

DS 462 DPP for revision through addenda of GSR Part 1, NS-R-3, SSR-2/1, SSR-2/2 and GSR Part 4

| COMMENTS BY REVIEWER | | | | RESOLUTION | | | |
|---|--|--|--|------------|-----------------------------------|----------|-----------------------------------|
| Reviewer: Country/Organization: USA (US Nuclear Regulatory Commission) Date: 5/24/2012 | | | | | | | |
| Comment No. | Para/Line No. | Proposed new text | Reason | Accepted | Accepted, but modified as follows | Rejected | Reason for modification/rejection |
| 1 | Page 2, Section 4 paras 2 and 3 | <p>“It is expected that this annex will continue to be updated with national, regional and international contributions, as well as with the contribution from the second CNS Extraordinary Meeting in August 2012.</p> <p>In particular, additional input to the revision of the Safety Requirements publications is expected from several meetings, including the extraordinary meeting of the Convention on Nuclear Safety in August 2012.”</p> | Editorial comment. Suggest deletion of text that is repeated in the next, subsequent paragraph (Section 4, para 3). | OK | | | |
| 2 | Page 2, Section 4, para 3 Section 6, lines 5 – 6 Section 7 | <p>Section 4. Any such additional input will lead to an updating of the detailed proposals for strengthening the Safety Requirements publications.</p> <p>Section 6. The annex provides a first idea of those topical areas to be covered and will be kept updated as new information becomes available.</p> | A new step in the schedule presented in Section 7 should be added to address the action required by the review and “updating” of the Annex as described in Sections 4 and 6. The new Step 5bis action will need to be completed by the end of August or no later than September 2012 (after the August CNS Extraordinary Meeting) to support the Coordinating Committee review/approval of the revised | | OK as part of step 5 | | |

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| | | <p><u>Add a new milestone</u> to the schedule in Section 7:</p> <p>Step 5bis Update Annex and draft addenda to reflect new information obtained from national, regional and international contributions.</p> | <p>draft addenda in September 2012 and subsequent review/approval by the four Safety Standards Committees in October/November 2012.</p> <p>Section 7 would be somewhat clearer if the steps were in chronological order.</p> | | | | |
| 3 | Page 2, Section 7, Step #3 and Step #7 | <p>“Approval of Document outline by the Safety Standards Committees or the relevant group where appropriate”</p> | <p>Only SSCs are identified as review committees in Page 1, Section 1. It is unclear what other “relevant groups” are expected.</p> | | | X | We may involve the NSGC, if agreed by the Interface Group |
| 4 | Page 2, Section 7, Step #5 and Step #6 | <p>STEP 5: Preparing the draft addenda</p> <p>STEP 6: Approval of draft addenda by the Coordination Committee</p> | <p>Clarification of what product is being prepared and approved.</p> | OK | | | |
| 5 | Page 2, Section 7, Step #6 | <p>STEP 6: Approval of draft by the Coordination Committee is scheduled by September 2012. However, approval of the DPP by the CSS is scheduled in October 2012. In this context, it is unclear how the draft document will be approved before the DPP’s approval by the CSS.</p> | <p>Consistency in the schedule to ensure CSS recommendations on the Structure and general content of the document are accounted for and incorporated in the draft document.</p> | | | X | We have a de facto approval by the CSS |
| 6 | Reference List | <p>We recommend adding to the DPP or Annex a “Reference List” that includes references to reports (and</p> | <p>Completeness, as “Reference List” would help the reader understand the background and iterative process of the</p> | | OK for the draft addenda | | |

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| | | websites) used for development of the lessons learned, such as the reports from the Government of Japan, issued in June and September 2011, the report of the IAEA Fact Finding Mission conducted from 24 May to 2 June 2011, and the letter from INSAG dated 26 July 2011, as well as SSCs reports and CSS updated Action Plan. | proposed changes. | | The progress report to the CSS does mention the sources | | |
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| | | General Comments | | | | | |
| 1 | General | Question/Issue - How will use of newly defined and revised definitions of terms in the IAEA Safety Glossary be addressed when addenda revisions are made to existing IAEA Safety Standards? | Need to describe how a revised definition, such as “nuclear installation” that is used so prevalently throughout the five safety standards will be addressed when the addenda revisions are proposed. The revised IAEA Safety Glossary will be applicable to the addenda while the other, unchanged parts of the five existing safety standards use terms as defined in the previous edition of the IAEA Safety Glossary. The use of the same term with differing definitions in the same safety standards can cause confusion and possible complications in implementation. | OK Throughout the revision, the terminology will be updated so as to reflect in a consistent manner the latest version of the Safety Glossary | | | |
| 2 | General | The DPP document appears to disregard updates/modification of safety guides directly associated with the proposed marked changes in safety requirements. We believe that corresponding safety guides | Safety Guides associated with the proposed changes in safety requirements needs to be addressed in parallel to ensure clarification of the new safety requirements’ implementation. The concern is miss-interpretation of the | | The revision of the safety guides | | |

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| | | need to be evaluated and developed in parallel to explain newly added safety requirements. Therefore, we recommend that the DPP discuss the strategy for safety guide updates and possibly develop a listing of Safety Guides that need to be updated to elucidate implementation aspects of the proposed changes in safety requirements. | certain ambiguous requirements such that corresponding actions or implementations may be interpreted differently by responsible parties. | | will be addressed in another DPP, but will be considered in sequence with the revision of the requirements | | |
| 3 | General | Clarify the lessons learned numbering scheme. | In the addendum tables, the correlation between proposed text changes and the initiating lesson learned is unclear and, therefore, difficult for reviewers to assess. | OK | The numbering of the lessons learned comes from the Secretariat - CSS progress report | | |

Title: Revision through addenda of GSR Part 1, NS-R-3, SSR-2/1, SSR-2/2 and GSR Part 4 (DS462)

| COMMENTS BY REVIEWER | | | | RESOLUTION | | | |
|---|------------------------|---|---|------------|-----------------------------------|----------|--|
| Reviewer: Mr.S.Maki Country/Organization: Japan/NISA | | Page 1 of Date: May 2012 | | | | | |
| Comment No. | Para/Line No. | Proposed new text | Reason | Accepted | Accepted, but modified as follows | Rejected | Reason for modif./rejection |
| 1 | P.1, Chapter 3 /Line 2 | Fukushima <u>Dai-ichi Nuclear Power Station</u> accident | Exact naming | OK | | | |
| 2 | P.2, Chapter 6 /Line 3 | Fukushima <u>Dai-ichi Nuclear Power Station</u> accident | Exact naming | OK | | | |
| 3 | P.2, Chapter 6 /Line 5 | <p>The main points of modification of Safety Requirements should be added after the chapter 6 as following</p> <p>GSR Part1</p> <ul style="list-style-type: none"> • Consideration of the regulatory body's effective independence under normal or emergency circumstances, the low probability extreme events in the safety assessment, and arrangements for international cooperation and assistance under severe accident. <p>NS-R-3</p> <ul style="list-style-type: none"> • Consideration of the low frequency events with high consequence that may lead to cliff edge effects in the major external phenomena. | I recognize Direction of modification of Safety Requirements (GSR Part1, NS-R-3, SSR-2/1, SSR-2/2 and GSR Part4) should be provided in the overview as DPP, if the annex isn't a discussion item in this DPP. | | | X | It is hard at this stage to rank the different proposal for strengthening the requirements. The annex documents the main areas for improvement |

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| Comment No. | Para/Line No. | Proposed new text | Reason | Accepted | Accepted, but modified as follows | Rejected | Reason for modif./rejection |
| | | <p>SSR-2/1</p> <ul style="list-style-type: none"> • Consideration of an extreme external hazard of an intensity or a duration, critical safety systems or components which are essential to avoid cliff edge effects of events exceeding its general design basis, a systematic process to review multiple unit sites with the potential for common cause failures. • Provisions for venting systems, hydrogen mitigation, filters, the explosive gas outside the containment, the backup power supply and on-site seismically robust Emergency Response Centre. • Means for reliable monitoring of the water level and means for maintaining the cooling of fuel handling and storage system. <p>SSR-2/2</p> <ul style="list-style-type: none"> • Alternative contingency measures such as supply of water, compressed air, mobile power and ultimate heat sink to mitigate severe accident. • Accident management programme for multiple units sites and radiological protected Emergency Response Centre. • Importance of safety parameter information and communications in design extension conditions. <p>GSR Part4</p> <p>Addition safety assessments on multi-facility sites and low probability extreme events.</p> | | | | | |
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| 4 | General | The definition of “alternative” should be clarified in the requirements. | Clarification. | | Proposals will be considered for the drafting of the table of proposed revision | | |

1. Title: Addendum to GSR Part1 (Governmental, Legal and Regulatory Frame work for Safety) DPP DS463

| COMMENTS BY REVIEWER | | | | RESOLUTION | | | |
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| Reviewer: Mr.S.Maki Country/Organization: Japan/NISA | | Page 1 of Date: May 2012 | | | | | |
| Comment No. | Para/Line No. | Proposed new text | Reason | Accepted | Accepted, but modified as follows | Rejected | Reason for modif./rejection |
| 1-1 | Page3 Lesson learned 5.1 | 4.43. The regulatory body shall assess all radiation risks associated with normal operation, anticipated operational occurrences and accident conditions, including low frequency <u>events with high consequence.</u> | Appropriating the expression. | | | | |

2. Title: Addendum to SSR-2/1 (Safety of Nuclear Power Plant : Design) DPP DS465

| COMMENTS BY REVIEWER | | | | RESOLUTION | | | |
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| Reviewer: Mr.S.Maki Country/Organization: Japan/NISA | | Page 1 of Date: May 2012 | | | | | |
| Comment No. | Para/Line No. | Proposed new text | Reason | Accepted | Accepted, but modified as follows | Rejected | Reason for modif./rejection |
| 2-1 | SSR-2/1: [21.2] Para 2.12-2.14, 4.9-4.13 SSR-2/2: [46.1, 21.2 and 46.17] R19, para5.9 | Linked to 1.1.21.2 in SSR-2/1. Strengthen para. 5.8 and 5.9 for accident management in SSR-2/2. | (Commented by NISA on 3/26 /2012 @CSS31 #1: Equipment of alternative measures should have <u>adequate capabilities</u> to deal with accidents. (In the Fukushima accident, there were problems with the discharge pressure of the alternative pumps for water injection to the core.)) | | | | |
| 2-2 | R20 (1.1.22.1) | Confirm the following new wording exactly. 1) <u>short term cliff edge effects</u> (What's a difference from "cliff edge effects"?) 2) "events exceeding its general design basis" 3) "General" 4) "including DEC". It looks broad meaning from DEC and means more severe DEC? | Just clarification for these words. | | | | |

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| Reviewer: Mr.S.Maki Country/Organization: Japan/NISA | | Page 1 of Date: May 2012 | | | | | |
| Comment No. | Para/Line No. | Proposed new text | Reason | Accepted | Accepted, but modified as follows | Rejected | Reason for modif./rejection |
| 2-3 | 5.55 (1.1.25.2) | <p>5.55. The design shall support operating personnel in the fulfillment of their responsibilities and the performance of their tasks, and shall limit the effects of operating errors on safety. The design process shall pay attention to plant layout and equipment layout, and to procedures, including considering the procedures for maintenance and inspection as well as the actions under AM programme, to facilitate interactions between the operating personnel and the plant.</p> <p><u>Add after para 5.18.</u> <u>The plant layout and equipment layout shall be such that the items important to safety are operable continuously under extreme external events with due consideration to physically separation, redundancy, independence and diversity.</u></p> | <p>To clarify physical separation for not only plant layout but also equipment layout. In accordance with the countermeasures #5, 'Disperse On-site power equipment'.</p> <p>To secure vent operation in accident condition.</p> | | . | | |
| 2-4 | SSR-2/1: [25.2] Para5.18 | <p>Add "equipment" as the objects for design of layout as well as the plant in SSR-2/1 para 5.18 in accordance with NISA comments #3.</p> | <p>(Commented by NISA on 3/26/2012 @CSS31 #2: To strengthen requirements concerning the plant layout, it is important to consider <u>equipment layout</u> as well. (In the Fukushima accident, the electric equipment installed in the basement floors was damaged due to common cause failure- tsunamis.))</p> | | | | |

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| Comment No. | Para/Line No. | Proposed new text | Reason | Accepted | Accepted, but modified as follows | Rejected | Reason for modif./rejection |
| 2-5 | Para 29.1 | Add a requirement on alternative means for providing an ultimate heat sink for an extended period <u>after accident.</u> | Clarification | | | | |
| 2-6 | R58 (l.l. 30.2) | (It is suggested to include descriptions on alternative means for temperature control in containment vessel and the accessibility of vent valves in case of manual operation.) | Reflect on the countermeasures #18, 'Enhance diversity of PCV cooling system'. | | | | |
| 2-7 | SSR-2/1: [30.2], R58 #23, 24 SSR-2/2: [46.15] or Related Guides Para 5.8 | Strengthen R58 and related para in SSR-2/1 in accordance with NISA comments #3. Strengthen R26 and related para in SSR-2/2 in accordance with NISA comments #3. | (Commented by NISA on 3/26 /2012 @CSS31 #3: As for venting, it is important to ensure maneuverability of <u>venting operation</u> . (Challenges in the Fukushima dai-ichi NPP accident were the maneuverability of the venting operation, high radiation working environment and the timing of the venting.)) | | | | |
| 2-8 | SSR-2/1: Para 6.28. or Related Guides | Strengthen R58 and para 6.28 in SSR-2/1 in accordance with NISA comments #4. | (Commented by NISA on 3/26 /2012 @CSS31 #4: Further consideration for <u>alternative measures of PCV cooling</u> to prevent a PCV from being overheated and overpressure. (In the Fukushima accident, the release of radioactive materials may have occurred due to the overheat of the PCV.)) | | | | |

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| Reviewer: Mr.S.Maki Country/Organization: Japan/NISA | | Page 1 of Date: May 2012 | | | | | |
| Comment No. | Para/Line No. | Proposed new text | Reason | Accepted | Accepted, but modified as follows | Rejected | Reason for modif./rejection |
| 2-9 | R58.1? 1.1.30.1 | <p>Add Requirement XX as “Control of reactor building condition” after R58 as follows for a sample of BWR.</p> <p>Provision shall be made to prevent deflagration or detonation in the reactor building due to leakage from the containment system (applicable to only BWR). Sufficient capacity of exhaust of hydrogen gas from the reactor building and the appropriate instrumentation to monitor leakage gas shall be provided. The venting system shall be designed to minimize the reliance on operator actions and minimize radiological consequences for event response.</p> | Clarify and add a requirement in order to prevent deflagration or detonation in the reactor building due to leakage from the containment system. | | | | |
| 2-10 | Para 6.29 | <p>The independency of PCV venting line should be added into the related requirements. In the case of Fukushima accident(BWR), the key points are below;</p> <ol style="list-style-type: none"> 1) Independence from the other unit venting line 2) Independence from the SGTS line in the unit. | Prevent and ensure venting pipes as harmless interaction independently between multiple unites by the common caused failures in accordance with countermeasures #24. | | | | |

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| Reviewer: Mr.S.Maki Country/Organization: Japan/NISA | | Page 1 of Date: May 2012 | | | | | |
| Comment No. | Para/Line No. | Proposed new text | Reason | Accepted | Accepted, but modified as follows | Rejected | Reason for modif./rejection |
| 2-11 | SSR-2/2 or Related Guides SSR-2/1 R26 para.6.34 SSR-2/2 R26 | To ensure to reflect in guides effectively, NISA's comments #5, which have already covered in R26 in SSR-2/1. Strengthen R26 in SSR-2/1 to recognize the necessity of fail-safe function by operators correctly especially in severe accident. | (Commented by NISA on 3/26/2012 @CSS31 #5: The design concept such as the failsafe function (including the implementation of necessary measures) needs to be <u>well recognized</u> in terms of measures against severe accidents. (In the Fukushima accident, IC lost its function due to the failsafe function.)) | | | | |

3. Title: Addendum to SSR-2/2 (Safety of Nuclear Power Plant : Commissioning and Operation) DPP DS467

| COMMENTS BY REVIEWER | | | | RESOLUTION | | | |
|---|---|---|---|------------|-----------------------------------|----------|-----------------------------|
| Reviewer: Mr.S.Maki Country/Organization: Japan/NISA | | Page 1 of Date: May 2012 | | | | | |
| Comment No. | Para/Line No. | Proposed new text | Reason | Accepted | Accepted, but modified as follows | Rejected | Reason for modif./rejection |
| 3-1 | 4.44 | 4.44. Safety reviews shall be carried out at regular intervals. Safety reviews shall address, in an appropriate manner, the consequences of the cumulative effects of plant ageing and plant modification, equipment requalification, operating experience, current standards, technical developments, and organizational and management issues, as well as site related aspects. Safety reviews shall be aimed at ensuring a high level of safety throughout the operating lifetime of the plant. | To clarify the change from siting aspects to site related aspects. | | | | |
| 3-2 | SSR-2/1: [30.2], R58 SSR-2/2: [46.15] or Related Guides Para 5.8 | Strengthen R58 and related para in SSR-2/1 in accordance with NISA comments #3. Strengthen R26 and related para in SSR-2/2 in accordance with NISA comments #3. | (Commented by NISA on 3/26 /2012 @CSS31 #3: As for venting, it is important to <u>ensure maneuverability of venting operation</u> . (Challenges in the Fukushima accident were the maneuverability of the venting operation, high radiation working environment and the timing of the venting.)) | | | | |

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| Reviewer: Mr.S.Maki Country/Organization: Japan/NISA | | Page 1 of Date: May 2012 | | | | | |
| Comment No. | Para/Line No. | Proposed new text | Reason | Accepted | Accepted, but modified as follows | Rejected | Reason for modif./rejection |
| 3-3 | After Para 5.9 (l.l. 46.1, 21.2 and 46.17) | Add a requirements after para 5.9 on the need for alternative contingency measures such as supply of water, compressed air, mobile power and alternative ultimate heat sink to mitigate severe accident including any necessary equipment. <u>Alternative contingency measures shall be operable in accident conditions.</u> | Reflect on the countermeasures #16 more clearly to specify the ability of alternative contingency measures. | | | | |
| 3-4 | SSR-2/1: [21.2] Para 2.12-2.14, 4.9-4.13 SSR-2/2: [46.1, 21.2 and 46.17] R19, para5.9 | Linked to l.l.21.2 in SSR-2/1. Strengthen para. 5.8 and 5.9 as accident management in SSR-2/2. The same as #2-1 comment. | (Commented by NISA on 3/26/2012 @CSS31 #1: Equipment of alternative measures should have <u>adequate capabilities</u> to deal with accidents. (In the Fukushima accident, there were problems with the discharge pressure of the alternative pumps for water injection to the core.)) The same as #2-1 comment. | | | | |
| 3-5 | R18 or R19 | Add under requirement 18 or requirement 19: For multiple units sites, the accident management programme shall take due account of the potential for all units to be simultaneously in a severe accident. The programme should enable common resources (if any), whether material or human, expected to be used in accident conditions are still effective for each unit if all units at the site are in accident conditions. <u>Training for multiple units accident condition should be performed.</u> | Reflect on the countermeasures #30 to clarify the training for multiple units accident. | | | | |

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| Reviewer: Mr.S.Maki Country/Organization: Japan/NISA | | Page 1 of Date: May 2012 | | | | | |
| Comment No. | Para/Line No. | Proposed new text | Reason | Accepted | Accepted, but modified as follows | Rejected | Reason for modif./rejection |
| 3-6 | R19 | Add: For a nuclear power plant with multiple units, an adequate number of qualified <u>trained</u> personnel, equipment and supplies shall be available to manage all the units if each of them is under an accident condition. | To clarify the difference between qualified and trained | | | | |
| 3-7 | R19 | Add to paragraph 5.9 Nuclear sites shall have an adequate on-site seismically robust, suitably shielded, ventilated and well equipped buildings to house the Emergency Response Centre. The Emergency Response Centre shall not be prone to external hazards such as flooding. It shall require sufficient provisions and shall also have <u>sufficient capacity</u> to maintain the welfare and radiological protection of workers needed to manage severe accident. The above document outline contains of requirements for SSR 2/1 (design), SSR-2/2 (operating) and GS-R-2 (emergency preparedness), therefore this should be separated into these requirements respectively. | The design and construction of the emergency response centre should be required in SSR 2/1, SSR-2/2 and GS-R-2 respectively. | | | | |

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| 3-8 | After Para7.9 | <p>Requirement 27: Operation control rooms and control equipment</p> <p>The operating organization shall ensure that the operation control rooms and control equipment are maintained in a suitable condition.</p> <p>5.7 5.8 5.9 Add a requirement specifying need to ensure safety parameter information and communications in design extension conditions is effective between the on-site emergency control rooms/response centres.</p> | The design and establishment of the communication system for emergency condition should be required in SSR 2/1, SSR-2/2 and GS-R-2 respectively.. | | | | |

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| COMMENTS BY REVIEWER | | | | RESOLUTION | | | |
|--|---------------------|--|---|--|-----------------------------------|----------|-----------------------------------|
| Reviewer: Country/Organization: Ukraine/ SSTC NRS (State Scientific and Nuclear Center for Nuclear and Radiation Safety) | | | | Page 1 of 1 Date: 01.06.2012 | | | |
| Comment No. | Para/Line No. | Proposed new text | Reason | Accepted | Accepted, but modified as follows | Rejected | Reason for modification/rejection |
| 1 | Format of the table | Propose to add a separate column for identifying paragraph in the document to be changed (Please see below). | To facilitate navigation. For instance, this would facilitate tracking the changes to specific sections of the standards (e.g., allow sorting, etc) | OK for the table to be submitted to the SSCs | | | |
| 2 | Schedule | It is proposed to increase duration of Step 7. | To provide more time for approval of the draft by the Committees. For instance, CSS approval of the outline (Step 4) is planned for the same period as approval of the draft by the Committees that seems to be a conflict in schedule. | That was the request from the CSS | But time will be flexible | | |

Appendix

| Lesson learned | Para/line No. | Current text | Modification | Addition |
|----------------|---------------|--------------|--------------|----------|
| X.X | | | | |