

DS474 DPP for Safety Guide: Arrangements for the termination of an emergency
Version 2.0 dated 06/06/2013

COMMENTS BY REVIEWER					RESOLUTION			
Reviewer:		Page 1 of						
Country/Organization:		Date:						
Relevance	Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
Argentina								
1	1	General		<p>This forthcoming Safety Guide addressed to termination of an emergency and its necessary arrangements is welcome. In this regard the DPP reflects the intended Objective and Scope as well as the applicable interfaces.</p> <p>Complementary, the Dual Convention should be also considered as a reference.</p> <p>Chernobyl and Fukushima are taken into account as a case study but intended as an Annex. Taking account of these accidents as severe disruptive events, the lessons learnt and experience acquired, it is conceivable that an Annex –even it will be a part of the main text-, such case study could be diluted in spite of its importance. At the plenary meeting it will be interesting to know the position of the Secretariat.</p> <p>Besides, as this DPP is not limited to NPPs the grading concept should be added.</p> <p>In brief, NUSSC should endorse this DPP.</p>	✓			<p>We agree. Therefore, Early Notification and Assistance Conventions are given under number 1 of the interface documents listed in the DPP submitted for review.</p> <p>Annex is not part of the document. The Safety Guide imposes recommendations for the termination of an emergency and these case studies are intended to evaluate some example emergencies as a support to recommendations. At the preliminary review and discussion of the proposed DPP by the IAEA SSCS, it was recommended the annex to be removed at all from the proposed document. However, considering its importance, the annex has been kept for Committee’s members’ consideration.</p> <p>Under Section 3 of the proposed for the safety guide, a subtitle has been added as following: ‘Applying a graded approach’.</p>

Germany							
2	2	Proposed Title	“Arrangements for the termination of a nuclear or radiological emergency”	Consistency with the titles of the IAEA Safety Standards GS-R-2, GS-G-2.1, GSG-2 and DS475. All these publications refer to the phrase “nuclear or radiological emergency”.	✓		
3	3	Section 2	1 st para, 1 st sentence: “The IAEA General Safety Requirements <u>No. GSR</u> Part 3 (Radiation Protection and Safety of Radiation Sources: International Basic Safety Standards, Interim Edition), following the 2007 Recommendations of the International Commission on Radiological Protection (ICRP Publication 103), defines three <u>different</u> types of exposure situations, i.e. planned, emergency and existing exposure situations, ...”	Editorial/Wording.	✓		
3	4	Section 2	1 st para, 2 nd sentence: “Although the transition from an emergency exposure situation to an existing exposure situation is based on an administrative decision made by the authority responsible for the overall response, the IAEA General Safety Requirements Part 3 (Radiation Protection and Safety of Radiation Sources: International Basic Safety Standards, Interim Edition), No. GSR Part 3, following the ICRP Recommendations, recognizes that the transition requires planning	Dispensable. The same information is already provided in the first sentence.	✓		

			in advance and such planning is to be undertaken as part of the overall emergency preparedness process.”				
3	5	Section 2	1 st para, last sentence: “Nevertheless, the IAEA Safety Requirements Publication, Preparedness and Response for a Nuclear or Radiological Emergency No. GS-R-2 (2002), as part of the functional requirement on conducting recovery operations, recommends <u>requires</u> arrangements to be in place for a planned transition from the emergency phase operations to routine long term recovery operations.”	In fact, arrangements for the termination of an emergency are expressed as “shall” statements in GS-R-2 and DS457. See <ul style="list-style-type: none"> • paras 4.46, 5.18 and 5.20 of GS-R-2; • Requirement 16 of DS457. 	✓		
3	6	Section 2	2 nd para: “In order to facilitate the implementation of the IAEA requirements related to termination of an emergency phase by transition from an emergency exposure situation to an existing exposure situation and/or by returning to a a planned exposure situation, this topic needs to be further elaborated <u>in a Safety Guide</u> .”	Editorial/Wording.	✓		
3	7	Section 3	1 st para, 2 nd sentence: “The General Safety Guide on Arrangements for Preparedness for a Nuclear or Radiological Emergency No. GS- R <u>G</u> -2.1 (2007) provides recommendations on the implementation of the safety requirements established in IAEA Safety	Wrong citation of the corresponding IAEA Safety Standards Series number.	✓		

			Standards publication No. GS-R-2.”					
2	8	Section 3	2 nd para, 1 st sentence: “The current IAEA Safety Requirements publication, Preparedness and Response for a Nuclear or Radiological Emergency No. GS-R-2 is under revision to take into account the developments and experience gained since its publication in 2002, especially the lessons learnt in response to the accident at the Fukushima Daiichi nuclear power plant. ”	For completeness.	✓			
2	9	Section 3	2 nd para, 3 rd sentence: “This revision considers the ICRP recommendations provided in the ICRP publications 103 and 109 and the IAEA Safety Requirements contained in GSR Part 3 for emergency exposure situations ...”	Specify publication numbers to be more specific. Both publications are given in the list of references in Section 5 (No. 11 and 12).	✓			
3	10	Section 4	1 st para: “... (a) transition to an existing exposure situation and/or (b) returning to a planned exposure situation, as appropriate.”	Editorial.	✓			
3	11	Section 4	2 nd para: “... (a) transition to an existing exposure situation and/or (b) returning to a planned exposure situation, as appropriate.”	Editorial.	✓			
3	12	Section 5	1 st para: “Within the IAEA Safety Standards Series, this Safety Guide will be part of the General Safety Guides supporting the Part 7 of the	Uniform citation of GSR Part 7 and GSR Part 3 is preferred.	✓			

			General Safety Requirements on emergency preparedness and response (revised GS-R-2, currently under development as DS457) and the Section IV on E mergency E xposure S ituations of the Part 3 of the General Safety Requirements <u>on Radiation Protection and Safety of Radiation Sources (IAEA-GSR Part 3).</u> ”					
3	13	Section 5	<p>2nd para: “This Safety Guide will interface with the following international conventions and the IAEA Safety Standards: ... 2. ... Preparedness and Response for a Nuclear or Radiological Emergency, IAEA Safety Standards Series No. GS-R-2, IAEA, Vienna (2002) <u>(under revision, DS457)</u>; 3. ... Governmental, Legal and Regulatory Framework for Safety, General Safety Requirements, No. GSR Part 1, <u>IAEA, Vienna (2010) (under revision, DS462)</u>; 4. ... Radiation Protection and Safety of Radiation Source: International Basic Safety Standards (Interim Edition),</p>	<p>1.) The IAEA Safety Standards GS-R-2, GSR Part 1, TS-G-1.2 and WS-G-3.1 are currently under revision. A revision notice is recommended in all these cases.</p> <p>2.) General note: The citation of IAEA Safety Standards should follow a consistent format, e.g. <i>author, title, name of series, series number, IAEA, Vienna (year of publication)</i>.</p>		✓		For consistency.

			<p>General Safety Requirements, No. GSR Part 3, IAEA, Vienna (2011);</p> <p>...</p> <p>6. ... Planning and Preparing for Emergency Response to Transport Accidents Involving Radioactive Material, Safety Standard Series No. TS-G-1.2 (ST-3), IAEA, Vienna (2002) (under revision, DS469);</p> <p>...</p> <p>8. ... Environmental and Source Monitoring for Purposes of Radiation Protection, Safety Standard Series No. RS-G-1.8, IAEA, Vienna (2005);</p> <p>9. ... Remediation process for areas affected by past activities and accidents, Safety Standard Series No. WS-G-3.1, IAEA, Vienna (2007) (under revision, DS468).”</p>				
2	14	Section 5	<p>3rd para: “The Safety Guide will interface with the following documents under development:</p> <p>10. General Safety Requirements No. GSR Part 7 (revision of GS-R-2, DS457);</p> <p>11. General Safety Requirements No.</p>	<p>Revisions of existing IAEA Safety Standards should be specified in the list of draft documents. Beside GS-R-2, also GSR Part 1, TS-G-1.2 and WS-G-3.1 are currently under revision und have an interface with the new Safety Guide. Therefore, they should be mentioned here as well.</p>	✓		

			GSR Part 1 Rev. 1 (revision through addendum, DS462); 12. Planning and Preparing for Response to Transport Events Involving Radioactive Material, Safety Guide No. XXX (revision of TS-G-1.2, DS469); 13. Remediation Process for Areas with Residual Radioactive Material, Safety Guide No. XXX (revision of WS-G-3.1, DS468).”					
Japan								
2	15	L12/ 6.OVER-VIEW p.3	3. Arrangement for the termination of an emergency at preparedness stage	Consistency with the scope of this guide The scope of this guide is development of arrangements for preparedness in relation to the termination of an emergency phase.	✓			
2	16	Under the L9/ 6.OVER-VIEW p3	Comment only	It is better to add some description about the examples of the “conditions to be met” such as the doze criteria or the other information.			✓	As these are expected contents of the proposed safety guide, it is better to keep it general rather than being very specific in order to avoid that some aspects/conditions would be missed. However, for clarification, these conditions relate to the target dose for implementation of actions aimed at enabling the transition to an existing exposure situation as well as for characterization of the source of the exposure for all members of the public, stability of exposure situation, restrictions imposed and compliance with them etc.
2	17	L3/p4	Comment only	“Predetermined operational criteria” should be clarified what kind of contents it assumes specifically. Particularly, a difference with OIL should be			✓	The term is general, well defined and elaborated in the Safety Guide No. GSG-2. The term operational criteria encompass OILs (related to field and laboratory measurements derived on the

				clarified.				basis of generic criteria) as well as observables/indicators related to conditions on the site. The term is also already in use in IAEA GSR Part 3 and DS457, under development.
1	18	L5/p4	(1) Add words to line 5 as follows. — Consideration of the <u>radiological and non-radiological</u> consequences (2) These 2 issues should be added in Para 3, 6. OVERVIEW · <u>methods for assessing radiological consequences</u> · <u>review of the hazard assessment</u>	(1) This guidance should be consistent with the description in requirements 16 of DS457 which is a higher document. (2) It seems that two issues of the matters in requirements 16 of DS457 are not described in this guide.		✓		L5/p4 is kept as it is. Namely, radiological consequences are addressed with the rest of subtitles of the proposed contents. Therefore, at this point of the document we would like to focus particularly on the non-radiological consequences.
2	19	L6/p4	Comment only	“Emergency workers and helpers” should include the volunteer and/or the worker who performs social infrastructure maintenance for recovery from a disaster.		✓		As long as an emergency exposure situation is not lifted: the volunteer from the public is encompassed under term ‘helpers in an emergency’ and all workers are ‘emergency worker’ irrespective of their duties and they should all be appropriately protected.
2	20	L10/p4 Annex: Case study	Comment only	In order to be implemented effectively in member state, it would be preferable to provide the individual case which has been experiencing the following in the past. 1. The transition to an existing exposure situation 2. The returning to planned exposure situation		✓		
3	21	Para 9, Section 5	INTERNATIONAL ATOMIC ENERGY AGENCY, Remediation process for areas affected by past activities and accidents, Safety Standard Series No. WS-G-3.1, IAEA, Vienna (2007), <u>(revision of WS-G-3.1, DS468)</u>	Editorial		✓		

3	22	L4/p1 3.JUSTFI CATION~	... for a Nuclear or Radiological Emergency No. GS-G-2.1 GS-R-2.1 (2007)	Editorial	✓			
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