Revision of 7 closely interrelated Safety Guides on the Operation of Nuclear Power Plants: NS-G-2.2 to 2.6, NS-G-2.8 and NS-G-2.14 (DPP DS497 indice 2)

DS497G – NS-G-2.14: 10 comments / Accepted (fully or partially): 10 (100%) / Rejected: 0 (0%)

Some comments are multiple: one part can be accepted and another rejected; hence, total of "accepted" and "rejected" is not equal to number of comments

Country or Organization	Number of comments	Accepted	Rejected
USA	2	2	
WNTI	0		
ENISS	8	8	

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: P. Malesys, S. Edwards Country/Organization: WNTI			Page 1 of 1 Date: 9 October 2020				
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
		No comment					

COMMENTS BY REVIEWER				RESOLUTION ENISS			
Reviewer: ENISS Country/Organization: ENISS			Page 1 of 3 Date: 9 October 2020				
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1	2.2.	The management and organization of a nuclear power plant should ensure a high level of safety performance in the conduct of operations within the plant. This should be achieved through the effective implementation and control of operations activities.	This document is Safety guide and thus we should speak about safety performance	X			
2	2.3.	A clear understanding by operating personnel3 of their authorities, responsibilities, accountabilities and the associated interfaces is essential for the proper and safe functioning of a nuclear power plant. To achieve this, the organizational structure in relation to plant operations should be clearly defined, and the administrative controls for implementing the structure should be formally documented	This document is Safety guide and thus we should speak about safety performance	X			
3	2.35.	Adequate provision should be made for providing prompt support to shift supervisors in normal working hours and outside normal working hours in the event of a problem arising in a	Environment protection is also very important and is not covered neither by radiation protection nor chemistry	X			

		particular subject, such as maintenance, reactor physics, radiation protection, environment protection or water chemistry					
4	3.2 c	To coordinate the conduct of operations, chemistry, radiation protection, maintenance, reactor physics and technical support groups to accomplish the objectives of the shift.	Maintenance, chemistry, rad. Protection are mentioned, reactor physics should be included too.	X			
5	4.4	As noted in para. 4.2, distractions to shift personnel are required to be minimized. Examples of such distractions are excessive administrative burdens and excessive numbers of people allowed entry to the main control room. The need to minimize such burdens is especially important in shift arrangements for accident conditions. To be put in a footnote	This paragraph quotes a requirement, provides examples and does not contain a “should”. ENISS propose to use it as a footnote.	X			
6	4.11.	Operating procedures and training should be provided on the operation of the plant (including load following mode if applicable). Operators should carefully check parameters during the power changes and make appropriate records.	It is understood that the plant needs to have instructions proper for load follow mode, if that is used, as base load mode instructions might not be completely sufficient.	X			
7	5.52.	Restarting the plant should be allowed only after independent verification of the safety status of the plant and identification of the cause of the reactor trip. A senior manager in the operations department or shift safety engineer or shift technical adviser should conduct the independent verification with the assistance of the shift supervisor. The shift supervisor	Finally, it must be the shift supervisor who will issue an order to restart the reactor, but it must be conditional on said verification	X			

		should never be given the authority to take the decision to restart the reactor after a reactor trip has occurred without the mentioned verification.					
8	5.53	5.53. Paragraph 4.39 of SSR-2/2 (Rev. 1) [1] states: "A modification programme shall be established and implemented to ensure that all modifications are properly identified, specified, screened, designed, evaluated, authorized, implemented and recorded." Temporary modifications in the operation of a nuclear power plant should be managed in accordance with the recommendations provided in DS497B [4]. The operations department should have basic responsibilities with respect to temporary modifications and these are discussed in paras 5.55–5.59 ~~60~~.	Typo or numbers changed	X			

COMMENTS BY REVIEWERS					RESOLUTION			
Reviewer: U.S. Nuclear Regulatory Commission								
Country/Organization: U.S. Nuclear Regulatory Commission				Date: 14 October 2020				
Comment No.	Draft Safety Guide No.	Para/ Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1	DS497G	5.1	It should be ensured that these standards are well known by the operating **and maintenance** personnel.	Clarification that maintenance personnel should also be very familiar with the labeling system.	X			

2	DS497G	5.70	**- Peer checking and reviews**	Suggested additional item		X Agree, here: — Self-checking and peer checking; ‘Review’ is already considered in the list.		