Periodic safety review for nuclear power plants (Revision of SSG-25)

COMMENTS BY REVIEWER Reviewer: Page.... of.... Country/Organization: IRAN/ National Radiation Department of Iran Nuclear Regulatory Authority (INRA) Date: 2022-04-25				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1	2.Background/First paragraph/ Third line	"…their ~~operational~~ operating lifetime."	According to the used term in SSR-2/2 and IAEA Safety Glossary.	X			
2	7. OVERVIEW/ Bullet 7 (Chapter 7)	As an example: "7. SAFETY FACTORS IN A PERIODIC SAFETY REVIEW - Safety factors relating to… - Safety factors relating to…"	First paragraph of Scope states: "The anticipated revisions concern namely Section 3 (Input from the periodic safety review in assessing long term operation or licence renewal), **Section 5 (Safety factors in a PSR)** and Section 6 (Global assessment)." For the revision of Section 3 and 6, some suggestions have been provided. But for section 5 it is not clear what the suggestions are. Please provide some details for this section in the DPP too.	X			
3	7. OVERVIEW/ Bullet 7 (Chapter 7)	One of the safety factors is" "**Emergency plan** **"**	One of the safety factors in this chapter should be emergency plan.			X	Already within the scope of SF13 on Emergency Planning

{* Periodic safety review for nuclear power plants *(DS535)}

COMMENTS BY REVIEWER Reviewer: DOE Country/Organization: USA			Page 1 of 1 Date: 4/26/2022	RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1	5. Scope section, or 2. Background (where most appropriate)	"The document will address, as necessary, consideration of interfaces between safety and security."	Too early in the process to exclude the possibility of interfaces that should be considered. The current SSG-25 addresses the relationship with physical security reviews.		X "The document will also address, as necessary, consideration of interfaces between safety, security, and safeguards according to the Requirement 8 of the SSR-2/1 (Rev. 1)."		To specify the extent of the interface considerations and to accommodate comments from NUSSC Members.

MS	Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
Belgium – FANC/Bel V	**1**	**7 Overview**		The fact that the PSR could result in a negative decision should be explicitly considered.There should be some guidance on how to deal with a negative conclusion of the PSR. It could happen that the gaps are too important to be solved with "reasonably feasible measures" and too important to continue the operation of the NPP for 10 years more.These gaps could be in relation with the current design of the NPPs but also regarding "current standards and practices" for which it is considered that they must be fulfilled to reach an acceptable level of safety today.Do we need criteria or guideline defined in advance to determine the acceptable level of safety? How/by whom are they developed?...This question is applicable for any PSR but is very important in the framework of a LTO-PSRThis topic is probably implicitly addressed in section 2-8-9 of the guide but could be made more explicit			**X**	These considerations are implicitly addressed in the Section 8 with the methodology how to elaborate the Global Assessment and how to develop and justify the Safety Improvement Plan to substantiate the suitability of the plant for continuous operation. In the context of LTO consideration, this issue is implicitly addressed in the chapter 9. It the end, the final decision-making process, due account of financial aspects will be taken into consideration, however, these considerations are out of scope of this safety guide. Therefore, it is not possible to outline explicit criteria as they are specific for Member States, rather to outline the methods to be following to develop the safety insights for the final decision-making that goes beyond the pure PSR assessments.
Belgium – FANC/Bel V	**2**			Some countries require also a PSR for NPPs that will be definitively shutdown on a short term after the PSR. This case should be addressed as well:How can the scope be adapted to fit/be useful in that framework?		**X**		For plants that will be permanently shutdown shortly after the last PSR, the extent of the PSR assessment should be the same, however, the short period, for which the plant will be operated after the PSR will be taken into account during the Global Assessment, development of safety improvements plan and justification for suitability of the continuous operation for this short period. It is clear that most probably only the high priority safety issues identified during the PSR should be addressed in the safety improvements plan.The revised guide will address these considerations in the Section 8.
Belgium – FANC/Bel V	**3**	**Scope**	Add a (Sub)Chapter on PSR for NPPs in permanent shutdown	At present, NPPs are being brought to permanent shutdown (for political and/or economic reasons) in several countries. Nevertheless, it is a good practice to impose also for those NPP a PSR to address global safety in their (sometimes longlasting) Post-Operational Phase. Therefore, did you consider to include a specific Chapter for PSR in a Post-Operational Phase (a chapter that would be similar as Chapter 9 for LTO) ?		**X**		New chapter included to address specifics of such consideration together with considerations for PSR for NPPs in decommissioning.
Belgium – FANC/Bel V	**4**			A guidance, as annex, on the "timely" implementation of the PSR action plan could be added	**X**			
FRANCE	**1**	**1 / 04**	However, these routine safety reviews are focused reviews and typically do not inclusively consider changes in safety standards ~~and technological developments~~, the cumulative effects of plant ageing, plant modifications, feedback of operating experience, organizational and management issues, site related aspects or developments in science and technology.	Un-necessary repetition related to technology development in line 4 and line 6.	**X**			
FRANCE	**2**	**2 / 15**	- The adequacy of the arrangements that are in place to ~~maintain~~ ensure plant safety for the next operational period;	To "maintain" suggests keeping the same safety level, which might not be consistent with the evolution of safety standards and in particular with the next bullet on possible safety improvements.	**X**			
FRANCE	**3**	**6 / 03**	The recommendations provided in SSG-25 on the conduct of a PSR need to be updated to reflect changes made to IAEA safety standards as well as the feedback received from Member States during Technical Meetings organized in the topical area of PSR for NPPs, and TSR-PSR peer-review services. ~~conducted as well as changes made to IAEA safety standards.~~	The changes to the safety standards should be considered first in the list because the other reasons (feedbacks from TMs and TSR-PSR) depend somehow on safety standards' changes.	**X**			
FRANCE	**4**	**7 / 02**	The purpose of this Safety Guide is to provide recommendations and guidance on the conduct of a PSR for an existing nuclear power plant to determine whether ~~they~~ it conforms ~~with~~ to current requirements and respective recommendations provided in existing IAEA safety standards.	It is the nuclear power plant, which needs to conform to current requirements, etc.	**X**			
FRANCE	**5**	**8 / 02**	It will revise the specific topics addressed in SSG-25 to reflect relevant changes, in particular those made to IAEA safety standards since the publication of SSG-25 in 2013.	As mentioned above in the DPP, not only changes in the IAEA safety standards are considered for the revision of SSG-25.	**X**			
FRANCE	**6**	**8 / 03**	The anticipated revisions concern ~~namely~~ in particular Section 3 (Input from the periodic safety review in assessing long term operation or licence renewal), Section 5 (Safety factors in a PSR) and Section 6 (Global assessment). Other sections, e.g. Sections 4, 7, 8 and 9 might be subject to revision, due to the change of their place in the new structure of the safety guide.	The structure of the safety guide, as given in the DPP, is significantly changed with respect to the structure of SSG-25, edition 2013. This change, which is not justified in the DPP, affects all the sections, except Sections 1 and 2. Sections 3, 4, 5, 6, 7, 8 and 9 become sections 9, 6, 7, 8, 3, 4, 5 respectively.This significant change is expected to potentially affect the revision of other sections than Sections 3, 5 and 6.	**X**			
FRANCE	**7**	**Section 6**	Please consider adding SSG-62: Design of Auxiliary Systems and Supporting Systems for Nuclear Power Plants and SSG-63: Design of Fuel Handling and Storage Systems for Nuclear Power Plants to the list of safety guides	SSG-62 and SSG-63 published in 2020 are both relevant for PSR	**X**			
FRANCE	**8**	**Section 8 (Production schedule)**	Please consider revising the date for Step 8 (that should be August 2023)	The date proposed for Step 8 does not give the time necessary for the review and comments by Member States, in view of addressing them in January 2024.		**X**		The original date 'December 2023' reflects the length of the period for the review and comments by Member States (120 days) as specified in the SPESS. However, a mistake has been found in the target dates for Step 9 and Step 10. These have been revised to facilitate the resolution of MSs' comments and CC approval to June 2024 and August 2024, respectively.
FRANCE	**9**	**Section 8 (Production schedule)**	Please clarify why Step 11 should be implemented in November 2024, while the draft safety guide would have been approved by the Coordination Committee in April 2024.	Unless there are reasons related to the meetings' dates of the other review committees, there is no need to wait for November 2024 to submit the draft safety guide to the relevant review committees.			**X**	In the updated Production Schedule, with the modified comment No. 8 addressed as explained above, the earliest meeting dates for review committees are in November 2024
GERMANY BMUV	**1**	**5 / 02**	… The anticipated revisions concern namely Section 3 (Input from the periodic safety review in assessing long term operation or licence renewal), Section 5 (Safety factors in a PSR) and Section 6 (Global assessment). With regard to LTO, the anticipated revisions specify the interfaces between PSR and LTO (SSG-25 and SSG-48).	The interfaces between PSR and ageing management should be specified more clearly in the revision of the SSG-25 in order to provide an orientation how the programmes can cooperate and how synergies can be used efficiently.		**X**		Comment accepted, text slightly modified as follows:'' With regard to LTO consideration, the anticipated revisions will address in detail the interfaces between PSR and LTO (SSG-25 and SSG-48).'
GERMANY BMUV	**2**	**7 / 18**	Identification, ~~D~~development and justification of safety improvements for the next PSR period	The need for safety improvements must first be identified.	**X**			
GERMANY BMUV	**3**	**7 / 25**	Programmes for promoting safety culture (including knowledge management) focused on the pursuit of excellence in all aspects of safety management and human factors for continued LTO	Knowledge management is an important aspect regarding LTO and should be highlighted. In addition of the transfer of the 'know how', also the 'know why' is essential if plant lifetimes extent over several generations of staff.		**X**		Comment accepted, text modified to read '…and the knowledge management…' as it is included in the title of the subsetion.
GERMANY BMUV	**4**	**7 / 27**	Identification, ~~D~~development and justification of safety improvements for long term operation	The need for safety improvements must first be identified.	**X**			
Japan	**1**	**Section 3 Justification**	Although it reflects the latest findings in the DPP, it is insufficient description in the justification of this revision because there are no specific findings. Some examples should be mentioned. Otherwise, a gap analysis among the latest SSGs and SSG-25 should be referred.	Although it reflects the latest findings in the DPP, it is insufficient description in the justification of this revision because there are no specific findings. Some examples should be mentioned. Otherwise, a gap analysis among the latest SSGs and SSG-25 should be referred.		**X**		Annex with Feedback report included in the DPP to address the comment.

Korea KINS	**1**	**4 / 24**	~~5.~~8. POST ACTIVITIES FOLLOWING PERIODIC SAFETY REVIEW	The contents to be included in '5. ACTIVITIES FOLLOWING PERIODIC SAFETY REVIEW' is unknown.If it is prepared to describe the post activities to be performed as part of PSR process, it can be included in SEC. 4, or it is desirable to move to between '8. GLOBAL ASSESSMENT IN THE PERIODIC SAFETY REVIEW' and '9. INPUT FROM THE PERIODIC SAFETY REVIEW IN ASSESSING LONG TERM OPERATION'			**X**	The content of this chapter will be the updated information from the chapter 9 'Post-Review Activities' of the SSG-25. The decision to move the chapter was made to make the safety guide structure more logical, i.e., to start first with process and programmatic description (chapter 2 - 5), following with detailed information on scope and description of PSR assessment to be performed (chapters 6 – 8), and finally with chapters on application of PSR to in specific considerations (chapter 9 – 10).
UK ONR			In general, the UK has no objections to this proposed revision as set out in the DPP. There are just two minor comments on the edges of its scope.					
UK ONR	**1**	**Section 6**	Include GSR Part 6: Decommissioning of Facilities	Some of the aspects addressed in Periodic Safety Reviews such as ageing management, modifications, actual condition of SSCs and equipment qualification are relevant to decommissioning. For example, some key components such as polar cranes are needed for decommissioning so their design and management should enable their use beyond the operational period. It is also important that operational records relevant to decommissioning are retained. The list of relevant safety guides does not include GSR Part 6 on Decommissioning of Facilities (which itself does not mention PSR). However, there would be value in demonstrating awareness of the importance of some of the content to decommissioning to provide holistic consideration of the lifecycle of a facility. GSR Part 6 states "The regulatory body shall ensure that the licensee takes decommissioning into account in the siting, design, construction, commissioning and operation of the facility". The current version of SSG-25 briefly hints at decommissioning in section 1.5 and in 5.47 (in the context of ageing).Therefore we suggest GSR Part 6 could be included in the list of relevant guides, and strengthening slightly in the new revision of the standard the need to consider decommissioning requirements in PSRs.	**X**			
UK ONR	**2**	**Section 6**	Include SSG-15: Storage of Spent Nuclear Fuel	Spent nuclear fuel is often stored on site at NPPs for extended periods of time, under the control of the operators, and therefore should be considered in PSRs.	**X**			
LIBYA	**1**	**2 / 03**	[….] these routine safety reviews are focused ~~reviews~~ and typically do not inclusively consider changes in safety standards [….]	This description is more concise when you do not repeat the noun.(Improved Clarity)			**X**	The word 'review' is kept emphasizing the statement about so called focused reviews.
LIBYA	**2**	**2 / 05**	[….] organizational and management issues, site - related aspects or developments in science and technology.	It seems that site related is missing a hyphen.(Improved Clarity)			**X**	For the term 'site related' the hyphen is not used in the IAEA Safety Standards.
LIBYA	**3**	**2 / 15**	[….] compliance with applicable standards with ~~the aim of enhancing~~ to enhance the safety of the plant by further reducing the likelihood and the potential consequences of accidents. [….]	Improved Clarity	**X**			
LIBYA	**4**	**2 / 19**	– The extent to which the (updated) licensing basis will remain valid to the next operational period,	Improved grammar	**X**			
LIBYA	**5**	**2 / 22**	It is recognized that (in some jurisdictions) the PSR is consistently used to support decision - making on periodic permission for continued operation. [….]	It seems that site related is missing a hyphen.(Improved Clarity)			**X**	For the term 'decision making' the hyphen is not used in the IAEA Safety Standards.
LIBYA	**6**	**2 / 23**	[….] the PSR can provide an evaluation of safety factors related to the operation[….]	Improved grammar	**X**			
LIBYA	**7**	**4 / 06**	This updated Safety Guide will support the implementation of the IAEA Technical Safety Review (TSR) service on the periodic safety reviews.	Improved grammar		**X**		Sentence modified to read 'This updated Safety Guide will support the implementation of the IAEA Technical Safety Review (TSR) service on the periodic safety review.'The IAEA peer-review service is titled Technical Safety Review on the Periodic Safety Review.
STUK	**1**	**General comment**	Current SSG-25 covers 14 safety factors and physical protection is out of the scope of the safety guide.Please consider including safety-security-safeguards interface in the safety factors so that this interface at NPPs is covered in all regulatory frameworks. Interface is any decision point where 3S should be considered.SSR-1/2 states that "Requirement 8: Interfaces of safety with security and safeguards Safety measures, nuclear security measures and arrangements for the State system of accounting for, and control of, nuclear material for a nuclear power plant shall be designed and implemented in an integrated manner so that they do not compromise one another."	The interdependence between information security, physical protection, safety, and safeguards is strong and these areas are also mutually supportive. The interdependence is partly due to programmable systems and general increased connectivity, in all nuclear facilities, and in novel advanced reactors in particular. Achieving the fundamental objective [to protect people, the society and the environment from harmful effects of ionizing radiation] requires a balanced, risk-informed approach (not "one S comes first" but "3S considered together"). Developing the different regimes in silos is likely to result in suboptimal effectiveness.	**X**			
STUK	**2**	**3. JUSTIFICATION FOR THE PRODUCTION OF THE PUBLICATION**	Please add some resent safety guides to the list SSG-77 Protection Against Internal and External Hazards in the Operation of Nuclear Power PlantsSSG-9 (rev.1) Seismic Hazards in Site Evaluation for Nuclear InstallationsGSG-16 Leadership, Management and Culture for Safety in Radioactive Waste ManagementSSG-69: Equipment Qualification for Nuclear Installations		**X**			
STUK	**3**	**6. PLACE IN THE OVERALL STRUCTURE OF THE RELEVANT SERIES AND INTERFACES WITH EXISTING AND/OR PLANNED PUBLICATIONS**	Please update the list.**SSG-77 Protection Against Internal and External Hazards in the Operation of Nuclear Power Plants (**DS503: Protection against Internal and External Hazards in the Operation of Nuclear Power Plants has been published as SSG-77)SSG-9 (rev.1) Seismic Hazards in Site Evaluation for Nuclear InstallationsGSG-16 Leadership, Management and Culture for Safety in Radioactive Waste Management		**X**			
USNRC	**1**	**Section 3, last paragraph**	The recommendations provided in SSG-25 on the conduct of a PSR need to be updated to reflect the feedback received from Member States during Technical Meetings organized in the topical area of PSR for NPPs and, ~~,~~ Technical Safety Review (TSR) peer-services conducted on PSR peer-review services, ~~conducted~~ as well as changes made to IAEA safety standards.	Clarity		**X**		Text of the whole paragraph modified to accommodate comments from several NUSSC Members.
USNRC	**2**	**Section 4**	This updated Safety Guide will support the implementation of the IAEA ~~Technical Safety Review (~~TSR~~)~~ service on periodic safety review.	Clarity (defined previously)	**X**			
USNRC	**3**	**Section 5**	The anticipated revisions concern namely Section 7 (Safety factors in a PSR), Section 8 (Global assessment), and Section 9 (Input from the periodic safety review in assessing long term operation or license renewal).	The description in Section 5 does not properly reflect the outline in Section 7		**X**		The text of the whole Section 5 of the DPP has been significantly modified to accommodate comments from several NUSSC Members.

USNRC	**4**	**Section 6**	This publication will potentially interface with ~~at least~~ the following IAEA Safety Standards Series publications	To provide flexibility in which other IAEA publications are cited in the revised document.	**X**			
Pakistan		**Section 2**	The adequacy of the arrangements that are in place to maintain plant safety for the next operational period or long term operation.	Scope of this document also includes LTO as mentioned in section 5.			**X**	Scope of the revision of SSG-25 is not the LTO, only how the PSR should be used in support of the LTO. The PSR itself cannot justify the full set of arrangements to be put in place to subtatiate the LTO programme of the plant. The extent of the outcomes of the PSR is always binded by the next operational period.
Pakistan	**1**	**Section 2 Paragraph 2**	[…] and technological developments are considered to provide assurance of the continued viability of the plant's licensing basis, given the cumulative aspects of emerging national and international standards, evolving regulatory requirements, plant ageing, and operating experience, technological development […]	Technological developments mentioned twice. hence need to be deleted once preferably at the end of sentence.	**X**			
Pakistan	**2**	**Section 4**	This updated Safety Guide will support the implementation of conclusions and recommendations of IAEA Technical Safety Review (TSR) service on periodic safety review to enhance and improve safety	Outcome of IAEA Technical Safety Review (TSR) service on periodic safety review mostly appears in form of conclusions and recommendations to enhance and improve safety.			**X**	The updated Safety Guide will be used as a basis document to conduct the TSR service on the periodic safety review in future. Support of the implementation of the outcomes of the TSR-PSR is rather outlined in the set of relevant safety standards used as a basis for the TSR-PSR together with the updated SSG-25.
Pakistan	**3**	**Section 5**	The anticipated revisions are mainly concerned with...	In order to make the text more meaningful and clear		**X**		Text of the whole para modified to account for several comments from NUSSC Members.
Pakistan	**4**	**Section 6**	Revision-1 of SSG-9 (Seismic Hazards in Site Evaluations for Nuclear Installations) has been published in 2022. Therefore, please mention SSG-9 (Rev. 1) instead of SSG-9.	SSG-9 has been revised in 2022.	**X**			
Pakistan	**5**	**Section 6**	Mentioned "DS503 (Protection against Internal and External Hazards in the Operation of Nuclear Power Plants)" has been finally issued in 2022 with SSG-77. Please replace DS503 with SSG-77.	SSG-77 has been issued in 2022.	**X**			
Pakistan	**6**	**Section 6**	[…] SSG-2 (Rev.1): "Deterministic Safety Analysis for NPPs" […]	Complete reference is required and same is applicable to other reference given in Section 6 of DPP.	**X**			
Pakistan	**7**	**Section 7 Para 9**	Plant programmes to support the safety factors relating to plant design, the actual condition of SSCs important to safety, equipment qualification and ageing, and status of SSCs with respect to their obsolescence	Reference SSR-2/2 (Para 4.38) and SSG-48 (Section 6); To assess long term operation of nuclear power plants, it is required to analyze the status of SSCs with respect to their obsolescence. The PSR should discuss the components that may be declared obsolete by vendors and provide their replacement programs. The discussion may also include systematic identification of useful service life and anticipated obsolescence of SSCs along with management programs	**X**			
Pakistan	**8**	**Section 7**	Contributors to drafting and review	It is missing and may be included in contents	**X**			
Pakistan	**9**	**Section 7 Appendix I**	INTERFACES **AMONG** SAFETY FACTORS	Grammatically "between" is used for two items while "among" is used for more than two items.	**X**			

DPP DS535 Periodic safety review for nuclear power plants

COMMENTS BY REVIEWER Reviewer: Kuryndin Anton Page.... of.... Country/Organization: Russian Federation (SECNRS) Date: April 2022				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1	2 Line 3	However, these routine safety reviews are focused reviews and typically do not inclusively consider changes in safety standards ~~and technological developments~~, the cumulative effects of plant ageing, plant modifications, feedback of operating experience, organizational and management issues, site related aspects ~~or~~ and developments in science and technology	«Changes in technological developments» is the same as «developments in technology». «or» should be changed on «and» because aspects, evaluated during PSR, are equally important	X			
2	2 Line 10	[….] which is carried out with the established frequency and relies on a systematic and comprehensive process [….]	It is important to underline that PSR conducts with the established frequency	X			
3	2 Line 12	[….] evolving regulatory requirements, plant modifications, ageing, operating experience, site related aspects and technological development [….]	To align with the factors, specified in the first paragraph of chapter 2	X			
4	2 Line 15	[….] to determine reasonably practicable modifications for further bringing of the NPP in compliance with applicable standards [….]	Clarifies why modifications are needed		X		Text slightly modified taking into account the whole sentence as follows: …to determine reasonably

							practicable modifications of the plant to provide for compliance with applicable standards with the aim of enhancing the safety of the plant by further reducing the likelihood and the potential consequences of accidents.
5	2 Line 19	~~The extent to which the (updated) licensing basis will remain valid to next operational period, or to the end of the plant's proposed extended operating life~~	It is unclear how the PSR allows you to determine the relevance of the regulatory framework in the future			X	One of the objectives of PSR is to determine that there continues to be a valid licensing basis taking account of, for example, plant ageing and current safety standards and operating practices. Should any unpredictable events change the regulatory framework in a given point in time, e.g., event like Fukushima, it is expected that a dedicated safety reassessment being made in order to

							address the regulatory framework change on top of the PSR results.
6	3 Line 5	add new hyphen GSR part 1 (Rev.1): Governmental, Legal and Regulatory Framework for Safety	It is proposed to complement the list of IAEA Safety Standards presented in paragraph 3 with the IAEA Safety Standard GSR Part 1, (published in 2016), which contains requirements that relate to PSR Requirement 25	X			
7	4 Line 2	[….] ~~existing~~ operational nuclear power plant [….]	To align with the line 1 of the chapter 2	X			
8	7 Line 20	Plant programmes to support the safety factors relating to plant design, the actual condition of SSCs important to safety, equipment qualification, operating experience, monitoring of changes of the NPP site characteristics and ageing	Added factors are also important in terms of LTO		X		Wording slightly modified to keep the heading concise
9	6 Line 2	add new hyphen GSR part 1 (Rev.1): Governmental, Legal and Regulatory Framework for Safety	It is proposed to complement the list of IAEA Safety Standards presented in paragraph 6 with the IAEA Safety Standard GSR Part 1, (published in 2016), which contains requirements that relate to PSR (Requirement 25)	X			

MS	Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
Pakistan	**1**	**General comment**	Provide gap analysis.	The proposed DPP is a revision of IAEA SSG 25, whoever, the gap analysis is not provided in the proposed DPP which highlight specifically the changes to be incorporated in the revised document. Please include the same.		**X**		Feedback and gap analysis report included as the DPP Annex
RUSSIAN FEDERATION SECNRS	**1**	**2 / 03**	However, these routine safety reviews are focused reviews and typically do not inclusively consider changes in safety standards ~~and technological developments~~, the cumulative effects of plant ageing, plant modifications, feedback of operating experience, organizational and management issues, site related aspects ~~or~~ and developments in science and technology	«Changes in technological developments» is the same as «developments in technology». «or» should be changed on «and» because aspects, evaluated during PSR, are equally important	**X**			
RUSSIAN FEDERATION SECNRS	**2**	**2 / 10**	[….] which is carried out with the established frequency and relies on a systematic and comprehensive process [….]	It is important to underline that PSR conducts with the established frequency	**X**			
RUSSIAN FEDERATION SECNRS	**3**	**2 / 12**	[….] evolving regulatory requirements, plant modifications, ageing, operating experience, site related aspects and technological development [….]	To align with the factors, specified in the first paragraph of chapter 2	**X**			
RUSSIAN FEDERATION SECNRS	**4**	**2 / 15**	[….] to determine reasonably practicable modifications for further bringing of the NPP in compliance with applicable standards [….]	Clarifies why modifications are needed		**X**		Text slightly modified taking into account the whole sentence as follows: …to determine reasonably practicable modifications of the plant to provide for compliance with applicable standards with the aim of enhancing the safety of the plant by further reducing the likelihood and the potential consequences of accidents.
RUSSIAN FEDERATION SECNRS	**5**	**2 / 19**	~~The extent to which the (updated) licensing basis will remain valid to next operational period, or to the end of the plant's proposed extended operating life.~~	It is unclear how the PSR allows you to determine the relevance of the regulatory framework in the future			**X**	One of the objectives of PSR is to determine that there continues to be a valid licensing basis taking account of, for example, plant ageing and current safety standards and operating practices. Should any unpredictable events change the regulatory framework in a given point in time, e.g., event like Fukushima, it is expected that a dedicated safety reassessment being made in order to address the regulatory framework change on top of the PSR results.
RUSSIAN FEDERATION SECNRS	**6**	**4 / 02**	[….] ~~existing~~ operational nuclear power plant [….]	To align with the line 1 of the chapter 2	**X**			
RUSSIAN FEDERATION SECNRS	**7**	**7 / 20**	Plant programmes to support the safety factors relating to plant design, the actual condition of SSCs important to safety, equipment qualification, operating experience, monitoring of changes of the NPP site characteristics and ageing	Added factors are also important in terms of LTO		**X**		Wording slightly modified to keep the heading concise
UK ONR			In general, the UK has no objections to this proposed revision as set out in the DPP. There are just two minor comments on the edges of its scope.					
UK ONR	**1**	**Section 6**	Include GSR Part 6: Decommissioning of Facilities	Some of the aspects addressed in Periodic Safety Reviews such as ageing management, modifications, actual condition of SSCs and equipment qualification are relevant to decommissioning. For example, some key components such as polar cranes are needed for decommissioning so their design and management should enable their use beyond the operational period. It is also important that operational records relevant to decommissioning are retained. The list of relevant safety guides does not include GSR Part 6 on Decommissioning of Facilities (which itself does not mention PSR). However, there would be value in demonstrating awareness of the importance of some of the content to decommissioning to provide holistic consideration of the lifecycle of a facility. GSR Part 6 states "The regulatory body shall ensure that the licensee takes decommissioning into account in the siting, design, construction, commissioning and operation of the facility". The current version of SSG-25 briefly hints at decommissioning in section 1.5 and in 5.47 (in the context of ageing).Therefore we suggest GSR Part 6 could be included in the list of relevant guides, and strengthening slightly in the new revision of the standard the need to consider decommissioning requirements in PSRs.	**X**			
UK ONR	**2**	**Section 6**	Include SSG-15: Storage of Spent Nuclear Fuel	Spent nuclear fuel is often stored on site at NPPs for extended periods of time, under the control of the operators, and therefore should be considered in PSRs.	**X**			