

DS472

Comments received from:

- The Netherlands (AVNS)
- Finland – All Committees and NSGC
- Germany - NUSSC
- Japan - NUSSC
- USA (US NRC)
- France – NUSSC and NSGC
- Korea (KINS)
- Austria - NUSSC

Status

STEP 7: Approval by the relevant safety review committees for submission to Member States for comments

Below you will find the set of individual comments and then the individual answers.

Netherlands

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: Mr R.Jansen, Ms G. Delfini Country/Organization: Netherlands/ANVS (RB)			Page.... of.... Date:				
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1	Objective/ 1.10	Add: international regulatory and operating experience exchange and cooperation	Fukushima accident has shown that supporting the global safety regime is essential for achieving national safety goals.			X	Not a core function of the regulatory body.
2	Objective/ 1.11	Add: competence management, training and qualification and knowledge management	They are essential support functions and already partly discussed in the documents			X	Not functions, these are processes.
3	Financial aspects/ 2.12	Specific provisions to fund the regulatory body should be established through implementing legislation or through the national fiscal process. In many countries this includes a system of retributions or fees paid by the licensees. How this is best accomplished will depend on a number of considerations and factors, including: – National precedents for funding other regulatory organizations; – The types and scale of regulated facilities and activities, and the associated workload based on the application of a graded approach to the execution of the regulatory body functions; – How the regulatory body is structured, including its use of in-house and outsourced competencies.	Since most countries have some sort of retribution or fees as part of the financing of the RB directly or indirectly it is important to mention this as a practice			X	This is addressed by bullets below. No specific listing was provided, but generic considerations – safety standards language.
4.	Competence aspects/ 2.14	The independence of a regulatory body's decision making depends heavily on the competence of its staff. The regulatory body should have sufficient technical expertise in the areas relevant to its safety mission. The management of the regulatory body should therefore have the responsibility and authority to recruit sufficient staff with the necessary skills and technical expertise and train and qualify them to carry out the regulatory functions. In order to maintain independence, the following types of competence are needed: – Competence in the relevant scientific and technological areas; – Competence with regard to the installations, organizations and activities of the licensees; – Competence in applying the regulatory processes with their underpinning legal framework, ethical principles and codes of conduct. 13	You cannot always recruit people with the needed competence and the aspect of training and qualification for a function/job should be part of this document. Refer to 3.16 and 3.17.		“The management of the regulatory body should therefore have the responsibility and authority to <u>maintain</u> recruit sufficient staff with the necessary skills and technical expertise and train and qualify them to carry out the regulatory functions. In order to maintain independence, the...”		

<p>5.</p>	<p>Openness, transparency and predictability/2.25</p>	<p>The principles and considerations on staffing and competence of staff are addressed in greater detail in Chapter 6 Staffing and competence of staff.</p> <p>The regulatory body should assure that regulations and requirements are applied in a consistent, transparent, balanced and predictable manner. The regulatory body should apply policies and internal guidance to establish and cultivate principles that promote proportionality, transparency and consistency, and the broad internal sharing of information and ideas in the conduct of the work. They should also be shared with the licensees.</p>	<p>It was felt that internal regulatory guidance was missing as a fundamental way to promote predictability.</p>			<p>X</p>	<p>This paragraph covers the application of regulations and requirements to authorized parties. Sharing of information is addressed in para 2.24 and the use of internal guidance is covered in Chapter 6 (Methods for acquiring competence) and Appendix III Elements of a regulatory body's training programme. Supplementary information on the use of internal guides can be found in DS473, which should be used in close conjunction with DS472.</p>
	<p>Inspection/4.14</p>	<p>GSR Part 1 further requires that the regulatory inspections shall cover all areas of responsibility of the regulatory body, and the regulatory body shall have the authority to carry out independent inspections. Provision shall be made for free access by regulatory inspectors to any facility or activity at any time, within the constraints of ensuring operational safety at all times and other constraints associated with the potential for harmful consequences. Access to facilities and activities should also include the premises of national or international organizations constructing SSCs for nuclear facilities. These inspections should include announced and unannounced inspections and audits, and a basic inspection program should be developed, taking into account the graded approach.</p>	<p>Access to fabrication locations is not obvious and should be organized. Announced and unannounced inspection should both be part of the inspection strategy. Including audits. Important that it is part of a program and use of graded approach.</p>			<p>X</p>	<p>Access to facilities and activities is stated in the second phrase of the paragraph and the suggested change is not accurate, but it refers to revision and assessment as part of the licensing process and is further detailed in DS473, which should be used in close conjunction with DS472. Announced inspections are part of a typical inspection programme. Further information on types of inspection can be found in DS473, which should be used in close conjunction with DS472.</p>

Finland – All committees and NSGC

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: M-L Järvinen, K-L, Hutri, R. Bly, S. Hellstén, P. Karhu, J.Mononen, A-M Sunabacka-Starck, K.Merimaa, P.Karhu, K. Koskinen							
Country/Organization:STUK				Page.... of....			
				Date: 22 nd May 2015			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1.	Title	Reformulation: Organization, management and staffing of a regulatory body for safety	Regulatory body is clear enough			X	We would like to maintain the formulation; "for safety" provides important clarification.
2.	General	This safety guide should be in line with forthcoming GSR Part 2. Some work is still needed.		X			Noted. Consistency will be ensured with DS456 as the draft progresses.
3.	General	use " the integrated management system " instead of various expressions	In this document expressions * integrated management system' , *management system' and ' management system for safety' are all used, use only one of these to be consistent	X	Have checked document for correct use of "integrated management system" and corrections were made in the following locations: para 5.1, para A2.9, as well as sub-chapter titles IMPLEMENTATION PHASE OF AN INTEGRATED MANAGEMENT SYSTEM, MAINTENANCE PHASE OF THE INTEGRATED MANAGEMENT SYSTEM, <u>Integrated</u> management system review		
4.	2.21	New formulation: Values of a Regulatory Body values should incorporate the following characteristics:	Clarification			X	Para 2.21 does not address values but the responsibility for safety.
5.	p. 14, para. 2.20	Misspelling. "This commitment can be achieved by developing and fostering a strong safety culture within <i>the organization</i> the regulatory body of the regulatory body as further described in section 3.2 Safety culture."	Misspelling (the regulatory body of the regulatory body)	X	Have corrected the paragraph as follows: 2.20. Every member of the regulatory body should exhibit a strong commitment to safety. This commitment can be achieved by developing and fostering a strong safety culture within the regulatory body of the regulatory body as further described in section 3.2		

					Safety culture.		
6.	p. 14, para. 2.23	Addition. "The information collected ... the regulatory body's mandate. " <i>The regulatory body's staff should be periodically informed about the collected information.</i>	It is most relevant that staff is informed about the public expectations, concerns and proposals for improvement.			X	The proposed addition does not relate to acting in the public interest.
7.	p. 11 para 2.4	... decisions in respect of the radiological radiation protection of workers, the public and the environment. At the same time, the need for independence of the regulatory body does not imply that it ought to have an	clarification	X	The paragraph was corrected as follows: "...necessary decisions in respect of the radiological <u>radiation</u> protection of workers, the public <u>the people</u> and the environment."		
8.	p. 14 para 2.19	The protection of the public from any hazard due to ionizing radiation is the main focus of the regulatory body. In doing so, the view of the regulatory body should cover all aspects of a nuclear installation <u>facility or activity</u> including its organization and its staff. The regulatory body should have a holistic approach in discharging its responsibilities, taking into account all aspects of Individuals, Technology, and Organization (ITO) and their respective interactions.	use of radiation should be also covered	X	The paragraph was corrected as follows: 2.19. The protection of the public <u>people and the environment</u> from any hazard due to ionizing radiation is the main focus of the regulatory body. In doing so, the view of the regulatory body should cover all aspects of a nuclear installation <u>facility or activity</u> including its organization and its staff. The regulatory body should have a holistic approach in discharging its responsibilities, taking into account all aspects of Individuals, Technology, and Organization (ITO) and their respective interactions.		
9.	p. 14 para 2.21	The prime responsibility for safety rests with the authorized parties. The regulatory body should ensure that its actions do not take the prime responsibility from the authorized parties.	the expression should be in line with GSR Part 2 which talks about licensees, here 'authorized parties'			X	The terminology in GSR Part 1 and DS460 was used.
10.	p. 14 para	... A strong communication with	clarification	X	The paragraph was corrected as follows: A strong communication with all		

	2.24	all interested parties enables the regulatory body to take into account all the different opinions perspectives and expectations and to use them as a basis for establishing or modifying the regulatory framework....			interested parties enables the regulatory body to take into account all the different opinions perspectives and expectations and to use them as a basis for establishing or modifying the regulatory framework.		
11.	p. 15 para 2.28	...This requires a continuous improvement process of in the regulatory body's organization.	new formulation continuous improvement of management system and all activities within the organization is needed		Accepted but modified as follows: ...This requires a continuous improvement process of in for the regulatory body's organization.		For clarity and simplicity.
12.	Whole chapter 3	whole chapter needs to be checked and partly rewritten	the chapter should be inline with GSR Part 2			X	Noted. Consistency will be ensured with DS456 as the draft progresses.
13.	p.17	Addition - Questioning attitude is promoted	clarification, to be inline with SC attributes in other IAEA publications			X	Questioning attitude is addressed in para 3.7.
14.	p. 22, para 4.7	Clarification. " The objective of granting authorizations is for the regulatory body to establish effective regulatory control throughout the lifetime of a facility or duration of an activity in relation to safety. " A suggestion for new text: <i>When granting authorization the regulatory body needs to take into account the whole life time of the facility or activity."</i>	It is not clear what is meant here. However, the objective of granting authorizations for the regulatory body is not to establish regulatory control - that needs to be done already earlier.			X	The only way to establish regulatory control is through authorization. That is how one becomes an authorized party.
15.	p. 23, para.4.11.	Modification and addition. "The review and assessment process should include <i>have an interaction between the core process Inspection of facilities and activities to validate through inspections and</i> checks on the site and elsewhere to validate the claims made in the submissions. " .	Interface between core processes/functions "Review and assessment" and "Regulatory inspection"			X	This is already mentioned in the first phrase of the paragraph. Further details on the interaction between the core processes can be found in DS473, which should be used in close conjunction with DS472.
16.	p. 77, A3.2	Add to the list: - <i>Human Factor Engineering</i>	HFE is essential to design processes.			X	The information is already included in the paragraph (Behavioural sciences and Systems engineering)

DS472 RC comments resolution 05 06 2015

17.	p. 30, para. 4.43.	“The regulatory body should establish and maintain a list of qualified external experts, as well as arrangements for engaging their services when needed and <i>assess and approve also the external organizations which services they use.</i> “	It is important that the RB also assesses whether the external organizations and experts fulfill the requirements set for them.			X	The suggested information is already addressed in the previous para (para 4.42.)
18.	Chapter 5		rather detailed guidance – should be on same detail level than the rest of the document and also in line with GSR Part 2			X	This is the intention; the information, in line with GSR Part 2, falls in the scope of the document. DS472 should be used in close conjunction with DS473.
19.	p. 35 para 5.2	Addition: The integrated management system of the regulatory body is should include a set of coherent processes and procedures that control the fulfilment of the regulatory functions in an effective and efficient manner, considering all internal and external conditions.	clarification Management system is not just a set of processes, other aspect should be in place as well.			X	We believe para 5.2. appropriately describes an integrated management system.
20.	p. 37 para 5.10	At each phase in the life of an integrated management system it is necessary to assign clear responsibilities to the individuals and units involved. Leadership and oversight for the system should be assigned to a senior staff member. Senior management should assign responsibilities and allocate appropriate resources to develop, implement, and maintain the integrated management system, including for the training to be provided.	Need to be reformulated			X	No useful suggestion was provided.
21.	p. 40, para. 5.31, 3rd bullet	Please clarify the following: “Training, briefings, workshops, where the process introduces new practices. A graded approach should be adopted to match the importance and complexity of the process;”	The statement should be reassessed. A graded approach is normally applied to management system requirements of a product, item, system, structure or component, service, activity or controls of a process.			X	It is not considered necessary to reassess. The paragraph states that the target and complexity of the trainings, briefings, workshops varies in accordance with the importance and complexity of the new process.
22.	p. 38	Suggestion to the title: DEVELOPMENT ESTABLISHMENT PHASE OF AN	This Chapter should give more guidance for establishing the management system (compare the section “IMPLEMENTATION			X	The proposed change is only a language suggestion.

		INTEGRATED MANAGEMENT SYSTEM	PHASE OF A MANAGEMENT SYSTEM” which presents implementation steps).				
23.	p. 53 para. 6.32.	<p>Addition.</p> <p>“Knowledge in human and organizational factors (HOF) should be part of the regulatory body’s competence profile. These competences are needed for oversight on issues such as safety culture, leadership, organizational and management aspects, competence development as well as aspects of human system interfaces <i>and human factor engineering.</i>”</p>	To manage human factor engineering the organization needs experts also on the area of human factors.			X	This is what the paragraph depicts.

Germany - NUSSC

		COMMENTS BY REVIEWER				RESOLUTION			
		Reviewer: Federal Ministry for the Environment, Nature Conservation, Building and Nuclear Safety (BMUB) (with comments of BfS and GRS) Page 1 of 17 Country/Organization: Germany Date: 20.05.2015							
Relevanz	Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection	
2	1	General	Please check the references: <ul style="list-style-type: none"> • Proper citation in text, and • Proper numbering (e.g. Ref. [5] is not used in the document) 	Clarification	X	Reference [5] inserted in para 5.1.			
2	2	1.6 / 1	This Safety Guide has been developed in parallel with IAEA Safety Guide DS473 [89], [...]	Clarification	X				
2	3	1.8 / 5	[...] Detailed guidance on establishing the safety infrastructure for a nuclear programme can be found in the IAEA Safety Guide SSG-16 [910].	Clarification	X				
3	4	1.10 / 9	[...] <ul style="list-style-type: none"> – Communication and consultation with interested parties. – [...]	Editorial	X				
2	5	1.10 / 11	[...] The regulatory core functions and their interactions, as well as the associated core processes, are described in detail in the Safety Guide DS473 [89].	Clarification	X				
2	6	1.14	<u>“safety” means the protection of people and the environment against radiation risks and the safety of facilities and activities that give rise to the radiation risks. This includes...</u>	Clarification Check consistency of definition of “safety” with GS-R-Part 2 draft 1.10			X	This is not a (re)definition, but clarification for a terminology used throughout the document in order to avoid unnecessary repetitions (nuclear and radiation safety).	
1	7	1.15	<u>...does not extend to nuclear security. Where security is mentioned in this document it is only to remind the reader that security aspects might have to be considered – through</u>	Security is mentioned (and rightly mentioned) in several paragraphs throughout the document, however it		Accepted but modified as follows: “The scope of this Safety Guide is		To include both current suggestion and the	

			<u>an appropriate interface.</u> Guidance on ...	should be clarified to the reader what this entails.		limited to the regulation of radiation and nuclear safety and does not extend to nuclear security. <u>Where security is mentioned in this document it is only to remind the reader that security aspects might have to be considered through an appropriate interface, especially for crisis management.</u> Guidance on addressing...?		recommendation of NSGC.
2	8	1.15 / 4, 5	[...] Nuclear security recommendations on physical protection of nuclear material and nuclear facilities [67] and Nuclear Security Recommendations on Radioactive Material and Associated Facilities, [78] and supporting guidance.	Clarification	X			
2	9	2.1 / 9	[...] - Openness and transparency with authorized parties, the public and other interested parties to promote confidence and trust in its judgements and decisions; [...]	Clarification; Compare with text 1.14 (Definition of interested parties).		X		Current terminology is in accordance with GSR Part 1. We note this general comment and confirm the terminology will be consistent with DS460.
2	10	2.15 / 3 - 4	[...] It is essential to underline that that the advice obtained is independent and it does not relieve the regulatory body of its assigned responsibilities. [...]	Clarification	X			
2	11	2.17 / 1 – 6	As such, the regulatory body should have the authority and the obligation to establish provisions for appropriate means of communication with the interested parties including the public about the possible radiation risks associated with facilities and activities, as well as about the regulatory decision making processes and regulatory decisions. Informing and consulting interested parties and the public should be done by means of a transparent, open and constant communication process. GSR Part 1 R36	Clarification; Compare with text 1.14 (Definition of interested parties).				See resolution 9 above.
2	12	2.19 / 4 – 5	[...] The regulatory body should have a holistic approach in discharging its responsibilities, taking into account all aspects of Individuals Man, Technology, and Organization (IMO) and their respective interactions.	Clarification Is the official wording not: "Man, Technology,			X	ITO is the correct wording.

				and Organization (MTO)”?				
2	13	3.1 / 5	[...] – Promoting a systemic/holistic approach to safety that embraces all interactions between <u>man, technology and human, organization and technology</u> ; [...]	Clarification See comment on 2.19		“Promoting a systemic/holistic approach to safety that embraces all ITO interactions between human, organization and technology ”	X	See resolution 12 and proposed text.
2	14	3.5	These characteristics should permeate the entire regulatory body and, so that individuals show a questioning attitude, feel responsible and are supported in identifying safety concerns.	Typing mistake affecting the understanding of the sentence	X			
2	15	3.12 / 1	Senior management should ensure that the resources ^[1] essential to the fulfilment of the regulatory body’s functions and to the achievement of the regulatory body’s objectives are identified and made available. Footnote [1]: <u>Resources’ includes individuals, infrastructure, the working environment, information and knowledge, and suppliers, as well as material and financial resources.</u>	Clarification Please include the definition of resources as in GS-R-3.	X			
2	16	3.19 / 3	Information and knowledge are part of the corporate memory of the regulatory body and should be managed as a key resource that is embedded in the regulatory body’s processes, activities and functions (See the example of KM process II-21. <u>Knowledge management</u> in Annex II).	Clarification	X			
2	17	4.2 / 4	In fulfilling its core functions there are also several supporting functions that should be available within the regulatory body. These supporting functions are necessary enablers in fulfilling the core functions, and a regulatory body could not operate satisfactorily without most of them. They <u>Core and supporting functions</u> are described in <u>separate subsections below</u> \emptyset .	Clarification	X			
2	18	4.22 / 1	The regulatory body should provide information concerning its activities to the interested parties including the public, both on a regular basis and in relation to abnormal events. Information should be factual and as objective as possible,	Clarification; Compare with text 1.14 (Description				See resolution 9 above.

			reflecting the regulatory body's independence. [...]	of interested parties).				
2	19	4.23 / 1 - 2	The regulatory body should, in accordance with national legislation, consult with interested parties including the public on its policies, regulations, guidance and operations.	Clarification; Compare with text 1.14 (Description of interested parties).				See resolution 9 above.
3	20	4.24 / 3 - 4	[...] – Administrative functions supporting the routine operations of the regulatory body (e.g. Finance, management of documents and records, equipment purchasing and control, etc...) and, [...]	Editorial	X			
2	21	4.25 / 1 - 18	The regulatory body should have organizational units dedicated to various administrative activities, often divided into specific aspects to support its core activities. The number and the size of the units will depend on the size of the regulatory body. Administrative functions include the following activities: – General administration such as internal planning, maintenance of buildings and equipment, operation of communication systems and <u>physical protection security</u> ; – Personnel administration (human resources management), which covers recruitment and training, internal communication, arrangements for medical care, <u>occupational safety and access authorization security</u> , travel arrangements and so on; – Financial administration, including procurement, contracting, accounting, salaries and invoicing. – Management of documentation and records, including the preparation, storage, retrieval, security , reproduction and distribution of documents including legal instruments e.g. authorisations, permits; – Computer and/or data administration, adequate computing capability for technical use (data handling, analytical computing) as well as general IT uses and <u>IT-security</u> – Preservation of 'corporate memory', knowledge management and library services including access to	Clarification: Paragraph 1.15 states that this Guide does not extend to nuclear security. In order to avoid confusion it is suggested that reference to the single term "security" is avoided at this point and a different wording is found (as suggested)			X	This is the security of the regulatory body, its staff and its resources, not nuclear security.

			specialized publications;					
2	22	4.30 / 3	Research and development provide supporting information in regard to the safety of the operation of a facility or the conduct of activities and should be performed under a systemic view, considering MTO individual, technical and organizational (ITO) aspects.	Clarification See also comment to 2.19.		Research and development provide supporting information in regard to the safety of the operation of a facility or the conduct of activities and should be performed under a systemic view, considering <u>ITO</u> aspects.	X	See resolution 12 above and new text (ITO abbreviation was already introduced under Chapter 2).
2	23	4.39 / 7 - 9	[...] The advisory committee should solicit, where appropriate, views from the public, industry, regional and local governments, and other relevant interested parties on regulatory matters.	Clarification; Compare with text 1.14 (Description of interested parties).		X		See resolution 9.
1	24	4.56 / 7	[...] – Magnitude and maturity of the existing <u>medical, nuclear, waste disposal and/or research</u> programme. – Magnitude of future <u>medical, nuclear power, waste disposal and/or research</u> plans (new installations and/or facilities, new technology, lifecycle activities e.g. decommissioning); [...]	A Regulatory Body takes responsibility for all kind of facilities and activities not only nuclear power.		Accepted with modifications, as follows: -Magnitude and maturity of the existing <u>facilities and activities</u> – Magnitude of future nuclear power plans (new installations and/or facilities, new technology, lifecycle activities e.g. decommissioning); [...]		For consistency and clarity, please see text on left. Nuclear programme does not equal nuclear power programme.
2	25	4.59 / 5	[...] However, it should be emphasized that the regulatory body uses an interdisciplinary approach to the oversight concept, enabling the regulatory body to implement a systemic approach and adequately consider all aspects relevant to safety with an integrated view to MTO and their interactions.	Clarification See also comment to 2.19.			X	See resolution 9.
2	26	4.63 / 1 - 3	In order to gain the acceptance of their authority by the staff, managers at all levels should demonstrate effective leadership that continuously improves safety awareness and safety culture (see Section Ø , <u>Leadership for safety in Chapter 3</u>).	Clarification;	X			
2	27	5.1	...quality, <u>societal</u> and economic...	Consistency with GS-R-Part 2 draft R 7.	X			Consistency will be ensured with DS456 as the draft progresses.
1	28	5.13	which includes the identification and definition of the processes. For each process a process owner should be assigned. <u>The responsibility to approve a process for</u>	The responsibilities should be clearly assigned.			X	This is mentioned in the following paragraph (para 5.14)

			<u>application should be assigned for each process.</u>					
3	29	5.13 / 3	The roles and responsibilities of individuals involved in each process should be identified during the first phase of developing an integrated management system, which includes the identification and definition of the processes. For each process a process owner should be assigned.	Editorial	X			
3	30	5.20 / 9	[...] – Communication and consultation with interested parties; – Emergency Preparedness and Response. –	Editorial	X			
3	31	5.33 / 5 - 10	After the integrated management system has been established and implemented, it should be used for the daily work of all individuals within the regulatory body. During this phase special care should be given to the maintenance of the integrated management system. Management should ensure that processes, both individually and collectively, are applied reliably across the regulatory body and improved to continually fulfil the purposes and objectives of the integrated management system. Opportunities for improvements in the integrated management system, as well as improvements to the efficient and effective discharge of the regulatory body's work, should be identified and actions to improve processes and the regulator's effectiveness and efficiency should be selected, planned, resourced and recorded. This phase includes audit, evaluation, process review and update, including system documentation and procedures. In this phase again, the process owner plays a central role.	The paragraph should be divided into two paragraphs. The sentences addressing improvements are more suitable in section "Measurement, Assessment, Evaluation and Continuous Improvement" Make a new point after 5.34. See also next comment.	X			Accepted, but to be implemented at the very end, for tracking purposes.
3	32	5.35	<u>Opportunities for improvements in the integrated management system, as well as improvements to the efficient and effective discharge of the regulatory body's work, should be identified and actions to improve processes and the regulator's effectiveness and efficiency should be</u>	See comment on 5.33.	X			Accepted, but to be implemented at the very end, for tracking purposes.

			<u>selected, planned, resourced and recorded. This phase includes audit, evaluation, process review and update, including system documentation and procedures. In this phase again, the process owner plays a central role.</u>					
2	33	5.50 / 6	[...] – Governance, leadership, management and <u>organizational</u> culture; [...]	Clarification			X	The intention is to simplify and to reduce the number of “artificial” terms, such as organizational culture, regulatory culture etc. Corrections have been applied in this regard also in para 3.1., 5.45, 5.58., 6.18.
2	34	5.53 / 2	The results of assessments should be communicated in an open and transparent manner, consistent with the needs of security and confidentiality <u>where it is necessary due to the security reasons.</u> [...]	Clarification (See text 1.15; <i>The scope of this Safety Guide is limited to the regulation of radiation and nuclear safety and does not extend to nuclear security.</i>)		Agreed and modified as follows: “...consistent with <u>the applicable security and confidentiality rules.</u> ”		For clarity and simplicity.
2	35	5.54 / 3	[...] Senior management should foster a <u>regulatory</u> culture that encourages individuals to identify and report non-conforming processes and outcomes of the regulatory work.	Clarification The term “regulatory culture” is inconsistently used across the document. Compare with text 5.45.			X	The intention is indeed to simplify and to reduce the number of “artificial” terms, such as organizational culture, regulatory culture etc. Corrections have been applied in this regard also in para 3.1., 5.45, 5.58., 6.18.
2	36	6.7 / 4 – 6	This plan should cover <u>also</u> recruitment <u>strategy</u> (see <u>subsection Recruitment</u>). And, where relevant, rotation of staff in order to obtain staff with appropriate competence. It includes also a strategy to compensate for the departure of qualified staff (succession planning, knowledge management).	Clarification Compare with text 6.57 (doublication) Please also check whether the concept of rotation is adequately addressed in the document..	X	Para 6.57 was deleted (duplication)		
2	37	6.8 / 1 – 2	The staffing needs are assessed based on the regulatory body’s main functions as listed in Chapter 3 of (see DS473) . [...]	Clarification;		Accepted with modifications; this was an editing error. Correct chapter number is 4; brackets deleted.		

3	38	6.11 / 3	The number and the specialized skills of the regulatory staff will also depend on decisions about the coverage of functional areas and on the extent to which the regulatory body will use consultants and/or advisory committees. In any event, the regulatory body should have sufficient numbers of staff with the basic skills necessary to operate the regulatory system without depending on the immediate availability of external expert support. [...]	Editorial	X			
2	39	6.15/1	The competence management process may include the following typical sub-processes (for more information s. also <u>SRS 79</u>):	Add reference to SRS 79		Accepted with modifications, since SRS 79 is introduced in para 6.13. Reference inserted in 6.13 "As described in SRS 79 [11], the competence..."		
2	40	6.15/3 -4	– Competence needs analysis, <u>analysing the competence which is missing and therefore needed</u> ; ○ Task analysis leading to needed <u>required</u> competence <u>being necessary and required to perform the regulatory tasks and duties</u> ; ○ Gap analysis <u>leading to needed competence</u> ;	By needed competence is meant the competence which is missing and therefore needed. By required competence is meant the competence which is necessary and required to be able to perform the tasks. The required competence is defined by analysing the tasks to be performed. By comparing the existing competence against the required competence you get information about the needed competence.		Accepted with modifications, as follows (according to SRS 79): – Competence needs analysis; ○ Task analysis leading to needed <u>required</u> competence; ○ Gap analysis; ○ Prioritization and choosing ways of filling gaps.		
1	41	6.15/5	⊖ – Prioritization and choosing ways of filling gaps.	"Prioritization and choosing ways of filling gaps" is not part of the "competence needs and competence gap analysis" but a step after the "competence needs and competence gap analysis". Therefore change the circle in front of "Prioritization and choosing ways of filling gaps" into a hyphen.			X	Please see above resolution, on the basis of SRS 79. The competence analysis ends with the actions and their prioritization.
2	42	6.24/1 -3	The competences needed <u>required</u> by the regulatory body in order to fulfil its functions should be identified by a systematic analysis based on the regulatory body's function and processes (See	By needed competence is meant the competence which is missing and therefore needed. By required competence is meant the competence which is necessary and required to be	X			

			DS473).	able to perform the tasks. Therefore substitute needed by required.				
2	43	6.29 / 1 – 5	It should be emphasized that not only “technical” skills are considered in this analysis, but also what is often termed as “soft skills” (see list in Appendix III, <u>A3.5 Communication and management skills</u>). <u>According to the quadrant model of competence for regulatory bodies in the Safety Report Series No. 79 they are mentioned in quadrant 4.</u> Staff must be able to interact with people (within the regulatory body, as well as in oversight interactions with licensees <u>as well as with the interested parties</u>) in a constructive way, to address findings adequately, to give constructive feedback, to solve conflicts etc.	Clarification Make a reference to the Quadrant Model in the Safety Report Series No. 79.			X	The competence model in SRS 79 is addressed in the next paragraph (para 6.30)
1	44	6.30/7	6.30. Competence profiles provide a powerful management aid to address competence gaps. A valuable instrument for competence management at the regulatory body is a competence model. Safety Report Series 79 gives an example of a competence model for regulatory bodies. It enables a balanced approach to competency and consistency of regulatory performance. It suggests a basis for assessing competence needs both for the near and medium future. It is a significant input into the process of developing an effective regulatory body that responds to internal and external environments and the associated challenges. ^{Footnote:} <u>A Methodology for the Systematic Assessment of the Regulatory Competence Needs, called SARCoN, for Regulatory Bodies has been developed and made available by the IAEA for performing a competence gap analysis based on the Quadrant Model established in the Quadrant Model in the Safety Report Series No. 79. This methodology and the use of the IAEA-SARCoN-Excel-tool are explained in the IAEA-TECDOC-1757.</u>	Mention and refer to the IAEA-TECDOC-1757 and to the IAEA-SARCoN-Excel-tool in footnote.			X	SRS 79 and competence model already referenced. A TECDOC is not a reference for a safety guide.
2	45	6.33 / 1 – 8	It is advisable that beside human and organizational specialists also additional members of the staff bear this HOF competence. For example, managers who should ensure the deployment of the HOF strategy and attribute the means for its implementation, process specialists who can integrate the HOF approach into organizations processes and especially trainers, operational experience specialists and inspectors in order to enable them to understand and evaluate working conditions and factors contributing to human performance. It should also be stressed that HOF specialists and this <u>these</u>	Clarification		Accepted with modifications, as follows: It is advisable that beside human and organizational specialists also additional members of the staff bear this HOF competence. For example, managers who should ensure the deployment of the HOF strategy and attribute the means for its		

			other staff <u>members</u> should cooperate in the analysis of HOF aspects and of their relationship with the technical aspects <u>according to the holistic MTO approach (ITO)</u> .			implementation, process specialists who can integrate the HOF approach into organizations processes and especially trainers, operational experience specialists and inspectors in order to enable them to understand and evaluate working conditions and factors contributing to human performance. It should also be stressed that HOF specialists and this <u>these</u> other staff <u>members</u> should cooperate in the analysis of HOF aspects and of their relationship with the technical aspects <u>according to the holistic MTO approach (ITO)</u> .		
3	46	6.43 / 2	Staff working in this area should be able to engage in effective dialogue, representation and interaction with all interested parties (i.e. <u>e.g.</u> authorized parties, colleagues, media and the public)	Clarification Compare with text 1.14.	X			
3	47	6.45/1	The regulatory body should have internal competences to define relevant research questions <u>issues</u> , to specify the research activities needed and to identify appropriate research institutions that may conduct research and development.	Replace research questions by research issues.	X			
3	48	6.50	Collaboration <u>Cooperation</u> with national and international organizations	Wording	X	The regulatory body should establish and maintain <u>collaboration</u> and a good working relationship with other governmental, professional and private organizations at the national and international levels.		
2	49	6.52 / 2 - 3	The processes for the competence management are part of the integrated management system and are therefore evaluated with the same means as described in section <u>Measurement, Assessment, Evaluation and Continuous Improvement</u> . “Measurement, Assessment and Improvement” .	Clarification Meant is section in Chapter 5.	X			
2	50	6.66/7	The most common method to acquire competences is training. The regulatory body, depending on the number and complexity of the State nuclear programme, should have: – A training policy;	Wording: Substitute current competences by existing competences and desired competences by required competences also including	X			

			<p>– Budgetary provisions for training;</p> <p>– Processes in place (as part of the integrated management system) to establish training and development programmes which take into consideration the gaps that exist between the current existing and desired required competences.</p>	competences required in the future.				
2	51	6.67 / 5	[...] Basic elements of a regulatory body's training programme are listed in Appendix III.	Clarification	X			
3	52	6.77 / 3 - 4	<p>Efforts commensurate with the size of the regulatory body should be made to develop a systematic approach to the training (SAT) of personnel in order to ensure consistency in the conduct</p> <p>of regulatory activities, including the application of quality assurance principles to training (<u>see also</u> GS-G-1.1 5.5). [...]</p>	Editorial		Accepted with the following modification: deleted GS-G 1.1 5.5		Editorial error.
3	53	6.77 / 8	<p>[...] The SAT is a suitable technique that provides a logical progression from the identification of the competences required to perform a job to the design, development and implementation of training to achieve these competences, and subsequent evaluation of this training. Safety Reports Series 79</p> <p>provides an excellent overview of competence management for regulatory bodies including training <u>methods and options</u> (classroom based training, distance learning, on the job training) and options and, in addition, a detailed description of SAT.</p>	Editorial	X			
3	54	6.77 (6.78) / 9	<p>[...] Safety Reports Series 79 provides an excellent overview of competence management for regulatory bodies including training methods (classroom based training, distance learning, on the job training) and options and, in addition, a detailed description of SAT.</p> <p>6.78. Training requires substantial human and financial resources.</p>	Editorial	X			

				Spacing and line break in front of 6.78 is missing.				
2	55	6.82/2-3	If the regulatory body is not entirely self-sufficient in all the technical or functional areas <u>and if it is necessary</u> to discharge part of its responsibilities in core functions or in functions supporting core functions, it should seek advice or assistance, as appropriate, from external experts as described in Appendix I.	The structure and meaning of the sentence have not been clearly understandable.		Accepted but modified as follows: If the regulatory body is not entirely self-sufficient in all the technical or functional areas necessary to discharge part of its responsibilities, it should seek advice or assistance, as appropriate, from external experts as described in Appendix I.		For simplicity and clarity.
3	56	A 1.4 / 1	The regulatory body should have sufficient technical knowledge ("intelligent customer") to identify problems, [...]	Editorial	X			
3	57	A 1.9 / 2	External experts should be chosen on the understanding that they will provide impartial advice. The regulatory body should confirm that other activities of the external experts and other activities will not give rise to a bias in the advice given; the potential for any such conflict of interest should be minimized and when recognized, it should be dealt with.	Editorial	X			
1	58	A1.12/12	Not inappropriately influence the outcome of the work or the advice from the external expert or allow any other body to do so, in order that the external expert advice reflects unbiased technical opinion;	There should not be any influence.			X	Supervisors have the obligation to influence the work appropriately.
2	59	A2.6	...feedback of experience. <u>A balance should be found between documenting as much as necessary but not to be overly prescriptive so as to hinder people than help them in their work.</u> Documents...	Clarification			X	Point taken, however the technical details concerning documentation are appropriately covered in A2.6.
2	60	A1.20 / 14 - 15	– When the external expert or organization is involved in research and development activities together with other interested parties, including from industry.	Clarification; Compare with text 1.14 (Description of interested parties).	X			See also resolution 9.
2	61	A2.11 / 2	Regulatory bodies need to keep extensive records of their work and their interactions with authorised and interested parties and other relevant institutions.	Clarification; Compare with text 1.14 (Description of interested parties).	X			See also resolution 9.

1	62	A 2.14 / 2	<u>In order to obtain a readable and complete set of records</u> the control of records process should ensure that records: – Are categorized; [...]	The records have to be also readable and complete.			X	Already covered in the bullets below the phrase.
2	63	II-2 / Inputs 7.	Feedback and review comments from staff, other interested parties and the public.	Clarification; Compare with text 1.14 (Description of interested parties).	X			See also resolution 9.
2	64	II-4 Purpose	To provide the strategic direction and oversight of the regulatory body to ensure it fulfils its regulatory mandate in line with the expectations of interested parties and the public.	Clarification; Compare with text 1.14 (Description of interested parties).	X			See resolution 9.
2	65	II-7 / Purpose	To communicate and interact with interested parties and the public about matters related to safety regulation and control, commensurate with applicable legislation.	Clarification; Compare with text 1.14 (Description of interested parties).	X			See resolution 9.
2	66	II-12 / Performance criteria 2.	Successful communication with interested parties, including the public ; and,	Clarification; Compare with text 1.14 (Description of interested parties).	X			See resolution 9.
1	67	II-19	1. SRS 79; and , <u>TECDOC 1757</u>	Add reference TECDOC 1757			X	A TECDOC is not a reference for a safety guide.

Japan - NUSSC

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: Page 1 of							
Country/Organization: Japan/NRA Date: 22 May. 2015							
No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1.	General	This document should be developed based on not only GSR Part 1, but also GSR Part2 (DS456).	The overarching requirements and associate requirements of DS456 should be the base of section 5.				DS472 is directly supporting GSR Part 1 and will also take into account DS456 by means of consistency activities as the draft progresses.
2.	1.3 and New para	Delete "Management Systems for Regulatory Bodies (DS113) and Add new text; 1.3a Management system of regulatory body was discussed in the process of developing the specific guides as one of the IAEA Safety Guides Series under the GS-R-3 "The Management System for Facilities and Activities", but it was not completed, and GS-G-3.1, which is the management system mainly developed for the regulated parties, was used as appropriate. Meanwhile, GS-R-3 was revised as GSR Part2 (DS456) and it says in its para 1.9 "The requirements in this publication also apply in relation to the functions of the regulatory body." Indeed, specific document for regulatory body is necessary for maintaining effective and efficient regulatory activities, and then the relevant guidelines and recommendations on management system for regulatory body is incorporated into this new document.	Superseded guide must be formally approved and used in IAEA activities. Therefore, DS113 must be deleted from the list of superseded guide. Instead, it is suggested to describe past effort performed by the staff and member states in developing the guide on management system for regulatory body. Also, in section 5 of this guide, the description related to the management system is developed on the basis of GSR Part 2. In this context, new paragraph concerning the past effort and necessity on this subject is proposed.			X	The information in 1.3 is coming from the DPP.
3.	1.6	IAEA Safety Guide DS473 [8-9]	Editorial.	X			
4.	1.10	IAEA Safety Guide DS473 [8-9]	Editorial.	X			
5.	2.27/1-2	Add underlined message; <u>Safety is permanently universal but</u> the nuclear programme, technologies, rules and regulations, expectations from the public etc. change with time.	To avoid misunderstanding.			X	We do not believe there is any misunderstanding in the original text.
6.	3.4 – 3.7	Paras 3.4 -3, 7, and 5.3 should be developed based on DS456. For example, para 3.4 is suggested to be modified as follows; Everyone in the regulatory body, from senior management down, should contribute to promoting and maintaining <u>demonstrate leadership by fostering</u>	To keep consistency with DS456(GSR-Part2 draft) 5. SAFETY CULTURE Requirement 14 (note) modified portion should be subject to final version of DS456.				DS472 will be consistent with DS456 as the draft progresses.

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: Page 1 of							
Country/Organization: Japan/NRA Date: 22 May. 2015							
No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
		a strong safety culture, by adopting those behaviors as routine ways of working.					
7.	3.7	Para 3.5 of DS456 should be developed as recommended practices in para 3.7 of this document..	The description of this draft guide is almost same as the description of DS456. The Guide should specify how those requirements of DS456 are applied.			X	These are attitudes, not behaviours.
8.	Sec 4	Change the order of description; Description on “ORGANIZATION” comes first, and then “FUNCTION of THE REGULATORY BODY” comes. Proposed structure of section 4 is as follows; 4 ORGANIZATION AND FUNCTIONS INTRODUCTION ORGANIZATION FUNCTIONS OF THE REGULATORY BODY ROLES AND RESPONSIBILITIES OF THE MANAGEMENT	Para 4.56, which is the first paragraph of “ORGANIZATION”, includes important message, that is, “Depending on the national circumstances, the organization of the regulatory body will vary widely from State to State.” The fact that there is no single ideal model and the regulatory body would be organized in accordance with the national legal framework should be highlighted. In this context, this paragraph should be placed at the top of the section 4. Accordingly, the title of section4 is suggested to change to “ORGANIZATION AND FUNCTIONS”.			X	Form follows function, not reverse.
9.	4.2 /L4	They are described in <u>subsection 0</u> .	Needs clarification. Subsection 0 is not defined.		Modified as follows: <u>Core and supporting functions are described in separate subsections below 0.</u>		
10.	4.59/2-5	Difficult to understand the sentence of “However, ... ITO and their interaction.”	Clarification. This document will be a Safety Guide; more useful description is expected to be a better document.			X	This paragraph addresses the systemic approach.
11.	5.1/L3	Change GS-R-3 with GSR Part 2.	GS-R-3 will be superseded by GSR-Part 2 soon.			X	Until GS-R-3 is superseded, it remains a valid reference.
12.	6.40/L10	Add underlined portion As part of the function they are performing, inspectors are routinely involved in compliance assurance activities. <u>Details are shown in DS473.</u>	Clarification of the contents of “ <u>compliance assurance activities</u> ”.			X	Standard dictionary definition. DS473 does not further address the competence aspect of inspectors.

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: Page 1 of							
Country/Organization: Japan/NRA Date: 22 May. 2015							
No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
13.	6.51	– Staff certification;	Clarification of meaning of “Staff certification”.			X	Standard dictionary definition.
14.	6.58/L5	Typically, recruitment is targeted on people who possess <u>a first or second level university degree</u> and who have between <u>5 to 10 years of appropriate experience</u> .	Clarification. i) What is “a <u>first or second level university degree</u> ? ii) What is basis “ <u>5 to 10 years</u> ”? Suggested to say “who have experience in assigned tasks.”	X	Deleted.		
15.	6.65	Add underlined portion. – Salaries and conditions of service, including pensions <u>(if applicable)</u> ;	Pension depends on national legal framework.			X	Those are examples of factors that may or may not be applicable.
16.	ANNEX II, II-7. Process (p.87)	Modify as follows: II-7. Communication and consultation [Process] 3. Establish/maintain regular <u>appropriate</u> contact with interested parties in line with legal requirements and national or international obligations in a timely and effective manner ;	To keep consistency with Paragraph 4.21 of DS472, which says “The regulatory body should provide information concerning its activities to the interested parties including the public, both on a regular basis and in relation to abnormal events.” This paragraph (4.21) does not address the description of legal requirements and international obligations. In this context, any conditions such as international obligations should not be imposed. Furthermore, addition of the wording “in a timely and effective manner” is very useful to implement this process and to make a workable process and/or system.			X	“Regular” is a stronger term than “appropriate”/ The timely issue of information is one of the performance indicators of the process. We consider the proposed paragraph adequate.
17.	ANNEX II, II-7. Process (p.88)	Delete “inspection”; II-7. Communication and consultation [Process] 5. Establish web presence where interested parties can access relevant information on regulatory strategies, policies and inspection activities;	It is better not to limit “inspection activities.” The safety assessment and evaluation are also included in regulatory activities. So the deletion of “inspection” is better in order to broaden targeted regulatory activities.	X			
18.	ANNEX II-13 Purpose	Modify as follows; “To manage regulatory body’s effective response to nuclear or <u>radiological</u> emergency”	Editorial. The term “ <u>nuclear or radiological</u> ” is used in IAEA documents instead of the term “ <u>radiological or nuclear</u> ”.			X	GSR Part 7 terminology was used and will be maintained; in line with terminology used in the body of the draft.
19.	ANNEX II PROCESS DESCRIPTIONS II-14. (p.94)	Modify as follows; II-14. Information of interested parties [Process] 1. Development of information <u>communication</u> plan;	The purpose is to inform interested parties of radiation risks and hazards. But this is not intended to limit “information provision.” Other communication activities to inform interested parties are also included. In this sense, “communication plan” is preferable. The wording “communication plan” is frequently used in DS460.			X	This is specific to information. Communication is addressed under II-7.

USA

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: U.S. Nuclear Regulatory Commission							
Country/Organization: USA		Date: 22 May 2015					
Comment No.	Page / Para No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1	10 / 2.1	Frank, open, honest communication and the reporting of problems both within and outside the regulatory body <i>without fear of retribution or reprisal</i> ;	A key element of safety culture is ability to raise concerns without fear of retribution.			X	This is implicitly suggested by "frank, open, honest".
2	10 / 2.1	Consider adding "Leadership commitment to support a strong safety culture"	GSR, Part 2, "Leadership and Management for Safety" has a robust discussion of leadership's role in a strong safety culture. It should be reflected in the organization's values.			X	Leadership is addressed in Chapter 3.
3	11 / 2.6	Replace "the general public" with "all interested parties"	Ensure that uses of "general public" and "interested parties" are consistent with DS460.			X	This is a very specific case; the regulatory body is accountable to the public, not to all interested parties.
4	14 / 2.19	Add: "...protection of the public <i>and the environment</i> "	Consistency with 3.9		Accepted, but modified as follows, in line with SF-1. "protection of the people and the environment".		
5	14 / 2.24	Replace "to use them as a basis" with "to consider them in the basis"	Opinions can help inform regulatory framework, but are not an acceptable basis for development.	X			
6	17 / 3.6	A good safety culture does not grow by itself, nor can it be controlled <u>but it can be influenced.</u>	"nor can it be controlled" leads the user to believe one cannot influence the direction—either positive or negative—but one can influence in many ways.	X			
7	17 / 3.7	Consider deleting behavior #6, as it is reflected in the 1 st and 2 nd behaviors listed.	Second behavior "Acceptance of personal responsibility for safety" is the same as the 6 th behavior listed, "Responsibility and accountability of individuals for safety at all levels"	X			
8	17 / 3.7	Consider removing words such as "means" and "measures," as they are not behaviors and attitudes as this 3.7 section should be	Remove "means" and "measures," as these are not behaviors and attitudes in the context of this section.	X			

		including. Could simply remove “Means by which” at the beginning of the 5 th example and remove “Measures to” at the beginning of the 8 th behavior in this listing.					
9	18 / 3.13	Replace “respecting a graded approach.” with “commensurate with safety significance.”	Not clear what “graded approach” refers to, in the context of 3.13, financial resources.			X	<p>Principle 5 of the Fundamental Safety Principles [1], states that: “The resources devoted to safety by the authorized party, and the scope and stringency of regulations and their application, have to be commensurate with the magnitude of the possible radiation risks and their amenability to control.” To apply this principle, a graded approach needs to be taken in carrying out the regulatory functions for the wide range of facilities and activities, owing to the very different levels of possible radiation risks associated with them.</p> <p>The main factor that should be taken into consideration in the application of a graded approach is that the application of the regulatory functions has to be consistent with the magnitude of the possible radiation risks arising from the facility or activity. Implicitly this extends to the financial aspects/funding.</p> <p>Graded approach is a term agreed by the IAEA safety standards.</p>
10	23 / 4.10	Replace “again over the lifetime” with “during the lifetime.” Also, it would be helpful to add a definition or reference for “lifetime of the facility.”	Clarifies that review is not perpetual.	X			
11	23 / 4.11	Replace “validate the claims” with “verify the claims”	Verification is review goal; see also use in 4.12			X	There is no difference between the two. No added value.

12	24 / 4.16	Add: <i>authorized</i> "conditions"	Clarity	X			
13	25 / 4.21	There is a missing Section (e.g.; 4.21) between 4.20 and 4.22:	Editorial		Agreed; will be corrected at the end, in order to maintain the references for the comments.		
14	26 / 4.24	Add to second bullet as indicated below: Technical functions directly related to the effective implementation and fulfilment of the core regulatory functions. (e.g. Legal support, research and development, <i>radio-analytical labs, dosimetry support labs, effluent and environmental monitoring labs</i> , external expert support, advisory committees, international cooperation <i>and consultation</i>).	Completeness			X	e.g. means "for example", it does not imply an exhaustive list.
15	28 / 4.32	Add: "...rely" <i>to the extent practicable</i> "on the scientific..."	Not all state-of-the-art methods are practicable or reliable	X			
16	42 / 5.39	Delete: "...indicators which provide an early warning of declining authorized party safety performance..."	Indicators are not restricted to declines in performance.			X	Performance indicators should not be restricted to positive safety performance.
17	43 / 5.43	Replace "...feedback given to those who provided the suggestion." with "feedback given to entire staff."	Open discussion of issues fosters safety culture for entire staff, not only the questioner.		Agreed and modified as follows: The regulatory body should also provide convenient tools for the whole staff for suggesting improvements. Suggestions should be evaluated as soon as practicable by senior management. Feedback <u>should be given</u> to those who provided the suggestion <u>and should subsequently be disseminated to all staff.</u>		
18	43 / 5.46	Delete " Gathering of information which has no practical utility should be avoided. "	Non sequitur.	X			Placet!
19	44 / 5.49	Add: <i>safety</i> "significance of"	Metric of significance was not clear.	X			

20	47 / 5.66	Add: "...impact on regulatory effectiveness" <i>and safety.</i>	Safety significance of processes is equally important as effectiveness	X			
21	49 / 6.5	Add: "the cause", <i>or give the appearance,</i> "of a..."	Consistency with Col metrics used elsewhere in DS472.			X	If there is a conflict of interest, it should be treated as one. Otherwise not.
22	52 / 6.22	Replace "...capture of all explicit..." with "...capture of significant explicit..."	Use of "all" is too unconstrained for knowledge capture.	X			
23	54 / 6.34	Delete "...and conservative decision making."	Conservatism is not an inherent attribute of safety culture.			X	Conservatism is an attribute of safety culture.
24	56 / 6.42	Delete: "evaluate some emergency exercises"	Personnel should be able to evaluate all emergency exercises.	X			
25	56 / 6.43	Replace: "...understanding the true interests of people" with "...understanding potential sources of bias"	"True interests" are usually indiscernible, whereas potential biases can be addressed thoughtfully.	X			
26	62 / 6.79	Add: "work experience," <i>mentoring,</i> " continuing..."	Mentoring is an important component of training	X			
27	A1.10	Add new item: <i>Work should be conducted using a quality assurance programme that has been reviewed and approved by the regulatory body.</i>	Review of work products alone cannot assure quality; a formal QA program helps assure the work is accurate and acceptable.			X	Covered in first bullet. Not all regulatory bodies approve their suppliers QA program.
28	A1.22	Add: "...ability to" <i>evaluate, and potentially</i> "apply the..."	New methods must be evaluated for practicability before they can be applied.	X			
29	A2.12	Replace: "relevant information is collected" with "relevant records are collected"	Not all relevant information constitutes official records.	X			
30	A3.1	Delete " Relevant legislation; "	Duplicate with A3.3			X	The two bullets address different aspects and levels of knowledge in relation to legislation.
31	II-24	Clarify "It must contain several levels of loops."	Unclear what is meant by "levels of loops."	X	Deleted last sentence.		

France – NUSSC

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer:		Page					
Country/Organization: FRANCE / ASN		Date: May 2015					
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1.	1.11	Corresponding supporting functions [...] effectively. These include: – Administrative support, including human resources , finance, management of documents and records, equipment purchasing and control etc.; – [...]	Human resources management may be considered as an important field of administrative support	X			
2.	2.11	[...] assign financial resources to its various activities for the greatest effectiveness and efficiency.	Regulatory body activities are not limited to regulatory aspects			X	This document is only addressing regulatory aspects.
3.	2.12	[...], including : - Administrative status of the regulatory body - National [...]	According to the administrative status of the regulatory body it may be possible or not to implement national fiscal process as a budgetary source			X	This is addressed in the first sentence.
4.	2.14	The credibility and independence of a regulatory body's' decision making depend [...]	The credibility of the regulatory body depends just as much as its independence			X	Here one aspect of independence is addressed. Credibility is addressed in subsections Aspects of communication and consultation with interested parties and in Acting in the public interest.
5.	2.14	The management of the regulatory body [...] to recruit sufficient staff with the necessary skills and technical expertise and to implement a specific competence management to carry out the regulatory functions	Competence management is a complementary way to recruitment process to improve skills and technical expertise		“The management of the regulatory body should therefore have the responsibility and authority to maintain recruit sufficient staff with the necessary skills and technical expertise to carry out the regulatory functions. In order to maintain independence, the...”		
6.	3.13	In order to be able to act independently and to conduct and perform its duties , the regulatory body [...]	Sufficient financial resources are first necessary to the regulatory body to perform its functions in an adequate manner			X	To act means to perform functions.

France - NSGC

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer:		Country/Organization: France		Page.... of....		Date: 2015-05-20	
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1	General	A generic paragraph of awareness about security should be introduced in the document. Emphasize the need of interface between safety and security in crisis management.		X	1.15. The scope of this Safety Guide is limited to the regulation of radiation and nuclear safety and does not extend to nuclear security. <u>Where security is mentioned in this document it is only to remind the reader that security aspects might have to be considered through an appropriate interface, especially for crisis management.</u> Guidance on addressing ...		
2		Add in the references the NSS 20			Noted, to be decided later.		
3	appendix III (A3.2)	Mention in appendix III (A3.2) the awareness and a minimum of knowledge in security matters.		X	Added Security under A3.1		
4	Page 21 (§ 3.27)	Add the need for interfaces between authorities, in particular for safety and security.				X	We consider this aspect appropriately captured under paragraph 3.26.

Korea

COMMENTS BY REVIEWER				RESOLUTION			
Country/Organization: Republic of Korea / Korea Institute of Nuclear Safety (KINS)							
Date: May 20, 2015							
Comment No.	Para/Line No.	Identified problem/Proposed new text	Reason/Description	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1	Page 15 §3.1	... - Developing shared values for safety, establish establishing behavioural expectations so as to shape a strong safety culture, and encouraging acceptance of personal responsibility for safety among all individuals;	The expression “establishing” rather than “establish” seems to be more appropriate in this sentence.	X			
2	Page 20 §3.23	There are other types of resources necessary for the regulatory body to perform its functions and to discharge its responsibilities. These may include: ... - Support facilities, including canteen;	This seems to be less relevant to the regulatory body’s functions and responsibilities, compared to other resources listed in the text.	X			
3	Page 21 §3.26	... - Deciding on an a communications strategy setting out the methods and frequency of informing, ...	There is a type error.	X	...Deciding on a communications strategy		

Austria - NUSSC

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: N. Muellner Page. 1... of...2.							
Country/Organization: Austria, BMLFUW (Consultant) Date: 1 st of June 2015							
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1	2.1	Commitment to safety, based on a scientific and technical approach, by taking into account the state of the art;	The commitment to safety should be based on the state of the art.			X	
2	2.18	A systematic program for professional reviews and audits of regulatory performance is a useful tool to promote independence in decision making by the regulatory body. This should include participation in various types of international professional co-operation exercises and independent external peer reviews, either of a specific regulatory activity or of the regulatory body as a whole.	As pointed out in the chapter "Independence" and in "Appendix I" the independence of external experts is very important. By introducing this word, the effort towards independence will be strengthened.			X	This is suggested by "external peer reviews"
3	2.19	The protection of the public and the environment from any hazard due to ionizing radiation is the main focus of the regulatory body	In para 3.9 this addition is part of the responsibility of the regulatory body. Therefore it should be introduced here too.	X			
4	A1.10	There should be no actual conflicts of interest. In case of a potential or perceived conflict of interest, the situation should be discussed with all involved parties and managed;	As there should be no conflict of interest, the addition "actual" is not necessary at this place.	X			
5	A1.18	An important element in ensuring effective independence is the development and implementation of adequate arrangements that avoid conflicts of interest. All situations should be analysed early in the process for actual, potential or perceived conflicts of interest. Actual Conflicts of interest should be eliminated, while potential and perceived conflicts of interest should be addressed. Activities that can be undertaken include:	As there should be no conflict of interest, the addition "actual" is not necessary at this place	X			