editorial.	X			
47.	4.49	<b>6. Japan NUSSC</b> 4.49 <del>50</del> . Benchmarking against other experiences at the national and international levels should be considered, keeping in mind political, cultural and societal differences.	Typo	X			

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<b>5. COMMUNICATION AND CONSULTATION METHODS</b>							
48.	5.1	<b>18. Germany WASSC/RASSC</b> 1 <sup>st</sup> sentence: “ <u>Depending on the issue,</u> <del>C</del> ommunication and consultation activities may require <del>only either</del> the provision of information <u>only</u> or <del>may require the active</del> participation of interested parties <del>depending on the issue.</del> ”	To improve wording.		“ <u>Depending on the issue,</u> <u>communication</u> and consultation activities may require <del>only</del> the provision of information <u>only</u> or <del>may require the active</del> participation of interested parties”		Here, the use of an ‘inclusive OR’ is better here than an ‘exclusive or’. Active participation needs also provision for information.
49.	5.2/5	<b>4. Pakistan PNRA</b> The regulatory body should also inform the interested parties on its strategy plan, policies, <del>procedures,</del> and management system.	The procedures should also be included.	X			
50.	5.5	<b>19. Germany WASSC/RASSC</b> “Whatever the information delivered by the regulatory body, it should be <u>provided as a low-threshold service, meaning that it is</u> easily understandable <u>and accessible,</u> reliable, based on facts and evidences, <del>accessible,</del> and provided in a timely manner.”	Low-threshold service, as a term of social pedagogy, means to keep barriers to get a service (here: provision of information) as low as possible.			X	The use of this jargon may introduce confusion and even misinterpretation. The wording “easily understandable (define in 1.1) and accessible” is short and clearer for the users. (See 13. Germany WASSC/RASSC)
51.	5.9	<b>10. Japan NUSSC Channels and Tools</b> Clarify the meanings of “channels and tools”.	Clarification. "Communication channels and tools" are loosely-defined terms. For non-native talkers of English, it is not easily understand the difference of the meanings/concepts between "communication channels" and "communication tools." Please clarify the definitions and add the explanations.		under sub-section INFORMATION, the bold titles are deleted.		Considering the limited number of guidance on this sub-section, the bold titles ( <b>General provisions for information, Channels and Tools, Restricted information</b> ) do not provide real added value for the clarify of the document. It is proposed to delete those used under INFORMATION section (From 5.2 to 5.15).
52.	5.22.	<b>7. Japan NUSSC</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 <u>should</u> <del>may</del> consider the possibility of providing some support to enable them to contribute.	Better wording.			X	The use of ‘may’ instead of ‘should’ has been discussed in several instances. It was decided to soften the wording to make it acceptable by all.
53.	5.23	<b>13. USA NUSSC /WASSC</b> Add at the end of Para the following sentence: The dialogue process can be better accomplished through well trained facilitators.	Completeness to use the concept of professional facilitators.			X	The use of ‘facilitators’ is touched upon under 5.20. Facilitators may be used not only for dialogue but also consultation and others.

COMMENTS BY REVIEWER				RESOLUTION			
No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
<b>5. COMMUNICATION AND CONSULTATION METHODS</b>							
54.	5.30.	<b>8. Japan NUSSC</b> When necessary, for clarification and mutual understanding purposes, the regulatory body <del>may</del> <b>should</b> meet with the concerned applicants or authorized parties, relevant governmental authorities and agencies before ‘officially’ launching the consultation.	Better wording.	X			
55.	5.36.	<b>9. Japan NUSSC</b> To explore potential solutions to regulatory issues, such as the development of regulations, policies and guidance, a collaborative process <del>should</del> <b>may</b> be implemented to directly involve different interested parties. Thus, involved interested parties become active participants in developing a regulatory process with a focus on finding common ground.	Better wording.			X	During a review meeting, it was decided to soften the wording to make it acceptable by all.

COMMENTS BY REVIEWER				RESOLUTION			
No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
<b>APPENDICES I AND II</b>							
56.	4.4, Appendix I	<b>11. Germany WASSC/RASSC</b> Note: The text of Para 4.4 cited at the beginning of Appendix I differs slightly from the original text provided in Para 4.4. Harmonization is recommended.	Ensuring consistency throughout the document.	X			
57.	Appendix I	<b>11. Japan NUSSC</b> Communication Strategy It describes how the communication and consultation can help to achieve the mission and the vision of the regulatory body. - For internal interested parties, it may address for example the improvement of the communication and consultation system, the support of organizational changes within the agency and the promotion of the safety culture, transparency and openness. - For external interested parties, it may address for example: dialogue with the public, engagement of the news media, participation of industrial forum and establishment of international relation with relevant organizations	Clarification.  What are differences between “internal interested parties” and “external interested parties”? Need examples of “internal interested parties”.		For example, - For <b>the staff of the regulatory body</b> , it may address for example the improvement of the communication and consultation system, the support of organizational changes within <b>the regulatory body</b> and the promotion... - For other external interested parties, it may address for example...		For clarification - using the description provided under para 4.28. - ‘agency’ is replaced by regulatory body

COMMENTS BY REVIEWER				RESOLUTION			
No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
<b>APPENDICES I AND II</b>							
58.	Appendix I	<b>20. Germany WASSC/RASSC</b> Item “Communication strategy”, 1 <sup>st</sup> bullet: “... and the promotion of <del>the</del> safety culture, transparency and openness.”	Wording.	X			
59.	4.36, Appendix II	<b>15. Germany WASSC/RASSC</b> Note: The text of Para 4.36 cited at the beginning of Appendix II differs slightly from the original text provided in Para 4.36. Harmonization is recommended.	Ensuring consistency throughout the document.	X			
60.	Appendix II	<b>6. Korea KINS</b> (comments) <i>Please, insert the item: <u>Previous resolution</u></i>	The previous communication result is documented and its resolution is to be recalled.		Under <b>Background</b> ...provisions should be included as well as, when relevant, the actual results of previous communication plans.		This information should be typically part of the background.
61.	Appendix II	<b>21. Germany WASSC/RASSC</b> Item “Communication Team”: “List of the names and contact information of the staff members responsible for the implementation of the communication plan. <del>Identify</del> The team leader and back-up <u>should be identified</u> . The team should typically consist of: relevant <del>individuals</del> <u>experts</u> who work on the issue and the relevant communication staff. <del>Do not list people who don't know they are part of your team.</del> <u>Any person listed should be aware of it.</u> ”	The other items of this communication plan provide rather a description of the highlighted terms than a written instruction. Rewording is recommended to be in line with the remaining items.	X			

COMMENTS BY REVIEWER				RESOLUTION			
No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
<b>REFERENCES AND OTHERS</b>							
62.	List of references	<b>22. Germany WASSC/RASSC</b> Note: The references No. 8, 9, 11 to 18, 21, 23 to 26, 29 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. A proposal for inserting Ref. [29] is provided in our comment on Para 1.8.			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.

COMMENTS BY REVIEWER				RESOLUTION			
No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
<b>REFERENCES AND OTHERS</b>							
63.	Ref. [13]	<b>23. Germany WASSC/RASSC</b> “... Decommissioning of Facilities <del>Using Radioactive Material Safety Requirements</del> , IAEA Safety Standards Series No. <del>WS-R-5</del> <a href="#">GSR Part 6</a> , Vienna <del>(2006)</del> (2014).”	In the meantime, GSR Part 6 (revision of WS-R-5, formerly DS450) is established as an IAEA Safety Standard. Please refer to the new publication which will be issued this year.	X			Note: When DS460 is published, the references will be checked. Only published documentations may be referenced in IAEA safety standards.
64.	Ref. [21]	<b>24. Germany WASSC/RASSC</b> “... Application of the Management Systems for Facilities and Activities, IAEA Safety Standards Series No. GS-G-3.1, Vienna (2006).”	Editorial.	X			
65.	Ref. [27]	<b>25. Germany WASSC/RASSC</b> “... IAEA Safety Glossary: Terminology Used in Nuclear Safety and Radiation Protection, <a href="#">2007 Edition</a> , Vienna (2007).”	For completeness.	X			

63 comments have been posted but became 65 comments given that the comment ‘2. USA NUSSC/WASSC’ is split into 3 in the table.