

DS462

Amendments to the IAEA Safety Requirements:

- **GSR Part-1 on Governmental, Legal and Regulatory Framework for Safety**
- NS-R-3 on Site Evaluation for Nuclear Installations
- SSR-2/1 on Safety of Nuclear Power plants: Design
- SSR-2/2 on Safety of Nuclear Power plants: Commissioning and Operation
- GSR Part 4 on Safety Assessment for Facilities and Activities

Status

STEP 10: Second Internal review

Below the text submitted to the MS for comments, you will find the set of individual comments and then the individual answers

The overall resolution is to be found on the right column, highlighted in yellow

Lessons learned	Current text	Proposal for MS consultation	Proposed resolution of MS comments, after NUSC WG meeting

DS462 Amendments to GSR Part 1, NS-R-3, SSR-2/1, SSR-2/2 and GSR Part 4 – MS comments resolution

			<u>Track changes version, compared to what was submitted to the Member States for comments</u>		
Country X	Proposed text	Rationale	Accepted	Accepted with modification	Rejected and reason
Number of the comment					
Country Y	Proposed text	Rationale	Accepted	Accepted with modification	Rejected and reason
Number of the comment					

In some cases, there are proposal for additional amendments not initially proposed by the IAEA. They are highlighted in Blue

Amendments to GSR Part 1					
Lesson learned	Current text	Proposal for Member States consultation	Proposed resolution of MS comments		
ENISS general comment	GRS, Part 1 is the top requirements document applicable for all “facilities and activities” in their generic meaning defined by the Glossary. Attempts to complement the text by lessons learned from Fukushima tends to address nuclear power plants issues (using terms like “operational states”, “safety improvements”, “severe accidents”, etc.), which may not be fully applicable for storage of radiation generators, research, transportation activities, etc. If used in text, than applicability of these terms should be explained (e.g. by the footnote).			This concern is addressed by para 1.4 of GSR Part 1	
2.1 Japanese Investigation Committee Interim Report *Report by Fukushima Nuclear Accident Independent Investigation Committee *Extraordinary CNS Meeting August 2012	Req. 4 - Independence of RB 2.8. To be effectively independent, the regulatory body shall have sufficient authority and sufficient staffing and shall have access to sufficient financial resources for the proper discharge of its assigned responsibilities. The regulatory body shall be able to make independent regulatory judgements and decisions, free from any undue influences that might compromise safety, such as pressures associated with changing political circumstances or economic conditions, or pressures from government departments or from other organizations. Furthermore, the regulatory body shall be able to give independent advice to government departments and governmental bodies on matters relating to the safety of facilities and activities.	Req. 4 - Independence of RB 2.8. To be effectively independent <u>from undue influence in its decision making</u> , the regulatory body shall: <u>(a) have sufficient authority and sufficient staffing;</u> <u>(b) and shall have access to sufficient financial resources for the proper and timely discharge of its assigned responsibilities;</u> <u>(c) The regulatory body shall be able to make independent regulatory judgements and regulatory decisions, throughout the whole life cycle of a facility or an activity, under both operational states and accident conditions;</u> <u>(d) be free from any undue influences that might compromise safety, such as pressures associated with changing political circumstances or economic conditions, or pressures from government departments, authorized parties or from other organizations;</u> <u>(e) Furthermore, the regulatory body shall be able to give independent advice to government departments and governmental bodies on matters relating to the safety of facilities and activities.</u>	Req. 4 - Independence of RB 2.8. To be effectively independent from undue influence in its decision making, the regulatory body shall: (a) have sufficient authority and sufficient <u>competent</u> staffing; (b) have access to sufficient financial resources for the proper and timely discharge of its assigned responsibilities; (c) be able to make independent regulatory judgements and regulatory decisions, <u>at all stages in the lifetime of facilities and the duration of activities until their release from regulatory control, throughout the whole life cycle of a facility or an activity</u> , under both operational states and accident <u>conditions</u> ; (d) be free from any pressure associated with changing political circumstances or economic conditions, or pressure from government departments, authorized parties or from other organizations; (e) be able to give independent advice <u>and provide reports</u> to government departments and governmental bodies on matters relating to the safety of facilities and activities; <u>(f) liaise directly with regulatory bodies of other countries and with international organizations to promote co-operation and the exchange of regulatory information.</u>		
USA 1 (RES)	2.8. To be effectively independent from undue influence in its decision making , the regulatory body shall: (a) have sufficient authority and sufficient staffing; (b) and shall have access to sufficient financial resources for the proper <u>and timely</u> discharge of its assigned responsibilities; (c) The regulatory body shall be able to make independent regulatory judgements and <u>regulatory decisions, throughout the whole life cycle of a facility or an activity, under both operational states and accident conditions, without any undue influences that might compromise safety;</u> (d) be free from any <u>undue influences that might compromise safety, such as</u> pressures associated with changing political circumstances or economic conditions, or pressures from government departments, <u>authorized parties</u> or from other organizations;	Independence from undue influence is an important concept, but it does not apply to every responsibility in the list in 2.8.			Rejected Undue influence is applicable to more items than just (c)

	(e) Furthermore, the regulatory body shall be able to give independent advice to government departments and governmental bodies on matters relating to the safety of facilities and activities.				
Russia 1	2.8 To be independent not only formally but in fact from undue influence in its regulatory activities and decision making, the regulatory body shall:	The key postulate for achievement of regulatory body independence is the effective independence from undue influence in all regulatory activity and decision making processes rather than formal structural independence from the government. Besides, independence is necessary for regulatory body not only at decision making, but also at all is regulatory activities			Rejected This is already considered by the use of the word “effective” independence, which includes “de jure” (legal, formal, on paper) and “de facto” (in daily life when discharging reg functions)
Pakistan 1	2.8 The word “regulatory” may be added as “... independent from undue influence in its <u>regulatory</u> decision making, the regulatory body shall:	Since regulatory body makes lot of decisions which may not be regulatory such as recruitment of staff for which government rules are followed.			Rejected It is addressed in (c)
Pakistan 2	2.8 (a) the word competent may be added as “... authority and sufficient competent staff;”	In regulatory body or in operating organization when talking about staff, basic idea is that it should be competent	Accepted		
Russia 2	2.8 (b) Have access to sufficient financial resources for recruiting highly qualified personnel, possibly of maintaining its competence with the external support of highly skilled experts and the proper and timely discharge of its assigned responsibilities	Financial resources are necessary, first of all, to associate with possibility to involve in the work in regulatory body of competent workers that is possible only in case their salary will be commensurate with a salary of workers of the industry on similar position, and also with possibility of maintenance their competence by reception of the external support of highly skilled experts			Rejected Too specific and restrictive. Financial resources are needed for all assigned responsibilities, not just recruitment and external support request
Pakistan 3	2.8 (b) “and shall” may be deleted.	Editorial	Already done		
Germany GSR Part 1 1	2.8 (c) be able to make independent regulatory judgements and regulatory decisions, throughout the whole life cycle of a facility or an activity <u>until its release from regulatory control</u> , under both operational states and accident conditions;	Depending of the decommissioning strategy, parts of the facility could be reused for other purposes. The proposed text will clarify this. This is in accordance with para. 1.7 of GSR Part 1.			Text modified based on this comment and France 1, ENISS 1
Russia 3	2.8 c) be able to make independent regulatory judgments and regulatory decisions, throughout the whole life cycle of a facility or an activity, under both operational states and accident conditions and to have a direct reporting line to the highest levels of government	Important attribute of effective independence of regulatory body is its political independence. One of ways of ensuring this political independence is the establishment of a direct line of reporting to the highest level of government. Therefore it is offered to add 7-8 lines by words: “and to have a direct reporting line to the highest levels of government”			The concept is kep but introduced by adding “report” in (e)
Pakistan 4	2.8 (c) “The regulatory body shall” may be deleted	Editorial	Already done		
France 1	2.8 (c) ...be able to make independent regulatory judgements and regulatory decisions, throughout the whole <u>lifetime</u> cycle of a facility or <u>the duration of an</u> activity, under operational and accident conditions;	Consistency with the wording of the other requirements: see §§ 1.7, 2.14, 2.15, 2.28, ... The last part of the sentence could has been interpreted such that “regulatory judgment and decisions” is required for the nuclear			The wording is taken from 1.7 for consistency, but the “operational and accident conditions” is

		installations only (operational states and accident conditions = plant states). "Throughout lifetime" and "during activities" covers all states and conditions.		kept, as it clarifies	
ENISS 1	2.8 (c) ...be able to make independent regulatory judgements and regulatory decisions, throughout the whole lifetime cycle of a facility or <u>the duration of an</u> activity, under operational and accident conditions;	Consistency with the wording of the other requirements: see §§ 1.7, 2.14, 2.15, 2.28, ... The last part of the sentence could have been interpreted such that "regulatory judgment and decisions" is required for the nuclear installations only (operational states and accident conditions = plant states). "Throughout lifetime" and "during activities" covers all states and conditions.		Point taken, in conjunction with France 1 and Germany 1	
Pakistan 5	2.8 (d) "undue influences that might compromise safety" may be deleted	Since it is already covered in 2.8 main definition	Already done		
Poland 1	2.8 (d) The regulatory body shall be able to make independent regulatory judgments and decisions, free from any pressure associated with changing political circumstances or economic conditions, or pressure from government departments, authorized parties or from other organizations <u>or from the public</u> .	The regulatory body should also be independent of the pressures associated with changes in public opinion.			Rejected Public opinion is included in "political circumstances", in "other organizations". Moreover, interaction with the public is addressed in Req. 36
Russia 4	2.8 end f) to have the authority to communicate independently its regulatory requirements, decisions and opinions and their basis to the public; g) have the authority to liaise with regulatory bodies of other countries and with international organizations to promote co-operation and the exchange of regulatory information	It is necessary to add in the end of paragraph 2.8 two additional aspects of independence of regulatory body.	g) is accepted		f) is rejected because addressed in Req 36
Pakistan 6	2.8 (e) "Furthermore, the regulatory body shall" may be deleted	Editorial	Already done		
Letter from Chairman of INSAG (24 August 2012) Underlying theme of several reports, though not explicit It is strongly recommended to emphasise the meaning of the Requirement	Req. 5: Prime responsibility for safety The government shall expressly assign the prime responsibility for safety to the person or organization responsible for a facility or an activity, and shall confer on the regulatory body the authority to require such persons or organizations to comply with stipulated regulatory requirements, as well as to demonstrate such compliance.	Req. 5: Prime responsibility for safety New para. After 2.15 <u>2.15a Having prime responsibility for safety, the person or organization responsible for a facility or an activity must proactively search for, propose and implement reasonably practicable safety improvements taking into account progress in science and technology as well as relevant experience feedback.</u>	Req. 5: Prime responsibility for safety New para. After 2.15 2.15a Having prime responsibility for safety, the person or organization responsible for a facility or an activity must shall pro actively search for <u>evaluate progress in science and technology as well as relevant experience feedback to identify, propose and implement those safety improvements that are reasonably practicable.</u> safety improvements taking into account progress in science and technology as well as relevant experience feedback. <u>* Implementation may require prior notification to or authorization from the regulatory body</u>		
Russia 5	Requirement 5: The government shall expressly assign the prime	According to the Convention on Nuclear Safety conferring responsibility for safety on the applicant is connected with delivery to it the authorization by			Rejected Req 5 bold text was

	responsibility for safety to the person or organization authorized by the regulatory body to have responsibilities for the siting, design, construction, commissioning, operation or decommissioning of a nuclear installation responsible for a facility or an activity, and shall confer on the regulatory body the authority to require such persons or organizations to comply with stipulated regulatory requirements, as well as to demonstrate such compliance.	the regulatory body on the right to carry out activity on siting, design, construction, commissioning, operation and decommissioning of nuclear installation. The actual formulation of the requirement 5 supposed responsibility putting on by the administrative decision which has been not connected with licensing by regulatory body and thus destroys the mechanism established by the Convention at which a source of responsibility is the decision of regulatory body in reply to application of readiness to bear all completeness of responsibility and verification by regulatory body for the purpose to confirm this readiness. In this connection it is offered to change this formulation.			not opened for comments
USA 2 (RES)	2.15a Having ...must proactively <u>evaluate operating experience</u> search for, <u>and</u> propose and implement reasonably practicable safety improvements, taking into account progress in science and technology as well as relevant experience feedback.	Licensees and regulators have relatively sophisticated programs for the evaluation of operating experience. There is no current system that searches for "reasonably practical safety improvements."		Point taken in conjunction with ENISS 2 and WNA 1 Text modified to remove "search for"	
Germany GSR Part 1 2	2.15 a Having prime responsibility for safety, the person or organization responsible for a facility or an activity must <u>shall</u> proactively search for, propose and implement reasonably practicable safety improvements ...	In IAEA Safety Requirements publications, usually "shall" statements are provided.	accepted		
Russia 6	Requirement 6 2.15 a Having prime responsibility for safety, the person or organization authorized by the regulatory body to have responsibility responsible for a facility or an activity must proactively search for, propose and implement reasonably practicable safety improvements taking into account progress in science and technology as well as relevant experience feedback.	In offered amendments it is wrongly specified that this change concerns the requirement 5 instead of correct number 6			Rejected Text must remain consistent with Req 5 and 6 bold text
Russia 7	Requirement 6, footnote 8 Suspension or cancellation of authorization by regulatory body would not exonerate the person or organization responsible for the facility or activity from the responsibility for safety	We propose to refine wording of footnote 8 for its conformation with the proposed change of the formulation of the requirement 5 under the comment 5			Rejected In consistency with Russia 5 rejection
Pakistan 7	2.15 a ... and implement reasonably practicable safety improvements <u>based on experience feedback, technological development and outcome of research and development activities.</u>	To make sentence more clear		Accepted with modification	
France 2	2.15 a Having prime responsibility for safety, the person or organization responsible for a facility or an activity must proactively search for, propose and implement* reasonably practicable safety improvements taking into account progress in science and technology as well as relevant experience feedback. * <u>Implementation may require prior notification to or authorization from the regulatory body</u>	Add a footnote to clarify that implementation needs to be done in accordance with regulatory Reqmt. This is consistent with 4.48a	accepted		
ENISS 2	2.15 a Having prime responsibility for safety, the person or organization responsible for a facility or an activity must <u>shall assure that a process is established for evaluation of the progress in science and technology as well as relevant experience feedback in order to derive</u> proactively search for, propose and implement reasonably practicable safety improvements.	Consistency with the IAEA Requirements wording. It is essential to establish a respective process to cover the needed set of procedures, to involve the relevant staff and to achieve adequate effectiveness for implementing safety improvements.	"Shall" accepted	Evaluation inserted	

		For coherency, as GSR Part 1 is for all activities and facilities, “proposal” of safety improvements also asks for “approval”, which is not always needed. To avoid to get stuck in details of a procedure for proposal and approval of a feature, we suggest deleting the part regarding proposal.			
WNA 1	2.15 a Having prime responsibility for safety, the person or organization responsible for a facility or an activity must <u>assure that a process is established for continuous evaluation of the</u> progress in science and technology as well as relevant experience feedback <u>in order to derive</u> proactively search for, propose and implement reasonably practicable safety improvements.	It is essential to establish a respective process to cover the needed set of procedures, to involve the relevant staff and to achieve adequate effectiveness for implementing safety improvements. For coherency, as GSR Part 1 is for all activities and facilities, “proposal” of safety improvements also asks for “approval”, which is not always needed. To avoid to get stuck in details of a procedure for proposal and approval of a feature, we suggest deleting the part regarding proposal.		Accepted with modification	
2.2	Req. 8: Emergency preparedness and response 2.23. The government shall specify and shall assign clear responsibilities for decision making in an emergency, and shall make provision for effective liaison between authorized parties and competent authorities and for an effective means of communication.	Req. 8: Emergency preparedness and response 2.23. The government shall specify and shall assign clear responsibilities for <u>timely</u> decision making in an emergency, and shall make provision for effective <u>coordination and communication liaison</u> between authorized parties and <u>response organizations</u> . <u>*competent authorities and for an effective means of communication</u> . * Ref. to the revision of GS-R-2 (GSR Part 7)	Req. 8: Emergency preparedness and response 2.23. The government shall specify and shall assign clear responsibilities <u>so that for timely and effective decisions can be made making</u> in an emergency, and shall make provision for effective coordination and communication between authorized parties and response organizations. * * Ref. to the revision of GS-R-2 (GSR Part 7)		
Pakistan 8	2.23 The word “liaison” may be deleted as provision for effective coordination and communication liaison between authorized	Editorial	Accepted; already implemented.		
Pakistan 9	2.23 “*competent authorities and for an effective means of communication.” may be deleted	Editorial	Accepted; already implemented.		
*Report by Fukushima Nuclear Accident Independent Investigation Committee *ONR Final Report *Ext. CNS Meeting August 2012	Req. 8: Emergency preparedness and response	Req. 8: Emergency preparedness and response New paragraph after 2.24 <u>2.24a The government shall ensure that adequate training, drills and exercises are carried out regularly, involving authorized parties and response organizations, including decision makers, to contribute to an effective response to emergencies*. The training, drills and exercises shall cover a full range of potential emergencies (e.g. events affecting several facilities on a single site, long duration exercise and, if appropriate, transboundary emergencies).</u> * Ref. to the revision of GS-R-2 (GSR Part 7)	Req. 8: Emergency preparedness and response New paragraph after 2.24 2.24a The government shall ensure that adequate training, drills and exercises are carried out regularly, involving authorized parties and response organizations, including decision makers, to contribute to an effective response to emergencies*. The training, drills and exercises shall cover a full range of potential emergencies (e.g. events affecting several facilities on a single site, long duration exercise-emergencies and; if appropriate, transboundary emergencies <u>with transboundary consequences</u>).		
USA 1(JLD)	2.24a The government shall ensure that adequate training, drills and exercises are carried out regularly, involving authorized parties and response organizations, including decision makers, to contribute to an effective response to emergencies, <u>including consideration of protective action recommendations, such as evacuation and sheltering in place</u> [5]. The training, drills and exercises shall cover a full range of potential emergencies	Change of wording for clarification, in addition “if appropriate” is not needed, as it is stated as an example (same as the event affecting several facilities)			<u>Reject; too specific, drifts away from the original intention</u>

	(e.g. events affecting several facilities on a single site, long duration exercise and, if appropriate, transboundary emergencies).				
France 3	2.24 a The government shall ensure that adequate training, drills and exercises are carried out regularly, involving authorized parties and response organizations, including decision makers, to contribute to an effective response to emergencies*. The training, drills and exercises shall cover a full range of potential emergencies (e.g. events affecting several facilities on a single site, long duration exercise emergencies and, if appropriate, transboundary emergencies).		Accepted.		
ENISS 3 WNA 2	2.24a The government shall ensure that adequate training, drills and exercises are carried out regularly, involving authorized parties and response organizations, including decision makers, to contribute to an effective response to emergencies*. The training, drills and exercises shall cover a full range of potential emergencies (e.g. events affecting several facilities on a single site, long duration exercise emergencies and, if appropriate, transboundary emergencies).	Change of wording for clarification, in addition “if appropriate” is not needed, as it is stated as an example (same as the event affecting several facilities)	Accepted (see France 3 above)		
*Report by Fukushima Nuclear Accident Independent Investigation Committee *ONR Final Report *Ext. CNS Meeting August 2012	Req. 8: Emergency preparedness and response	Req. 8: Emergency preparedness and response New paragraph after 2.24 2.24b The government shall ensure that arrangements are in place to keep the public informed of the possible radiation risks due to accidents at facilities and activities and of arrangements for emergency preparedness and response. The arrangements shall include information provided before start of operations, during and after operation until release from regulatory control and during any emergency*. * Ref. to the revision of GS-R-2 (GSR Part 7)	Req. 8: Emergency preparedness and response New paragraph after 2.24 New proposal (reworded only for sake of consistency with latest draft of GSR part 7 2.24b The government shall ensure that arrangements, commensurate with the risks, are in place to keep the general public and the potentially or actually affected public informed about emergency preparedness and response of the possible radiation risks due to accidents at facilities and activities and of arrangements for emergency preparedness and response. The arrangements shall include information provided before start of operations, during and after operation until release from regulatory control, as appropriate and during any emergency. The information shall include the potential for a nuclear or radiological emergency, the nature of the hazard, how people will be warned or notified and actions to be taken, as appropriate*. * Ref. to the revision of GS-R-2 (GSR Part 7)		
USA 3 (RES)	2.24b 2 nd sentence The arrangements shall include Information shall be provided before start of operations , during and after operation s , until release of the facility from regulatory control, and during any emergency	“The arrangements” is unclear, as it could apply to arrangements to provide information, or arrangements to respond to emergencies, in the previous sentence.		Included in the new proposal	
Pakistan	2.24b The last sentence “The arrangements shall include information provided before start of operations, during and after operation until release from regulatory control and during	Since it is not specific to emergency.		Accepted with modification	

10	<i>any emergency*.” may be shifted under requirement 1, 2 or 36</i>				
ENISS 4	2.24 b The government shall ensure that arrangements are in place to keep inform the public informed of the possible radiation risks due to accidents at facilities and activities and of arrangements for emergency preparedness and response. The arrangements shall include information provided before start of operations, during and after operation until release from regulatory control and during any emergency.	Sentence one should clarify, what information shall be given. Communication with public about associated radiation risks is generally covered by Req. 36. (Req. 8 is about Emergency Preparedness and Response). Newly added 2.24(b) is mainly covered by existing paragraph 4.66. (incl. information about accidents). Should any text remain here, then it is information to the public during emergencies.			Rejected, the wording “public informed is consistent with GSR part 7 Rejected; Req.36 is for RB, not for Government.
WNA 3	2.24b The government shall ensure that arrangements are in place to keep inform the public informed of the possible radiation risks due to accidents at facilities and activities and of arrangements for emergency preparedness and response. The arrangements shall include information provided before start of operations, during and after operation until release from regulatory control and during any emergency*.	Continuous information is already included in the second sentence. Sentence one should clarify, what information shall be given			Rejected, the wording “public informed is consistent with GSR part 7
*Japanese Investigation Committee Interim Report *ONR Final Report *Ext. CNS Meeting August 2012	Req. 14: Int. obligations and arrangements for int. cooperation 3.2. The features of the global safety regime include: (a) International conventions that establish common obligations and mechanisms for ensuring protection and safety; (b) Codes of conduct that promote the adoption of good practices in the relevant facilities and activities; (c) Internationally agreed IAEA safety standards that promote the development and application of internationally harmonized safety requirements, guides and practices; (d) International peer reviews of the regulatory control and safety of facilities and activities, and mutual learning by participating States; (e) Multilateral and bilateral cooperation that enhances safety by means of harmonized approaches as well as increased quality and effectiveness of safety reviews and inspections.	Req. 14: Int. obligations and arrangements for int. cooperation 3.2. The features of the global safety regime include: [...] (e) <u>Regular Mmultilateral and bilateral cooperation with relevant national organizations</u> , that enhances safety by means of harmonized approaches as well as increased quality and effectiveness of safety reviews and inspections <u>through knowledge and experience sharing (e.g. by developing networks)</u> .	Req. 14: Int. obligations and arrangements for int. cooperation 3.2. The features of the global safety regime include: [...] (e) Regular multilateral and bilateral cooperation with of all the relevant national <u>or international</u> organizations, that enhances safety by means of harmonized approaches as well as increased quality and effectiveness of safety reviews and inspections through knowledge and experience sharing (e.g. by developing networks) .		
Pakistan 11	3.2 new clause New clause may be added as <i>(f) Multilateral and bilateral cooperation with international organizations to enhance the safety of facilities and activities in the country and in the region.</i>	Safety of the region is important which can be achieved by enhancing international multilateral and bilateral cooperation among different countries and organizations.		Accepted with modifications: the idea of cooperation with international organizations	
Germany GSR Part 1 3	3.2 (e) Regular multilateral and bilateral cooperation with of relevant national organizations, that enhances safety by means of ...	Use of the term ‘cooperation <u>with</u> ’ prompts the question: “Who cooperates with the relevant national organizations?” The probable intention of the statement is that the national organizations cooperate among each other in an international framework. This is better phrased by the term ‘cooperation <u>of</u> ’.		Accepted with modifications: “of all” relevant...	
France 4	3.2 (e) Regular multilateral and bilateral cooperation with relevant national, <u>foreign or international</u> organizations, that	As written, international cooperation is not promoted anymore and this		Accepted with modifications;	

	enhances safety by means of harmonized approaches as well as increased quality and effectiveness of safety reviews and inspections through knowledge and experience sharing (e.g. by developing networks).	is not a good idea... Example is not appropriate in a Reqmt.		“Foreign” is covered by “relevant national” Insertion in first phrase looks redundant; example is indeed not appropriate in a Req.	
A 5.1	Req. 14: Int. obligations and arrangements for int. cooperation The government shall fulfil its respective international obligations, participate in the relevant international arrangements, including international peer reviews, and promote international cooperation to enhance safety global.	Req. 14: Int. obligations and arrangements for int. cooperation The government shall fulfil its respective international obligations, participate in the relevant international arrangements, including international peer reviews, and promote international cooperation <u>and assistance</u> to enhance safety global. And new paragraph after 3.2 3.2a The government shall ensure that adequate arrangements are in place to benefit from international cooperation and assistance during a nuclear or radiological emergency*. *Ref. to the revision of GS-R-2 (GSR Part 7)	Req. 14: Int. obligations and arrangements for int. cooperation The government shall fulfil its respective international obligations, participate in the relevant international arrangements, including international peer reviews, and promote international cooperation and assistance to enhance safety globally. And new paragraph after 3.2 3.2a The government shall ensure that adequate arrangements are in place to benefit from international cooperation and assistance during a nuclear or radiological emergency*. *Ref. to the revision of GS-R-2 (GSR Part 7)		
USA 1(Johnson)	Requirement 14: Insert full stop after “Promote international cooperation and assistance.” Delete “to enhance safety global.”	The phrase “to enhance safety global” is not understandable and unnecessary.			Rejected; initially a typo.
	3.5 To enhance the safety of facilities and activities globally, feedback shall be provided on measures that have been taken in response to information received via national and international knowledge and reporting networks. Such measures could comprise promulgating new regulatory requirements or making safety enhancing modifications to operating practices or to equipment in authorized facilities and activities. Such feedback provided in response to information received via international networks also covers descriptions of good practices that have been adopted to reduce radiation risks.	No initial IAEA proposal		The regulatory body shall make arrangements for analysis to be carried out to identify lessons to be learned from operating experience and regulatory experience, including experience in other States, and for the dissemination of the lessons learned and for their use by authorized parties, the regulatory body and other relevant authorities. New para 3.5a: <u>All Relevant information and feedback shall be provided to these knowledge and information networks in a timely manner</u>	
USA DWMEP 8 Eid (FSME)	3.5 last The following sentence shall be added: In all cases, this information and feedback shall be provided to these knowledge and information networks in a timely fashion without undue delay.	For reasons of: <ul style="list-style-type: none">• relevance and usefulness• scope and completeness• quality and clarity This was a problem with Fukushima and Chernobyl. It is unfortunate that this lesson has been ignored in past catastrophic experiences.		A new paragraph will be added after 3.5 : See above	
4.1	Req. 21: Liaison between the RB and authorized parties 4.24. The regulatory body shall foster mutual understanding and respect on the part of authorized parties through frank, open and yet formal relationships, providing constructive liaison on safety related issues.	Req. 21: Liaison between the RB and authorized parties 4.24. The regulatory body shall foster mutual understanding and respect on the part of authorized parties through frank, open and yet formal relationships, providing constructive liaison on safety related issues <u>and in-depth technical dialogue between experts of each party.</u>	Req. 21: Liaison between the RB and authorized parties 4.24. The regulatory body shall foster mutual understanding and respect on the part of authorized parties through frank, open and yet formal relationships, providing constructive liaison on safety related issues and in-depth technical dialogue between experts of each party.		

<p>* Iter consult: Preliminary Report</p> <p>*ENSREG</p> <p>* NRC Task Force Report (implicit)</p> <p>*Ext. CNS Meeting August 2012 (implicit)</p>	<p>Req. 25: Review and assessment of information relevant to safety</p> <p>Req. 26: Graded approach to review and ass. of a facility or an activity</p>	<p>Req. 25 : Review and assessment of information relevant to safety</p> <p>New paragraph below the overarching requirement 26</p> <p>Req. 26: Graded approach to review and ass. of a facility or an activity</p> <p>New paragraph above 4.40.</p> <p>4.39a The Regulatory Body shall ensure that the authorized parties routinely perform operational experience reviews and periodically perform comprehensive safety reviews such as Periodic Safety Reviews for nuclear power plants*. These comprehensive safety reviews are submitted to assessment by the regulatory body, which shall ensure that any reasonably practicable safety improvements identified in the findings are implemented in a timely manner.</p> <p>*Include Ref. to SSR-2/2 requirement 12</p>	<p>Req. 25 : Review and assessment of information relevant to safety</p> <p>New paragraph below the overarching requirement 26</p> <p>Req. 26: Graded approach to review and ass. of a facility or an activity</p> <p>New paragraph above 4.40.</p> <p>4.39a The Regulatory Body shall ensure, <u>adopting a graded approach</u>, that the authorized parties routinely <u>perform evaluate</u> operational experience reviews and periodically perform comprehensive safety reviews such as Periodic Safety Reviews for nuclear power plants*.</p> <p>These comprehensive safety reviews are submitted to <u>the regulatory body for assessment, assessment by, or are made available to the regulatory body</u>, the regulatory body for assessment, which. <u>The regulatory body</u> shall ensure that any reasonably practicable safety improvements identified in the findings <u>review</u> are implemented in a timely manner.</p> <p>*Include Ref. to SSR-2/2 requirement 12</p>		
<p>USA 2 (NRR)</p>	<p>4.39a The Regulatory Body shall ensure that the authorized parties routinely perform evaluate operational experience reviews and periodically perform comprehensive and/or in-depth safety reviews such as Periodic Safety Reviews for nuclear power plants [10, requirement 12]. These comprehensive safety reviews are submitted to, or are made available to assessment by the regulatory body for assessment. which The regulatory body shall ensure that any reasonably practicable safety improvements identified in the findings are implemented in a timely manner.</p>	<p>The scope of the safety reviews is broadened to include both comprehensive and more focused in-depth reviews; additional sentences were added to provide the authorized body the flexibility of either submitting the safety reviews to the regulator for assessment or making the safety reviews available for the regulator to review.</p>		<p>Accept with modifications;</p>	
<p>USA 7 (JLD)</p>	<p>4.39</p> <p>The new paragraph 4.39a indicates that the authorized parties perform safety assessments and submit the results to the Regulatory Body for review. The Regulatory Body may wish to have an expert onsite presence to conduct inspections, rather than only reviewing reports submitted for its review.</p> <p>This may be captured in Requirement 29.</p>				<p>Rejected; although the statement is correct, it refers to inspection, not Review and Assessment specifically. No added value for the proposal.</p>
<p>Germany</p> <p>GSR Part 1</p> <p>4</p>	<p>4.39a</p> <p>The Regulatory Body shall ensure that ...</p>	<p>Use uniform spelling. In the whole document, the term 'regulatory body' is written in lower case.</p>	<p>Accepted; editorial, before QA check.</p>		
<p>Ukraine 1</p>	<p>4.39a The Regulatory Body shall ensure that the person or organization responsible for a facility or an activity routinely ... which shall ensure that any safety gaps identified in the findings and appropriate reasonably practicable safety improvements proposed for implementation in a timely manner</p>	<p>To be compliant with 2.15a of GSR Part 1</p> <p>Safety review process is the one of sources for development of safety enhancement programs/measures. These processes are separated in time, thus Regulatory Body cannot see implrmentation of safety improvements in safety review reports (excluding improvements proposed in previous safety review).</p>			<p>Rejected; "authorized party" terminology used throughout the document. Risk of lack of consensus.</p>

DS462 Amendments to GSR Part 1, NS-R-3, SSR-2/1, SSR-2/2 and GSR Part 4 – MS comments resolution

Japan 1	4.39a The Regulatory Body shall ensure that the authorized parties routinely perform operational experience reviews and periodically perform comprehensive safety reviews such as Periodic Safety Reviews or updated Safety Analysis Reports for nuclear power plants*. These comprehensive safety reviews are submitted to assessment by the regulatory body, which shall ensure that any necessary reasonably practicable safety improvements identified in the findings are implemented proactively by the authorized parties in a timely manner. *Include Ref. to SSR-2/2 requirement 12	(1) It would be preferable to indicate another type of comprehensive safety reviews, as some countries do not have PSA, but periodic assessment on continuous safety improvement activities such as updating Safety Analysis Report. (2) The aim of regulatory assessing of these comprehensive safety reviews submitted to regulatory body is primarily to improve the regulations. Implementation of the findings by operating organization identified in the comprehensive safety reviews is another type of effective usage of comprehensive safety reviews. Furthermore, Req.12 of SSR-2/2 and its associated paragraphs say that the operating organization is asked to implement them voluntarily without any assessment by the regulatory body.			Rejected; increases level of detail, which could increase risk for lack of consensus. Additionally, “necessary” contradicts “proactively”. Last phrase from France 5.
Canada 11	4.39a second sentence: These comprehensive safety reviews are submitted subject to assessment by the regulatory body, which shall ensure that any reasonably practicable safety improvements identified in the findings are implemented in a timely manner	Editorial		Accepted with modifications; according to USA 2 wording.	
Pakistan 12	4.39a may be changed as “... experience reviews and periodically perform comprehensive safety reviews such as Periodic Safety Reviews for facilities and activities nuclear power plants*. ...	Since requirement is related to facilities and activities not for NPP only.			Rejected; the intention IS to have PSR for NPP only.
France 5	4.39 a The Regulatory Body shall ensure that the authorized parties routinely perform operational experience reviews and periodically perform comprehensive safety reviews such as Periodic Safety Reviews for nuclear power plants*. These comprehensive safety reviews are submitted to assessment by the regulatory body. The authorized party , which shall ensure that any reasonably practicable safety improvements identified in the findings review are implemented in a timely manner.	It is the obligation of the authorized party to ensure the implementation of the improvements (responsibility for safety is at the licensee, also see new 2.15a)		Accepted with modifications; (only last phrase). In 2.15a the requirement is put on the operator, here it is for the Reg Body to ensure that the operator implement the improvements	
ENISS 5 WNA 4	4.39a The Regulatory Body shall ensure that the authorized parties routinely perform operational experience reviews and periodically perform comprehensive safety reviews such as Periodic Safety Reviews for nuclear power plants*. These comprehensive safety reviews are submitted to assessment by the regulatory body. The authorized party , which shall ensure that any reasonably practicable safety improvements identified in the findings review are implemented in a timely manner.	It is the obligation of the authorized party to ensure the implementation of the improvements (responsibility for safety is at the licensee, also see new 2.15a)		See France 5 above.	
5.1 *ENSREG Report *Japanese Investigation	Req. 25: Review and assessment of information relevant to safety Req. 26: Graded approach to review and ass. of a facility or an activity 4.43. The regulatory body shall assess all radiation risks	Req. 25: Review and assessment of information relevant to safety Req. 26 : Graded approach to review and assessment of a facility or an activity 4.43. The regulatory body shall assess all radiation risks associated with normal operation, anticipated operational occurrences and		Req. 25: Review and assessment of information relevant to safety Req. 26 : Graded approach to review and assessment of a facility or an activity 4.43. The regulatory body shall assess all the radiation risks associated with normal operation, anticipated operational occurrences and accident conditions, including severe accidents those	

Committee Interim Report *NRC Task Force Report *ONR Final Report Also see Req. 1 / 2.5 (3)	associated with normal operation, anticipated operational occurrences and accident conditions, prior to operation of the facility or conduct of the activity, and periodically throughout the lifetime of the facility or the duration of the activity, to determine whether radiation risks are as low as reasonably achievable.	accident conditions, including severe accidents , prior to operation of the facility or conduct of the activity, and periodically throughout the lifetime of the facility or the duration of the activity, to determine whether radiation risks are as low as reasonably achievable.	of very low probability , prior to operation of the facility or conduct of the activity, and periodically throughout the lifetime of the facility or the duration of the activity, to determine whether radiation risks are as low as reasonably achievable.		
Canada 13	4.43 The regulatory body shall assess all radiation risks associated with normal operation, anticipated operational occurrences and accident conditions, including where applicable severe accidents , prior to operation of the facility or conduct of the activity, and periodically throughout the lifetime of the facility or the duration of the activity, to determine whether radiation risks are as low as reasonably achievable.	“where applicable” is added as the definition of severe accident only applies to facilities that have a reactor core. The scope of GSR Part 1 is broader and covers all facilities and activities.	.	Considered with the new wording that is more general	
Pakistan 13	4.43 ... operational occurrences and accident conditions, including severe accidents , prior to operation of the facility or conduct of the ...	Since in accordance with new definition of “plant states” “accident conditions” include severe accidents so the words “including severe accidents,” may be deleted.			Rejected (post-Fukushima review of GSR Part 1, it HAS to involve severe accidents specifically).
UK 1	4.43 “The regulatory body shall assess <u>the all</u> radiation risks associated with normal operation, anticipated operational occurrences and accident conditions, including severe accidents,”	“All” would involve a substantial quantity of work which might not be appropriate depending on the level of risk presented.	Accepted.		
France 6	4.43 The regulatory body shall assess all radiation risks associated with normal operation, anticipated operational occurrences and accident conditions, including severe accidents in nuclear installations , prior to operation of the facility or conduct of the activity, and periodically throughout the lifetime of the facility or the duration of the activity, to determine whether radiation risks are as low as reasonably achievable.	Term “severe accident” is newly introduced into GSR Part 1 now. It should apply for NI only (significant core degradation). If the paragraph has been applied generally, then the INES terminology (“serious incident and/or serious accident”) should better be used here.		Clarification provided, with new wording	.
ENISS 6	4.43 The regulatory body shall assess all radiation risks associated with normal operation, anticipated operational occurrences and accident conditions, including severe accidents in nuclear installations , prior to operation of the facility or conduct of the activity, and periodically throughout the lifetime of the facility or the duration of the activity, to determine whether radiation risks are as low as reasonably achievable.	Term “severe accident” is newly introduced into GSR Part 1 now. It should apply for NI only (significant core degradation). If the paragraph has been applied generally, then the INES terminology (“serious incident and/or serious accident”) should better be used here.		Idem as France 6	
4.1	Req. 25: Review and assessment of information relevant to safety Req. 26: Graded approach to review and ass. of a facility or an activity	Req. 25: Review and assessment of information relevant to safety Req. 26: Graded approach to review and ass. of a facility or an activity New paragraph after 4.48 4.48a The regulatory body shall encourage the authorized party to continuously search for safety improvements and implement	Req. 25: Review and assessment of information relevant to safety Req. 26: Graded approach to review and ass. of a facility or an activity No need for a new paragraph after 4.48 Covered by the 2.15a above		

		reasonably practicable ones in line with the regulatory process without needing to be prompted or required to do so by the regulatory body.		
USA 4 (RES)	4.48a The regulatory body shall encourage the authorized party to continuously search for <u>ensure safety by reviewing relevant experience or other information sources to identify</u> improvements and implement <u>those that are</u> reasonably practicable, <u>commensurate with their safety significance and</u> ones in line with the regulatory process, without needing to be prompted or required to do so by the regulatory body.	This sentence was rewritten to account for the fact that some Member States' regulatory framework precludes the regulatory body from continuously requesting the authorized body to search for safety improvements. The revised sentence fulfills the original intent of "searching for continuous safety improvements" while affording Member States the flexibility of accomplishing such goal under their own regulatory framework.		Paragraph deleted
Germany GSR Part 1 5	Delete 4.48a	Here, expectations of the authorized party (applicant/licensee shall behave proactively) are formulated as a requirement of the regulatory body. This could imply that the regulatory body is responsible, if the authorized part does not behave as expected. Is in principal covered by new 2.15a.	Accepted	
Canada 14	4.48a The regulatory body shall encourage the authorized parties to continuously <u>improve search for safety improvements</u> and implement reasonably practicable <u>modifications to enhance safety ones</u> in line with the regulatory process without needing to be prompted or <u>required to do so ordered by</u> the regulatory body.	Editorial		Paragraph deleted
Pakistan 14	4.48a "... party to continuously search for safety improvements <u>and experience feedback</u> and implement reasonably..."	Experience feedback is an important part for improvement so may be added		Paragraph deleted
Ukraine 2	4.48 a The regulatory body shall encourage the <u>operator</u> authorized party to continuously search for safety improvements and implement reasonably practicable ones in line with the regulatory process <u>without needing to be prompted or required to do so by the regulatory body</u>	"Operator" term is more clear than "authorized party". Sentence looks better without the "tail" proposed for deletion		Paragraph deleted
ENISS 7 WNA 5	4.48a The regulatory body shall encourage the authorized party to continuously search for safety improvements and implement reasonably practicable ones in line with the regulatory process <u>without needing to be prompted or required to do so by the regulatory body</u> .	The encouragement stated in 4.48a is already stated in new 2.15 a as an obligation(!), so the whole para should be deleted. If not deleted as a whole, at least the last part of 4.48a ("without needing to be prompted to do so by the regulatory body") seems in contradiction to the beginning of the sentence (encourage) and must be deleted.		Paragraph deleted
*IAEA Mission on Remediation *ONR Final Report (implicit) *Ext. CNS Meeting August 2012 (implicit)	Req. 36: Communication and consultation with interested parties 4.66. The regulatory body shall establish, either directly or through authorized parties, provision for effective mechanisms of communication, and it shall hold meetings to inform interested parties and the public and for informing the decision making process. This communication shall include constructive liaison such as: [...] (d) Communication on the requirements, judgements and decisions of the regulatory body, and on the bases for them, to the public; (e) Making information on incidents in facilities and activities, including accidents and abnormal occurrences, and other information, as appropriate, available to authorized parties, governmental bodies, national and international organizations, and the public.	Req. 36: Communication and consultation with interested parties New bullet in 4.66 (d) Communication on the requirements, judgements and decisions of the regulatory body, and on the bases for them, to the public; (e) <u>Ensuring that the public is given appropriate opportunities to be consulted effectively in the process for making important regulatory decisions, in accordance with national legislation and international obligations. The results of these consultations shall be taken into account by the regulatory body in a transparent manner;</u> (fe) Making information on incidents in facilities and activities, including accidents and abnormal occurrences, and other information, as appropriate, available to authorized parties, governmental bodies, national and international organizations, and the public.		Req. 36: Communication and consultation with interested parties New bullet in 4.66 <u>text at the end of 4.67 (because 4.66 refers to communication and 4.67 refers to consultation)</u> 4.67. The regulatory body, in its public informational activities and consultation, shall set up appropriate means of informing interested parties, the public and the news media about the radiation risks associated with facilities and activities, the requirements for protection of people and the environment, and the processes of the regulatory body. In particular, there shall be consultation by means of an open and inclusive process with interested parties residing in the vicinity of authorized facilities and activities, <u>and other interested parties, as appropriate [SF-1]. Interested parties and the public shall have</u>

	[...] 4.67. The regulatory body, in its public informational activities and consultation, shall set up appropriate means of informing interested parties, the public and the news media about the radiation risks associated with facilities and activities, the requirements for protection of people and the environment, and the processes of the regulatory body. In particular, there shall be consultation by means of an open and inclusive process with interested parties residing in the vicinity of authorized facilities and activities.		opportunities to be consulted effectively in the process for making significant regulatory decisions, in accordance with national legislation and international obligations. The results of these consultations shall be taken into consideration by the regulatory body in a transparent manner		
Finland GSR Part 1 1	(e) Ensuring that the public is given appropriate opportunities to be consulted effectively in the licensing process for making important regulatory decisions, in accordance with national legislation and international obligations. The results of these consultations shall be taken into account by the regulatory body in a transparent manner;	clarity, The requirements should not be ambiguous. It is not clear what all regulatory processes are expected to include public consultation. The consultation of the public in the licensing process is important.			Rejected; see UK 2 ["strategic"] and France 7 [last phrase] below.
Hungary 1	(e) Ensuring that the public is given appropriate opportunities to be consulted effectively in the process for making in important regulatory licensing decisions, in accordance with national legislation and international obligations. The results of these consultations shall be taken into account by the regulatory body in a transparent manner;	The words "appropriate" and "effectively" in the text make the obligation of the new bullet quite uncertain and can result in legal disputes how this condition shall be applied in the practice. Furthermore, it is advisable that the public shall not take part in every important regulatory decision. For this reason it is suggested to narrow the number of the related decisions and specify this obligation only on the main licensing processes of the regulatory body. The delete of the second phrase is in connection with the Hungarian regulation. Upon the Act CXL of 2004 on the general rules of administrative proceedings and services the regulatory body shall not take into account the results of the public hearings. In addition the suggested solution is in accordance with the last version of the proposal for a amending Directive 2009 /71 /EURATOM establishing a Community framework for the nuclear safety of nuclear installations (Article 8 – Transparency, bullet 3) This proposal envisages similar rules in that context but it do not specify that obligation.		Accepted with modifications; Ensuring that the public is given opportunities consulted effectively in the process for making significant regulatory decisions, in accordance with national legislation and international obligations.	
UK 2	4.66 (e) (e) Ensuring that the public is given appropriate opportunities to be consulted effectively in the process for making important strategic regulatory decisions, in accordance with national legislation and international obligations. The results of these consultations shall be taken into account by the regulatory body in a transparent manner;	Public consultation in the regulatory process is important however the texted implies that the public should be consulted for <u>all important regulatory decisions</u> , this could make the process for making quick regulatory decisions, where necessary, difficult. This statement should be qualified; maybe the term "strategic" could replace "important".		Accepted with modifications; "significant" is a good term, showing appropriate level of detail.	
France 7	4.66 (e) Ensuring that the public is given appropriate opportunities to be consulted effectively in the process for making important regulatory decisions, in accordance consistently with national legislation and international obligations. The results of these consultations shall be taken into consideration account by the regulatory body in a transparent manner;	National legislation should encourage such consultation. However, if it is not the case, this should not be an excuse for not consulting stakeholder, unless this breach the law. "taken into account" may be too strong. Comments have to be reviewed to decide whether or not the initial view is to be changed		Accepted with modifications; only last phrase.	
ENISS 8	4.66 (e) Ensuring that the public is given appropriate opportunities to be consulted effectively in the process for making important regulatory decisions, in accordance with national legislation and international obligations. The results of these consultations shall be taken into account by the regulatory body in a transparent manner;	"appropriate opportunities to be consulted effectively" seems doubled.			Rejected: see above.

ENISS 9	4.66 (e) Ensuring that the public is given appropriate opportunities to communicate their views before be consulted effectively in the process for making important regulatory decisions, in accordance with national legislation and international obligations. The results of these consultations communications shall be taken into account by the regulatory body in a transparent manner.	Consultation brings effective results if it is held among experts. Public opinion should be considered in regulatory decision making, but the final resolution does not necessarily be complying with views of all interested parties.			Rejected: see above.
WNA 6	4.66 (e) (e) Ensuring that the public is given appropriate opportunities to be consulted effectively in the process for making important regulatory decisions, in accordance with national legislation and international obligations. The results of these consultations shall be taken into account by the regulatory body in a transparent manner;	“appropriate opportunities to be consulted effectively” seems doubled			Rejected: see above.
A 6.2 * IAEA Mission on Remediation * Japanese Investigation Committee Interim Report * NRC Task Force Report * ONR Final Report * Ext. CNS Meeting August 2012 (implicit)	Req. 36: Communication and consultation with interested parties 4.68. The authorized party has an obligation to inform the public about the possible radiation risks associated with the operation of a facility or the conduct of an activity, and this obligation shall be specified in the regulations promulgated by the regulatory body, in the authorization or by other legal means.	Req. 36: Communication and consultation with interested parties 4.68. The authorized party has an obligation to inform the public about the possible radiation risks (under both operational states and accident conditions) associated with the operation of a facility or the conduct of an activity, and this obligation shall be specified in the regulations promulgated by the regulatory body, in the authorization or by other legal means.	Req. 36: Communication and consultation with interested parties 4.68. The authorized party has an obligation to inform the public about the possible radiation risks (arising from under both operational states and accidents-conditions, including those of very low probability) associated with the operation of a facility or the conduct of an activity, and this obligation shall be specified in the regulations promulgated by the regulatory body, in the authorization or by other legal means.		
Canada 4, 5, 6, 9, 12 and 18	2.23, 2.24a, 2.24b, 3.2 a, 4.39a and reference updates Are references to documents in preparation permitted at IAEA? The following reference document is in preparation.	Normally published documents are referenced in regulatory documents and standards.			At the time DS462 will be finalized, the other referenced drafts will also be finalized
USA DWMEP 11 Eid (FSME)	References to documents which are still in preparation at the time of final publication should be deleted or modified to the existing revision.	For reasons of: <ul style="list-style-type: none"> • relevance and usefulness • scope and completeness • quality and clarity If such references are necessary, then GSR Part 1 should be withheld until the time that they are published; otherwise there would be doubts on the accuracy and validity of statements made within this document.			At the time DS462 will be finalized, the other referenced drafts will also be finalized