

**TITLE: DS460 Communication and Consultation with Interested Parties (2013-08-02)**

**NOTE: The resolution of the comment #9.a has been changed (comparing with the Table posted on October 7, 2013) !**

This table of resolution compiles all comments posted by Committees' members. These comments are addressed in the order of the content of the DS460 DPP. These comments have been provided by:

1. France / ASN – NUSSC	60 Comments	7. Sweden / SSM	03 Comments
2. Japan / NRA – NUSSC	03 Comments	8. United States of America / NRC	22 Comments
3. ENISS	08 Comments	9. Switzerland / ENSI	01 Comment
4. Argentina / ANR – NUSSC	08 Comments	10. France / MEDDE	03 Comments
5. Germany / BMU and GRS – RASSC	35 Comments	11. NSGC / Russian Federation	01 Comment
6. Finland / STUK – WASSC, NUSSC, RASSC	36 Comments	12. WASSC Chairman	01 Comment

COMMENTS BY REVIEWER				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
<b>0. GENERAL</b>							
1.	General	<b>1. France / ASN - NUSSC (F. Feron)</b> Review the document to verify the appropriate and consistent use of “stakeholder” and/or “interested parties” considering the definition given in 1.5	It is not clear why, in some recommendations, “stakeholders” is used and not “interested parties”	X			In order to consistent with GSR part1, ‘Stakeholders’ is replaced by ‘interested parties’
2.	General	<b>1. Argentina / ANR – NUSSC</b> Besides, in the near future consideration should be given to the preparation of a single self-contained document addressing the subject for all scenarios in order to prevent such a diversity of IAEA complementary publications (see paragraph 1.6).	The target audiences will be grateful.			See comment 9.a	The scope is in line with the DPP. Security and emergency preparedness will be addressed separately and in greater details (within the Nuclear Security Series and for emergency aspects in DS475).
3.	General	<b>1. Germany / BMU and GRS - RASSC</b> The existing text seems to contain several unnecessary repetitions and should be streamlined.	To achieve a better legibility of the document.		X		Duplications were screened during a dedicated technical meeting in March 2013. The comments provided here by the SSCs Members helped to identify some apparent repetitions for which resolution proposals are provided (ex.: comment 162 and 170).

COMMENTS BY REVIEWER				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
4.	General	<p><b>2. Germany / BMU and GRS - RASSC</b> Please use uniform spelling in the whole document:</p> <ul style="list-style-type: none"> <li>- 'organisation' versus 'organization',</li> <li>- 'authorised' versus 'authorized',</li> <li>- 'decision-making' versus 'decision making',</li> <li>- 'licence' versus 'license',</li> <li>- 'feedback' versus 'feed-back'.</li> </ul>	Harmonization through-out the document is required.	X			"Organization", "authorized party", "decision making", "licence" and "feedback" will be used systematically in the document.
5.	General	<p><b>1. Finland / STUK – WASSC, NUSSC, RASSC</b> Most of the text should be restructured and rewritten to take into account a balance between big issues and details.</p>	<p>Text in unbalanced; mixture of principles and detail solutions. Text contains a lot of basic communication principles which are commonly known by the communication professionals.</p> <p>This guide could be more focused to good practises in responding to communication challenges of use of nuclear energy and radiation.</p>			X	The readership is broader than communication professionals. Therefore, it was considered necessary to include key communication principles along with more safety specific aspects. The guidance has been developed accordingly to provide good practices to communicate and consult on issues related to nuclear and radiation safety.
6.	General	<p><b>2. Finland / STUK – WASSC, NUSSC, RASSC</b> Recommendation to consider and mark clearly when the regulatory body means a governmental level organisation (ministries, Council of state etc.) and when a safety authority.</p>	There are different roles between the organizations; if the safety authority is advised to follow this guide there is a danger that it will not be self-contained and appears not to be independent. In addition, these (both) organizations should have their own communication policies. See some examples below, this applies specifically to Chapter 3.		X		As the guide should be primarily used by regulatory bodies, in the text, when necessary, clarifications have been introduced (e.g., paragraphs 2.8, 2.9, 2.15, 2.17, 3.1, and comment 42)
7.	General	<p><b>1. Sweden / SSM</b> Rewrite the text so that the principles and most important aspect stand out and the structure of the text gets more logical.</p>	There is a mixture in the text of principles and major aspects on one hand and details on the other.			X	The text has been developed in a logical manner starting by the overarching recom. up to the methods and tools, through legal and reg. requirements and implementation process. See also answer to comment 5.

COMMENTS BY REVIEWER				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
8.	General	<b>2. Sweden / SSM</b> Be more detailed concerning which organization the paras relate to.	There are unclarity about which organization is subject to some of the paras.	X			See comment 6
9.	General	<b>22. United States of America / NRC</b> Consider if additional information is needed with respect to communication on security of radioactive materials.	Completeness			X	The provided guidance covers all areas which should be regulated by the radiation and nuclear safety regulatory body.
9.a	General	<b>1. WASSC Chairman</b> See note "DS460, A WASSC Perspective" DS460 to be developed as a stand-alone safety guide, providing guidance on all the important obligations highlighted below from Agency safety standards, for effective public communication and consultation by both regulators and operators.				X	Ok to be discussed with NUSSC. However, DS460 has been developed in full compliance with the DPP discussed and endorsed by SSCs and the CSS.
10.	Introductory text on IAEA Safety Standards	<b>3. Finland / STUK – WASSC, NUSSC, RASSC</b> The radiation risks to workers and the public and to the environment that may arise from these applications have to be assessed and, if necessary, controlled.	Taken into account of basic radiation protection principles, (e.g. optimization, justification, ALARA and SAHARA) risks should always be controlled.			X	The introductory part titled "the IAEA Safety Standard" is common to every Safety Standard and shall not be changed.
11.	1.5 & Paragraphs include stakeholders.	<b>1. Japan / NRA – NUSSC</b> Para. 1.5 <b>Interested Parties</b> , referred to also as stakeholders or concerned parties [26], are those individuals or organisations concerned with safety and the regulatory body's decisions. Para 2.9 2.9. The methods for communication and consultation with <b>interested parties</b> should be adapted to the communication objectives, the expected <b>stakeholders</b> and according to the graded approach. Also it should be used in accordance with national circumstances, concerns and interests of <b>interested parties</b> .	<b>Clarification.</b> Both "interested parties" and "stakeholders" are used in a large number of paragraphs (e.g. paras.2.2, 2.8, 2.9 ---), which means that "stakeholders" has different meanings than "interested parties." However, the definition "Interested parties" defined in para.1.5 says that "interested parties" and "stakeholders" have same meaning. If both terms have same meaning, "stakeholders" in the text should be replaced with "interested parties." If each term has its own specific characteristics, definition of stakeholders should be added.	X			See answer to comment 1.
12.	Table of Content	<b>3. Germany / BMU and GRS – RASSC</b> Proposed title of Figure 3: "Steps in the communication and consultation process, should include these steps from setting communication and consultation objective up to the evaluation of the process."	The title is not consistent with the one provided in the text. See also our related comment No. 13.		X		Modified as proposed by US-NRC

COMMENTS BY REVIEWER				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
13.	Table of contents	<b>1. United States of America / NRC</b> Figure 3: Communication and consultation process	The additional text included should be removed from the Contents page and placed below the figure. Too much detail for the contents page.	X			
14.	Table of contents	<b>2. United States of America / NRC</b> Add/assign page numbers to figures	Editorial. There's no point in including the figures on the contents page and not providing where they are found.	X			
15.	Introductory text on IAEA Safety Standards	<b>3. United States of America / NRC</b> p.5, line 4. Insert [11] after the phrase "...the transport of radioactive material..."	Although it is listed in the references, the document text does not refer to reference [11].			X	The introductory part titled "the IAEA Safety Standard" is common to every Safety Standard and shall not be changed.

COMMENTS BY REVIEWER				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
<b>1. INTRODUCTION</b>							
16.	1.1	<b>4. Finland / STUK – WASSC, NUSSC, RASSC</b> <del>“Most people, who are dependent on information provided by regulatory bodies, operating organizations, experts and the news media, want to</del> <i>Public should</i> have access to reliable, comprehensive and easily understandable information about safety and regulatory issues to form opinions and make fully informed decisions <i>and</i> <del>–They also want</del> to have fair and reasonable opportunities to provide their views and to influence regulatory decision-making processes.	This is often a legal prerequisite. Here, the difference between political decision making process and safety authority decision making process should be clarified.		<u>The Public rightfully expects to</u> have access to reliable, comprehensive and easily understandable information about safety and regulatory issues to form opinions and make fully informed decisions <u>and</u> to have fair and reasonable opportunities to provide <u>its</u> views and to influence regulatory decision-making processes.		This part is an introduction to the guidance, which describes a situation and a context. Recommendations and “should” statements are to be developed in the core part of the document.
17.	1.1	<b>4. United States of America / NRC</b> It was stated on page 11 “Members of the public usually have limited knowledge and a great deal of uncertainty in any issue involving radiation because of the complexity of this topic, the perceived risk associated with nuclear energy and the use of ionizing radiation sources.”	Completeness and clarification. Perhaps a section on risk communication is warranted. DS460 recognizes the importance of risk communication with the interested parties. In this regard, the guidance lacks any details on how to communicate risk with members of public, educating public regarding radiation risk, and alleviating concerns regarding risk perception. This is specifically important for developing countries merging into development of nuclear energy where public awareness about nuclear risk and safety is minimal.			X	In general it is not the role of the RB to “alleviate” concerns regarding risk perception. The objective is for the public to have objective information on the topic. The information provided should be adapted to the level of knowledge of the audience but is not a tool to increase “public acceptance” of a nuclear power programme.
18.	1.2	<b>2. France / ASN - NUSSC (F. Feron)</b> Communication and consultation are strategic instruments to support the regulatory body in discharging its regulatory functions and in developing the safety awareness amongst interested parties, <del>therefore in promoting safety culture amongst them.</del>	Communication or consultation does not directly promote safety culture....			X	Raising safety awareness of interested parties, especially professional categories contribute to promote safety culture.

COMMENTS BY REVIEWER				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
19.	1.2	<b>1. ENISS</b> Establishing strong regular communication and consultation practices will also ensure <u>adequate and plain</u> <del>greater</del> communication <del>success</del> during a possible emergency.	The term “greater communication success” does not really express the intended results of communication in this case.		... will also ensure <u>a more efficient communication</u> during a possible emergency.		The sentence is rephrased for better clarity but the meaning is kept.
20.	1.2	<b>4. Germany / BMU and GRS – RASSC</b> last sentence: “Establishing strong regular communication and consultation practices will also ensure greater communication success during a possible <u>nuclear or radiological</u> emergency.”	Wording.	X			
21.	After 1.2	<b>5. Germany / BMU and GRS – RASSC</b> Add a new paragraph 1.3 in the subsection “BACKGROUND” with the following text: “ <u>The involvement of interested parties is now a mandatory component of various international conventions and treaties that detail the role of governments in the strategic environmental assessment (SEA) and environmental impact assessment (EIA). This includes, but is not limited to, nuclear facilities. Development of a national policy, such as the introduction of a nuclear power programme, is subject to SEA requirements, and specific facilities and activities are subject to EIA requirements. While not all Member States are signatories to the relevant international conventions and treaties (such as Espoo 1991 [36], Aarhus 1998 [37], Article 37 of the EURATOM Treaty [38], and various EU Directives), many of these instruments incorporate responsibilities to neighbouring countries. As such, many Member States will find themselves obligated to incorporate at least some level of involvement of interested parties during the different stages in the lifetime of a nuclear facility [30].</u> ”	This is another important aspect which is worth mentioning in the context of this subsection. It is addressed in Section 2.2 of Ref. [30], too. In fact, international conventions and treaties have triggered the establishment and implementation of an effective national strategy for communication and consultation with interested parties. Note: The references to the conventions and treaties mentioned at the left in brackets are provided in our comments No. 33 to 35.		The involvement of interested parties is now a mandatory component of various international conventions and treaties that detail the role of governments. This includes, but is not limited to, nuclear facilities. Development of a national policy, such as the introduction of a nuclear power programme, is subject to strategic environmental assessment, and specific facilities and activities are subject to environmental impact assessment.		IAEA Safety Standards should be relevant to all Member States.
22.	1.3 p12	<b>3. France / ASN - NUSSC (F. Feron)</b> <i>Higher quality in regulatory function implementation:</i> the active involvement of interested parties in safety issues allows individuals or societal groups to <u>influence or even</u> challenge the regulatory process, which may strengthen the decision-making basis and safety	Challenge may be perceived negatively. There may also be benefit and positive outcomes...	X			

COMMENTS BY REVIEWER				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
23.	1.3 p12	<b>4. France / ASN - NUSSC (F. Feron)</b> The knowledge of interested parties – for example, local residents’ knowledge of the local environment, diverse social culture, values and meanings – can inform <del>critical</del> discussions about how issues are framed	Superfluous	X			
24.	1.3 p12	<b>5. France / ASN - NUSSC (F. Feron)</b> <del>Even though some interested parties may not always agree with a decision, if there is trust and mutual respect they will accept the integrity of the decision making process.</del>	Although somehow true and may be a wish of the regulator, it does not match the topic (stability of regulatory control) of the paragraph.	X			
25.	1.3 p11	<b>2.ENISS</b> Beyond the legitimate interest of interested parties in radiation and nuclear safety matters, safety issues are best handled with the participation of all concerned individuals or societal groups <del>citizens</del> , at the relevant level.	For harmonization (see 1.3 3rd bullet).	X			
26.	1.3 p12	<b>3. ENISS</b> At the same time, this is an opportunity for interested parties to express their concerns and opinions, allowing the regulatory body to better understand and, therefore, better consider these concerns; <del>and</del>	Editorial	X			
27.	1.3 p12	<b>6. Germany / BMU and GRS – RASSC</b> 3rd bullet point, last line: “... allowing the regulatory body to better understand and, therefore, better consider these concerns; <del>and</del> ”	Editorial. The word “and” is inappropriate here because more than one bullet points are following.	X			
28.	1.3 p12	<b>5. Finland / STUK – WASSC, NUSSC, RASSC</b> Please clarify: <i>Higher quality ...</i> ” the active involvement of interested parties in safety issues allows individuals or societal groups to challenge the <u>political</u> regulatory process, which may strengthen the decision-making basis and safety.”	Here, the difference between political decision making process and safety authority decision making process should be clarified.		“the active involvement of interested parties in safety issues allows individuals or societal groups to challenge <u>the regulatory body and information used to discharge its duties</u> , which may strengthen the decision-making basis and safety”		This is not the regulatory process to be challenged itself but information, basis and the regulator itself.

COMMENTS BY REVIEWER				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
29.	1.3 p12	<b>6. Finland / STUK – WASSC, NUSSC, RASSC</b> Please clarify; the chapter is not understandable. “ <i>Independence...</i> : Transparency and openness help make any undue influences that might adversely affect safety more visible, therefore enhancing the ability of the regulatory body to make independent judgements and decisions;”	The chapter is not understandable		By revealing any undue influences that might adversely affect safety, <u>transparency and openness enhance</u> the ability of the regulatory body to make independent judgements and decisions.		Rephrased for clarity.
30.	1.3 p12	<b>5. United States of America / NRC</b> <i>Credibility and legitimacy</i> : transparent and open communication about regulatory decision-making and opportunities for stakeholder involvement <del>in that process</del> reinforces interested parties’ awareness of the role and responsibility of the regulatory body for protecting people and the environment from harmful effects of ionizing radiation and helps to inform interested parties how it discharges its duties.	Suggest deleting “in that process.” It is not clear what process is referring to.	X			
31.	1.3 p12	<b>6. United States of America / NRC</b> Second paragraph, second line, edit to add as follows: ... individuals or societal groups to <u>participate in, and challenge,</u> the regulatory...	Completeness: Individuals may participate in the regulatory process. Challenge is a subset of participation.	X			
32.	1.5 p13 Consultation	<b>6. France / ASN - NUSSC (F. Feron)</b> Consultation includes processes such as public meetings, public hearings, <u>feedback through internet,</u> advisory committees, polling and focus groups.	To put emphasis on internet.	X			
33.	1.6	<b>7. United States of America / NRC</b> Last sentence, revise to read as: This guide does <u>not</u> address communication <del>neither</del> during emergency situations <del>nor</del> <u>or</u> with respect to security, covered by other IAEA publications.	Editorial to simplify sentence construction for understanding. Note: Should we be addressing security in communication with interested parties?	X			According to the DPP, security is not to be discussed in this publication. See also answer to comment 2.



COMMENTS BY REVIEWER				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
<b>2. OVERARCHING RECOMMENDATIONS</b>							
34.	2.2	<b>7. France / ASN - NUSSC (F. Feron)</b> <del>If any interested party does not trust the regulatory body in a particular process setting it will not take part in the process and consequently the regulatory body will lose legitimacy.</del>	The sentence is too affirmative.		If any interested party does not trust the regulatory body in a particular process setting, it <u>may</u> not take part in the process and consequently the regulatory body <u>may</u> lose some <u>credibility</u> .		It is proposed to keep the content of this sentence but to soften it. Indeed, it stresses the importance for the RB to be a trusted organisation. Considering comment 36 (Finland), legitimacy is replaced by credibility.
35.	2.2	<b>7. Germany / BMU and GRS – RASSC</b> last sentence: “... Stakeholders’ trust can never be established “once and for all”. It is easy to lose and it should be earned on a <del>continual</del> <u>continuous</u> basis.”	It should be avoided to use the adjectives ‘continuous’ and ‘continual’ interchangeably because there is a difference between them. ‘continuous’ indicates duration without interruption. ‘continual’ indicates duration that continues over a certain period of time, but with intervals of interruption. In the context of this subsection, the term ‘continuous’ is preferred.	X			
36.	2.2	<b>7. Finland / STUK – WASSC, NUSSC, RASSC</b> <del>“ If any interested party does not trust the regulatory body in a particular process setting it will not take part in the process and consequently the regulatory body will lose legitimacy.”</del>	The legitimacy of the regulatory body should due to legislation; it is not due to interest of interested parties.		See proposal to comment 34.		Authority is due to legislation. Legitimacy can refer either to: - the quality of conforming to law; or - credibility (authenticity). To avoid misunderstanding, ‘credibility’ is used.
37.	2.2	<b>8. Finland / STUK – WASSC, NUSSC, RASSC</b> <del>Stakeholders’ trust can never be established “once and for all”. It is easy to lose and it should be earned on a continual basis.</del>	Trivial; text is not type of safety guides.			X	Trust is a difficult but important concept that should be addressed and that the regulatory body should keep in mind. See also comment 38.

COMMENTS BY REVIEWER				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
38.	After 2.3	<b>8. Germany / BMU and GRS – RASSC</b> Add a new paragraph 2.4 in the subsection “EARNING TRUST” with the following text: “ <u>Trust can also be built by the public perception that a regulatory body is represented by qualified and competent staff. It should therefore be assured that the personnel of the regulatory body have the necessary knowledge, skills and abilities, as stated in Requirement 18 – Staffing and competence of the regulatory body – of GSR Part 1 [2].</u> ”	The aspect of competence, in combination with transparency and openness, has proven to be a key factor for the reputation of the regulatory body as well as for the public confidence in the regulatory body. Therefore, this aspect should be addressed in any way at any place in the document.		Trust can also be built by the public perception that a regulatory body employs a sufficient number of qualified and competent staff to perform its functions and to discharge its Responsibilities, as specified in GSR Part 1, Requirement 18 “Staffing and competence of the regulatory body” [2].		The guidance on the competence of the staff of the RB is addressed in GS-G-1.1 (being revised in DS472).
39.	2.3	<b>9. Finland / STUK – WASSC, NUSSC, RASSC</b> <del>Staff Senior management</del> of the regulatory body should be committed to implement a high level of transparency and openness	Requirement should be for all staff members of the regulatory body.		2.3 The regulatory body should be committed to implement a high level of transparency and openness.		
40.	2.3	<b>10. Finland / STUK – WASSC, NUSSC, RASSC</b> This implementation should be based on pro-active public communications and initiating dialogue, and on willingness to listen and respond to a broad variety of concerns, <u>as well as a real public participation in regulatory activities.</u>	Here, the difference between political decision making process and safety authority decision making process should be clarified.			X	As described by the DPP, DS460 provides guidance for regulatory activities and does not address political issues, such as public acceptance.
41.	2.5	<b>11. Finland / STUK – WASSC, NUSSC, RASSC</b> Please clarify the roles of the organisations. “The regulatory body is responsible for the regulatory oversight of nuclear and radiation safety and <u>not biased</u> in favour of promotion of the nuclear uses.”	A prerequisite for a safety authority but not necessarily for governmental organizations. See comment 2.		X		See comment 6: when necessary, clarifications have been brought (e.g., paragraphs 2.8, 2.9, 2.15, 2.17, 3.1) to clarify the scope of DS460. This is a key guidance for RB, which should be independent from any promotional activities (see GSR Part 1 req. 4, 2.8 and 2.11, and req. 17, 4.9).

COMMENTS BY REVIEWER				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
42.	2.6	<b>8. France / ASN - NUSSC (F. Feron)</b> 2.6. <u>Within its budget</u> , The regulatory body should be <del>adequately funded</del> <u>devote funds</u> to support communication and consultation with interested parties.	GSR part 1 (requirement 3, para 2.8 and 4.4) does not dedicate specific resources to specific actions of the regulator. GSR Part 1 requirement 16 and para 4.5 establish that the regulator has to allocate resources...	X			
43.	2.6	<b>9. Germany / BMU and GRS – RASSC</b> “The regulatory body should be adequately funded to support communication and consultation with interested parties <u>and enable the regulatory body to act independently from external influences.</u> <u>Insufficient funding could make the regulatory body prone to offerings of interested parties and might thereby compromise its independence.</u> ”	Clarification. Sufficient funding is not directly a prerequisite for independence but can make the regulatory body more robust against the influence of interested parties. The amendment shall provide the connection to the title of the subsection (“INDEPENDENCE”).		.	X	The general issue of funding the RB is not relevant here. See answer to comment 42.
44.	2.6	<b>12. Finland / STUK – WASSC, NUSSC, RASSC</b> “The regulatory body should be adequately funded to support communication and consultation with interested parties.”	This should be a requirement in a policy paper. Please check.		True, see more specific guidance in answer to comment 42.		
45.	2.8, 3 <sup>rd</sup> bullet	<b>2. Argentina / ANR – NUSSC</b> Add: - <u>consider transboundary relations with other countries than neighbouring countries, for promoting in such way a global network.</u>	Completeness		Last existing bullet amended as follow: – consider international relations and in particular transboundary relations with neighbouring countries. In this respect, together with the competent national authorities, the RB should explore...		Inclusion of relation with other countries than neighbouring countries.

COMMENTS BY REVIEWER				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
46.	2.8	<b>13. Finland / STUK – WASSC, NUSSC, RASSC</b> “...establish meaningful two-way interactions with interested parties in order for them to have fair and reasonable opportunities to provide their views and <u>to influence regulatory processes.</u> ”	Here, the difference between political decision making process and safety authority decision making process should be clarified.			X	The comment is not very clear. The decisions made by the regulatory body are about safety-related decisions which should be clearly described within the legal and regulatory framework. It does seem to be appropriate to attempt to address a political dimension here.
47.	2.10	<b>9. France / ASN - NUSSC (F. Feron)</b> - it makes possible for interested parties to <u>positively</u> influence the process and to contribute with their perspectives at a stage when they <del>can still be</del> <u>may be more easily</u> incorporated.	Superfluous  It is still possible later in the process....	X			
48.	2.10	<b>14. Finland / STUK – WASSC, NUSSC, RASSC</b> When necessary, the regulatory body should ensure that interested parties are involved as soon as possible, even in certain cases before launching the <u>regulatory activity, e.g., review and assessment relating to radioactive waste facilities [20, 21].</u> This includes that the arrangements for public’s participation are clearly explained as early as possible.	Here, the difference between political decision making process and safety authority decision making process should be clarified.			X	See comment 46.
49.	2.12	<b>10. France / ASN - NUSSC (F. Feron)</b> 2.12. The regulatory body should ensure that these arrangements are stable and consistent <del>with the communication strategy to build confidence among interested parties.</del>	Superfluous	X			
50.	2.12	<b>11. France / ASN - NUSSC (F. Feron)</b> Merge 2.12 as modified (see previous comment) with 2.11	Same topic in 2.11 and 2.12	X			
51.	2.13	<b>3. Argentina / ANR – NUSSC</b> 2.13. All results of communication and consultation with interested parties should be considered formally or informally, on a case-by-case basis.	To be congruent with paragraph 4.34		2.13 All results of formal communication and consultation with interested parties should be documented.		In congruence with 4.34 and to address the actual issue of this sentence.

COMMENTS BY REVIEWER				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
52.	2.14	<b>8. United States of America / NRC</b> “...taking into consideration other experiences at the national or international level, feedback...”	Inserting article “the” to improve sentence	X			
53.	2.15	<b>12. France / ASN - NUSSC (F. Feron)</b> 2.15. Each interested party should have appropriate access to information concerning safety that is held by public authorities and authorised parties, and the opportunity to influence the decision-making processes. States should facilitate and encourage public awareness and participation by making information widely available. <u>Restriction on information should be limited, although it is acknowledged that some sensitive information with regards to nuclear security and proprietary information for instance, cannot be released to the public.</u>	Insert in 2.15 the second sentence of 2.16 so that, in the same paragraph, both aspect of transparency on safety matters and protection of sensitive information are addressed.		2.15. ... The regulatory body should facilitate and encourage public awareness and participation by making information widely available. Although it is acknowledged that some sensitive information cannot be disclosed (e.g. with regards to nuclear security, physical protection and proprietary information), restriction on information should be limited and fully justified on the basis of legal and regulatory criteria.		Agreed but modified for better clarity and to consider Finland’ comment (comment 70) regarding the justification based on legislative criteria.
54.	2.16	<b>13. France / ASN - NUSSC (F. Feron)</b> 2.16. The regulatory body should strive to publish as much relevant information as possible, <u>while protecting</u> . <del>Restriction on information should be limited, although it is acknowledged that some sensitive information with regards to nuclear security and proprietary information for instance, cannot be released to the public.</del>	Simplification, considering changes proposed to 2.15		2.16. The regulatory body should strive to publish as much relevant information as possible, <u>while protecting</u> sensitive information with regards, <u>for instance,</u> to nuclear security and proprietary information		Rephrased
55.	2.16	<b>4. Argentina / ANR – NUSSC</b> Instead of “ <del>to publish as much relevant information as possible</del> ” the phrase should read “ <u>to publish the relevant necessary information</u> ”.	Clarification			X	The meaning is different.

COMMENTS BY REVIEWER				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
56.	2.16	<b>10. Germany / BMU and GRS – RASSC</b> 3 <sup>rd</sup> sentence: “It needs and should have responsibility for providing information about: (a) its programmes, activities and results, positions and decisions; (b) <del>and about</del> the radiation risks associated with facilities and activities; and (c) accidents, incidents, <del>including accidents</del> and abnormal occurrences in facilities and activities.”	1.) This sentence addresses three specific areas of information to be provided by the regulatory body. Introduce structuring of the different items to improve the readability of the whole sentence. 2.) The existing text assigned to (c) insinuates (by the word “including”) that accidents and abnormal occurrences are a subset of incidents.		It <del>needs and</del> should have responsibility for providing information about: (a) its programmes, activities and results, positions and decisions; (b) the radiation risks associated with facilities and activities; and (c) <u>accidents, incidents and abnormal occurrences in facilities and activities</u>		Superfluous
57.	2.16	<b>11. Germany / BMU and GRS – RASSC</b> last sentence: “It is advisable that the regulatory body makes the results of the evaluation of its organisation and performances through external assessments, such as the <u>IAEA-led Integrated Regulatory Review Service (IRRS)</u> missions, available to the public to increase its own credibility in the eyes of other interested parties.”	The abbreviation IRRS should be explained here because it is not introduced elsewhere in the document.		See answer to 59.		
58.	2.16	<b>9. United States of America / NRC</b> Change to read “ <del>It</del> <u>The regulatory body</u> needs and should have the responsibility for providing...”	Editorial. The previous sentence addresses the restriction on data.	X			
59.	2.16	<b>10. United States of America / NRC</b> Change to read “...such as the <u>Integrated Regulatory Review Service (IRRS)</u> missions available to...”	Editorial. The previous sentence addresses the restriction on data.	X			
60.	2.17	<b>5. Argentina / ANR – NUSSC</b> Information on access to administrative review procedures should be available to any interested party which considers that its request for information has been ignored, wrongfully refused, whether in part or in full, inadequately answered, or otherwise not dealt with in accordance with applicable provisions	The information for accessing to such judicial review procedures may be outside the legal competence of the regulatory body, so its application should be evaluated on a case-by-case basis.			X	Of course, however the RB should be able to explain how to access the administrative review procedure.

COMMENTS BY REVIEWER				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
61.	After 2.17	<b>1. France / MEDDE</b> Addition after 2.17 <u>“PROTECTION OF SENSITIVE INFORMATION”.</u> <u>2.18 Before being released each information shall always be checked for sensitivity.</u> <u>2.19 Information shall be managed according to national rules on protection of information.</u>	Overarching recommendations should take into account the need for protection of information with is a high level requirement.			X	This issue is already covered in 2.16 and also addressed in section 4 para 4.9. However, it is proposed to add in 4.9 for clarity purpose: “ <i>according to national rules on protection of information</i> ”.

COMMENTS BY REVIEWER				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
<b>3.</b>							
62.	3. (p.19)	<b>16. Finland / STUK – WASSC, NUSSC, RASSC</b> Please rewrite	See comment 2.			X	The rationale is not very clear. The text has been carefully developed and checked during a TM in March 2013. In addition, although the objective of the document spelt out in 1.6, it is proposed for enhance again clarify to modify para. 3.1 as follow: 3.1. This section addresses ... legal and regulatory framework for safety. The regulatory body should ensure that the following guidance should be followed... (See comment 6).
63.	3.3	<b>14. France / ASN - NUSSC (F. Feron)</b> 3.3. Legal and regulatory requirements should be placed on licensees of nuclear facilities to disclose and make available information <u>related to the safety of their facilities</u> to interested parties.	Clarification on the nature of information expected.		See answer to comment 64.		The Safety Guide should apply to both facilities and activities.
64.	3.3	<b>15. France / ASN - NUSSC (F. Feron)</b>	Why is such recommendation limited to nuclear facilities?		“Legal and regulatory requirements should be placed on authorized party to disclose and make available information to interested parties about the possible radiation risks associated with the operation of a facility or the conduct of activities.”		Sentence reworded to be in line with GSR Part 1 requirement 36, 4.68.



COMMENTS BY REVIEWER				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
65.	3.3	<b>4. ENISS</b> Legal and regulatory requirements should be placed on licensees of nuclear facilities to disclose and make available information to interested parties <u>as far as this is connected to the scope of the license or gives rise to radiation</u>	The requirements of the licensees should be specified and dedicated to the granted license.		See answer to comment 64.		Sentence reworded to be in line with GSR Part 1 requirement 36, 4.68.
66.	3.6	<b>16. France / ASN - NUSSC (F. Feron)</b> To facilitate their participation in specific activities or projects, provision should be made in the regulation <del>that they should be</del> <u>to have interested parties</u> informed in a timely and effective manner (e.g., either by public notice or individually as appropriate.), of:	Clarification		To facilitate <u>interested parties'</u> participation in specific activities or projects, provision should be made in the regulation to have them be informed in a timely and effective manner...		Rephrased
67.	3.6	<b>17. France / ASN - NUSSC (F. Feron)</b> - The (envisioned) procedure, including as and when this information can be provided:	The procedure may already be clear as per regulation (it would not be an envisioned procedure but the procedure that will be followed...)	X			
68.	3.8	<b>18. France / ASN - NUSSC (F. Feron)</b> <del>3.8 Governments and regulatory bodies should have an open attitude to the possible institutionalization of new processes for communication and consultation. Such processes can be developed and established as informal and voluntary activities</del>	Superfluous Simplification	X			
69.	3.9	<b>19. France / ASN - NUSSC (F. Feron)</b> 3.9 A balance should be struck between <del>the inescapable force of</del> legal or regulatory requirements and an informal process that can be effective in providing awareness but is essentially dependent on the good will of key actors.	Superfluous	X			
70.	3.13	<b>15. Finland / STUK – WASSC, NUSSC, RASSC</b> Please rewrite the text. In principle, all information is public. The information disclosure may be restricted only if there is criterion in legislation. Such criteria can be for example the... »	Clarification of the communication principles.		3.13 Legal and regulatory restriction disclosure criteria should be designed for information disclosure which may adversely affect...		See also answer to comment 53.
71.	3.13	<b>2. France / MEDDE</b> <u>Add</u> <u>Guidance on security of information is provided in IAEA NST 022</u>	Reference to IAEA guidance on security of information should be done.		Reference to publications from security series will be added		IAEA NST 022 seems to be still under development

COMMENTS BY REVIEWER				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
72.	3.14	<b>20. France / ASN - NUSSC (F. Feron)</b> A refusal should state the reasons for not disclosing the information and describe <u>briefly</u> how the decision was made to deny the request for information. The refusal should be made as soon as possible and within regulatory limits ( <u>if any</u> ).	Clarifications	X			
73.	3.14	<b>17. Finland / STUK – WASSC, NUSSC, RASSC</b> “A refusal should state the <i>legal based</i> reasons for not disclosing the information and describe how the decision...”	Basis for communication is that all information is public and information disclosure may be restricted only, if there is criterion in legislation.	X			See also answers to comment 53 and 70.

COMMENTS BY REVIEWER				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
<b>4.</b>							
74.	4. (p.22)	<b>18. Finland / STUK – WASSC, NUSSC, RASSC</b> Please check that the wordings are in line with GSR Part 1 and GSR Part 2 (draft) (avoid repetition).	Requirement level documents. Information disclosure should be restricted only, if there is criterion in legislation	X			Wording is in line with GSR Part1. GSR Part 2 is not finalized yet and cannot be quoted but this document is also in line with it.
75.	4.2	<b>21. France / ASN - NUSSC (F. Feron)</b> 4.2. Senior management should provide leadership and a clear commitment to a high level of transparency and openness in regulatory activities, <del>going beyond, when possible, what the legislation and the regulations require keeping in mind compliance</del> <u>complying</u> with legislation and regulation <del>should be ensured at any time and going beyond if needed</del> as. Merely following the legal and regulatory requirements in an administrative way can result in a low level of meaningful public participation, without true transparency and openness.	Alternative wording to emphasis first compliance with mandatory requirements for transparency and openness, then recognizing it may not be enough.		Senior management should provide leadership and a clear commitment to transparency and openness in regulatory activities, going beyond to, when possible, the minimum level imposed by laws and regulations...		Rephrased
76.	4.2	<b>3. Japan / NRA – NUSSC</b> Change as follows; 4.2. Senior management should provide leadership and a clear commitment to a high level of transparency and openness in regulatory activities, <del>going beyond, when possible, what the legislation and the regulations require keeping in mind compliance with legislation and regulation should be ensured at any time, considering that the requirements of the legislation and the regulations are minimum ones.</del> Merely following the legal and regulatory requirements in an administrative way can result in a low level of meaningful public participation, without true transparency and openness.	<b>Improvement.</b> Description “going beyond, when possible, what the legislation and the regulations require” sounds that the regulatory body is allowed not to follow the legislations and the regulations in the country ruled by law.		See answer to comment 75.		Rephrased to clarify its meaning.
77.	4.3	<b>22. France / ASN - NUSSC (F. Feron)</b> 4.3. Efforts should be made to promote the importance and to support an in-house culture of transparency and openness among the regulatory body staff. <del>Such a culture helps enhance interested parties’ confidence in the regulatory body.</del>	Too affirmative	X			

COMMENTS BY REVIEWER				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
78.	4.3	<b>11. United States of America / NRC</b> “Efforts should be made to promote the importance <u>of</u> and to support an in-house culture...”	Inserting the word “of” to improve sentence flow	X			
79.	4.4	<b>23. France / ASN - NUSSC (F. Feron)</b> 4.4. A communication strategy should be developed and implemented considering the role and functions of the regulatory body as well as its overall aim to improve transparency and openness and contribute to increased public confidence <u>in the regulatory body</u> .	Clarification	X			
80.	4.4	<b>12. Germany / BMU and GRS – RASSC</b> 1 <sup>st</sup> sentence: “A communication strategy should be developed and implemented considering the role and functions of the regulatory body as well as its overall aim to improve transparency and openness and contribute to increased public confidence (Cf. Appendix I).”	This statement refers to Appendix I. Note that Appendix I is not cited elsewhere in the document.	X			
81.	4.4	<b>19. Finland / STUK – WASSC, NUSSC, RASSC</b> “This strategy should be integrated within the overall strategy <u>for safety</u> of the regulatory body”	Include this to the top level strategy of the regulatory body.	X			
82.	4.6	<b>24. France / ASN - NUSSC (F. Feron)</b> 4.6. The interaction between the communication staff and technical staff of the regulatory body should be <u>encouraged constant and continuous</u> .	Unrealistic recommendation		Good interaction between the communication and technical staff of the regulatory body should <u>exist</u> .		Rephrased to make it stronger.
83.	4.8	<b>25. France / ASN - NUSSC (F. Feron)</b>	This recommendation may need a discussion in NUSSC		The regulatory body, where appropriate, should <del>encourage and</del> assist communities to develop processes of communication and to understand issues with its assistance and the assistance of operators.		This guidance is in line with 4.23 to 4.25 regarding local liaison groups (or committees) assistance. But other communities may need some assistance, e.g., local people for town hall meetings.
84.	4.8	<b>5. ENISS</b> The regulatory body, where appropriate, should encourage and assist communities to develop processes of communication and to understand issues with its assistance and the assistance of <del>operators</del> <u>the licensees</u> .	If Legal and regulatory requirements are placed on licensees of nuclear facilities to disclose and make available information to interested parties the licensee is the correct contact person.	X			

COMMENTS BY REVIEWER				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
85.	4.9	<b>26. France / ASN - NUSSC (F. Feron)</b> At all times, the national legal and regulatory requirements should be fulfilled and <del>confidential sensitive</del> information properly protected.	To be consistent with 2.15 and 2.16	X			
86.	4.9	<b>6. Argentina / ANR – NUSSC</b> Delete the phrase “ <del>the national legal and regulatory requirements should be fulfilled</del> ”	It is obvious and it could be deleted.	X			
87.	4.14	<b>3. France / MEDDE</b> <u>Guidance on information considered to be sensitive can be found in IAEA NST 022.</u>	Ref to NST 022 should be done to inform on what kind of information could be restricted	X			
88.	4.15	<b>27. France / ASN - NUSSC (F. Feron)</b> 4.15. The regulatory body should participate in meetings, conferences or other public gatherings <del>that</del> <u>even those are</u> sponsored by other organizations, preferably in a consistent manner over time.	To allow flexibility	X			
89.	4.15	<b>20. Finland / STUK – WASSC, NUSSC, RASSC</b> Please consider removing/rewriting the following: “The regulatory body should participate in meetings, conferences or other public gatherings that are sponsored by other organizations in a consistent manner over time.”	This in not necessarily wise, this may lead to loss of perceived independence.		When relevant, The regulatory body should consider participating in meetings, conferences or other public gatherings that are sponsored by other organizations in a consistent manner over time.		These participations could be a very good vehicle to convey some key messages regarding safety for instance and to reach some specific interested parties categories, e.g., medical doctors. Of course, in compliance with the other guidance, doing so, the RB should ensure its independence will not be called into question.
90.	4.17	<b>28. France / ASN - NUSSC (F. Feron)</b> 4.17. The regulatory body should <u>strive to</u> be known as an independent, credible and reliable source of information.	To be humbler	X			
91.	4.17	<b>6. ENISS</b> All communications with interested parties should be concise and in <u>unmistakable and plain clear</u> language.	Communication should avoid misinterpretation and should therefore be unmistakable and plain.	X			

COMMENTS BY REVIEWER				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
92.	4.17	<b>21. Finland / STUK – WASSC, NUSSC, RASSC</b> “At the same time, it should be quick to respond to their inquiries and, if possible, to correct inaccuracies, and also <i>of its own activity/behaviour.</i> »	It is most important to correct also RB’s own behavior/communication process in addition to correction of e.g. misleading/incorrect information.			X	Inaccuracies in its own communication are already implied/included in the sentence. The improvement of the communication process is already addressed in para 4.53 and 4.54.
93.	4.17	<b>7. Argentina / ANR – NUSSC</b> “... respond to their inquiries and, when necessary, to correct and clarify inaccuracies”.	Clarification	X			
94.	4.19	<b>22. Finland / STUK – WASSC, NUSSC, RASSC</b> <i>Communication should be adapted to the audience, taken into account also e.g. educational and cultural issues. “Communication may also be adapted according to the gender and the age (e.g., children, teenagers, adults) of the public. The role of community leaders such as local elected officials, religious and social leaders in framing public perception should not be underestimated.”</i>	Too detailed and maybe even illegal. One of the basic principles of communication is to adapt the message to the audience.		Communication should be adapted to the audience, and therefore should take into account aspects such as cultural, social or educational issues.		Rephrased
95.	4.20	<b>7. ENISS</b> There is no way to control how a message is eventually diffused through the media; that is why all communications with media should be concise and in <del>clear</del> <u>unmistakable and plain</u> language.	Communication should avoid misinterpretation and should therefore be unmistakable and plain.	X			
96.	4.20	<b>12. United States of America / NRC</b> <del>Journalists, are important stakeholders, and various news and social media are one of the most important channels for the regulatory body to communicate with interested parties.</del>	Delete the first part of the sentence that made it too long and read awkwardly.	X			
97.	4.22	<b>23. Finland / STUK – WASSC, NUSSC, RASSC</b> “A press conference should be announced in a timely manner and advance information may be provided to facilitate journalists’ participation. <i>When possible press conferences should be available on line (and recorded) in web.</i> ”	Addition.		When possible press conferences should be recorded and made available on Internet.”		Rephrased
98.	4.24	<b>29. France / ASN - NUSSC (F. Feron)</b> 4.24. Members of liaison groups should come largely from those who reside in the vicinity of nuclear installations. <u>Liaison groups should also be able to invite, as necessary, third parties (e.g., professors, researchers and experts) for discussion-facilitation and fact-finding.</u>	Add the second sentence of 4.25			X	For clarity purpose. Indeed, 4.24 addresses liaison groups composition whereas 4.25 talks about possible invitees

COMMENTS BY REVIEWER				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
99.	4.25	<b>30. France / ASN - NUSSC (F. Feron)</b> 4.25. Upon invitation of a local liaison group, the regulatory body and other concerned state organizations should participate in activities of the local liaison group and may attend meetings in an advisory capacity. <del>Moreover, local liaison groups should be able to invite, as necessary, third parties (e.g., professors, researchers and experts) for discussion facilitation and fact finding.</del>	To take into account change in 4.24 and focus on 4.25 on Administrative Bodies.			X	See comment 98
100.	4.26	<b>13. United States of America / NRC</b> Para 4.26 appears to address specific interest groups' concerns without guidance on how to alleviate such concern. We recommend adding the following sentence at the end of Para 4.26: These groups should be given fair opportunities to participate. They should also be provided with factual information on current nuclear issues to help avoid misconceptions. <u>For example, an independent expert elicitation group could be appropriate to provide unbiased information regarding potential risk, elucidating technical issues, and addressing specific interest groups' concerns.</u>	Completeness and clarification: An independent expert elicitation group could be an appropriate vehicle to address public concerns and illustrate safety/risk issues in a simplified fashion. This is due to the fact for certain countries embarking on nuclear energy; governmental authorities appear to be promoter of nuclear power. Therefore, having an independent expert groups could enhance public trust in the decision making process.		For example, a dedicated independent expert group could be appropriate to provide unbiased information regarding potential risk, elucidating technical issues, and addressing specific interest groups' concerns.		Rephrased
101.	4.27	<b>31. France / ASN - NUSSC (F. Feron)</b> 4.27. Within the governmental, legal and regulatory infrastructure, the exchange of information and the consultation among governmental bodies and other regulatory authorities are paramount for coherent and efficient regulation of safety, <del>including especially</del> in the following areas: environmental protection; public and occupational health, emergencies, radioactive waste management, and safety in the transport of radioactive materials.	Clarification	X			
102.	4.27	<b>14. Germany / BMU and GRS – RASSC</b> “... including in the following areas: environmental protection, public and occupational health, <del>emergency</del> <u>preparedness and response</u> , radioactive waste management, and safety in the transport of radioactive materials.”	Wording.	X			

COMMENTS BY REVIEWER				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
103.	4.29	<b>32. France / ASN - NUSSC (F. Feron)</b> 4.29. Elected officials at all levels should be kept informed of the regulatory body's actions in protecting people and the environment. The regulatory body should inform elected officials of events and actions, and should provide timely and <del>complete</del> appropriate responses to their inquiries.	"Complete" is inadequate as the question may exceed the regulator mandate or knowledge...	X			
104.	4.30	<b>8. ENISS</b> Then, the regulatory body should contribute to informing professionals using ionizing radiation, and transporting, using or processing radioactive materials, such as <del>licensees operators</del> of nuclear facilities, on safety-related matters (e.g., new developments relating to safety, lessons learned from incidents and accidents, and new regulations).	The contact person of the regulator is the licensee.	X			
105.	4.30	<b>24. Finland / STUK – WASSC, NUSSC, RASSC</b> Please rewrite: "Then, the regulatory body should contribute to informing professionals using ionizing radiation, and transporting, using or processing radioactive materials, such as operators of nuclear facilities, on safety-related matters (e.g., new developments relating to safety, lessons learned from incidents and accidents, and new regulations)."	Unclear, what is meant by this?		Then, the regulatory body should contribute providing professionals and authorized parties involved in the operation of a facility or the conduct of activities with safety-related information on, for instance: new developments relating to safety regulation and lessons learned from incidents and accidents, etc.		Rephrased
106.	4.30	<b>14. United States of America / NRC</b> The document quotes from GSR requirements (e.g.; GSR Parts 1 through 7) in developing specific guidance regarding communication and consultation. We note that these documents are under further review and revision (e.g.; DS462).	Ensure alignment of text quoted from GSRs with text proposed in DS462. Specifically, additional requirements pertaining to emergency situations and related communications need to be	X			This is the case (see answer to comment 51.)
107.	4.34	<b>33. France / ASN - NUSSC (F. Feron)</b> They should be kept informed about the regulatory decisions and activities, and <del>at</del> other relevant safety-related information.	Too ambitious	X			



COMMENTS BY REVIEWER				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
108.	4.34	<b>8. Argentina / ANR – NUSSC</b> The regulatory body's employees <u>when necessary</u> communicate with the public both formally and informally.	In order to be practical		The regulatory body's employees communicate with the public <u>formally, but also informally, in their daily life.</u> <u>Therefore</u> they should be kept informed about the regulatory decisions and activities, and all other relevant safety-related information		The first part is a fact not a recommendation. It provides an explanation why the regulatory staff is a (key) interested party. In this respect, numerous organisations formally address both: external and 'internal' communication.
109.	4.34	<b>25. Finland / STUK – WASSC, NUSSC, RASSC</b> <del>"The regulatory body's employees routinely communicate with the public both formally and informally. They</del> <i>The public</i> should be kept informed about the regulatory decisions and activities, and all other relevant safety-related information	Unclear and trivial. Either needs edition or removal.		X		See answer to comment 108.
110.	4.35	<b>15. United States of America / NRC</b> Change to read "from <del>setting up</del> identifying the objective <del>up to the process evaluation</del> <u>to evaluating the consultation process to identifying areas for improvement.</u> "	Editorial and provides clarification.	X			
111.	4.35 (Fig. 3)	<b>13. Germany / BMU and GRS – RASSC</b> Proposed title of Figure 3: <del>"Steps in the c</del> ommunication and consultation process, <del>should include these steps from setting</del> communication and consultation objective up to the <del>evaluation of the process."</del>	The title is not consistent with the one provided in the text.	X			
112.	4.37	<b>34. France / ASN - NUSSC (F. Feron)</b> At all points in the communication and consultation process, it should <del>be crucial to</del> be clear about what the regulatory body can or cannot do.	Superfluous	X			
113.	4.37	<b>26. Finland / STUK – WASSC, NUSSC, RASSC</b> <del>"At all points in the communication and consultation process, it should be crucial to be clear about what the regulatory body can or cannot do. If interested parties have unrealistic expectations, they are more likely to be disappointed and lose confidence in the process and in the regulatory body itself."</del>	Trivial.			X	This is an important prerequisite proposed by expert during the technical meeting organised in March 2013. Not keeping this in mind could lead to misunderstandings when consulting interested parties.

COMMENTS BY REVIEWER				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
114.	4.37	<b>16. United States of America / NRC</b> Revise to read: "...process, it <del>should be</del> <u>is</u> crucial to be clear..."	Editorial. Sentence construction.		...it should be clear about what...		Better to use should-statement
115.	4.38 bullet list	<b>35. France / ASN - NUSSC (F. Feron)</b> - increase public trust and confidence <u>in the regulatory body</u> by keeping the public informed in a transparent and open manner on how safety requirements are established and enforced;	clarification	X			
116.	4.38 bullet list	<b>36. France / ASN - NUSSC (F. Feron)</b> - disseminate information on safety to interested parties, including information about <u>abnormal occurrences, incidents and accidents</u> in facilities and activities, <del>including accidents and abnormal occurrences</del> ; radiation risks associated with facilities and activities; - <u>requirements</u> for protecting people and the environment; processes of the regulatory body; and regulatory judgements and decisions;	More logical order  Make it a separate bullet as it is a different topic from the previous sentence	X			
117.	4.38 3 <sup>rd</sup> bullet	<b>2. Japan / NRA – NUSSC</b> Add underlined word; - involve interested parties in decision-making <u>process</u> through consultation or even collaboration mechanisms.	Involvement of interested parties should be not in decision-making directly, but in its process.	X			
118.	4.38 bullet list	<b>37. France / ASN - NUSSC (F. Feron)</b> - involve interested parties in decision-making through consultation or even collaboration mechanisms. In this respect, interested parties residing in the vicinity of current or proposed authorized facilities and activities should, <u>where relevant</u> , be consulted by means of an open, inclusive and responsive process.	It may be excessive for a dentist...		In this respect, interested parties residing in the vicinity of current or proposed authorized facilities and activities should be consulted, <u>when relevant</u> , by means of an open, inclusive and responsive process;		Slightly rephrased.
119.	4.38 bullet list	<b>15. Germany / BMU and GRS – RASSC</b> 2 <sup>nd</sup> bullet point: "disseminate information on safety to interested parties, including information about <u>accidents, incidents and abnormal occurrences</u> in facilities and activities, <del>including accidents and abnormal occurrences</del> ; ..."	Clarification. The existing text insinuates (by the word "including") that accidents and abnormal occurrences are a subset of incidents.		including information about <u>abnormal occurrences, incidents and accidents...</u>	X	See comment 116.  However, the initial wording is the one used in GSR Part 1, req. 36, 4.66 (e)!

COMMENTS BY REVIEWER				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
120.	4.38 bullet list	<b>16. Germany / BMU and GRS – RASSC</b> 3 <sup>rd</sup> bullet point: “involve interested parties in decision-making <u>process</u> through consultation or even collaboration mechanisms. ...”	Consistency with the terminology used elsewhere in the document. It is understood that interested parties should not be involved in decision-making directly (this is the task of the regulatory body), but in the corresponding process.	X			
121.	4.41	<b>38. France / ASN - NUSSC (F. Feron)</b> 4.41. <del>At all times</del> , the regulatory body should ensure that adequate budget and other resources are available to achieve the goals of the communication and consultation process.	Superfluous	X			
122.	4.41	<b>27. Finland / STUK – WASSC, NUSSC, RASSC</b> “At all times, the regulatory body should ensure that adequate budget and other resources are available to achieve the goals of the communication and consultation process.”	This should be a requirement in a policy paper. Please check	X			This is already the case. Here, the guidance is about the need to ensure a full coherence between the design and the implementation of a specific com. process and the actual fund available for it.
123.	After 4.41	<b>17. Germany / BMU and GRS – RASSC</b> Insert a new subheading “ <u>Establishment of a communication plan</u> ”	As shown in Figure 3, the main steps in the communication and consultation process are ‘Preparation’, ‘Planning’, ‘Implementation’ and ‘Evaluation’. Preparation, implementation and evaluation are reflected in the text by corresponding subhead-ings. This should also be done for the planning step (Paras 4.42 to 4.49).		New subheading titled “Planning”		
124.	4.42	<b>18. Germany / BMU and GRS – RASSC</b> 1 <sup>st</sup> sentence: “... a communication plan should be established as part of an integrated strategy for achieving transparency and openness (Cf. <del>Annex</del> <u>Appendix II</u> ).”	This statement refers to Appendix II. Annex II does not exist in the document.	X			

COMMENTS BY REVIEWER				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
125.	4.45	<b>19. Germany / BMU and GRS – RASSC</b> 1 <sup>st</sup> sentence: “... specific complex projects (siting of <u>radioactive waste management</u> repository, cleaning of legacy contaminated sites, etc.)”	Use correct terminology (compare with the word-ing in the 2nd sentence of Para 4.47). According to the IAEA Safety Glossary (2007 Edition), the term ‘radio-active waste man-agement’ encompasses all administrative and operational activities involved in the handling, pretreatment, treatment, conditioning, transport, storage and disposal of radioactive waste.	X			
126.	4.47	<b>39. France / ASN - NUSSC (F. Feron)</b> the regulator may decide to implement a specific process to give interested parties the possibility to participate actively and to be involved <u>since the very beginning of the decision making process.</u>	Clarification	X			
127.	4.47	<b>28. Finland / STUK – WASSC, NUSSC, RASSC</b> “...the regulator may decide to implement a specific process to give interested parties the possibility to participate actively and to be involved in the decision making process.”	Here, the difference between political decision making process and safety authority decision making process should be clarified.			X	This case is highlighted as an option. See also comment 40.
128.	4.48	<b>40. France / ASN - NUSSC (F. Feron)</b> Others, <del>particularly some NGOs,</del> may be reluctant to participate fully in the consultation in order to preserve their independence and autonomy.	Superfluous	X			
129.	4.50	<b>3. Sweden / SSM</b> Development and implementation of a communication plan should be <u>led by the communication staff and</u> coordinated with experts and senior management of the regulatory body,when...	The communication staff should have a major role in the communication strategy, especially when the situation is stressed with short deadlines.		Development and implementation of a communication plan should be led by the communication staff in coordination with senior management and experts of the regulatory body, when...		Coordination with experts is essential in every circumstance, even when deadlines are short.
130.	4.51	<b>41. France / ASN - NUSSC (F. Feron)</b> Regular <del>staff meetings should</del> review <u>of</u> the plan’s progress <u>should be carried out</u> , identifying any difficulties with implementation and making any necessary adjustments	Alternative wording	X			

COMMENTS BY REVIEWER				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
131.	4.52	<b>42. France / ASN - NUSSC (F. Feron)</b> 4.52. <del>Implementing the</del> Communication plans <del>should</del> <u>be may require</u> flexibility.	This section is addressing the implementation of the communication plan.		The implementation of the communication plan should be flexible.		Rephrased
132.	4.53	<b>43. France / ASN - NUSSC (F. Feron)</b> 4.53. The regulatory body should <del>continuously</del> monitor and <u>regularly</u> evaluate its communication and consultation process to identify successes, lessons learned and potential improvements to help the process achieve its overall objectives and to enhance public confidence in the regulatory body.	Continuous evaluation is excessive	X			
133.	4.54	<b>44. France / ASN - NUSSC (F. Feron)</b> 4.54. These reviews should consider the expectations and opinions of interested parties, <del>especially as well</del> <u>as of</u> the technical and communications staff of the regulatory body.	Clarification			X	As described in 4.34, RB Staff are an interested party
134.	Footnote 5 to 4.54	<b>20. Germany / BMU and GRS – RASSC</b> “A <del>s</del> Satisfaction committee consists of representatives of regulatory body staff, the public and other relevant interested parties, ...”	Editorial.	X			

COMMENTS BY REVIEWER				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
<b>5.</b>							
135.	5.2	<b>45. France / ASN - NUSSC (F. Feron)</b> Thus, legal and regulatory requirements, review and assessment conclusions, including critical comments, <del>inspection programme</del> , findings of inspections, regulatory decisions, etc. should be made proactively publicly available.	Inspection programme are not public in France.	X			
136.	5.2	<b>21. Germany / BMU and GRS – RASSC</b> 1 <sup>st</sup> sentence: “The regulatory body should routinely make as much information as possible available to the public relating to safety, including the <del>radioactive</del> <u>radiation</u> risks associated with facilities and activities, ...”	Clarification.	X			
137.	5.3	<b>46. France / ASN - NUSSC (F. Feron)</b> The INES scale should be explained to the public <del>with more detail on the event/accident in question.</del>	Superfluous	X			
138.	5.3	<b>22. Germany / BMU and GRS – RASSC</b> 2 <sup>nd</sup> sentence: Assign a footnote to the term ‘safety significance of events’ with the following text of the footnote: “ <u>As stated in GS-R-2 [3], INES is not to be confused with the emergency classification system for facilities and activities. INES is used by States for the purpose of communicating to the public the severity of an event only. It cannot be used as the basis for emergency response actions.</u> ”	This is an important aspect which should be addressed here. In this context, reference to GS-R-2 (see Para 4.20) or DS457 (see Para 5.26) is strongly recommended.		The emergency response classification system is not to be confused with the INES. The INES is used for communicating to the public the severity or estimated severity of an event and cannot be used as the basis for emergency response actions		Quote from GS-R-2 to be inserted in the existing footnote dedicated to INES (refer to para 4.14).
139.	5.3	<b>23. Germany / BMU and GRS – RASSC</b> 3 <sup>rd</sup> sentence: “Based on the IAEA guidance, including the INES User’s Manual <del>[27]</del> [29], INES classifications should be carried out carefully to avoid inconsistencies.”	Wrong reference is cited.	X			
140.	5.4	<b>47. France / ASN - NUSSC (F. Feron)</b> 5.4. <del>Specific attention</del> <u>Arrangements</u> should be taken to answer <del>any</del> question or <del>any</del> request for information from any interested party. A response should be delivered within a reasonable timescale.	Superfluous.	X			

COMMENTS BY REVIEWER				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
141.	5.5	<b>48. France / ASN - NUSSC (F. Feron)</b> Make the last sentence (“Special attention should be taken to avoid inconsistency of information delivered over time. Background information and key messages could be developed to support consistency over time”) a specific paragraph	Not the same topic as the previous sentences in the paragraph.	X			
142.	5.5	<b>29. Finland / STUK – WASSC, NUSSC, RASSC</b> Please remove. “Whatever the information delivered by the regulatory body, it should be understandable, reliable, based on facts and evidences, accessible, and provided in a timely manner. <del>The regulatory body should be scrupulous in providing information, neither overstating nor understating the significance of the communicated information.</del> ”	The most important criteria are given in the previous sentence and being scrupulous does not add any value here.	X			
143.	5.6	<b>49. France / ASN - NUSSC (F. Feron)</b> Delete 5.16	Already covered by 5.5			X	This is not the same issues: 5.6 deals with Independency when creating a document whereas 5.16 is about the clarity of role and responsibility
144.	5.10	<b>50. France / ASN - NUSSC (F. Feron)</b> <del>Furthermore, the information is easily kept updated and may be accessible in many languages</del>	Superfluous			X	It is important that interested parties can get up-to-date information and understandable (cf. countries where several languages are used)
145.	5.11	<b>51. France / ASN - NUSSC (F. Feron)</b> When using the web-based tools, it is important to <del>be</del> <u>enable interested parties</u> to efficiently retrieve information and provide comments.	Clarification	X			
146.	5.11	<b>30. Finland / STUK – WASSC, NUSSC, RASSC</b> Please clarify. “When using the web-based tools, it is important to be able to efficiently retrieve information and provide comments.”	Clarification.			X	Sentence already seems clear enough.
147.	5.15	<b>52. France / ASN - NUSSC (F. Feron)</b>	How does the last sentence (about the ultimate decision maker) relate to the regulatory body mandates and duties?			X	This sentence provides an explanation about the importance to engage their participations

COMMENTS BY REVIEWER				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
148.	5.17	<b>53. France / ASN - NUSSC (F. Feron)</b> 5.17. Participation process should <del>include discussions about</del> <u>address</u> the form and structure of the decision-making and regulatory processes as much as <del>about</del> its technical and scientific contents. It is necessary to allow for enough time for the process <del>as there is a continuous need</del> for feed-back and overview.	The decision making process may be already set up by the legislation/regulations  Simplification	X		X	Not necessarily. The regulatory body may decide to consult without a clear process legal and/or regulatory based (e.g., drafting regulations). In this case, it may be useful to discuss with interested parties the consultation process in advance
149.	5.17	<b>17. United States of America / NRC</b> The participation process xxx	Starting sentence with article “the” to improve readability	X			
150.	5.19	<b>54. France / ASN - NUSSC (F. Feron)</b> 5.19. During a participation process, <del>it should be considered</del> professional facilitators to conduct public meetings and other specific events <u>may be an option to achieve in an efficient consultation in a perceived more and impartial manner.</u>	Alternative wording		See proposal from comment 153: “To enhance the participation process, it can be beneficial to consider the use of professional facilitators to conduct meetings and other specific events in an efficient and impartial manner.”		From comment 153.
151.	5.19	<b>24. Germany / BMU and GRS – RASSC</b> 2 <sup>nd</sup> sentence: “This applies especially to the discussions on contentious issues such as <u>site</u> selection of a nuclear installation <del>site</del> or <u>a radioactive waste repository, or the renewal of an operating licence.</u> ”	In this context, please remember that the recently revised definition of the term ‘nuclear installation’ does not include facilities for the disposal of radioactive waste. With respect to those States that already use nuclear power, one of the key challenges is to gain public acceptance for the site selection process of a radioactive waste disposal facility.		This applies especially to the discussions on contentious issues such as site selection of a nuclear installation or a radioactive waste repository		Agree but the last part should be deleted to take into account comment 152.
152.	5.19	<b>31. Finland / STUK – WASSC, NUSSC, RASSC</b> Please remove. “During a participation process, it should be considered professional facilitators to conduct public meetings and other specific events in an efficient and impartial manner. This applies especially to the discussions on contentious issues such as selection of a nuclear installation site <del>or renewal of an operating licence.</del> ”	Granting operating licence is based on safety assessment done by safety authorities, not on public consultation. The political discussion should not be in place here –or if so- the political decision making process and safety authority decision making process should be clarified in the text.		See answer to comment 151.		Agree but the first part should be changed to take into account comment 151.



COMMENTS BY REVIEWER				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
153.	5.19	<b>18. United States of America / NRC</b> Rewrite it to say: To enhance the participation process, it can be beneficial to consider the use of professional facilitators to conduct meetings and other specific events in an efficient and impartial manner.	Clarifying sentence	X			
154.	5.19	<b>19. United States of America / NRC</b> It <del>should be</del> <u>may</u> also <u>be</u> useful to consider <u>asking</u> a third party to attend a meeting to provide a neutral perspective to dialogue and to facilitate mutual understanding.	Inserting a verb into the sentence		It may be considered asking a third party to attend a meeting to provide a neutral perspective to dialogue and to facilitate mutual understanding.		Rephrased
155.	5.21	<b>55. France / ASN - NUSSC (F. Feron)</b>	This recommendation may need a discussion in NUSSC		Therefore, arrangements to provide some interested parties with funding to be able to contribute to participation processes may be considered but should not call the independence of the regulatory body into question. An example of such initiatives is the creation of local liaison groups or committees as described in 4.23 to 4.25.		To support new initiatives and to help some interested parties to participate effectively will strengthen the implementation of the consultation process (support to attend a public meeting for instance). The independence of the RB should be of course preserved at any time.
156.	5.21	<b>32. Finland / STUK – WASSC, NUSSC, RASSC</b> Please clarify the text; now it can be read in a way, that it may jeopardise the independence of the regulatory body. “The possibility to form new initiatives and to take part in processes of participation may be dependent on resources. Therefore, arrangements to provide some stakeholders with funding to be able to contribute to participation processes may be considered.”	Can be understood in a way that the recommendation may jeopardise the independence of the regulatory body	X			To reflect the overarching recommendation 2.4.

COMMENTS BY REVIEWER				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
157.	5.22	<b>56. France / ASN - NUSSC (F. Feron)</b> 5.22. In some cases, to increase the effectiveness of communication, a genuine dialogue between the regulatory body and interested parties, meaning exchanges of information based on discussions between two or more parties as equals and with respect, should be established. <del>Then the regulatory body will better understand the needs, concerns and interests of the interested parties and the role of regulatory body, its views and positions, and safety issues can be better understood.</del> Even if no consensus is expected at the end of the process, every participant should have possibility to give, express and discuss its positions and views to develop a mutual understanding. <u>As a result, the regulatory body will better understand the needs, concerns and interests of the interested parties and the role of regulatory body, its views and positions, and safety issues can be better understood.</u>	Alternative wording		As a result, the regulatory body will better understand the needs, concerns and interests of the interested parties and the role of regulatory body, its views and positions, and safety issues can be better understood by the interested parties.		
158.	5.22	<b>25. Germany / BMU and GRS – RASSC</b> 2 <sup>nd</sup> sentence: “Then the regulatory body will better understand the needs, concerns and interests of the interested parties and the role of regulatory body, its views and positions, and safety issues can be better understood by the interested parties.”	Clarification.	X			See comment 157.
159.	5.24	<b>57. France / ASN - NUSSC (F. Feron)</b> For example, <del>for</del> <u>prior to some regulatory decision consultation</u> , public meetings should be typically required. To gain maximum benefits from a public meeting, it is important to thoroughly prepare it.	Clarification	X			
160.	5.24	<b>33. Finland / STUK – WASSC, NUSSC, RASSC</b> Please clarify. “For example, for regulatory consultation, public meetings should be typically required”	Here, the difference between political decision making process and safety authority decision making process should be clarified.		X		See comment 159
161.	5.25	<b>26. Germany / BMU and GRS – RASSC</b> 3 <sup>rd</sup> sentence: “... whether they have pre-established positions of not, ...”	Editorial (typing error)	X			

COMMENTS BY REVIEWER				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
162.	5.26 and 5.27	<b>1. Switzerland / ENSI</b> delete	Paragraph 5.25 covers already the substance of paragraph 5.26 and 5.27.		5.25. Sometimes interested parties have blocked positions already at an early stage which makes it difficult to establish a fruitful two way dialogue. It is then important to establish working formats. In this respect, to ensure an open...		5.25, 5.26 and 5.27 are merged as proposed here.
163.	5.29	<b>34. Finland / STUK – WASSC, NUSSC, RASSC</b> Please clarify. “In accordance with legal and regulatory provisions such as those related to licensing process, the regulator should consult interested parties.”	Here, the difference between political decision making process and safety authority decision making process should be clarified.			X	As described by the DPP, DS460 provides guidance for regulatory activities and does not address political issues, such as public acceptance.
164.	5.31	<b>27. Germany / BMU and GRS – RASSC</b> 2 <sup>nd</sup> sentence: “To design a consultation procedure, the followings <u>aspects</u> should be considered: ...”	Editorial/ wording/	X			
165.	5.34	<b>58. France / ASN - NUSSC (F. Feron)</b> 5.34. Stakeholders should have the possibility to access all information (e.g., safety assessment report, regulation draft, position draft and guide draft) related to the consultation, free of charge <u>at designated locations</u> .	It can't be free of charge if copies are large documents (several binders) have to be provided anywhere/to anybody...	X			
166.	5.36	<b>35. Finland / STUK – WASSC, NUSSC, RASSC</b> Please reformulate. “The regulatory body should take into account the outcome of consultation.”	This may jeopardise the independence of the regulatory body.		The regulatory body should review the outcome of consultation and take them into account where appropriate.		
167.	5.39	<b>59. France / ASN - NUSSC (F. Feron)</b> 5.39. Different mechanisms <del>may should</del> be used to make a collaborative process efficient.	Clarification	X			

COMMENTS BY REVIEWER				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
168.	5.41	<b>60. France / ASN - NUSSC (F. Feron)</b> These working formats facilitate dialogue and discussion in order to identify areas of agreement and disagreement and to find <u>eventually</u> a common solution.	Consensus on a position may not be achieved...	X			
169.	Appendices I and II	<b>28. Germany / BMU and GRS – RASSC</b> Note: Appendices I and II cite the full text of the relevant paras 4.4 and 4.42, respectively (in italics). Please add the corresponding number of para (either at the beginning or at the end of citation).	For a better understanding, the origin of the citation should be mentioned.	X			
170.	Appendix I	<b>20. United States of America / NRC</b> Delete sections Introduction and purpose; Communication challenge; and Communication objective; with the exception of the three sentences (paragraph 2) describing the purpose of the strategy.	The template should not duplicate, and possibly deviate from, guidance in the document. The template should be simpler. A list of critical topics and bullets supporting issues to be considered in developing a communication strategy template should be provided. The purpose of the communication strategy and vision of the regulatory body (both immediate and long term) should be retained.	X			
171.	Appendix II	<b>36. Finland / STUK – WASSC, NUSSC, RASSC</b> Please remove. “An element that can attempt to identify the successes and lessons learned which would be documented.”	Trivial			X	This describes the possible content of an evaluation.
172.	List of references	<b>29. Germany / BMU and GRS – RASSC</b> Note: The references No. 1, 4, 6 to 19, 22 to 25, 27, 30 and 31 are not cited in the text of the draft document.	Either insert the references in the text or delete them in the list.			X	Reference documents are not to be systematically quoted in the text, they are documents which have been consulted and served as a base to develop the draft.
173.	Ref. [12]	<b>21. United States of America / NRC</b> Delete reference [12].	Reference [12] has been superseded by reference [11].	X			
174.	Ref. [29]	<b>30. Germany / BMU and GRS – RASSC</b> INTERNATIONAL ATOMIC ENERGY AGENCY, INES: The International Nuclear and Radiological Event Scale <u>Users’ Manual, 2008 Edition, IAEA Safety Standards Series, Vienna (2008) (2009).</u>	Erroneous citation.	X			

COMMENTS BY REVIEWER				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
175.	Ref. [32]	<b>31. Germany / BMU and GRS – RASSC</b> INTERNATIONAL ATOMIC ENERGY AGENCY, Operations Manual for Incident and Emergency Communications, EPR-IECOMM, IAEA, Vienna, (2012).	Editorial.	X			
176.	Ref. [34]	<b>32. Germany / BMU and GRS – RASSC</b> INTERNATIONAL ATOMIC ENERGY AGENCY, Arrangements for Preparedness for a Nuclear or Radiological Emergency, IAEA Safety Standards Series No. GS-G-2.1, Vienna (2007).	Missing series number.	X			
177.	Ref. [36]	<b>33. Germany / BMU and GRS – RASSC</b> <u>UNITED NATIONS ECONOMIC COMMISSION FOR EUROPE, Convention on Environmental Impact Assessment in a Transboundary Context, 25 February 1991, UNECE, Espoo, Finland (1991).</u>	New reference to be included. See our related comment No. 5.			X	See answer to comment 21. IAEA Safety Standards should be relevant to all Member States.
178.	Ref. [37]	<b>34. Germany / BMU and GRS – RASSC</b> <u>UNITED NATIONS ECONOMIC COMMISSION FOR EUROPE, Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters, 25 June 1998, UNECE, Aarhus, Denmark (1998).</u>	New reference to be included. See our related comment No. 5.			X	See answer to comment 21
179.	Ref. [38]	<b>35. Germany / BMU and GRS – RASSC</b> <u>EUROPEAN ATOMIC ENERGY COMMUNITY, Treaty establishing the European Atomic Energy Community, EURATOM (1957).</u>	New reference to be included. See our related comment No. 5.			X	See answer to comment 21
180.	Add ref.	<b>1. NSGC / Russian Federation</b> It is desirable to add NSS 20 and NSS 13 in References Section and to make appropriate mention(s) in the body text (e.g. page 14, OBJECTIVE)	These documents contain subject matter information for security. For example, NSS 20 describes: International cooperation and assistance; Planning for, preparedness for, and response to, a nuclear security event etc.	X			

Total 181 comments (incl. 9.a. from WASSC Chairman)