

COMMENTS BY REVIEWER Reviewer: Marcus Grzechnik Country/Organization: ARPANSA, Australia Date: 9/10/18				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1.	General	The first three guides appropriately reference GSR Part 7, however consideration should be given to referencing GSR Part 7 in the remaining guides. This is particularly relevant where emergency plans are required (such as in NS-G-2.5 revision.				X	For NS-G-2.4 not applicable, it was already referenced

COMMENTS BY REVIEWER Reviewer: Mikko Lemmetty, Stéphanie NGUYEN, Laurence Oury Country/Organization: ENISS Date: 2018-09-26				RESOLUTION			
1.	NS-G-2.4 para 6.61.A	<del>Leaders</del> <u>Managers and supervisors</u>	IAEA Safety glossary does not know the term "leaders".	Ok Text modified			
2.	NS-G-2.4 appendix, article 8, point 3	<del>consult management as requested</del> <u>be available for the consultations of the management</u>	the verb "to consult" means "to ask advice", not "to provide advice"	Ok Text modified			

COMMENTS BY REVIEWER Reviewer: M-L Järvinen Country/Organization: STUK Date: 9 <sup>th</sup> October 2018				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1.	General	There is still overlapping and repetition in the guidance. AS an example, NS-G-2.3 Modifications and NS-G-2.4 Operating organization discuss organizational changes.				X	The idea is to have in NS-G-2.4, all important processes and responsibilities of operating organization.
2.	General	<del>NS-GS-2.29</del> NS-G-2.14 discusses the safety-security interface in a general manner in paragraphs 2.29 and 5.6. The approach is covers physical security but data security is not so well covered. The need-to-share principle and the need-to-know principles should be presented in the safety guides as appropriate. In other safety guides the safety-security interface should be covered in a systematic manner. For instance, one key safety-security interface exists in maintenance and modifications. Firstly, it is essential to take into account both safety and security issues in the planning and design. The main designers should	No action				

		have enough knowledge of the boundary conditions related to security. Secondly, security measures appropriate to the safety-security significance of the structure, system or component should be applied during the maintenance or modification. Also, additional or compensatory security measures may be necessary.					
3.	2.9	<p>...</p> <p><del>(3) the need to ensure that systems and components are available to cool the fuel for residual heat removal and contain the radioactive material during all operational states</del></p>	Fundamental safety functions should be used.	Ok Text modified	Removal of heat from the reactor and from the fuel store. This is according to SSR-2/1		
4.	3.19	<p><del>Since the operating organization has overall responsibility for the safe operation of its nuclear power plants, its management objectives should be to ensure that:</del></p> <ul style="list-style-type: none"> <li><del>— the approved design enables the plant to be operated safely;</del></li> <li><del>— the plant is constructed in accordance with the design;</del></li> <li><del>— the plant is tested, pursuant to prescribed specifications, to demonstrate that design and construction requirements have been met and that the plant can be operated in accordance with the operational limits and conditions, and design assumptions and intent;</del></li> <li><del>— the plant is operated and</del></li> </ul>	Change accident conditions to accidents. See definitions in SSR-2/1.	Ok Text modified			

		<p><del>maintained in accordance with the operational limits and conditions, authorized procedures and design assumptions and intent, by a sufficient number of competent persons who are adequately trained to cope with abnormal situations, including emergency situations;</del></p> <p><del>—adequate facilities and services are available in a timely manner during normal operation and for responding to all kinds of anticipated operational occurrences, design basis accidents and postulated severe accidents;</del></p> <p><del>—for all levels of requirements, the arrangements with participating organizations are adequate and effective;</del></p> <p><del>—adequate arrangements for response to all kinds of anticipated operational occurrences and accidents conditions have been made and appropriate actions have been taken to provide for protection of the health and safety of the site personnel and the public, and for protection of the environment</del></p>					
5.		<p><del>4. INTERFACES WITH EXTERNAL ORGANIZATIONS</del></p> <p><del>covers RB, constructors and public, should rescue organizations and other authorities be mentioned.</del></p>				X	It is out of scope of DPP and it is covered by other IAEA safety standards

6.	6.46		Acronyms OLC and MS&I should be written out.	Agree Text modified	OLC used in para 3.19 for the first time and MS&I used for the first time in the para 6.43D		
7.		<del>NUCLEAR SECURITY</del> <ul style="list-style-type: none"> <li>● <del>numbering of the paragraphs is missing.</del></li> <li>● <del>reference to data or cyber security is missing</del></li> </ul>		Ok Text modified			
8.		<del>WASTE MANAGEMENT AND ENVIRONMENTAL MONITORING</del>  <del>Paragraph 6.53 deals with radiative releases. The waste management is not discussed here.</del>				X	It is out of scope of DPP. Details of waste management are now covered by GSG-7 (radiation protection) and the SSG-40 (waste management) standards.
9.		<del>CONTROL OF PLANT CONFIGURATION AND PLANT MODIFICATIONS</del>  <del>Reference to NS-G 2.3 is missing, overlapping.</del>		Ok Text modified	See para 6.74.A		

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: ? Country/Organization: Germany/Federal Ministry for the Environment, Nature Conservation and Nuclear Safety (BMU) (with comments of GRS) Date: 05.10.2018							
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1.	1.2	Nuclear power technology is different from the customary technology of power generation from fossil fuel and by hydroelectric means or renewable energies.	Suggestion to add			X	Out of the scope of the DS497
2.	3.2	The operating organization management should have the following main responsibilities: ... <ul style="list-style-type: none"> <li>• Establishing arrangements and assigning responsibilities for effluent monitoring</li> <li>• Implement a radiation dose monitoring and record program for workers</li> <li>• To employ, or retain the services of, a Radiation Protection Officer</li> </ul> ....	Please add these points, relevant to radiation protection.			X	Out of the scope of the DS497. In this Safety Guide covered by term Radiation protection, details in NS-G-2.7 recently updated and issued as GSG-7 and SSG-40

3.	6.2	<p>The areas to be covered by various management processes and programmes in accordance with SSR2/2 Rev. 1 overarching requirement, for the safe operation of plant should [CR29] include, but are not limited to, the following:</p> <p>.....</p> <ul style="list-style-type: none"> <li>- waste management and environmental monitoring;</li> <li>- Radioactive waste management, clearance and disposal of waste</li> <li>- Effluent monitoring</li> </ul> <p>.....</p>	<p>Does the waste management and environmental monitoring cover both (radioactive and non-radioactive) issues?</p> <p>If no: Include the radioactive ones as suggested here</p>			X	<p>Out of the scope of the DS497. In this Safety Guide covered by term Radiation protection, details in NS-G-2.7 recently updated and issued as GSG-7 and SSG-40</p>
4.	New as 6.55D	<p>The operating organization should assign the responsibilities radiation-related safety supervision and appoint the responsibility to a Radiation Projection Officer</p>	<p>Add this new point as 6.55D.</p>			X	<p>Out of the scope of the DS497. In this Safety Guide covered by term Radiation protection, details in NS-G-2.7 recently updated and issued as GSG-7 and SSG-40</p>
5.	6.54	<p>The operating organization should establish the necessary organizational structure and should assign responsibilities for emergency preparedness and response.</p>	<p>This sentence is repeated in the next sentence – delete.</p>	<p>Ok Text modified</p>			

6.	6.64	<p>All plant personnel should be encouraged to report all events and near misses relevant to the safety of the plant. All plant personnel should be given the opportunity to report all events and near misses. It is the responsibility of plant management to review and respond to these submissions in a timely and confidential manner.</p> <p>Management shall encourage an honest error culture aimed at identification of potential risk without assignment of guilt/ responsibility. Staff shall enlist themselves in case that something fails without fearing punitive measures.</p>	<p>Why is this deleted? It's an important point. Suggestion is to put formulation as proposed here.</p>			X	<p>This is part of safety guide SSG-50 Operating experience feedback for nuclear installations (thus, it is to avoid overlapping).</p>
7.	Entire document		<p>NOTE: The numbering of the chapters is not correct in all chapters</p>	<p>Agree</p> <p>Remark will be modified after all comments incorporated.</p>			



COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: ? Country/Organization: United States of America/NRC Date: 10-11-2018							
Comment No.	Para/Line No.	Proposed new text/comments	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1.	General	Comment 7 in NS-G-2.2 above also applies to NS-G-2.3 through NS-G-2.8, namely, that these guides cite references and documents that were revised and published several years ago. The updated versions should be referenced.	Completeness and update.	Agree	This action will be implemented at the end of the process of revision (before publication)		
2.	Reference section in NS-G-2.4, NS-G-2.5, NS-G-2.14	EUROPEAN COMMISSION, FOOD AND AGRICULTURE ORGANIZATION OF THE UNITED NATIONS, INTERNATIONAL ATOMIC ENERGY AGENCY, INTERNATIONAL LABOUR ORGANIZATION, OECD NUCLEAR ENERGY AGENCY, PAN AMERICAN HEALTH ORGANIZATION, UNITED NATIONS ENVIRONMENT PROGRAMME, WORLD HEALTH ORGANIZATION, Radiation Protection and Safety of Radiation Sources: International Basic Safety Standards, IAEA Safety Standards Series No. GSR Part 3, IAEA, Vienna (2014).	Completion: Recognize all of the sponsors, and provide consistency with other safety guides.	Ok  Text modified			