

Canada Comments on DPP-472
Safety Guide: Organisation, Management and Staffing of a Regulatory Body

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer:		Page 1 of 1					
Country Organization: CNSC Staff/Division		Date -					
Comment No.	Para./Line No.	Proposed new text	Reason	Accepted	Accepted but modified as follows	Rejected	Reason for modify/rejection
1		The table of content should include the use of technical support organizations (TSO) (INSAG-17: Independence in regulatory decision making; and GSG-4: Use of external experts by the regulatory body).			The use of TSOs will be addressed under “External expert support”. As indicated, it is planned that this section will be based on GSG-4.		
2		One item not listed in the table of content is 'Reporting Requirements'				X	The meaning of “reporting requirement’ for the RB would need to be clarified. Where exactly should it be added?

Title: Comments for DPP DS 472 on Organization, Management and Staffing of a Regulatory Body

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer:		Page 1 of					
Country/Organization: Pakistan/PNRA		Date: 13 April. 2013					
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1	TOC item 3/line 5	Authorization	Delete ' <i>including siting</i> ' as 'siting' is not a function but an authorization stage or we may write other stages also.				
2	Page 4/line 1	Regulations and Guides	Delete ' <i>Development of</i> ' as no verb is used with other core functions then why with this one.				
3	TOC item 5		Management system is a broader topic which also includes the entire topic of the proposed guide, however, the vice versa is not true. It is proposed that this may be addressed in a separate safety guide and here only a reference to management system guide may be included whereas the contents listed here may be included in the separate guide.				

TITLE : DS472 DPP Organisation, Management and Staffing of a Regulatory Body

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer:		F. Féron	Page				
Country/Organization:		France /ASN	Date: 4 April 2013				
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1.	4	The objective of this Safety Guide is to provide practical guidance and recommendations to Regulatory Bodies on their organizational structure, management and staffing to support them in carrying out their responsibilities and functions in an independent manner, <u>considering the number and types of facilities and activities being regulated.</u>	To emphasize a grade approach				
2.	6	<p>Core Regulatory Functions</p> <ul style="list-style-type: none"> Review and assessment Authorization (including siting) Inspection Enforcement Development of Regulations and Guides <u>Emergency preparedness</u> <p>Other Functions</p> <ul style="list-style-type: none"> Emergency preparedness Research and development <u>International cooperation</u> <u>Public and media outreach</u> 	<p>Emergency preparedness is a core function</p> <p>Interactions with the public and the media is a function to be mentioned, as well as international cooperation</p>				

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: Country/Organization:		F. Féron France /ASN	Page Date: 4 April 2013				
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
3.	6	5) Management System for the Regulatory Body General <u>Safety culture</u> Management Systems Safety culture Documentation	Safety culture should be a separate item (the management system supports safety culture but is not enough by itself)				
4.	6	Management Responsibilities Management commitment and leadership <u>Interaction with Stakeholder satisfaction</u> Organizational Policies Planning Responsibility and authority for the management system Infrastructure and work environment Resource and staff planning	Satisfaction is too ambitious				

**DPP for DS472 draft Safety Guide on
“Organization, Management and Staffing of a Regulatory Body” (Version 4, March 2013)**

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: Page 1 of 2 Country/Organization: Ukraine / State Scientific and Technical Centre for Nuclear and Radiation Safe Date: 12/04 (uploaded 4/30)							
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1		The document shall more clearly identify the role of external experts and technical support organizations in activities of the regulatory body	It is indicated at the beginning of the document that it would combine some part of existing documents, such as (approved for publication) External Expert Support for the Regulatory Body, DS429. However, involvement of external experts and technical support organisations in activities of the regulatory body is not considered at all.				

2	6, 2)	To add: Co-ordination (co-operation) of regulatory (supervisory) bodies of the State	The state regulatory body should coordinate (interact with) several specialized regulatory (supervisory) bodies of the State (in the areas of environmental protection, health and epidemiological supervision, fire protection, etc.)				
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**DPP DS472, Draft Safety Guide “Organisation, Management and Staffing of a Regulatory Body”
(Version 4, March 2013)**

Note: Blue parts are those to be added in the text. Red parts are those to be deleted in the text.

	COMMENTS BY REVIEWER				RESOLUTION			
	Reviewer: Federal Ministry for the Environment, Nature Conservation and Nuclear Safety (BMU) (with comments of GRS) Country/Organization: Germany				Page 1 of 5 Date: 2013-04-19			
Relevance	Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification / rejection
2	1	Section 1	“Documents to be combined and revised: ... (approved for publication) <u>Use of External Experts</u> Support for <u>by</u> the Regulatory Body, <u>2013, GSG-4 DS429</u> ”	The new Safety Guide GSG-4 (ex DS429) has been published in February 2013.				
3	2	Section 2	1 st para, 2 nd sentence: “... is a fundamental element outlined in Principle 2 of the IAEA’s Safety Fundamental Safety Principles, SF-1.”	Editorial.				
3	3	Section 2	2 nd para, 2 nd sentence: “... the concept of Long Term Structure for the whole Safety Standards Series has been developed and the relevant <u>Safety</u> Requirements documents have been revised and replaced ...”	Wording.				
3	4	Section 2	4 th para, last sentence: “... scope of “facilities and activities” (see definition of in the Safety Glossary, <u>2007 Edition</u>) ...”	Editorial.				
2	5	Section 2	4 th para, last sentence: Assign a footnote to the term “nuclear installations” with the following text: “ <u>Nuclear installation, any nuclear facility subject to authorization that is part of the</u> ”					

Relevance: 1 – Essentials 2 – Clarification 3 – Wording/Editorial

			<p>nuclear fuel cycle, except facilities for the mining or processing of uranium ores or thorium ores and radioactive waste disposal facilities.</p> <p>The definition thus includes: nuclear power plants; research reactors (including subcritical and critical assemblies) and any adjoining radioisotope production facilities; spent fuel storage facilities; facilities for the enrichment of uranium; nuclear fuel fabrication facilities; conversion facilities; facilities for the reprocessing of spent fuel; facilities for the predisposal management of radioactive waste arising from nuclear fuel cycle facilities; and nuclear fuel cycle related research and development facilities.”</p>					
2	6	Section 5	<p>2nd para: “The Safety Guide will combine and revise the following documents: ... GSG-4 DS429 (approved for publication), Use of External Experts Support for by the Regulatory Body, 2013 ...”</p>	The new Safety Guide GSG-4 (ex DS429) has been published in February 2013.				
3	7	Section 6	<p>2nd sentence: “An outline of contents is set out below, however ...”</p>	Missing word.				
2	8	Section 6, Table of content	<p>Bullet No. 3), 2nd topic: “Core Regulatory Functions Review and assessment of facilities and activities Authorization and notification (including siting) Inspection of facilities and activities Enforcement of regulatory requirements Development of Regulations and Guides”</p>	1.) The siting process for a nuclear installation, i.e. site survey and site selection, is generally a de-regulated activity. Therefore, no license is required. Compare with the Draft Safety Guide DS433 “Safety Aspects in Siting for Nuclear Installations” (Version 00.16 dated 18 March 2013), para 2.6.				

				<p>2.) According to GSR Part 1, the term ‘authorization’ includes approval, written permission, licensing, certification and registration. Complete the subheading No. 2 with respect to notification in order to be consistent with the terminology used in</p> <ul style="list-style-type: none"> • the DPP for DS473 (see table of content), • GSR Part 1 (Requirement 23), • GSR Part 3 (Para 2.30 and Requirement 7). <p>Member States should benefit from the application of a graded approach to regulatory control, which should be commensurate with the magnitude and likelihood of exposures resulting from practices.</p> <p>3.) Complete the subheadings No. 1, 3 and 4 in order to be consistent with the list provided in Para 2.30 of GSR Part 3.</p>				
3	9	Section 6, Table of content	Bullet No. 3), last topic: “Supporting Functions Administrative support Legal assistance External expert support and Consultants (from DS429) ...”	External expert support does include consultants, technical support organisations, advisory committees, academic bodies, research organizations, national laboratories, ...				
2	10	Section 6,	Please provide more information on the	Looking simply at the				

Relevance: 1 – Essentials 2 – Clarification 3 – Wording/Editorial

		Table of content	planned content and structure of bullet No. 4) with heading “Communication and consultation with interested parties”.	number of subheadings within the different sections in the table of content, bullet No. 4) needs to become more elaborated. The planned content should be indicated by some subheadings.				
2	11	Section 6, Table of content	Bullet No. 5), 3 rd topic: “Management Responsibilities Management commitment and leadership Stakeholder satisfaction Interactions with interested parties Organizational P olicies ...”	Consistency with the terminology used in the Draft Safety Requirements DS456 “Leadership and Management for Safety” (Version dated 6 February 2013), see Para 2.5 j and Requirement 10. Satisfaction of stakeholders is very difficult to achieve.				
3	12	Section 6, Table of content	Bullet No. 5), 5 th topic: “Measurement, a Assessment , Evaluation and Improvement Monitoring and measuring Self-assessment Independent assessment ...”	Consistency with the terminology used in the Draft Safety Requirements DS456 “Leadership and Management for Safety” (Version dated 6 February 2013), see Requirement 9 with subordinated paras.				
3	13	Section 6, Table of content	Renumber the last bullet as follows: “ 5 6 Staffing and Competence of Staff”	The numbering of bullets in the table of content is wrong. Bullet No. 5) is inadvertently duplicated.				
2	14	Section 6, Table of content	Under the bullet No. 5) with heading “Staffing and Competence of Staff”, we recommend to add a new item “ Long-term planning of staff needs ”.	Recruitment of qualified staff is primarily a need of today and the near-term. A responsible planning, however, must also take into account the future needs over the next one or two				

				decades. This issue should also be addressed in the Safety Guide.				
3	15	Annex 2	Reference No. 1: “ SF-1 , Fundamental Safety Principles (2006)”	Harmonized citation of IAEA documents.				
3	16	Annex 2	Reference No. 3: “GSR Part 3 (interim), Radiation Protection and Safety of Radiation Sources, International BSS (2011 Interim Edition):”	Redundant information.				

Relevance: 1 – Essentials 2 – Clarification 3 – Wording/Editorial

Japan Comments on DPP-472 (2013/4/19)
Safety Guide: Organisation, Management and Staffing of a Regulatory Body

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer:		Page 1 of 1					
Country Organization: Japan/NRA		Date 2013/ 4 / 19					
Comment No.	Para./Line No.	Proposed new text	Reason	Accepted	Accepted but modified as follows	Rejected	Reason for modify/rejection
1	Section 5 /5 th bullet	Delete <ul style="list-style-type: none"> •DS460 (DPP endorsed by CSS)- Communication and Consultation with Interested Parties- 	Confirmation: Has DS460 been drafted?				