DS517
SSG-5 "Safety of Conversion Facilities and Uranium Enrichment Facilities",
SSG-6 "Safety of Uranium Fuel Fabrication Facilities",
SSG-7 "Safety of Uranium and Plutonium Mixed Oxide Fuel Fabrication Facilities"
Step 3 – Approval of DPP by the Committees

COMMENTS						RESOLUTION			
No	MS	Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1.	USA	1	General Title	The DPP for DS517 presented three proposed titles. DS517 is intended to integrate SSG-5 (on conversion and U-enrichment), SSG-6 (on U-fuel fabrication) and SSG-7 (on MO fuel fabrication). In this regard, we suggest the following title: "Safety of Uranium Conversion, and Uranium and Mixed Oxides Fabrication Facilities."	Completeness and redundancy avoidance in development of a title that covers the three safety guides (SSG-5, SSG-6, and SSG-7).			Y	According to Section 2 of this DPP, the SSG-5, SSG-6 and SSG-7 will remain as separate publications.
2.	France	1	General Scope	Include for each SSG a specific part for the safety demonstration involving hazardous chemicals		Y			The provisions related to protection against toxic chemicals and other hazardous chemicals and the safety demonstration of this will be addressed along the documents, as necessary, in accordance with SSR-4.
3.	Japan	1	General	New section on "management and verification of safety" should be described as simple as possible.	New safety guide concerning nuclear installations are now being revised as draft DPP-DP	Y			

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					513. General description on management system should be addressed in proposed DS-513, Meanwhile, the recommendations in new SSG-5, 6 and 7 should be limited to facility specific ones.				
4.	USA	2	Section 2 Page 1 Section 2	Spell out SEDO (e.g.***; Safety Evaluation of Fuel Cycle Facilities During Operation***) and provide reference website: https://www.iaea.org/services/review-missions/safety-evaluation-of-fuel-cycle-facilities-during-operation-sedo	Clarity	Y			
5.	Brazil	1	Section 2 Background p.2/ 4th para	Three Guides in Group 1 (SSG-5, SSG-6 and SSG-7) will be revised under this DPP~~. Two Guides in Group 2 (SSG-42 and SSG-43) will be revised under this DPP.~~	Correction. Guides in Group 2 (SSG-42 and SSG-43) will be revised under **DPP DS-518**.	Y			
6.	Japan	2	Section 3 JUSTIFICATION FOR THE PRODUCTION OF THE	The revision of the Guides covered by this DPP will take into consideration the following: • The new and modified requirements ….i; • Long Term Structure of the	To keep a consistency with otheres. The long term structure of the			Y	Combination of SSG-6 and SSG-7 was analyzed and discussed during consultancy meeting with participation of experts from different

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			DOCUMENTS 2nd para 3rd bullet	IAEA Safety Standards; • ~~Long Term Structure of the IAEA Safety Standards~~ • Feedback from the users ….	IAEA Safety Standards indicates that SSG-6 and SSG-7 will be combined including decommissioning aspects. However, the last sentence of 4th paragraph of "2. BACKGROUND describes "The Guides will remain as separate publications". Otherwise, justification of separate publication should be described.				types of facilities and Member States. It was concluded this is not appropriate due to different target users, hazards and risks posed and safety provisions and measures to be implemented for these types of the facilities.
7.	Brazil	2	Section 5 Scope p.4/ 2nd para 7th bullet	• …… Req. 39 Design of provisions for heat removal; **Req. 59 Conduct of safety related activities; Req. 62 Records and Reports; Req. 64 Operational housekeeping and material conditions;** Req. 71 Operational accident management programme; ……	Completeness. Req. 59, 62 and 64 on SSR-4 are also introduced as new requirements.	Y			

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8.	Brazil	3	Section 5 Scope p.4/ 2nd para 8th bullet	• The guidance on ageing management does not fully address Req. 32 Design **and Req. 60 Operation** considerations for management of ageing.	Completeness. Req. 60 in Chapter 9 Operation on SSR-4 also refers to ageing Management.	Y	• The guidance on ageing management does not fully address Req. 32 Design considerations for management of ageing and Req. 60 Ageing management during operation		Completeness and consistency
9.	Brazil	4	Section 5 Scope p.4/ 2nd para 9th bullet	• Align with SSR-4 **Req. 57** on operational limits and conditions and provide examples where missing;	Completeness. Make explicit reference to the SSR-4 Requirement as in the next bullet.	Y	• Align with SSR-4 on operational limits and conditions (Req. 18 and Req.57) and provide examples where missing		Consistency
10.	Brazil	5	Section 5 Scope p.4/ 2nd para 11th bullet	• Provide more guidance on functions of the operating organization including~~;~~**:** operating procedures; ageing management, maintenance and modifications, QA, retraining; **which shall be established and documented in accordance**	Completeness. Take into account the structure and functions of the operating organization, in accordance with SSR-4 Req.55.	Y	"which are to be…"		Avoiding "shall"

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				with a graded approach.					
11.	USA	3	Section 5 Page 4, Bullet #15; and Page 7, Item 9	Recommend using the term "Transitioning into Decommissioning" along with "Preparation for Decommissioning." The following inclusive term may be more appropriate: ***"Preparation for and Transitioning Into Decommissioning."***	"Transitioning into Decommissioning" is a widely used and well known term which covers certain aspects of preparation for decommissioning as well as initiation of the decommissioning process.			Y	Consistency with SSR-4 (Preparation for decommissioning)
12.	Japan	3	Section 5 SCOPE 2nd para 3rd bullet	• Align with SSR-4 on descriptions of topics such as: main safety functions; safety classification; human factors engineering; design for ageing; classification and qualification of items important to safety;	Completeness. Req. 27 "Human factors engineering" on SSR-4 is also introduced as a new requirement.	Y			
13.	Japan	4	Section 5 SCOPE 2nd para 6th bullet	• Influence of Human, Technology and Organization approach in GSR Part 2, ~~systematic~~ systemic approach to safety, leadership and safety culture.	Correction. GSR Part 2 defined "systemic approach" for interactions between technical, human and organizational	Y			

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					factors.				
14.	Japan	5	Section 5 SCOPE 2nd para 7th bullet	• …… Req.21 Design extension conditions, Req.27 Human factors engineering, Req. 28 Control over the transfer of radioactive material and other hazardous material; Req. 30 Qualification of items important to safety; Req. 39 Design of provisions for heat removal; Req. 71 Operational accident management programme; Req. 73 Feedback of operating experience and Req. 75 Interfaces between safety, nuclear security and the State system of accounting for, and control of, nuclear material;	Completeness. Req. 27 "Human factors engineering" on SSR-4 is also introduced as a new requirement.	Y			
15.	Japan	6	Section 5. SCOPE P.5	The following specific issues will be addressed for SSG-5: • The scope can be reduced to centrifuges in design and operation with gas diffusion only decommissioning; ▪ ▪ ▪ • Include the information on support systems and analytical laboratories. • Check for consistency with SSG-27, which is being revised in parallel.	TO keep a consistency with SSG-27. Criticality safety is also important to enrichment facilities.	Y			

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16.	USA	4	Section 6	The documents listed in Section 6 are 22 IAEA safety standards that interface with the current standards; it is unclear how the structure of this document will be developed to accommodate the interface and harmony of such diversified multiple standards. Recommend Section 6 of this document be provided in a Reference List.	Clarity & Completeness to address multiple interfaces with the listed safety standards to ensure harmony in a succinct fashion.	Y			These are specific safety guides support the specific safety requirements SSR-4. List of documents in Section 4 will be list of references.
17.	Pakistan/NUSSC	1	Section 7 Overview / 5. Design	• Specific requirements recommendations for design • Design requirements recommendations for protection against non-radiological hazards	Editorial	Y	• Design for protection against non-radiological hazards		For simplicity
18.	Pakistan/NUSSC	2	Section 7 Overview / 5. Design	• Radioactive waste management • Emergency preparedness and response	Radioactive waste management and Emergency preparedness and response are essential element as per Req. 24: Design provisions for radioactive waste management and Requirement 47: Design for emergency preparedness and response respectively of SSR-4. So these may be included as a separate content	Y	• Design for radioactive waste management • Design for emergency preparedness and response		Consistency with relevant Requirements 24 and 47 of SSR-4

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					in proposed guides.				
19.	Pakistan/WASSC	1	Section 7 Overview / 5. Design	Management of Radioactive Waste	Radioactive waste management is an essential element as per Req. 24: Design provisions for radioactive waste management of SSR-4. So it may be included as a separate content 'Management of Radioactive Waste' during design in proposed guides.	Y	Design for radioactive waste management		Consistency with relevant Requirement 24 of SSR-4
20.	Brazil	6	Section 7 Overview p.7/ 2nd para 8· Operation	(…) Facility operations **Nuclear Criticality Safety** Maintenance, periodic testing and inspection (…)	To keep consistency with SSR-4, Req. 66 Criticality control in operation.	Y			
21.	Pakistan/WASSC	2	Section 7 Overview / 8 Operation	Radioactive Waste Management Programme	Please provide separate heading of Radioactive Waste Management Programme instead of combining the two like Radiation	Y	Management of radioactive waste and effluents		Consistency with relevant Requirement 68 of SSR-4

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					protection programme and management of radioactive waste and effluents.				
22.	Germany	1	Annex: SSG-5, Section 1	Standardize background, objective and scope. Align discussion of graded approach with the new text in SSR-4. The scope can be reduced to centrifuges in design and operation with gas diffusion only decommissioning.	The last two words are not in the context. Please clarify the last sentence.	Y	Last sentence was deleted		