

Japan NUSSC comments on DS503 "Protection against Internal and External Hazards in the Operation of Nuclear Power Plants"

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: Japan NUSSC Member Page: 1 Country/Organization: Japan / Nuclear Regulation Authority (NRA) Date: 27 July, 2020							
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1.	5.4	<p>Delete paragraph 5.4.</p> <p>Notification protocols between appropriate external organizations and the operating organization for periods of increased risks from third party activities (e.g. rally groups, demonstrations, etc.) should be considered crucial and established in advance. These protocols should allow timely preparation to be taken by the plant organization to mitigate potential external hazards resulting from these third party activities. The protocols should also include the consideration for events at or near the site boundary area (e.g. temporary increases in population and traffic, potential external hazards and the dispatch plan of the external organizations to those hazards, etc.) so that the operating organization can provide clear guidance for the notification and implementing pre and post event actions.</p>	Consistency with paragraph 1.13.		<p>X</p> <p>Notification protocols between appropriate external organizations and the operating organization for periods of increased risks from third party activities (e.g. rally groups, demonstrations, etc.) should be considered crucial and established in advance. These protocols should allow timely preparation to be taken by the plant organization to mitigate potential external hazards resulting from these third party activities. The protocols should also include the consideration <u>The operating organization should establish effective notification protocols between external organizations in advance, by considering</u> for events at or near the site boundary area (e.g. temporary increases in population and traffic, potential external hazards and the dispatch plan of the external organizations to those hazards, <u>and third-party activities such as rally groups or demonstrations etc.</u>) so that the operating organization The effective notification protocol <u>can provide clear guidance for the notification and implementing both the operating organization and the external organizations to implement pre- and post-event actions.</u></p>		The paragraph 5.4 is modified by deleting inappropriate texts which gives wrong intention that the third party activities are the hazard itself, and by moderating the expression.

DS503 Protection against Internal and External Hazards in the Operation of NPP

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer:		Page.... of....					
Country/Organization: P.R.China , China Institute for Radiation Protection							
Date: July 30, 2020							
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1	Table of Contents	Change "APPPENDIX A" to " APPENDIX A ", change "APPPENDIX B" to " APPENDIX B ", and change "APPPENDIX C" to " APPENDIX C ".	Spelling mistakes	X			
2	6. Combination of hazards	It is recommended to add the related content below: “6.10. Based on the historical data of internal and external hazards such as earthquakes, fires, weather, etc. at the location of the power plant, sort them according to their frequency or probability, filter out specific local common hazards combination according to the sorting situation, and establish mitigation measures and response strategies in advance.”	It is impossible to predict all the harm combinations, it should be targeted.			X	The hazards which the operating organization is defined in design phase and the recommended contents is out of the scope of this guide. See para 6.3.
3	10. Exercises and drills	It is recommended to add the relevant content below: "10.12. Conduct exercises or drills against common local hazards combination regularly."	Feedback from the Fukushima nuclear accident.			X	In this guide, “Hazards” includes their combination as defined in para 2.1.

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COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: France Page.1 of. 1 Country/Organization: France Date: 29/07/20							
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1	5.14	Add “ including Missiles and Shockwaves ” to the bullet point “External explosions”	To be consistent with appendix B		X - Seismic hazards - External floods (storm surges and tsunamis) - External floods (flooding of rivers and streams, and floods due to extreme precipitation events) - Extreme winds including...Typhoons) - Other extreme meteorological conditions (including...temperatures) - Volcanism - External fire - External explosions - Toxic, radioactive, flammable, corrosive and asphyxiant chemicals, and their mixtures in air and liquids - Aircraft crash - Electromagnetic interference (including Solar Storm). - Biological phenomena - Hazards by floating objects and hazardous liquid on water intakes and components of the ultimate heat sink - Other site specific or design specific external hazard as appropriate The sub-section titles of Appendix (A and) B and their orders were also corrected to be compatible as in 5.13. And the details of the hazard, expressed in brackets, are expressed in the paragraphs within each sub-section to be consistent with DS498. The external explosions are following; B.8. EXTERNAL EXPLOSIONS including... Shockwaves B.8.1. The recommendation in par. B.7.1 for communication with off-site organizations for external fires should also be considered for explosions. B.8.2. In case of a notification of potential off-site explosions or shockwaves, heat flux, smoke and heated gases, ground and other vibratory motions resulting, blast and missiles from the explosions, the operating organization should consider notifying the on-site fire brigade and emergency response personnel of the potential hazard.		The 5.13 and appendix are modified to be consistent with appendix B and also the list in the latest draft of the Safety Guide (DS498) “Design of Nuclear Installations against External Events Excluding Earthquakes”.
2	9.3	Operability requirements should be set the exploitation conditions of these hazard protection measures. If the protection measures are associated in the safety analysis, the operability requirement should be in accordance with the results or assumptions of the analysis.			X The operating organization Operability requirements should be set the exploitation conditions of these hazard protection measures <u>in their operability requirements.</u>		The first sentence of is modified to identify a responsible party for the recommendations.