

TITLE: Algeria NUSSC comments to DPPDS476 on Safety of Research Reactors

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: D. MERROUCHE		Page.... of....					
Country/Organization: Algeria-CRNB		Date: 23/9/13					
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1	6	GENERAL REQUIREMENTS FOR DESIGN Replace <i>design for extension conditions</i> and keep it under the original text: <i>design for accident conditions</i>	The new state is not defined anywhere in publications related to RRs, except in the new SSR2/1 for NPPs. These conditions could be introduced within a general context, i.e. accident conditions.			X	To be coherent with SSR-2/1 design for extension conditions is introduced.
2	6	SPECIFIC REQUIREMENTS FOR DESIGN Radiation protection <i>systems</i>	The section is mainly dealing with systems & features, and also: - provision for RP are under the general requirements section; - the RP programme is under operation section (7).	X			
3	8	Add PHYSICAL PROTECTION SYSTEM	Add to this section the <i>physical protection system</i> , unless this will be covered under section (3) on regulatory supervision.			X	Chapter 8: Interface between safety and security in design and operation addressing physical protection. INFCIRC/225/Rev.5 is included the list of interfaces with existing and planned publication (Section 5. of the DPP).

TITLE: Argentina NUSSC comments to DPPDS476

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: Ricardo Waldman		Page.... of....					
Country/Organization: Argentina - ARN		Date: 23/9/13					
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1		General	For some Member States it will be important to find a section covering design basis for experimental devices such as high pressure and high temperature loops, cold neutron sources and hot neutron sources.	X	Design basis for experiments will be discussed in Chapter 6. Specific requirement for design – Experimental devices.		

TITLE : DS476 DPP Revision of Safety Requirements NS-R-4: Safety of Research Reactors (2005)

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer:		F. Féron		Page			
Country/Organization:		France /ASN		Date: Sept 2013			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1.	4.	Add a sentence to mention that revision of NS-R-4 will allow the definition of overarching requirements and associated requirements, enabling DS476 to come in line with current safety requirements format		X	The comment is valid the issue is addressed in Section 3. and 4. of the DPP		Although the wording is different the demand to be “in line” with the current safety requirement format is fulfilled. SSR-2/1 and 2/2 can be found in the interface list in Section 5.
2.	4.	Add a sentence to mention that the structure of DS476 and the overarching requirements will, unless a justification is provided to explicit specificities of research reactors, match the ones of SSR-2.1 and SSR-2.2.		X	Same as Comment No. 2		The answer is the same as above. SSR-2/1 and 2/2 can be found in the interface list in Section 5. Although the wording is different the demand to be “in line” with the current safety requirement format is fulfilled.
3.	4.	Add a sentence to mention that the associated requirements in DS476 will, unless a justification is provided to explicit specificities of research reactors or to support inapplicability, match the ones of SSR-2.1 and SSR-2.2.		X	Same as above.		Same as above.

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: F. Féron		Page					
Country/Organization: France /ASN		Date: Sept 2013					
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
4.	6.	3. REGULATORY SUPERVISION- LEGISLATIVE AND REGULATORY INFRASTRUCTURE REGULATORY BODY LICENSING PROCESS Safety Analysis Report Review and assessment by the regulatory body Acceptance criteria INSPECTION AND ENFORCEMENT 4. MANAGEMENT AND VERIFICATION OF SAFETY INTEGRATED MANAGEMENT SYSTEM VERIFICATION OF SAFETY	Nearly nothing is specific to Research reactors. Just make reference to other IAEA safety requirements (GSR part 1, GSR Part 4)			X	There is no intent to simply duplicate in this and other standards which include research reactors in their scope. As it was the case of NS-R-4 pursuant to requests from end-users (mainly from Member States operating only research reactors or with a small nuclear power programme), the NS-R-4 included requirements on regulatory supervision, management and verification of safety and site evaluation.
5.	6	5. SITE EVALUATION INITIAL EVALUATION AND SELECTION OF THE SITE GENERAL CRITERIA FOR SITE EVALUATION EXTREME AND RARE METEOROLOGICAL EVENTS FLOODING GEOTECHNICAL HAZARDS EXTERNAL HUMAN INDUCED HAZARDS SPECIFIC REQUIREMENTS FOR THE CHARACTERIZATION OF THE REGION UNDER CONSIDERATION MONITORING OF HAZARDS REASSESSMENT OF THE SITE	Nearly nothing is specific to Research reactors. Just make reference NS-R-3 –in which §1.9 explicitly mentions applicability to site evaluation of a research reactor)			X	Same as above.

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: F. Féron		Page					
Country/Organization: France /ASN		Date: Sept 2013					
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
6.		<p>6. DESIGN</p> <p>PRINCIPLE TECHNICAL REQUIREMENTS</p> <ul style="list-style-type: none"> — Fundamental safety functions — Radiation protection — Application of the defence in depth — Proven engineering practices — Safety assessment — Provisions for construction — Features for facilitating radioactive waste management and decommissioning <p>APPLYING THE SAFETY PRINCIPLES AND CONCEPTS</p> <p>Radiation protection</p> <p>Safety in design (2.8–2.11)</p> <p>The concept of defence in depth</p> <p>Maintaining the integrity of design of the plant throughout the lifetime of the RR</p> <p>MANAGEMENT OF SAFETY IN DESIGN</p> <p>Requirement 1: Responsibilities in the management of safety in RR design</p> <p>Requirement 2: Management system for RR design</p> <p>Requirement 3: Safety of the RR design throughout the lifetime of the RR</p>	Follow SSR2.1 architecture and overarching requirements	X	<p>In defining the content of DS476 the structure and content of the already published NPP documents have been considered and applied the extent possible.</p> <p>To provide a comprehensive list of requirements in the DPP approval phase of the preparation process is not feasible.</p> <p>During the preparation the list of requirements can be (and probably will be) modified. It is not appropriate to fix the numbering sequence of the requirements at this stage.</p>		

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: F. Féron		Page					
Country/Organization: France /ASN		Date: Sept 2013					
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
7.	6	<p>GENERAL REQUIREMENTS FOR DESIGN</p> <p>Classification of Structures, Systems, and Components</p> <p>Codes and Standards</p> <p>Design Basis</p> <p>Design for extension conditions</p> <p>Design for reliability</p> <p>Design for commissioning</p> <p>Provision for maintenance, testing and inspection</p> <p>Design for emergency planning</p> <p>Design for decommissioning</p> <p>Provision for radiation protection</p> <p>Human factors and ergonomics</p> <p>Provision for utilization and modification</p> <p>Ageing management</p> <p>Provision for extended shutdown</p> <p>Safety analysis</p> <p>Requirement 4: Fundamental safety functions</p> <p>Requirement 5: Radiation protection</p> <p>Requirement 6: Design for a RR</p> <p>Requirement 7: Application of defence in depth</p> <p>Requirement 8: Interfaces of safety with security and safeguards</p> <p>Requirement 9: Proven engineering practices</p> <p>Requirement 10: Safety assessment</p> <p>Requirement 11: Provision for construction</p> <p>Requirement 12: Features to facilitate radioactive waste management and decommissioning</p> <p>....</p> <p>Requirement 42: Safety analysis of the plant design (5.71–5.76). .</p>	Follow SSR2.1 architecture and overarching requirements	X	As it can be seen in the Table of Contents given in the DPP all the listed issues are addressed and SSR-2/1 and 2/2 have been fully considered. Regarding the comprehensive list of Requirements the answer is the same as above (comment 6).		

8.	6	7. OPERATION	Follow SSR2.1 architecture and overarching requirements	X	Will be considered in the extent possible.		
9.							

**Comments on IAEA Document Preparation Profile
“Safety of Research Reactors (NS-R-4)” (DPP DS476)**

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: United States of America Country/Organization: U.S. Nuclear Regulatory Commission Date: September 24, 2013							
Comment No. / Reviewer	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1	Page 2, Section 4, “ OBJECTIVE AND SCOPE,” Paragraph 2, 2 nd sentence)	Eliminate the inclusion of “critical assemblies” from the document.	Critical Assemblies, in general, were designed to present minimal nuclear hazards even when compared to very low powered research reactors. Material security and material control and accounting (MC&A) are typically the primary areas of concern associated with these types of facilities, not nuclear safety. We recognize that there are a few exceptions where some critical assemblies can present a more significant safety hazard.			X	According to IAEA Safety Glossary critical assemblies are research reactors. They are considered in NS-R-4. Accelerator driven subcritical assemblies are out of the scope of the document (second paragraph of Section 4. of the DPP.

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: United States of America Country/Organization: U.S. Nuclear Regulatory Commission Date: September 24, 2013							
Comment No. / Reviewer	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
			Due to the rarity and unique design of such devices (e.g. accelerator driven subcritical assembly with a k_{eff} approaching 1), we feel that they would be best addressed on a case-by-case basis or by documents more focused on the specific critical assembly design.				
2	Page 3, Section 6 "OVERVIEW"	Propose the inclusion of a new section related to the "CONCEPT OF A GRADED APPROACH" under subsection 6.2 "APPLYING SAFETY OBJECTIVE, PRINCIPLES AND CONCEPTS"	The concept of the graded approach should be mentioned, due to its importance to research reactors. This importance is derived from the wide diversity in design among research reactors.	X			
3	Page 3, Section 6 "OVERVIEW"	Propose the inclusion of a new section related to the "Application of a graded approach" to follow the "Application of the defence in depth" under subsection 6.6 "DESIGN," "PRINCIPAL TECHNICAL REQUIREMENTS"	Guidance for the appropriate application of the graded approach should be included, due to its importance to research reactors and its potential to adversely impact safety. This comes down to ensuring	X			

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: United States of America Country/Organization: U.S. Nuclear Regulatory Commission Date: September 24, 2013							
Comment No. / Reviewer	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
			that the establishment of an adequate qualitative or quantitative justification or basis accompanies the application of a graded approach.				
4	Page 4, Section 6, Chapter 7	Insert "Transportation" as a topic to be discussed and referenced in Chapter 7, Operations for a research reactor.	The DPP appropriately references SSR-6 in Section 5 as a topic for interface but fails to identify the interface with transportation in the long list of topics to be addressed and included in Chapter 7. Operations performed by facility personnel are likely to include radioactive material transport package loading and offering to carrier for transport, or package receipt and unloading. These operations may also affect facility personnel training requirements.	X	Transportation within the site will be addressed in Section 7, chapter: Core management and fuel handling.		
5	General	Consider adding a discussion of security and the safety-security		X			

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: United States of America Country/Organization: U.S. Nuclear Regulatory Commission Date: September 24, 2013							
Comment No. / Reviewer	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
		interface throughout the document, in an integrated approach.					

Japan NUSSC Comments on DPP-DS476 (2013/9/24)
Safety Requirements: Safety Research Reactors

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer:		Pageof					
Country Organization: Japan/NRA		Date 2013/ 9/20					
Comm ent No.	Para./Line No.	Proposed new text	Reason	Acce pted	Accepted but modified as follows	Rej ecte d	Reason for modify/rejection
1	3. Justification for the Production of the Document	Furthermore, revision will be an opportunity to incorporate the relevant feedback from the accident at the Fukushima-Daiichi nuclear power plant (<u>e.g. measures against large-scale natural disasters such as Earthquakes and Tsunamis, and severe accidents including beyond design basis accidents</u>).	Clarification.			✗	The text is clear as it is.
2	6. Overview	3. <u>LEGAL FRAMEWORK AND REGULATORY SUPERVISION</u>	Consistency with DS478			✗	“Legal framework” is discussed in Section 2, under Safety principles according to Principle 2. of SF1 .
3	6. Overview Section5 Site Evaluation	The following items will be better to be subheadings. <u>GENERAL CRITERIA FOR SITE EVALUATION EXTREME AND RARE</u>	Basically, site evaluation will be addressed in revised NS-R-3. In our understanding, those items can be addressed in “INITIAL EVALUATION AND SELECTION OF THE SITE”.	✗			

**DPP Draft Specific Safety Requirements DS476 “Safety of Research Reactors”
(Version 2 dated 28 June 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 9 Date: 2013-09-23			
Relevance	Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
3	1	Section 2	2 nd para, 1 st sentence: “The main objective of the NS-R-4 was to provide a basis for safety and a-basis for safety assessment for <u>during</u> all stages in the lifetime of a research reactor.”	Wording.	X			
1	2	Section 3	2 nd para, last two sentences: “Furthermore, <u>the</u> revision <u>process</u> will be an opportunity to incorporate the relevant feedback <u>and lessons learned</u> from the accident at the Fukushima-Daiichi nuclear power plant. <u>The operational experience feedback documented in the IAEA Incident Reporting System for Research Reactors (IRSRR) will be considered for deriving research reactor specific requirements and especially for revising the list of postulated initiating events in the appendix.</u> ”	When revising NS-R-4, the events reported to the IRSRR database should be considered when formulating research reactor specific requirements, especially for revising the postulated initiating events listed in the appendix. It is important to include latest insights.	X			
3	3	Section 4	1 st para, 1 st sentence: “The objective of the revised version of the NS-R-4 is to provide a basis for safety and a-basis for safety assessment for <u>during</u> all stages in the lifetime of a research reactor, ...”	Wording.	X			

1	4	Section 4	<p>2nd para: “The scope of the revised NS-R-4 will cover research reactors of all types, sizes and power levels, including critical assemblies, and will be expanded to cover sub-critical assemblies. The scope covers new research reactors and existing ones. <u>Especially</u> Rresearch reactors with power levels in excess of several tens of Megawatts and fast reactors may <u>shall</u> require the application of standards for power reactors and/or additional safety measures.” ”</p>	<p>Regarding cold and hot neutron sources as well as special piping circuits put under high pressure and high temperature for use in experiments, Germany can identify no regulations for power reactors that could be of any help in this respect. This should really be covered by NS-R-4 or its successor document as these installations are special, research-reactor-specific experimental installations that do not exist in power reactors as such.</p> <p>Generally, the limit of "several tens of megawatts" is not a well-chosen one for switching to regulations for power reactors since this phrasing is on the one hand very vague (10 MW, 20 MW 50 MW?) and on the other hand does not reflect the hazard potential of research reactors.</p>		<p>X Keep “may” instead of “shall”.</p>		
2	5	Section 4	<p>Note to the 2nd para: In the 1st sentence, a footnote should be added to the term ‘sub-critical assemblies’ in order to clarify which kinds of sub-critical assemblies will be considered in the revised NS-R-4.</p>	<p>Two different projects applying sub-critical assemblies are currently under discussion: 1.) Experimental set-ups mainly for research purposes (e.g. the</p>			<p>X</p>	<p>It will be discussed in the revised document. In a DPP approval stage is better to use the general term and not to</p>

				<p>MYRRHA project in Belgium or the MUSE experiments at the MASURCA facility in France), and</p> <p>2.) Demonstrators for commercial energy production and transmutation of radioactive waste (e.g. the European XT-ADS or EFIT projects).</p> <p>For the last-mentioned projects, power levels up to several 100 MW_{th} are envisaged. Therefore, a footnote should be added for clarification.</p>				specify one particular type..
2	6	Section 5	<p>“The document will be a Specific Safety Requirements publication for Research Reactors. This document will interface with the following IAEA publications (the list is not intended to be final or exhaustive):</p> <p>...</p> <p>4. DS457: Preparedness and Response for a Nuclear or Radiological Emergency Safety Requirements, (Revision of the GS-R-2);</p> <p>5. DS456: Leadership and Management of Safety (Revision of the GS-R-3);</p> <p>...</p> <p>7. Safety Assessment for Facilities and Activities, IAEA Safety Standards Series No. GSR Part 4, (2009);</p> <p>8. Predisposal Management of Radioactive Waste, IAEA Safety</p>	<p>1st sentence: Grammar.</p> <p>2nd sentence: The current wording in the suggests that the subsequent list of publications is complete. This misunderstanding should be avoided by the insertion in brackets.</p> <p>List of publications: 1.) We propose to separate approved and draft Safety Standards in the listing (see also our related comment No. 7). In case of acceptance, renumbering of publications in the list might be required.</p>	X			

			<p>Standards Series No. GSR Part 5, (2009);</p> <p>9. DS450: Decommissioning and Termination of Activities (Revision of the WS-R-5);</p> <p>...</p> <p>11. DS462: Revision through addenda of GSR Part 1, NS-R-3, SSR-2/1, SSR-2/2 and GRS Part 4;</p> <p>...</p> <p>17. Nuclear Security Recommendations on Physical Protection of Nuclear Material and Nuclear Facilities_ (INFCIRC/225/Revision 5), IAEA Nuclear Security Series No. 13 (2011).”</p>	<p>2.) The citation of IAEA publications should follow a consistent format, e.g. <i>title, name of series, series number, year of publication.</i></p>				
2	7	Section 5	<p>Include new last sentence: “This document will interface with the following IAEA publications under development:</p> <p>14. DS457: Preparedness and Response for a Nuclear or Radiological Emergency (Revision of GS-R-2);</p> <p>15. DS456: Leadership and Management for Safety (Revision of GS-R-3);</p> <p>16. DS450: Decommissioning of Facilities (Revision of WS-R-5);</p> <p>17. DS462: Revision through addenda of GSR Part 1, NS-R-3, SSR-2/1, SSR-2/2 and GRS Part 4.”</p>	<p>The IAEA Safety Standards GS-R-2, GS-R-3, GSR Part 1, GSR Part 4 and WS-R-5 are currently under revision. The Safety Requirements should reflect the current draft documents.</p> <p>Note that the titles of DS450 and DS456 as cited in the DPP are partially erroneous. The correct ones are given at the left.</p>				
3	8	Table of contents	<p>Title of Subchapter 2.1: SAFETY OBJECTIVE</p>	<p>Editorial (typing error).</p>				
1	9	Table of contents	<p>Note: Chapter 3 “REGULATORY SUPERVISION” should be deleted.</p>	<p>Requirements on regulatory supervision are comprehensively covered by the General Safety</p>				

				Requirements GSR Part 1. The current section in NS-R-4 is only a repetition of GSR Part 1 and contains no specific requirements for research reactors.				
1	10	Table of contents	Title of Chapter 4: MANAGEMENT AND VERIFICATION OF SAFETY	<p>1.) Management of safety is comprehensively covered by the Safety Requirements GS-R-3, which will be superseded in near future by DS456.</p> <p>2.) Verification of safety is comprehensively covered by the General Safety Requirements GSR Part 4 and contains no specific requirements for research reactors. Even the graded approach is already included in GSR Part 4.</p> <p>As a conclusion from 1.) and 2.), the title of Chapter 4 should be changed as proposed. Chapter 4 should include more general statements like in SSR-2/1 (Section 3) and SSR-2/2 (Section 3). A more or less complete repetition of the content described in GS-R-3 (or DS456) should be avoided. The proposed content of Subchapter 7.1 “ORGANIZATIONAL PROVISIONS” should be incorporated here.</p>			X	The General Safety Requirements documents contain requirements for nuclear installations. As in case of defence depth concept or graded approach some important requirements will be discussed here.
1	11	Table of	Note:	Requirements on site			X	There is no intent

		contents	Chapter 5 “SITE EVALUATION” should be deleted.	evaluation are comprehensively covered by the Safety Requirements NS-R-3. The current section in NS-R-4 is only a repetition of NS-R-3 and contains no specific requirements for research reactors.				to simply duplicate in this and other standards which include research reactors in their scope. As it was the case of NS-R-4 pursuant to requests from end-users (mainly from Member States operating only research reactors or with a small nuclear power programme), the NS-R-4 included requirements on regulatory supervision, management and verification of safety and site evaluation.
3	12	Table of contents	Title of Subchapter 6.1.3: Application of the defence in depth concept	Missing word.	X			
1	13	Table of contents	Note: A new item “ Sub-critical assemblies ” should be added to Subchapter 6.3 “SPECIFIC REQUIREMENTS FOR DESIGN”.	This topic is missing in the DPP. According to Section 4, the revised NS-R-4 will also apply to sub-critical assemblies. Consequently, specific requirements for these facilities should be formulated (e.g. design of the reactor core taking into account trips of the accelerator, etc.).	X			
1	14	Table of contents	Note: A new Subchapter “ Protection against internal and external hazards ” should be	This issue is missing in the DPP. A research reactor shall	X			

			added to Chapter 6 “DESIGN”.	be designed in such a way that it is protected against both internal and external hazards. On the one hand, this is important with regard to the accident at the Fukushima-Daiichi NPP. On the other hand, the proposed subchapter reflects Requirement 17 of SSR-2/1 (for consistency within the IAEA framework).				
3	15	Table of contents	Note to Chapter 6 “DESIGN”: To avoid misunderstanding of the terms “design basis”, “design basis accident” and “design extension conditions”, an adequate terminology should be discussed while revising NS-R-4.	Comment only.				
1	16	Table of contents	Note: Subchapter 7.1 “ORGANIZATIONAL PROVISIONS” with its associated items should be deleted and incorporated in Chapter 4 renamed to “MANAGEMENT OF SAFETY”.	See our comment No. 10.		X See the answer at comment No. 10.		
1	17	Table of contents	Note: Subchapter 7.4 “COMMISSIONING” should be moved to a higher level in the structuring of contents: ... 6. DESIGN 7. COMMISSIONING 8.7. OPERATION ...	As elaborated in the Safety Guide SSG-12 “Licensing process for nuclear installations”, commissioning is an independent stage in the lifetime of a nuclear installation and should not be considered to be part of operation, although past experience has shown that there is some overlap of both stages. This is in line with the structuring of contents in the Safety		X The comment is valid but needs further considerations. If “organizational provisions and training and qualification“ go to Section 4. it is logical and acceptable to open a new Section for commissioning. If this text remains here commissioning remains a chapter		

				Requirements SSR-2/2 and NS-R-5, both of which are complementary to NS-R-4. There are several steps in the commissioning procedure for which the regulatory body may require the licensee to obtain prior approval and at which regulatory decisions are made.		under Operation.		
1	18	Table of contents	Note: We recommend to split up Subchapter 7.14 “AGEING MANAGEMENT AND PERIODIC SAFETY REVIEW” into two separate headlines “ AGEING MANAGEMENT ” and “ PERIODIC SAFETY REVIEW ”.	The objective of ageing management focusses mainly on the possible degradation of structures, systems and components (SSCs), while the periodic safety review (PSR) also addresses the compliance with the current regulatory framework, implementation of operational experience feedback, etc. PSR is a tool for continuous verification and identification of improvements concerning nuclear safety.	X			

DS 476 - Safety of Research Reactors

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: GD		Page.... of....					
Country/Organization : FRANCE/MEDDE		Date: 23-09-2013					
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1	6	8. INTERFACE BETWEEN SAFETY AND SECURITY IN DESIGN AND OPERATION	<p>A complete paragraph does not seem to be needed.</p> <p>As proposed by NSGC a generic sentence at the beginning of the document should draw awareness of users about the need to take into consideration interfaces between safety and security. This sentence should reference ad hoc security documents.</p> <p>Conflicts between nuclear safety and nuclear security</p>	X			

			provisions should be managed when and where they are identified in the document				
3							