

DS462

TABLE OF COMMENTS RESOLUTION

Comments from Argentina, Germany NUSSC,
Germany WASSC, France, Finland, Poland, Japan
NUSSC, Japan WASSC, USA, Switzerland, Canada,
Ukraine, ENISS and WNA

Addenda 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 7: first review by the Review
Committees (NUSSC, RASSC,
TRANSSC, WASSC)
Information of NSGC

Addendum to GSR Part 1

Lesson learned	Current text	Proposal following NUSSG WG meeting held from 5 to 8 March 2013	Proposed Resolution for the Committees meetings
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 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 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) 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, under operational and accident conditions ; (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, authorised parties or from other organizations. (f) 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 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) 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, under both operational states and accident conditions; (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, authoriz ed parties or from other organizations. (f) be able to give independent advice to government departments and governmental bodies on matters relating to the safety of facilities and activities.
Argentina	2.8 (a) have sufficient authority and sufficient competent staffing; (d) be free from any undue influences (duplication of item a) that might compromise safety, such as pressures associated with changing political circumstances or economic conditions, or pressures from government departments, authorised parties or from other organizations.	X see Switzerland	X Competence is covered by Req. 18. If added here, it should be added everywhere in the document, which is not desirable.
Canada	2.8 To be effectively independent from undue influence in its decision making , the regulatory body shall:	The yellow highlighted text (expansion on 'effectively independent') is redundant here because of the text in item (d) below. In addition, the term "effectively independent" is clearly described in other IAEA documents such as Safety Fundamentals SF-1, Section 3.10 and Requirement 17 of GSR Part 1.	X see Switzerland

Finland	2.8 (c)	(c) be able to make independent regulatory judgements and regulatory decisions <u>throughout whole life cycle of facility or an activity</u> ,	Clarity			x	Finland proposal addresses a different aspect. The goal is to take into account LL from Fukushima and to enhance regulatory capability also during accident conditions.
Germany WASSC 1	2.8 (c)	(c) be able to make independent regulatory judgements and regulatory decisions, under <u>both</u> operational <u>states</u> and accident conditions;	(c): With regard to the plant states, the terminology used in SSR-2/1 distinguishes between ‘operational states’ and ‘accident conditions’ (see Section “Definitions” in SSR-2/1).	X			
Switzerland	2.8 (d)	(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, authorised parties or from other organizations.	Purely semantic: Original phrase results in a tautology. Suppress second mention of “undue influences”	X			
Germany WASSC 1	2.8 (d)	(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;	(d): Change wording to avoid unnecessary doubling. The phrase “from undue influence” is already used in the introductory statement of this para.	X			
Letter from Chairman of INSAG (24 August 2012) Underlying theme of several reports, though not explicit It is strongly recommended to	Req. 5 Prime responsibility for safety – 2.15 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 – 2.15a 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	Req. 5 Prime responsibility for safety – 2.15a 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				NO CHANGE 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

emphasise the meaning of the Requirement								
Argentina	Para 2.15a	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 knowledge progress in science and technology as well as relevant experience feedback as well as its own experience when applicable				X	Not necessarily. "Knowledge" does not seem to bring a strong added value here, and is not a word usually used in the Safety Standards	
						X	Already included in "relevant experience feedback".	
2.2	Req. 8 Emergency preparedness and response – 2.23 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 2.23 The government shall specify and shall assign clear responsibilities for timely decision making in an emergency, and shall make provision for effective coordination and communication between authorized parties and response organizations* competent authorities and for an effective means of communication. *Include Ref. to the revision of GS-R-2 (GSR Part 7)	Req. 8 Emergency preparedness and response - 2.23 2.23 The government shall specify and shall assign clear responsibilities for timely decision making in an emergency, and shall make provision for effective coordination and communication between authorized parties and response organizations [5]. [5] Ref. to the revision of GS-R-2 (GSR Part 7)	Req. 8 Emergency preparedness and response - 2.23 NO CHANGE (no comments)				
*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 – 2.24a 2.24a The government shall ensure that adequate training, drills and exercises are carried out, involving authorised parties and response organizations, including decision makers, to demonstrate an effective response to emergencies*. The training, drills and exercises should consider a full range of potential emergencies (e.g. events affecting several facilities on a single site, practical exercise with long duration and, if appropriate, transboundary emergencies). *Include Ref. to the revision of GS-R-2 (GSR Part 7)	Req. 8 Emergency preparedness and response – 2.24a 2.24a The government shall ensure that adequate training drills and exercises are carried out regularly, involving authorised parties and response organizations, including decision makers, to contribute to demonstrate an effective response to emergencies [5]*. The training, drills and exercises should consider shall cover a full range of potential emergencies (e.g. events affecting several facilities on a single site, long duration practical exercise with long duration and, if appropriate, transboundary emergencies). [5] *Include Ref. to the revision of GS-R-2 (GSR Part 7)	Req. 8 Emergency preparedness and response – 2.24a 2.24a The government shall ensure that adequate training drills and exercises are carried out regularly, involving authorised parties and response organizations, including decision makers, to contribute to demonstrate an effective response to emergencies [5]*. The training, drills and exercises should consider shall cover a full range of potential emergencies (e.g. events affecting several facilities on a single site, long duration practical exercise with long duration and, if appropriate, transboundary emergencies). [5] *Include Ref. to the revision of GS-R-2 (GSR Part 7)				
Germany 1 Germany WASSC	2.24a	2.24a The government shall ensure that adequate training, drills and exercises are carried out regularly, involving authorised parties and response organizations, including decision makers, to demonstrate an effective response to	To ensure that the training, drills and exercise could always practice in case of an event			X		

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Comment resolution table draft 1, 7 June 2013

		emergencies.					
Germany 2	2.24a	2.24 a The training, drills and exercises should consider a full range of potential emergencies (e.g. events affecting several facilities on a single site, practical <u>exercise with long duration events with long-term release</u> and, if appropriate, transboundary emergencies) [5].	Clarification			X	This is not only the duration of the release but the duration of the event, like prolonged LOOP
Germany WASSC	2.24a	The government shall ensure that adequate training, drills and exercises are carried out <u>regularly</u> , involving authorized parties and response organizations, including decision makers, to demonstrate an effective response to emergencies [5]. The training, drills and exercises should <u>shall</u> consider a full range of potential emergencies (e.g. events affecting several facilities on a single site, practical exercise with long duration and, if appropriate, transboundary emergencies) [5] .	<p>1st sentence:</p> <p>Ensuring consistency with the General Safety Requirements No. GSR Part 7 “Preparedness and Response for a Nuclear or Radiological Emergency” (revision of GS-R-2; draft version DS457 dated 3 May 2013). Requirement 23 of GSR Part 7 states “The government shall ensure that relevant response staff shall take part in <u>regular</u> training and exercises to ensure that they are able to perform their assigned response functions in a nuclear or radiological emergency effectively.”</p> <p>It is inadequate to carry out training, drills and exercises rarely.</p> <p>2nd sentence:</p> <p>In IAEA Safety Requirements, “shall” statements are to be provided. Please also take note that the statement in this sentence does not rely on Requirement 23 and the subordinated paras 6.29 to 6.34 of GSR Part 7. Therefore, the reference to GSR Part 7 should be placed at the end of the 1st sentence.</p>	X	X	X	X
France 1	2.24a	“consider” may be a little weak but replacing it with “address” may be too			Replaced by		

		ambitious			"cover"			
*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 – 2.24b 2.24b The government shall ensure that arrangements are in place to keep the public informed in regard to potential emergencies. The arrangements shall include information provided before start of operations, during normal operation and throughout any emergency*. *Include Ref. to the revision of GS-R-2 (GSR Part 7)			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 in regard to potential <u>for an emergenciesemergency and emergency preparedness and response</u> . The arrangements shall include information provided before start of operations, during normal and after operation <u>until release from regulatory control</u> and during throughout any emergency <u>[5]*</u> . <u>[5]</u> *Include Ref. to the revision of GS-R-2 (GSR Part 7)		
Germany 3	2.24b	2.24b The arrangements shall include information provided before start of operations, during normal operation and throughout any emergency <u>and post operation phase</u>) [5].	There is also a risk in the post operation phase	X	Taken into account in new proposal			
Germany 4	2.24b	2.24b The arrangements shall include information provided before start of operations, during normal operation and throughout any emergency))-[5].	The bracket. (Editorial)	X				
Germany WASSC	2.24b	The government shall ensure that arrangements are in place to keep the public informed <u>throughout a nuclear or radiological emergency as well as</u> in regard to potential emergencies. The arrangements shall include including information provided before start of operations, <u>and</u> during normal operation and throughout any emergency) [5].	Ensuring consistency with Requirement 11 of GSR Part 7 which states "The government shall ensure that arrangements are put in place to keep the public informed <u>throughout a nuclear or radiological emergency</u> in order for people to be able to take appropriate protective actions and other response actions."		Taken into account in new proposal			
Argentina	2.24b	2.24b The government shall ensure that arrangements are in place to keep the public correctly informed in regard to ¿potential? (why potential?,				X	Preparedness should also be addressed	

		the safety issue is with real emergencies) emergencies. The arrangements shall include information provided before start of operations, during normal operation and throughout any emergency				
ENISS	2.24b	The government shall ensure that arrangements are in place to keep the public informed in regard to potential emergencies <u>emergency preparedness and response</u> . The arrangements shall include information provided before start of operations, during normal operation and throughout any emergency) [5].	Potential emergencies is not a defined term and is unclear – what is relevant is the emergency preparedness and response needs to be known to the public.	Taken into account in new proposal		
*Japanese Investigation Committee Interim Report *ONR Final Report *Ext. CNS Meeting August 2012	Req. 14 Int. obligations and arrangements for int. cooperation – 3.2 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 – new bullet (f) in 3.2 3.2. The features of the global safety regime include: [...] (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. (f) Development of regular cooperation between Regulatory Bodies and other relevant organizations in order to share knowledge and experience (e.g. through the development of networks).	Req. 14 Int. obligations and arrangements for int. cooperation – new bullet (f) in 3.2 3.2. The features of the global safety regime include: [...] (e) <u>Regular m</u> Multilateral and bilateral cooperation <u>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> . (f) Development of regular cooperation between Regulatory Bodies and other relevant organizations in order to share knowledge and experience (e.g. through the development of networks).			
France 2	3.2	Combine proposed new (f) with current (e): (e) <u>Cooperation with relevant national organization</u> , Multilateral and bilateral cooperation with relevant national organization, that enhances safety by means of harmonized approaches as well as increased quality and effectiveness of safety reviews and inspections <u>through knowledge and practices sharing</u> .		Ok if we keep the idea of “regular” cooperation and highlight the role of networks.		
Canada	3.2	3.2. The features of the global safety regime include: [...] (f) Development of regular cooperation	Why is a verb used in (f) when (a) to (e) use nouns?	Covered by the French proposal		

		between Regulatory Bodies and other relevant organizations in order to share knowledge and experience (e.g. through the development of networks).	Suggest deleting “development of”				
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 globally.	Req. 14 Int. obligations and arrangements for int. cooperation – 3.2a 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 globally. 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*. *Include Ref. to the revision of GS-R-2 (GSR Part 7)	Req. 14 Int. obligations and arrangements for int. cooperation – 3.2a 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 globally. 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 [5]. [5] Ref. to the revision of GS-R-2 (GSR Part 7)				
USA 2	3.2a	“...international cooperation and assistance...”	Comment: Some thought should be given to exercising these arrangements.		X	More detail is provided in the DS457 revising GS-R-2 and at the level of Safety Guides.	
Canada	3.2a	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*. *Include Ref. to the revision of GS-R-2 (GSR Part 7)	Suggestion: Because of the fundamental nature of this requirement, this text should be rolled into the actual requirement 14 language. As 3.2a, it is not visible enough.	X	“Assistance” has been added in the req.14.	.	
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 and in-depth technical dialogue between experts of each party.	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.				
* Iter consult:							

<p>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 and 26 – 4.39a</p> <p>4.39a The Regulatory Body shall ensure that the authorised parties periodically perform comprehensive safety reviews and submit them to its assessment (e.g. for nuclear power plants, Periodic Safety Reviews shall be performed, at least every ten years). The Regulatory Body shall ensure that any reasonably practicable safety improvements identified in the findings are implemented.</p>			<p>Req. 25 and 26 – 4.39a</p> <p>4.39a The rRegulatory bBody shall ensure that the authorizsed parties periodically perform comprehensive safety reviews <u>such as Periodic Safety Reviews required for nuclear power plants*</u>. Routine reviews such as operating experience reviews can support this process. These comprehensive safety reviews are submitted to assessment by the regulatory body and submit them to its assessment (e.g. for nuclear power plants, Periodic Safety Reviews shall be performed, at least every ten years). The Regulatory Body, which shall ensure that any reasonably practicable safety improvements identified in the findings are implemented <u>in a timely manner</u>.</p> <p><u>* Ref. to SSR 2/2, Req. 12</u></p>	
<p>Germany WASSC 4</p>	<p>4.39a</p>	<p>“The Regulatory Body shall ensure that the authoriszed parties periodically perform comprehensive safety reviews and submit them to its assessment (e.g. for nuclear power plants, Periodic Safety Reviews shall be performed, at least every ten years). The Regulatory Body shall ensure that any reasonably practicable safety improvements identified in the findings are implemented <u>in a timely manner</u>.”</p>	<p>1st sentence: Editorial (uniform spelling throughout the document).</p> <p>2nd sentence: Clarification. In case of safety-relevant findings in PSR, improvements need to be implemented by the authorized party without undue delay.</p>	<p>X</p> <p>X</p>		
<p>USA 3</p>	<p>4.39a</p>	<p>The Regulatory Body shall ensure that the authorised parties <u>systematically</u> perform comprehensive safety reviews of <u>a routine (e.g. operating experience reviews), special (e.g. stress test reviews) and periodic (e.g. Periodic Safety Reviews, external hazards reviews) nature. Significant reviews are submitted to the Regulatory Body for its assessment. (e.g. for nuclear power plants, Periodic Safety Reviews shall be performed, at least every ten years).</u> The</p>	<p>Suggested re-write of current 4.39a. The current 4.39a is too narrowly focused on PSR, which is an important piece, but not the only piece of an overall program by which the regulator sets the standard for continuous improvement. This fuller statement of the underlying ENSREG principle of continuous improvement is consistent with Section 1.2 of the IAEA safety guide on PSR. This change is also consistent with the lessons</p>		<p>“Routine” and “special” reviews are not systematically comprehensive. They are also not defined concepts. Agree to highlight the value added of operating experience reviews.</p>	

		Regulatory Body shall ensure that any reasonably practicable safety improvements identified in the findings are implemented.	learned from Fukushima, where it is not the regulatory process associated with PSRs that provides or did provide the safety enhancements associated with Fukushima, but instead, it was the “special” regulatory evaluation process that is providing the evaluation and implementation path for Fukushima response.				
Canada	4.39a	4.39a The Regulatory Body shall ensure that the authorised parties periodically perform comprehensive safety reviews and submit them to its assessment (e.g. for nuclear power plants, Periodic Safety Reviews shall be typically required to be performed, at least every ten years). The Regulatory Body shall ensure that any reasonably practicable safety improvements identified in the findings are implemented.	Is it appropriate to put a requirement in a bracketed example? Suggest: (e.g. for nuclear power plants, Periodic Safety Reviews are typically required to be performed at least every ten years)			No need with new proposal	
ENISS	4.39a	The Regulatory Body shall ensure that the authorised parties periodically perform comprehensive safety reviews and submit them to its assessment (e.g. for nuclear power plants, Periodic Safety Reviews shall be performed, at least every ten years). The Regulatory Body shall ensure that any reasonably practicable safety improvements identified in the findings are implemented.	This requirement doesn't seem adequate for most activities and is stated for NPP and facilities in many other documents. We suggest deleting this para from GSR Part 1 Also “any” in the last sentence should be deleted, reasonable practicable would be sufficient.			X Important feedback from the Fukushima accident	
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	4.43. The regulatory body shall assess all radiation risks	Req. 25 and 26 – 4.43 4.43. The regulatory body shall assess all radiation risks associated with normal operation, anticipated operational occurrences and accident conditions, including low frequency 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			Req. 25 and 26 – 4.43 NO CHANGE	4.43. The regulatory body shall assess all radiation risks associated with normal operation, anticipated operational occurrences and accident conditions, including low frequency 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

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.	radiation risks are as low as reasonably achievable.					determine whether radiation risks are as low as reasonably achievable.
Argentina	4.43	4.43. The regulatory body shall assess ¿all? (too ambitious and besides, is it practical?) radiation risks associated with normal operation, anticipated operational occurrences and accident conditions, including low frequency 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.			X Current text not submitted for comment		
Germany WASSC 5	4.43	“The regulatory body shall assess all radiation risks associated with both normal operation, anticipated operational occurrences states and accident conditions, including low frequency severe accidents, prior to operation of the facility or conduct of the activity, and ...”	With regard to the plant states, the terminology used in SSR-2/1 distinguishes between ‘operational states’ and ‘accident conditions’ (see Section “Definitions” in SSR-2/1). The term ‘operational states’ includes normal operation and anticipated operational occurrences.	Same meaning but current proposal is more detailed.			
USA 4	4.43	“...including low frequency severe high consequence accidents,...”	This original change is unclear in that the term “accident conditions” by definition already include as part of the design extension conditions, low frequency severe accidents. The suggested change would point towards a family of accidents beyond the design		X We are not discussing the family of accident beyond DEC.		

			extension conditions (i.e. in the realm of practically eliminated). In the US system, those items are considered but this may not be true in other regulatory systems.				
ENISS	4.43	The regulatory body shall assess all radiation risks associated with normal operation, anticipated operational occurrences and accident conditions, including low frequency 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.	This event type is not defined in any IAEA document and is therefore unknown. Accident conditions is sufficient here. This event type is neither a lesson learnt.			X	It is a LL from Fukushima.
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 and 26 – 4.48a 4.48aThe regulatory body shall encourage the authorized party to continuously search for safety improvements and implement them in line with the regulatory process without needing to be prompted to do so by the regulatory body.			Req. 25 and 26 – 4.48a 4.48aThe regulatory body shall encourage the authorized party to continuously search for safety improvements and implement <u>reasonably practicable ones</u> , in line with the regulatory process, without needing to be prompted <u>or required</u> to do so by the regulatory body.	
Argentina	4.48a	4.48aThe regulatory body shall encourage the authorized party to continuously search for safety improvements and implement them in line with the regulatory process without needing to be prompted to do so by the regulatory body by means of a solid safety culture embebbed in both organizations and decision-makers. Besides, the graded approach should also be iterated (necessary duplication taking account of its importance, mainly for newcomers).			OK but the wording to be simplified Graded approach can be covered by the use of ENISS proposal		
France 3	4.48a	4.48aThe regulatory body shall encourage the authorized party to continuously search for safety improvements and implement them in line with the regulatory process without needing to be prompted <u>or required</u> to do so by the regulatory body.	Clarification (is “prompted” covering legally binding requirements set out by the regulator ?)	OK			
USA 5	4.48a	4.48a Revise text to state: The regulatory body shall encourage the authorized party to identify,	The current version seemed to suggest the authorized party was obligated to				As proposed, this would limit the requirement to

		fully evaluate, and promptly address and correct issues impacting safety commensurate with their significance without undue need for prompting by the regulator.	implement every safety improvement that could be found. It seemed a bit too impractical. A requirement to identify, fully evaluate and then address or correct a safety issue commensurate with its significance is both practical and represents what good licensees are currently doing. This statement of the requirement is also consistent with traits expressed in safety culture documents such as the NRC Safety Culture Policy Statement.		Ther part of “commensurate” can be covered with the ENISS proposal		“issues”. The scope of 4.48a is broader (continuous improvement of safety...).	
ENISS	4.48a	The regulatory body shall encourage the authorized party to continuously search for safety improvements and implement <u>reasonable practicable ones</u> them in line with the regulatory process without needing to be prompted to do so by the regulatory body.	Not all safety improvements also need to be implemented, only reasonable practicable ones. 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 and should be deleted.	X	OK like 4.39 a			
WNA	4.48a	4.48a The regulatory body shall encourage the authorized party to continuously search for <u>cost effective, risk informed, safety improvements</u> and implement them in line with the regulatory process without needing to be prompted to do so by the regulatory body.	Any safety improvement must be “cost effective” and “risk informed” otherwise it will become prohibitively expensive for a minimal improvement in plant safety or core damage frequency. As the requirement is now written it is open ended ...anything that improves safety, even if the improvement in safety risk may be small, must be implemented...This is unreasonable.		OK with ENISS wording			

<p>*IAEA Mission on Remediation</p> <p>*ONR Final Report (implicit)</p> <p>*Ext. CNS Meeting August 2012 (implicit)</p>	<p>Req. 36: Communication and consultation with interested parties – 4.66</p> <p>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. [...]</p>	<p>Req. 36: Communication and consultation with interested parties – 4.66 new bullet (e)</p> <p>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: [...] (e) The public shall be given the appropriate opportunities to be involved effectively in regulatory decision making, in accordance with national legislation and international obligations; (f) 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.</p>	<p>Req. 36: Communication and consultation with interested parties – 4.66 new bullet (e)</p> <p>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: [...] (e) Ensuring that the public shall be given the appropriate opportunities to be involved-consulted effectively in important-regulatory decisions making, 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; (f) 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.</p>					
Argentina	4.66	<p>(e) The public shall be given the appropriate opportunities to be involved effectively in regulatory decision making, in accordance with national legislation and international obligations; It's correct but, is it applicable to all Member States; a gradual approach should be advisable for countries where this legal mechanism is noy yet implemented. (f) Making correct information, avoiding subjective opinions, 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.</p>				X	<p>See new proposal and mention of "considering national legislation and international obligation"</p> <p>No modification proposed to the current text</p>	
France 4	4.66	<p>(e) The public shall be given the appropriate opportunities to be involved effectively in regulatory decision making, in accordance with considering national legislation and international obligations;</p>	<p>Of course, national legislation and international obligation are mandatory. But if they do not include stakeholder involvement, then the purpose of the IAEA requirement would not</p>	X				

			be met				
Finland	4.66 (e)	(e) The public shall be given the appropriate opportunities to be involved . effectively in the <u>licensing process of a nuclear installation and periodic safety review processes</u> in accordance with national legislation and international obligations;	The public involvement in the licensing process. The involvement on all the decision making is not possible.			X	GSR Part 1 is for all facilities and activities. This is addressed through: “appropriate opportunities” and “according to national legislation and international obligations”.
Switzerland	4.66 (e)	(e) Taking into account the results of public consultation, in accordance with national legislation and international obligations;	a) The original wording is not in accordance with Req. 36 (“...informing and consulting...”). b) The proposed wording is consistent with 4.66 (a)-(d) and (f).		See new proposal: 1) consultation takes place, 2) results are taken into account		
Germany WASSC 6	4.66	“... This communication shall include constructive liaison such as: ... (e) The public shall be given the appropriate opportunities to be involved effectively <u>Taking into account the results of public consultation</u> in regulatory decision making, in accordance with national legislation and international obligations; ...”	Ensuring consistency with the content of Requirement 36 stating that “The regulatory body shall promote the establishment of appropriate means of <u>informing and consulting interested parties and the public</u> about the possible radiation risks associated with facilities and activities, and about the processes and decisions of the regulatory body.” Furthermore, the proposed wording is also consistent with that in subparas (a) to (d) and (f).		See new proposal: 1) consultation takes place, 2) results are taken into account		
USA 6	4.66	<u>Providing appropriate opportunities for t</u> The public shall be given the appropriate opportunities to be involved effectively in regulatory decision making, in accordance with national legislation and international	Parallel grammar structure with 4.66 (a) – (d), (f).		See new proposal		

		obligations					
Canada	4.66 (e)	(e) The public shall be given the appropriate opportunities for effective involvement by the public to be involved effectively in regulatory decision making, in accordance with national legislation and international obligations;	Is a “shall” appropriate when none of the other bullets are written in ‘shall’ language? Suggest: “(e) Appropriate opportunities for effective involvement by the public in regulatory decision making, in accordance with national legislation and international obligations”	See new proposal			
ENISS	4.66 (e)	The public shall be given the appropriate opportunities to be involved effectively <u>before a</u> in regulatory decision is taken making, in accordance with national legislation and international obligations;	To be “involved effectively in regulatory decision making” is contradictory of the requirement on the regulator, to be free from influence.	See new proposal: 1) consultation takes place, 2) results are taken into account			
WNA	4.66(e)	Req. 36 new bullet in 4.66 (e) the public shall be given the appropriate opportunities to be involved effectively in regulatory decision making, in accordance with national legislation and international obligations;	This point exceeds the framework of the Req. 36 and its intention. The public does not have the competence, nor the independence required for regulatory decision making . This is precisely why there is a competent and independent regulatory body. Furthermore, bullet (c) already provides for “ <i>communication of ... documents and opinions from private or public organizations or persons to the regulatory body as may be considered necessary and appropriate</i> ”. Alternately, the words “ <i>regulatory decision making</i> ” may be replaced by “ regulatory process ” if bullet (e) is to be kept.	Solved by new proposal			

<p>A 6.2</p> <p>* IAEA Mission on Remediation</p> <p>* Japanese Investigation Committee Interim Report</p> <p>* NRC Task Force Report</p> <p>* ONR Final Report</p> <p>* Ext. CNS Meeting August 2012 (implicit)</p>	<p>Req. 36: Communication and consultation with interested parties – 4.68</p> <p>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.</p>		<p>Req. 36: Communication and consultation with interested parties – 4.68</p> <p>4.68. The authorized party has an obligation to inform the public about the possible radiation risks (under both operational 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.</p>		<p>Req. 36: Communication and consultation with interested parties – 4.68</p> <p>4.68. The authorized party has an obligation to inform the public about the possible radiation risks (under both operational <u>states</u> 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.</p>	
<p>Argentina</p>	<p>4.68</p>	<p>4.68. The authorized party has an obligation to inform the public about the conceivable radiation risks (under both operational 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.</p>			<p>X</p>	<p>Possible was previously agreed.</p>
<p>Germany WASSC 7</p>	<p>4.68</p>	<p>“The authorized party has an obligation to inform the public about the possible radiation risks (under both operational <u>states</u> and accident conditions) associated with the operation of a facility or the conduct of an activity, and ...”</p>	<p>With regard to the plant states, the terminology used in SSR-2/1 distinguishes between ‘operational states’ and ‘accident conditions’ (see Section “Definitions” in SSR-2/1).</p>	<p>X</p>		
<p>Canada</p>	<p>4.68</p>	<p>4.68. The authorized party has an obligation to inform the public about the possible radiation risks (under both operational and accident conditions) associated with the operation of a facility (under both operational and accident conditions) or the conduct of an activity and this obligation shall be specified in the regulations promulgated by the</p>	<p>For clarity, this added text should actually be put after the words ‘operation of a facility’: i.e. The authorized party has an obligation to inform the public about the possible</p>		<p>X</p>	<p>Both facilities and activities need to be covered.</p>

		regulatory body, in the authorization or by other legal means.	radiation risks associated with the operation of a facility (under both operational and accident conditions) 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				
USA 1	2.30 Additional modification not initially proposed by the Secretariat	2.30. Radioactive waste generated in facilities and activities shall be managed in an integrated, systematic manner up to its disposal. The interdependences of the steps in the entire management process for radioactive waste, and likewise for spent fuel, shall be recognized [3]. In addition, the authorized party shall coordinate with the regulatory authority to address plans for radioactive waste disposal after severe accidents, including plans to expedite licensing of new disposal facilities and onsite storage.	It is necessary to establish plans for waste disposal/storage after severe accidents and to address expedited licensing of waste disposal or storage facilities.			X	This is a requirement for the authorized parties, not for GSR Part 1. Moreover, this would not apply for all facilities and activities