NST067 // DS533 Management of the interfaces between safety and nuclear security

COMMENTS BY REVIEWER					RESOLUTION			
Reviewer: Country/Organization: Compilation			Page.... of.... Date: 2021-10-27					
Comment No.	Country/Org	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification /rejection
1.	Iraq	4 line 10	The target audience of this publication are regulatory bodies and other competent authorities, as well as operators of facilities and activities (including shippers and carriers) involved in the management or regulation of the safety and nuclear security of all facilities and activities and the general public who may be exposed to radiation directly or indirectly .and emergency planning and response agencies	add			X	This guide includes technical informati on. It is not for the general public.
2.	Iran	General comment	An example, footnote for "other competent authorities" "According to IAEA Security Glossary, competent authorities may include regulatory bodies, law enforcement, customs and border control, intelligence and security agencies or health agencies, etc. In this document, the term "other competent authorities" refers to all these authorities except regulatory body."	Differences in used terms and their definitions between safety and security make some problems. For example, the terms "regulatory body" for those who are working in the field of safety and "competent authority" for those who are working in the field of security are well known. But "other competent authorities" in "regulatory body and other competent authorities" makes	X			

				confusion for those who are working on safety. It is suggested for these cases provide the explanation as the footnote.				
3.	Iran	Proposed title	"Management of the interfaces between nuclear safety and nuclear security" or "Management of the interfaces between safety and ~~**nuclear**~~ security" Proposed footnote: "In this document, the 'nuclear safety' is abbreviated to 'safety'."	IAEA Safety Glossary (Terminology Used in **Nuclear Safety** and Radiation Protection 2018 Edition) on page 2 states: "'Nuclear safety' is **usually** abbreviated to 'safety' in IAEA publications. In **IAEA safety standards,** 'safety' means 'nuclear safety' unless otherwise stated." The title of the document should be clear. Also 'nuclear security' is usually abbreviated to 'security, for example in NSS. No. 14 or INSAG 24 (**The Interface Between Safety and Security at Nuclear Power Plants).** Please replace the term 'safety' with 'nuclear safety' in the title and provide explanation for 'safety' as a footnote in the document.			X	Safety covers nuclear safety and radiation safety as well.
4.	Iran	5. Scope/ Second line	"…for operators of facilities and activities (including shippers and carriers) on management of the …"	According to the paragraph above scope.		X including transport		
5.	Iran	5. Scope/ third line	"…at all stages of the lifetime of all facilities and the duration of activities…"	Considering the definition of 'lifetime' in IAEA Safety Glossary, using this term for	X			

				activities needs clarification. The proposed sentence is chosen from GSR Part 1 (Rev.1) and GSR Part 2 that is in line with the definition of 'lifetime' in IAEA Safety Glossary.				
6.	Iran	5. Scope	"…activities, for all operational states and for accident conditions, and in a nuclear or radiological emergency. And for nuclear and other radioactive material out of regulatory control. "	More clarification is needed. It is not clear this guide covers **all operational states, accident conditions and a nuclear or radiological emergency** too or it only covers **all operational states.** If this guide is not covers accident conditions and emergencies, it is suggested to extend the scope and include these topics.	X			
7.	Iran	5. Scope	"…material out of regulatory control. The lifetime of a facility includes its siting and site evaluation, design, construction, commissioning, operation and decommissioning (or closure and the post-closure period, including any subsequent period of institutional control), until its release from regulatory control."	Please provide a clear explanation about the lifetime of facilities. The stages of lifetime of facilities in **GSR Part 2** and **IAEA Nuclear Security Series No. 35-G** are not the same. The proposed text is from GSR Part 2.		X at all stages of the lifetime and operational conditions.. the duration of..		
8.	Iran	7. Overview/ 2.4	"2.4. Importance of the ~~**proper**~~ management of the interfaces between safety and nuclear security"	It is better to explain about the importance of the management first. In addition detailed criteria should be defined to assist in assessing compliance with principles, requirements and recommendations (to judge	X			

				about the management and if it is proper or not)				
9.	Iran	7. Overview/ 2.4	Add another subsection with the following title: "2.5 Criteria for judging the management of the interfaces between safety and nuclear security"	If the above mentioned comment is not accepted, it is suggested to add another subsection with the proposed title to make the criteria for judging the management clear.		X Detailed proposals on the ToC will be discussed during CM#1		
10.	Ukraine		Add a reference to the Convention on the Physical Protection of Nuclear Material with Amendment to the list of documents in Chapter 6.	CPPNM&A is the basic international instrument for implementation of physical protection regime and, consequently, for nuclear security. The Amendment contains Fundamental Principles of Physical Protection, on which the entire legal framework of nuclear security is founded. These Principles are allied with Fundamental Safety Principles, indicated in the first line of Chapter 6. Display of interference between the two sets of Principles may be	X			

				substantial for interface identification.				
11.	ENISS	Page 2; 6. PLACE IN THE OVERALL STRUCTURE OF THE RELEVANT SERIES AND INTERFACES WITH EXISTING AND/OR PLANNED PUBLICATIONS	6. PLACE IN THE OVERALL STRUCTURE OF THE RELEVANT SERIES AND INTERFACES WITH EXISTING AND/OR PLANNED PUBLICATIONS:	Page 2; 6. PLACE IN THE OVERALL STRUCTURE OF THE RELEVANT SERIES AND INTERFACES WITH EXISTING AND/OR PLANNED PUBLICATIONS	X			
12.	ENISS	Page 5, 8. PRODUCTION SCHEDULE	Please check dates of STEP 4 and STEP 5.	While STEP 4: Approval of DPP by the CSS in consultation with NSGC 2021 is scheduled in Q4, STEP 5: Preparing the draft starts in 2023 Q2. It	X			

				seems that there is no activity in 2022?				
13.	USA	Page 2/ Para 1/ Line 3	"…therefore, there is a need for further guidance on [how to] meeting the safety requirements established in the IAEA Safety Standards Series and the recommendations established in the IAEA Nuclear Security Series [in a harmonized, holistic and complementary manner]."	To make the purpose and the gap that this document will fill clearer.	X			
14.	USA	Page 2/ Para 5/ Lines 1-3 4. Objective	"The objective of the publication is to [distinguish the objectives and measures associated with safety and security and] provide overarching guidance on managing the interfaces between safety and security so as to ensure that safety measures and security measures are designed and implemented in an integrated manner."	Recommend highlighting the differing objectives and measures for safety and security to ensure that Member States have a consistent understanding of each.	X			
15.	USA	Page 2/ Para 6/ Lines 3-4 4. Objective	"…involved in the management or regulation of the safety and nuclear security of all facilities and activities, including ~~.and~~ emergency planning and response ~~agencies~~."	As written, it is a little unclear whether emergency planning and response agencies are another audience or an activity. Given that response agencies would likely fall under the category of	X			

				competent authorities, then assuming this is an additional activity/role.				
16.	USA	6. PLACE IN THE OVERALL STRUCTURE OF THE RELEVANT SERIES AND INTERFACES WITH EXISTING AND/OR PLANNED PUBLICATIONS	Add NSS 42-G and NSS 17-T (Rev 1) – Computer Security for Nuclear Security and Computer Security Techniques for Nuclear Facilities technical guidance – both of which discuss the safety - (computer) security interface.	Recommend adding language that addresses computer security because Section 6 does not include either of the newly released guidance documents on Computer Security for Nuclear Security.	X			
17.	USA	Page 4 7. Overview/ 2.3	"2.3. National legislative and regulatory framework for managing the interfaces between safety and nuclear security" should be its own separate section after the intro section. It could then include related/associated roles and responsibilities from now Section 3 as sub-items.	Recommend this topic needs its own space, and sequence is suggested in consideration of a flow from laws and regulations (broad) to their implementers who are managing work and interfaces daily (narrower).	X			
18.	USA	Page 4 7. Overview/ 4	Configuration management should be addressed in the draft document, perhaps in Section 4 (Implementation		X			

			of technical requirements and recommendations).					
19.	USA	Page 5 8. Production Schedule	Steps 5-14 seem to skip a year (2022), so we recommend revising to account for 2022 within the schedule.		X			
20.	Norway	General		The DPP is very general and the scope is very broad, including all areas in which safety–security interfaces may arise. This might be different for the various nuclear facilities. The general principles and approaches need to be considered for the whole scope.	X			
21.	Norway	4. Objective General comment	The objective of the publication is to provide overarching guidance on managing the interfaces between safety and security **and where applicable safeguards**,….	The DPP should address the interface of safety and security towards safeguards where it is applicable.			X	Safeguards is out of scope
22.	Norway	5. Scope	The Guide will focus on general approaches for managing interfaces. It will address interfaces that are common to different areas of safety and security if these are not already addressed in safety standards and	Specific interfaces are already addressed, or should be addressed, in relevant safety standards and nuclear security guidance, and detailed	X			

			nuclear security guidance. [It will not address in detail interfaces that are specific to particular areas of safety and security.] OR [Examples of interfaces that are specific to particular areas of safety and security will be discussed in an Annex.]	consideration of these in this Guide would create a risk of inconsistency. If there are interfaces that are common to different areas, then it may be appropriate to address them here. More specific interfaces may be mentioned as examples, but not addressed in detail.				
23.	Norway	7 Overview		Depending on the scope (addressed in the comment above), some more details about Chapter 4 should be indicated. It could potentially be a very large chapter.		X Specific details of the ToC will be discussed in CM#1		
24.	Norway	7 Overview		Chapter 2.4 in the Overview is about the "Importance of the proper management of the interfaces between safety and nuclear security". This should be addressed in the Background and Objective, so it is not clear if a specific chapter is needed for this.		X Specific details of the ToC will be discussed in CM#1	X	Other opinions highlighted its importnace

25.	Finland	General	The DPP on a serial interface management publication is welcome.	General comment on the DPP.	X			
26.	Finland	2. Background, para 3, page 1-2	Feedback from different IAEA conferences, technical meetings [(in particular the IAEA Technical Meeting on the Safety and Security Interface – Approaches and National Experiences, held in Vienna in 2018)], IAEA peer review missions, training courses and workshops have highlighted the importance of interface management in order to take advantage of the synergies and to avoid adverse effects of potential conflicts ~~that in many regulatory bodies and other competent authorities, operators, shippers and carriers there are different approaches to managing the interfaces between safety and security of nuclear and other radioactive material and in facilities and activities~~, and therefore there is a need for further guidance on meeting the safety requirements established in the IAEA Safety Standards Series and the recommendations established in the IAEA Nuclear Security Series.	Different approaches are not necessarily a bad thing. If there are gaps in the approaches, that is another matter.	X			
27.	Finland	4. Objective, para 1, page 2.	The objective of the publication is to provide overarching guidance on managing the interfaces between safety and security so as to ensure that safety measures and security measures are designed and implemented in an integrated manner. This will facilitate improved/more effective and	A slightly more ambitious objective setting is suggested (with some alternative wording options indicated).	X			

			efficient/… implementation of the relevant safety requirements of the IAEA Safety Standards Series and recommendations of the IAEA Nuclear Security Series.					
28.	Finland	6. PLACE IN THE OVERALL STRUCTURE OF THE RELEVANT SERIES AND INTERFACES WITH EXISTING AND/OR PLANNED PUBLICATIONS	Please add SSR-1 ”Site Evaluation for Nuclear Installations” to the list of interfacing IAEA safety standards.		X			
29.	Finland	6. PLACE IN THE OVERALL STRUCTURE OF THE RELEVANT SERIES AND INTERFACES WITH EXISTING AND/OR PLANNED	Please add GSR Part 4 ”Safety Assessment for Facilities and Activities” to the list of interfacing IAEA safety standards.		X			

		PUBLICATIONS						
30.	Finland	7. Overview, tentative table of contents	We suggest keeping in mind and addressing the topics listed by NSGC Working Group and presented in NSGC#15 (adapted and rearranged here): - Similarities and differences - Recommendations about leadership, organisation, management and culture - Certain key areas: – Information Security including Computer Security – Design – Classification of Systems, Structures and Components – Personnel Security – Physical Protection – Change Management – Detection and Response	To take advantage of progress made so far, and to add substance (although each area is not expected to include much text).		X Specific details of the ToC will be discussed in CM#1		
31.	Finland	7. Overview, tentative table of contents	Clarify/elaborate, what kind of content is intended for present Chapters 2.1 "Identification…" and 2.2 "Requirements and recommendations…" as well as Chapter 4. "Implementation of the technical requirements and recommendations".	For clarity and to enable comments by the Committees on the DPP. An overarching, generic approach is suggested, instead of guidance (only) on topics presently flagged in existing publications.		X Specific details of the ToC will be discussed in CM#1		

32.	Finland	7. Overview, tentative table of contents	Move Chapter 2.4 “Importance of the proper management of the interfaces between safety and nuclear security” towards the beginning in the table of contents or include in 1.1 Background.	It seems that this motivating chapter/text should appear early in the publication.	X			
33.	Finland	7. Overview, tentative table of contents	Consider whether Chapter 3. “Roles and responsibilities…” is necessary (in this extent).	Roles of the regulator and the operator are the same as ever – oversight and implementation, respectively. Or are there significant differences found in this regard in interface management? The Coordination Sub-Chapter 3.1.3, however, may deserve explicit attention. The present tentative table of contents risks the publication to appear “[top]heavy”. Could we include the different levels of interface management, including coordination, in the present Sub-Chapter 2.3 National…framework and delete present Chapter 3, to fix that?		X Specific details of the ToC will be discussed in CM#1		
34.	Finland	7. Overview, tentative table of contents	Present Sub-Chapter 3.3 may necessarily not fit under “Roles and responsibilities…”.	This depends on the final approach, considering also the comments above, and other comments from the Committees. It might fit under Chapter 4.		X Specific details of the ToC will be discussed in CM#1		

				Implementation…before the more technical areas of interface management implementation (some of which are identified in the comments above).				
35.	USA	7.3	3.4. Coordinated command and control interfaces and communications (interoperability).	In addition to the roles and responsibilities in the management of interfaces listed in this section, there needs to be a discussion on how to address coordinated command and control interfaces and communications. This will ensure a more efficient and effective interface between safety and security.	X			
36.	Australia	Section 7 Proposed Section 3.1, 3.1.2, 3.1.3	The current text refers to the "roles and responsibilities of the regulatory body and other competent authorities." We would suggest that the word "competent authorities" is replaced by "governmental authorities" (or similar).	We agree that defining roles and responsibilities is important, however the definition of "competent authority" differs between the safety and security glossaries. For the Safety glossary, competent authority actually refers to the regulatory body, so		Further discussion will be made during CM#1		

				most of the titles for the proposed Section 3.1 do not make sense.				
37.	Australia	Section 7 Proposed Additional Section 3.1.4	Proposed addition: 3.1.4 Coordination between the regulatory body and emergency responders	There is a gap between coordination with first response agencies. These are not included as 'competent authorities' in the safety or security glossaries.		Further discussion will be made during CM#1		
38.	France	4	The objective of the document should be clarified: • The objective is to provide a guidance but the corresponding requirement that need guidance are not identified (section 1 remains quite genral). SPESS B indicates that the gap analysis report should be attached for a new publication. Could this gap analysis be provided? • Is the objective related to "managing the interfaces…" or "how to address the safety security interfaces" (as quoted for CSS in section 3) or "interfaces" in general (as mentioned for the title of 2.2 in section 7? • does "management" mean "consideration in the "management system" (management system is defined in the IAEA safety glossary)? If yes, please consider			Several changes were made in the objective.		

			using these terms; if not please consider complementary explanations					
39.	France	3, 4, 7	"regulatory bodies and other competent authorities" need complementary explanations to ensure consistency with glossaries	According to IAEA safety glossary, it seems that regulatory bodies include competent authorities. According to IAEA security glossary, it seems that competent authorities include regulatory bodies		Further discussion will be made during CM#1		
40.	France	7	Draft structure to be discussed after clarification of the objective			X Specific details of the ToC will be discussed in CM#1		
41.	France	7	~~National legislative and~~ regulatory framework…	Legislative decisions cannot be guided by external recommendations			X	Legislative framework is within the scope of safety and security publications
42.	Belgium	§6	Another useful reference (although not IAEA) is the WENRA Document "Interfaces between Nuclear Safety and Nuclear Security" of 10 April 2019.		X			
43.	Belgium	§7	Proposals for the substructure of this section could be:			X Specific details of the		

			- Different stages of the life time of the installation (siting, design, construction, commissioning, operation, shutdown, decommissioning - Different type of materials (nuclear, radioactive, whether or not under regulatory control - Difference in the type of installation (NPP, research reactor, fuel cycle facilities, …)			ToC will be discussed in CM#1		
44.	Germany	Page 4 7.OVERVIEW Para.4.1 New issue	<u>Communication, Transparency and Confidentiality</u>	Please add the following issue (see report published by WENRA[1]). Transparency and confidentiality are issues when communicating where nuclear safety and nuclear security have differences. Nevertheless, exchanging information is important to improve nuclear safety as well as nuclear security.		X Specific details of the ToC will be discussed in CM#1		
45.	Germany	Page 4 7.OVERVIEW Para.4.2	<u>Independent Assurance and Oversight Functions</u>	Please add the following issue (see report published by WENRA[1]). A process for the independent assurance		X Specific details of the ToC will be		

[1] WENRA, Report Interfaces between Nuclear Safety and Nuclear Security, 10 April 2019

		New issue		and oversight functions should be in place and it should include means to identify and resolve any conflicts between nuclear safety and nuclear security.		discussed in CM#1		
46.	Germany	Page 4 7.OVERVIEW Para.4.3 New issue	Integrated Management System	Please add the following issue (see report published by WENRA[1]). The management system should include all the elements of management to ensure processes and activities that may affect the way nuclear safety or nuclear security are addressed in an integrated manner.		X Specific details of the ToC will be discussed in CM#1		
47.	Germany	Page 4 7.OVERVIEW Para.4.4 New issue	Organizational Culture	Please add the following issue (see report published by WENRA[1]). There are differences between nuclear safety and nuclear security in regards of focus, approaches and language used. This is partly explained by the difference in technical training and professional experiences that exists amongst the experts in the two disciplines. In this context, the creation		X Specific details of the ToC will be discussed in CM#1		

				of a common understanding of the interfaces between nuclear safety and nuclear security is essential.				
48.	Germany	Page 4 7.OVERVIEW Para.4.5 New issue	<u>Staff Qualification and Training</u>	Please add the following issue (see report published by WENRA[1]). All personnel should be suitably qualified and experienced to comply with relevant aspects of both nuclear safety and nuclear security regimes. Roles, responsibilities and accountability for each level of the organization should be clearly defined and supported by effective training.		X Specific details of the ToC will be discussed in CM#1		
49.	Germany	Page 4 7.OVERVIEW Para.4.6 New issue	<u>Site Area</u>	Please add the following issue (see report published by WENRA[1]). Selection and design of the site area of a nuclear power plant has implications for nuclear safety as well as nuclear security.		X Specific details of the ToC will be discussed in CM#1		
50.	Germany	Page 4 7.OVERVIEW	<u>Requirements for Safety and Security Measures</u>	Please add the following issue (see report published by WENRA[1]).		X Specific details of the ToC will be		

		Para.4.7 New issue		Previously the design of nuclear power plants focused mainly on nuclear safety aspects. Nuclear security was generally addressed as a separate topic. However, nuclear safety provisions alone will not always be sufficient to ensure that possible consequences of malicious acts are mitigated. A 'security by design' philosophy should be adopted to ensure security measures are considered and implemented at the earliest stages of design or plant modification to avoid post design security modifications and ensure there is no conflict with safety requirements.		discussed in CM#1		
51.	Germany	Page 4 7.OVERVIEW Para.4.8 New issue	<u>Requirements for IT-Systems related to Nuclear Safety and Nuclear Security</u>	Please add the following issue (see report published by WENRA[1]). I&C specialist should work together with cyber security specialists to create a common understanding and ensure the technology is resilient		X Specific details of the ToC will be discussed in CM#1		

				to cyber security incidents.				
52.	Germany	Page 4 7.OVERVIEW Para.4.9 New issue	Systems, Structures and Components	Please add the following issue (see report published by WENRA[1]). The classification of systems, structures and components (SSCs) associated with nuclear safety or nuclear security should be based on the potential safety and security significance of these SSCs. Due account should be taken of the need for nuclear security SSCs and components to be designed to be inherently secure or to fail in a secure manner where it does not impact on nuclear safety.		X Specific details of the ToC will be discussed in CM#1		
53.	Germany	Page 4 7.OVERVIEW Para.4.10 New issue	Feedback from Operating Experience and Plant Modification	Please add the following issue (see report published by WENRA[1]). Joint evaluation programs between nuclear safety and nuclear security personnel should be performed. The processes applicable for modifications should		X Specific details of the ToC will be discussed in CM#1		

				ensure that modifications of SSCs related to nuclear safety do not impair SSCs related to nuclear security and vice versa. This requires close engagement at all stages of the modification process of both nuclear safety and nuclear security personnel.				
54.	Germany	Page 4 7.OVERVIEW Para.4.11 New issue	<u>On-site Emergency Response</u>	Please add the following issue (see report published by WENRA[1]). A nuclear security event may impact on nuclear safety and vice versa. Additionally, the cause of a safety related event may not be immediately identifiable (malicious activity should be considered). Joint exercises should be organized and conducted to confirm the coordination among all organizations involved.		X Specific details of the ToC will be discussed in CM#1		
55.	Germany	Page 4 7.OVERVIEW Para.4.12 New issue	<u>Zones, Access and Escape Route</u>	Please add the following issue (see report published by WENRA[1]). Design of zones, access and escape routes of a nuclear power plant has implications for nuclear		X Specific details of the ToC will be discussed in CM#1		

				safety as well as nuclear security. Solutions should be found to achieve the two aims.				
56.	Germany	Page 4 7.OVERVIEW Para.4.13 New issue	<u>Regulatory Framework</u>	Please add the following issue (see report published by WENRA[1]). The legal and regulatory framework should not only define the responsibilities of several organizations: the State, the competent authorities, and the operating organizations, but define the requirements to be satisfied by the licensee for both nuclear safety and nuclear security taking relevant interface issues into account, verify them, set up and implement a licensing system, an inspection and enforcement system etc.		X Specific details of the ToC will be discussed in CM#1		
57.	Pakistan	7/ Overview 2. Considerations for management of the interfaces between	Considerations for management of the interfaces between safety and nuclear security may separately address the following: • Identification of activities where safety security interfaces are synergic	To highlight the two different aspects of safety security interfaces and considerations for management of the same. For management of interfaces, challenges	X			

		safety and nuclear security	• Identification of activities where safety security interfaces are challenging	should be resolved and synergies should be developed.				
58.	Pakistan	7/ Overview 2.1 Identification of interfaces between safety and nuclear security	This content may split in further sub-contents as under: • Identification of safety interfaces with security • Identification of security interfaces with safety	How safety should be considered in implementation of security and how security should be considered in implementation of safety should have equal weightage and consideration in management of interfaces.	X			
59.	Pakistan	7/ Overview	The contents may include coordination and interfaces in the activities of Safety Control Room and Security control room.	Any security event could have safety implications as well and vice versa. The necessary coordination and interfaces in handling of such event through respective controls room should be identified and resolved.		X Specific details of the ToC will be discussed in CM#1		
60.	Pakistan	7/ Overview	The contents may include Demonstration and assessment of Safety- Security interfaces including joint safety-security exercises.	The joint exercises may lead to identification of unidentified interfaces between safety and nuclear security.		X Specific details of the ToC will be discussed in CM#1		

61.	Pakistan	6	IAEA TECDOC "Safety and Security Interfaces in the Regulatory Infrastructure for the Oversight of Nuclear Power Plants" which is currently in the process of publication may be added in the list of existing and / or planned publications.	Section 6 may be updated to reflect the planned publication.	X			
62.	Pakistan	6	Section 6 is not covering some of the important nuclear security series documents which has interface with nuclear safety, It is proposed to include the following in that list: • INTERNATIONAL ATOMIC ENERGY AGENCY, Establishing the Nuclear Security Infrastructure for a Nuclear Power Programme, IAEA Nuclear security Series No. 19, IAEA Vienna. • INTERNATIONAL ATOMIC ENERGY AGENCY, Physical Protection of Nuclear Material and Nuclear Facilities (Implementation of INFCIRC/225/Rev.5), IAEA Nuclear Security Series No. 27-G, Vienna (2018) • INTERNATIONAL ATOMIC ENERGY AGENCY, Security During the Lifetime of a Nuclear Facility, IAEA Nuclear	Section 6 may be updated to reflect some of the important nuclear security series publications which deals with safety and security interface.	X			

			Security Series No. 35-G, Vienna (2019)					
63.	Russian Federation	General	Russian Federation consider current draft DPP premature. The main purpose of the document is not clear. Scope is too broad and tentative table of contents is very limited.	Russian Federation requests consultancy meeting to discuss the possible content of a joint document (as per **NSGC decision 16.2**). This meeting will provide understanding of the main purpose (then DDP could be reviewed accordingly) and relevance/ usefulness of the joint publication. It might be more useful to develop NSS document covering more areas of safety-security interface with cross-reference to Safety Series.			X	The DPP was prepared based on the decision an guidance of the DDG
64.	Russian Federation	Page 2, paragraph 3, sentence 2	The Nuclear Security Guidance Committee (NSGC), at its 16th meeting, **expressed its wish "to explore the possibility of** ~~requested the development of~~ "a jointly-published Safety Standard – Nuclear Security Series document on the subject of safety-security interfaces, in accordance with respective procedures, …[of] high-level, strategic and have a tight focus."	Text in draft DPP reflects the **NSGC decision 16.2** incorrectly. NSGC has not requested development of a joint document yet.	X			
65.	United Kingdom	Section 1. Identification	Review title as appropriate	Simply saying safety (and not nuclear safety) seems inconsistent with saying nuclear security.			X	Safety covers both nuclear

				The 2018 Safety glossary does say that both nuclear safety and nuclear security will often be abbreviated in IAEA publications to safety and security, but why do one and not the other?				safety and radiation safety
66.	United Kingdom	Section 3. Justification	New text in the first paragraph of 3., not to replace existing text. "When the interfaces between nuclear safety and security are managed effectively and proactively this can have a very positive effect on both functions, enabling synergies and efficiencies."	In the UK's opinion the extant text does not give a strong enough positive sense of what can be achieved by effectively managing the interfaces.	X			
67.	United Kingdom	Section 4. Objective	The objective of the publication is to provide overarching guidance on managing the interfaces between safety and security so as to ensure that safety measures and security measures are designed and implemented in an integrated and graded manner	If the intention of this publication is to cover a wide range of facilities and activities, it is suggested that an expectation of a graded approach is followed should be clearly stated (in addition to the brief mention provided in Section 7, item 2.5).	X			
68.	United Kingdom	Section 5. Scope	Expand scope section as appropriate to be clear on what facilities and activities are intended to be within scope, or give a reference	If the title of the guide is intended to "nuclear safety and nuclear security", it may infer a scope limitation for some	X			

				readers to nuclear installations. The 2018 safety glossary provides a very specific and detailed definition of "facilities and activities" with reference to SF-1. There is no indication to the general reader that "facilities and activities" is being used in this DPP to establish the scope. The proposal is either to define the full scope in Section 5, or at least point the reader to the definition in the safety glossary.				
69.	United Kingdom	Section 7. Overview	Sub section 2.4 (Importance of the proper management) should move up the list to come before or after section 2.1.	Clearly establishing the importance early on in the document sets the tone for the next sub sections	X			
70.	United Kingdom	Section 7. Overview	In Section 4 remove the word "requirements"	This is not appropriate in a security context where sovereignty is important	X			
71.	Japan	Para3/ Line 1-2, 3. Justification	Add some explanation about the AdSec - INSAG joint publication on safety-security interface and the relation between AdSec - INSAG publication and NSGC-NSS publication.	It would be reader friendly to explain the difference of objectives and the relation between two publications.			X	Not published yet
72.	France	Identification /Title	Proposed Title: Management of the interfaces between nuclear safety and nuclear security	For consistency.			X	Safety includes nuclear safety and

								radiation safety
73.	France	Para 3		It could be added in the justification a reminder of the similar objectives of safety and security to protect environment and population.		X In background		
74.	France	Para 4/line 3	The objective of the publication is to provide overarching guidance on managing the interfaces between safety and security so as to ensure that safety measures and security measures are designed and implemented in ~~an integrated~~ a coordinated manner.	Replace *integrated* by *coordinated*. The use of *integrated* seems a limitation to the different ways to implement interfaces. The wording *coordinated* is more general, hence gives more flexibility.	X			
75.	France	Para 5/scope		The scope indicates "operators of facilities and activities". Is transport included in activities?	X			
76.	France	Para 7	Redraft the overview to clearly indicates the areas for guidance.	It seems that the different topics that will be considered for guidance are in chapter 2. "Considerations for management of the interfaces between safety and nuclear security". The wording "considerations" is too vague.		X Specific details of the ToC will be discussed in CM#1		
77.	France	Para7/2.2	Requirements and recommendations on the management of interfaces between safety and security	Addition of " management of" in order to be consistent with the objective of the publication	X			

78.	France	Para7/2.2	~~Requirements and recommendations~~ Guidance on the management of interfaces between safety and security	There are no requirements and recommendations in a technical guidance. Consider using 2.2 as the title of paragraph 2.	X			
79.	France	Para 4/3.3	~~Integrated~~ management system	Delete integrated to give more flexibility for the implementation of the management system		X Specific details of the ToC will be discussed in CM#1		
80.	France	Para 8	The process as described in the table is not clear. The meaning of the shaded areas in column B is not clear despite the note below the table. Does it mean that as we use a "fast track" and that NSGC will not have the opportunity to review the document at step 7? If that is the case, no substantive comment could be made.	The approval process between safety and security is not balanced. The consultation of NSGC at step 11 allows only editorial comments. Furthermore, the aim of the "fast track" procedure is to speed-up the publication of a given Guidance. This is not the case here, where the publication is scheduled for 2025.		X NSGC will act twice once at the level of the review committees, once with CSS		
81.	France	Para 8/4.	Implementation of technical guidance ~~requirements and recommendations~~	There are no requirement and recommendation in a technical guidance	X			