

***Predisposal Management of Radioactive waste from Fuel Cycle Facilities (DS447)***

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: FRANCE/MEDDE		2013-04-17					
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
	General comments	Integration of security aspects in safety documents and vice versa should follow the agreed proposal made during second meeting of NSGC. It should consist in including brief references to where interfaces may exist and provide cross-references in the appropriate serie.	This will prevent making incomplete or inappropriate recommendations. Detailed comments are presented in the following resolution tables	x	See Responses To Detailed Comments Below		
1	1.16	Delete “comprehensive and detailed” in 1 <sup>st</sup> sentence :  “The Safety guide does not provide recommendations on PP of nuclear facilities ....”	The Saftey guide does not aim at providing recommendations on physical protection even when it takes into account interfaces between safety and security. In this case it should limit itself to give inputs on interfaces.	x			
2	3.24	Proposal to delete references to security	We do not see the need to mention the security				

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: FRANCE/MEDDE		2013-04-17					
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
		in this paragraph	requirements as regard responsibilities of the operator in this document. Moreover this quotation of responsibilities is not complete and accurate.				
3	4	Delete 4.2, and 4.3	See comments in DSS 448  As for 4.4, the implication of safety on security issues should also be mentionned. This paragraph could be merged with 4.1.		Propose to replace 4.2-4.4 with  “4.2 For a new facility, the site selection and design should take physical protection into account as early as possible and also address the interface between physical protection, safety and nuclear material accountancy and control to avoid any conflicts and to ensure that all three elements support each other.”  “4.3 The operator should assess and manage the interfaces between nuclear security, safety and nuclear material accountancy and control activities in a manner to ensure that they do not adversely affect each other and that, to the degree possible, they are mutually supportive.”		Consistency with Nuclear Security Series 13

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: FRANCE/MEDDE		2013-04-17					
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
4	7.34	Replace (g) with "malevolent action"			7.34 (f) modified: "...sabotage, and other malicious acts <del>etc.</del> " 7.34 (g) deleted		Per discussion w NSGC:

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: Adrian Freer		Page 1 of 3					
Country/Organization: ONR, UK		Date: 16 April 2013					
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1	1.16 and Reference 13	Delete “INFCIRC/274” and “13” in 1.16 and 13 in the Reference section.	This refers to a Convention whose contents are legally binding on States Party and an Amendment to it which is not yet in force. It is therefore not directly applicable to operating organisations who are required to comply with regulations issued by the State.	x			
2	1.16	Delete “physical protection” and insert “nuclear security”. Amend to state that the Guide also does not provide recommendations on the nuclear security of radioactive material and that these are contained in NSS No.14 and provide details of this document in the document reference section	Correct IAEA terminology. Non-nuclear radioactive material will also be produced by fuel cycle facilities	x			
3	3.24 3 <sup>rd</sup> sentence	Delete “and security”	It is not the place of a Safety Standard to set requirements relating to nuclear security	x			
4	3.26(h)	Delete	The responsibilities of an operating organisation in relation to nuclear security go far wider than conducting “assessments” (which in	x			

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: Adrian Freer		Page 1 of 3					
Country/Organization: ONR, UK		Date: 16 April 2013					
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
			any case is not a defined nuclear security term)				
5	3.30 Line 3	Delete “security”	That “special considerations” may be required to achieve high security standards is meaningless	x			
6	Section 4 Box	Insert appropriate reference as to origin of Requirement 5	Consistency with other boxes	x			
7	4.1, 4.5, 4.6, 4.17, 4.21 and 4.24	Insert “nuclear” before the references to “security”	IAEA terminology	x			
8	4.2 Line 2	Delete “and security”	Risk management is applied in the nuclear security area. Requirements are not “balanced” against operational needs and costs.		Propose to delete paragraph		In response to France comments
9	4.3	Delete “In addition” and the word “should” in line 3	Unnecessary words	x			
10	4.4	Add at end “Similarly, the implications of all safety systems and arrangements should be assessed and it should be ensured that no nuclear security function is compromised on account of	Nuclear security is equally as important as safety.		Propose to replace 4.4 with: “The operator should assess and manage the interfaces		Consistent with Nuclear Security Series 13

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: Adrian Freer		Page 1 of 3					
Country/Organization: ONR, UK		Date: 16 April 2013					
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
		such systems and arrangements.			between physical protection, safety and nuclear material accountancy and control activities in a manner to ensure that they do not adversely affect each other and that, to the degree possible, they are mutually supportive.”		
11	7.6(m)	Delete	This aspect has already been well addressed in paragraphs 4.1-4.6. (In any case the correct term is “nuclear security”, not “physical security”.	x			
12	7.34(g)	Delete	By itself, the failure of the physical protection system (or more correctly “nuclear security system”) will not result in any radiological consequences and its inclusion is therefore not relevant to a discussion on beyond design basis accidents		See response to France comment 4		

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: Adrian Freer		Page 1 of 3					
Country/Organization: ONR, UK		Date: 16 April 2013					
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
13	4.3 and 7.58(d)	Amend “physical protection” to “nuclear security”	Correct IAEA terminology	x			