

Comments on IAEA DPP 456

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer:		Date: 24 May 2011					
Country/Organization: EC							
Comment No. / Reviewer	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1	General	It is not clear from the DPP how the current Requirements will be used. It was agreed that when a revision of a standard is proposed the IAEA secretariat will identify areas which will be substantially modified and those that will not.	Better clarification on this issue may help to ensure better quality of the document and avoid unnecessary rewriting.	YES A gap analysis will be presented			

TITLE : DS456 DPP Leadership and Management for Safety

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: F. Féron		Page					
Country/Organization: France/ASN		Date: 31-05-2011					
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1.	2	Clarify the content of the revision	This DS456 will be a revision of General Safety Requirement “The Management System for Facilities and Activities” - July 2006 - No GS-R-3. What will be the areas which will be substantially modified and those that will not?	The structure of the document will be changed but we will make sure that what was good in the existing GS-R-3 will be kept in the revision. A gap analysis will be presented.			
2.	2	Clarify interface with IAEA BSS	The BSS is not mentioned as having an interface with GS-R-3	BSS is a requirement in itself and shall be implemented at the same level as other requirements. Liaison will be made with the officer in charge of the BSS to make sure that appropriate interface will be treated.			

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Reviewer: Country/Organization:		F. Féron France/ASN		Page Date: 31-05-2011			
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3.	2	Provide information on the process and timeframe of revision of these safety guides.	The DPP states “An important work would be to review the associated Safety Guides in parallel of the new publication with the objective to simplify and consolidate it into a single document.”. However, revision of GS-G-3.2 is already considered, at least partially, through DS453DPP			I do not have any information about that except that GS-G-3.2 is under review, and liaison with the officer in charge has been made.	These safety guides are for the majority of the content just copy paste from former GS-R-3, they do not address how to fulfill the requirements but just copy them.
4.	4	Clarify what is current feedback about the use of GS-R-3 by Member States	In the justification, additional feedback on current implementation of GS-R-3 should be added (see OSART or IRRS missions...)	Current feedback is coming mainly from European countries (WENRA and ENISS), Canada, regulators and utilities. The biggest difficulty is the integration of the management system. OSART feedback will be integrated.			

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5.	5	Clarify any interface with security aspects to be embedded in the scope of DS456	Are there interfaces with security aspects?		It is still early to answer clearly on these aspects but there are definitely connections with security e.g. control of access to site, to safety related equipment rooms, key control, control of radioactive materials/sources....		
6.	6	Clarify whether new/modified definition are expected to appear in DS456	Why is there a glossary? Definitions should appear in IAEA safety glossary.		YES – We usually refer to the glossary but the need for new definitions may appear then they will be proposed to be integrated into the glossary		

Title: Safety Requirement on Leadership and Management for Safety, DS456 DPP (Rev of GS-R-3)

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: S. Maki		Page 1 of					
Country/Organization: Japan/ NISA		Date:3 June 2011					
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modif./rejection
1	General	Lessons learnt from Fukushima NPP events should be taken into account, if any.		YES			
2	6.OVERVIEW	<p>The proposed OVERVIEW is significantly different with the current Requirement GS-R-3. The chapters: Resource management (Chapter 4), Process implementation (Chapter 5) and Measurement, assessment and improvement (Chapter 6) are disappeared and are not foreseeable from the proposed OVERVIEW.</p> <p>This significant difference between current GS-R-3 should be clearly explained and justified in this DPP.</p> <p>As far as the contents of GS-R-3 have been developed in line with ISO9001, the contents of GS-R-3 should be respected and take into account in DPP of DS456.</p>	<p>The contents and structure of GS-R-3 2006 Edition have been developed in line with ISO9001 which is used and applied in the world. In this regard standards complied with ISO9001 are considered in some countries complying with GS-R-3 as well.</p> <p>It would be confused in such countries if the contents and structure of the revised GS-R-3 has significantly changed.</p>			YES	<p>As per the roadmap, GS-R-3 must be aligned with SF1 principle No 3 and give requirements on WHAT has to be done by licensees and regulators.</p> <p>ISO 9001 is giving guidance on HOW to develop a quality management system and has no connection to Nuclear Safety. It should be referenced in the guides but not more as other systems are used e.g. in the USA.</p>

3	Title of the standard	The reason to change the document title from 'The Management System for Facilities and Activities' to Leadership and Management for Safety' should be clearly explained and justified. The requirements of leadership are not necessary to be defined explicitly.	GS-R-3 includes already the content; Leadership as for requirements for management commitment, organization policies and management system review. The need to be seen 'Leadership' on the title of the revised document is clear.			The title is imposed by the roadmap which has been approved in 2007.
4	2. BACKGRO UND/RATIO NALE /1st bullet/	Safety must be the fundamental basis of this document and shall have the highest priority; it must not be misunderstood to be considered as a product.	Clarification The meaning of 'a product' is not clear thus the intention of the last sentence is not clear as well. Clarification of 'a product' is needed.			Safety is the concept of protecting the people and the environment against harmful effect of ionizing radiations. This is not the result of any manufacturing, transforming or commercial process. Safety has to be considered in the elaboration of any process from the medical treatment to the production of electricity and also in the results of such processes.
5	2. BACKGRO UND/RATIO NALE/1^{2nd} bullet	The safety management objectives stated in INSAG 13 and other INSAG documents should be considered.	Clarification 'other INSAG documents' should be clarified/listed.	YES Other INSAG will be considered and referenced to also, in particular those related to management, leadership and safety culture		

6	3. OBJECTIVE /L7-8	The second objective is to capture the concept, which is embedded in the IAEA's fundamental Principle 3, that it is Leadership and Management for Safety not of Safety .	Clarification In order to understand clearly the message of this sentence, the difference between Leadership and Management for Safety and Leadership and Management of Safety should be clarified.			Safety is not something tangible: we can only manage any provision or measures made to ensure the protection of people and environment. And also this is imposed by the roadmap.
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TITLE: U.S. Comments on DS456 DPP on Leadership and Management for Safety

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: US - WASSC Comments (Contact: Bobby Eid) Page 1. Of 2.... Country/Organization: USA/ NRC-WASSC				Date: 06/12/2011			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1	General	<p>The U.S. provided feedback on IAEA safety standards on several occasions. A significant issue that needs to be addressed in development and update of IAEA safety standards is “integration of safety and security.” In this context, we request adding the following bullet to Section 2 of the DPP:</p> <ul style="list-style-type: none"> • The revised version of the GS-R-3 needs to be enhanced in addressing integration of safety and security at all levels of leadership and management for safety. 	Significance of integration of safety and security based on U.S. feedback.	Accepted as it is already an IAEA requirement in the roadmap			
2	Page 2 Para 2	<p>The Para <i>“The document should be written in such a way that it is applicable to the management of all types of facilities and activities, from small to large organizations.”</i> Needs to be modified to read: <i>“The document should be written in such a way that it is applicable to all types of facilities from small to large scale and to all organization</i></p>	Completeness/Language		Accepted and have also to deal with activities, not only facilities		

		<i>types from small to large organizations.”</i>					
3		The DPP lacks significant aspects addressing involvement of stakeholders in decision-making for management of safety particularly under circumstances of events or emergency conditions	Stakeholders’ involvement in management of safety is significant particularly under emergency exposure situations.	YES but keeping in mind that the sole responsibility for safety belongs to the licensee.			
4		The DPP should add under safety culture the following statements: <ul style="list-style-type: none"> • Enhance safety process to accommodate and encourage different views pertaining to safety; and • Accommodate and encourage whistle blowers to advance their views particularly under threat or emergency conditions that involve significant safety issues. 	DS456 can be improved to address different views pertaining to significant safety functions or issues.		YES but we are on the HOW and that will be integrated into the guides		