

NUSSC Comments Resolution Table 20131001

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	As the title is Operating Experience Feedback for Nuclear Installations, the references should include IRSRR and INES documents..	X			
COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: Canadian Nuclear Safety Commission in consultation with the Canadian nuclear industry							
Country/Organization: Canada		Date: Sep. 17, 2013					
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
2	Item 6, bullet 5	<p>The revised NS-G-2.11 will emphasize a more proactive approach to:</p> <ul style="list-style-type: none"> evaluating low level events, near misses, or error likely situations that could be consequential determining the risks and opportunities that need to be addressed to prevent or reduce undesired effects <p>The revised NS-G-2.11 will emphasize the effective use of error preventive tools such as risk management.</p>	This item appears to be another way of describing using error preventive tools (preventive action) when dealing with predominantly lagging performance indicators. This is OK only when using such tools to prevent the reoccurrence of such situations. However, if the 'situation' has not occurred then the information is considered as leading performance indicators, and preventive action is then applied to prevent any such occurrence.	X			
3	Item 6, bullets 7 and	IAEA to develop, see reason.	The reference to corrective-actions leaves the impression	X	Agree. It is a		

	9		<p>all Operating Experience (OE) information needs to be dealt with as if "your situation" needs correcting. This is not necessarily the case.</p> <p>One definition of corrective-action is "action to eliminate the cause of a nonconformity and prevent recurrence"; the operative term being <i>prevent reoccurrence</i>. Therefore, if the OE information (internal or external) is regarding a negative occurrence and the organization has not experienced the same or similar occurrence, there is nothing to correct to prevent its reoccurrence. Rather, the OE information can/should be considered as input to the process that determines risks and opportunities. Once the risk or opportunity in the form of the OE information has been identified and analyzed, an action can be taken to prevent or reduce the probability of the same or similar occurrence from happening and/or create an opportunity for continual improvement. The Safety Guide should consider this approach as not every occurrence should be treated as requiring corrective-action, but preventive action.</p>		<p>matter of definitions and understanding of an “action” or “corrective action” “to prevent or reduce the probability of the same or similar occurrence from happening.” <i>“Once the risk or opportunity in the form of the OE information has been identified and analyzed...”</i> there is a need to correct current status.</p>		
4	Annex I, Sub-sections 2.8 Quality	<ul style="list-style-type: none"> Process management (requirement 7) for 3.7 Programme quality assurance (including 3.6 Programme 	The use of 'quality assurance' is a throwback from past and contradicts the IAEA's	X			

	assurance, and 3.7 Programme quality assurance	<p>development, if this is regarding designing the OE programme)</p> <ul style="list-style-type: none"> Independent assessment (Line 4.49) for Quality assurance 	<p>adoption of the term 'management system' instead of the terms 'quality assurance' and quality assurance programme'. If these subsections are to replace Section 9. <i>Quality Assurance</i>, on the current Safety Guide the terminology should be consistent with Draft General Safety Requirements, GSR DS 456, <i>Leadership and Management for Safety</i>, if the subject matter remains the same.</p>				
5	General	<ul style="list-style-type: none"> 	<p>This is an area where there is significant overlap with the role of WANO, particularly in regards to power reactors. Given the recent agreement between IAEA and WANO, a key part of the scoping process for this revision should include a review of the WANO processes for operating experience, and align the requirements in this document to complement and leverage the WANO process.</p>	X	<p>Correct. Cooperation with WANO will enrich both organizations.</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

6	Para 4	The objective of the Safety Guide will be to provide guidance for the establishment or enhancement of an OE feedback system, <u>from design to decommissioning of nuclear installations</u> , at the operating organization, regulatory, national and international levels.	Clarification to ensure all stage (design, construction, commissioning, operation, decommissioning) of a nuclear installation lifetime is covered	X			
7	Para 5	DS476 and DS478 may be added	For similarities with SSR2-2.	X			
8	Para 6	Add a bullet on events warranting an INES rating (and reference to communication to stakeholders)		X			

9	Para 6	<ul style="list-style-type: none"> ▪ The revised NS-G-2.11 will place more emphasis on areas such as: <ul style="list-style-type: none"> ○ The importance of a harmonized coding system for OE ○ The use of performance indicators for performance review and plant comparison and trending tools ○ The use of OE during periodic safety assessments/safety reviews ○ The role of the OE program within the continuous improvement model ○ The utilization of common OE programmes in operating organizations with more than one facility ○ <u>The utilization of OE by designer/vendors of nuclear installations</u> 	<p>Clarification</p> <p>Add a bullet on the role of designers/vendors of nuclear installations in operating experience feedback use (see WNA/CORDEL feedback on Fukushima Daiichi lessons learned)</p>	X			
10	Para 7 Step 10	Add NSGC		X			

11	Annex 1	4. INVOLVEMENT OF THE REGULATORY BODY <u>Events to be reported by licensees</u> <u>Reported events review</u> <u>Utilization (interface with licensing and inspection processes...) and dissemination of information</u> <u>Programme development and effectiveness</u> <u>Programme quality assurance</u>	The section on regulator is not as detailed as the previous ones....	X	Involvement of the regulator into the process of operating experience feedback for nuclear installations will be outlined in this chapter taking account attributes mentioned in the proposal.		
12			How OECD WGOE input can/will used to update the current guide ?	X	All the interested parties are welcome to the revision process		

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
13		This document does not present any reference to nuclear security document. It is not clear how interfaces would be managed if any		X			Will be included as appropriate when the draft is prepared.

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: Federal Ministry for the Environment, Nature Conservation and Nuclear Safety (BMU) (with comments of GRS)		Page 1 of 6					
Country/Organization: Germany		Date: 2013-09-20					

Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
14	Section 2	2 nd para, 2 nd and 3 rd sentence: “It is essential to collect, document and evaluate such information in a	The documentation and evaluation of experiences are as important as their	X			

		systematic way that conforms to agreed-reporting thresholds for events and deviations occurring throughout the lifetime of nuclear installations (including design, construction, commissioning, operation, surveillance and maintenance activities and decommissioning). <u>The information to be collected and documented includes reportable events, low level events and near misses, error precursors, safety related results of periodic safety assessment or reviews and other findings that may contribute to the improvement of safety.</u> ”	collection. The kind of information should not be limited to reportable events and deviations (compare with the 1 st and 10 th bullet point in Section 6).				
15	Section 3	4 th bullet point, last sentence: “A management system designed to fulfil these requirements integrates safety, health, environmental, security, quality and economic elements <u>so that safety is not compromised.</u> ”	Essential amendment to make clear that safety has an overriding priority. Compare with Paras 1.5 and 4.1 of DS456 (Version dated 13 July 2013).	X			
16	Section 3	last para, 2 nd sentence: “These <u>improvements</u> necessitate changes to many aspects of the overall process ...”	Insertion to clarify the relation to the aspects mentioned in the 1 st sentence of this para.	X			
17	Section 5	1 st sentence: “This Safety Guide would fall within the thematic areas of operational safety and will interface with the following <u>IAEA Safety Standards and other publications</u> (this is not, and cannot be, regarded as an exclusive list): ... • <u>SSR-2/2 Safety of Nuclear Power Plants: Commissioning and Operation (2011)</u> • <u>NS-R-4 Safety of Research Reactors (2005)</u> • <u>NS-R-5 Safety of Nuclear Fuel</u>	1.) Modification in the introductory statement takes into account that INSAG publications and IRS Guidelines are not IAEA Safety Standards. Furthermore, we propose to separate approved and draft Safety Standards in the listing. See also our related comment No. 5. 2.) The scope of the revised Safety Guide is not limited to nuclear power plants. The	X			

		<p>Cycle Facilities (2008)</p> <ul style="list-style-type: none"> • SSG-15 Storage of Spent Nuclear Fuel (2012) • SSG-25 Periodic Safety Review for Nuclear Power Plants (2013) • GS-R-3 The Management System for Facilities and Activities (2006) • DS456 Leadership and Management for Safety (Draft) ... • NS-G-2.4 The Operating Organization for Nuclear Power Plants (2001) (2004) • IRS Guidelines (IAEA Services Series No. 19, 2010) • IRSRR Guidelines (2000) • FINAS Guidelines (IAEA Services Series No. 14, 2006) • PROSPER Guidelines (IAEA Services Series No. 10, 2003)” 	<p>methodologies recommended for nuclear power plants are applicable to other nuclear installations through a graded approach. Consequently, there should be an interface with the Safety Requirements NS-R-4 and NS-R-5 (both are complementary to SSR-2/2) as well as with the Safety Guide SSG-15. With regard to the feedback of OE, see e.g. Para 7.10 (o) of NS-R-4, Para 9.16 of NS-R-5 and Para 6.100 of SSG-15.</p> <p>3.) As stated in the 10th bullet point in Section 6, the revised Safety Guide will place more emphasis on the use of OE during periodic safety reviews. This provides an interface with the Safety Guide SSG-25.</p> <p>4.) The IAEA/NEA Incident Reporting System (IRS) covers the feedback of OE gained from nuclear power plants. Beside this database, the revised Safety Standard should also interface with the IAEA Incident Reporting System for Research Reactors (IRSRR) and the IAEA/NEA Fuel Incident Notification and Analysis System (FINAS). With regard to PROSPER missions, see our comment No. 9.</p>				
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18	Section 5	<p>Include new 2nd sentence: “This Safety Guide will interface with the following documents under development:</p> <ul style="list-style-type: none"> • DS456 Leadership and Management for Safety (revision of GS-R-3) • DS462 Revision through addenda of GSR Part 1, NS-R-3, SSR-2/1, SSR-2/2 and GRS Part 4 • DS476 Safety of Research Reactors (revision of NS-R-4) • DS478 Safety of Fuel Cycle Facilities (revision of NS-R-5)” 	<p>The above-mentioned Safety Standards GSR Part 1, SSR-2/2, GS-R-3, NS-R-4 and NS-R-5 are currently under revision. The Safety Guide should reflect the current draft documents (compare with the 2nd bullet point in Section 6).</p>	X			
19	Section 6	<p>1st bullet point, last sentence: “A successful OE feedback process utilizes feedback from nuclear installations (both domestic and abroad) and information from other relevant industries.”</p>	<p>For clarification that not only domestic installations are to be considered in the OE feedback process (compare with the 1st sentence of Section 4).</p>	X			
20	Section 6	<p>6th bullet point: “The emergent issue of counterfeit, fraudulent, and suspect parts items (CFSI), as well as ...”</p>	<p>That is what the abbreviation CFSI stands for in this context.</p>	X			
21	Annex I, Chapter 2	<p>Proposed title: “SYSTEM FOR THE FEEDBACK OF OPERATIONAL EXPERIENCE FOR THE OPERATORS OF NUCLEAR INSTALLATIONS”</p>	<p>As stated in the 1st sentence of Section 4, the objective of the Safety Guide will be to provide guidance for the establishment or enhancement of an OE feedback system, at the operating organization, regulatory, national and international levels. It is understood that the proposed Chapter 2 provides guidance for the operators.</p>	X			

22	Annex I, Chapter 2	Note: Drafting of Subchapter 2.7 “Reviewing the effectiveness of the process” should take into account the outcomes from IAEA-led PROSPER missions (peer review of the effectiveness of the operational safety performance experience review process) conducted in the last years.	An effective process for the feedback of OE can contribute significantly to minimizing the recurrence of events. In Section 8 of the current Safety Guide NS-G-2.11 it was recommended that NPPs conduct their own self-assessment of the effectiveness of their OE processes. A PROSPER mission can (a) review the effectiveness and comprehensiveness of the plant self-assessment, (b) determine whether the process for the feedback of OE meets established international standards and good practices, and (c) offer comments and recommendations to further enhance the conclusions of the self-assessment.	X			
23	Annex I, Chapter 2	Proposed title of Subchapter 2.8: “Quality assurance <u>Management system”</u>	As stated in Para 1.4 of the Safety Requirements GS-R-3, the term ‘management system’ reflects and includes the initial concept of ‘quality control’ and its evolution through ‘quality assurance’ and ‘quality management’.	X			
24	Annex I, Chapter 3	Proposed title: <u>“CENTRALIZED NATIONAL SYSTEM FOR THE FEEDBACK OF OPERATIONAL EXPERIENCE FOR OPERATING ORGANIZATIONS”</u>	As stated in the 1 st sentence of Section 4, the objective of the Safety Guide will be to provide guidance for the establishment or enhancement of an OE			X	The centralized system could be on an utility basis.

			<p>feedback system, at the operating organization, regulatory, national and international levels. It is understood that the proposed Chapter 3 covers the regulatory and national levels.</p> <p>Drafting of the revised Safety Guide should ensure that the centralized national system is accessible not only for the operators of nuclear installations, but also for the regulatory body, technical support organizations, research organizations, designers, manufacturers and engineering contractors.</p>				
25	Annex I, Chapter 3	Proposed title of Subchapter 3.7: “Programme quality assurance Management system”	See our related comment No. 10.	X			
26	Annex I, Chapter 4	<p>INVOLVEMENT OF THE REGULATORY BODY</p> <p>4.1. Criteria and procedures for reporting of events</p> <p>4.2. Screening of events</p> <p>4.3. Investigation, analysis and evaluation of events</p> <p>4.4. Regulatory review and inspection</p> <p>4.5. Utilization, dissemination, and reporting of information</p>	For the sake of completeness, Chapter 4 should be provided with some subchapters. Our proposals for structuring are to be considered as examples and can be amended or replaced by other aspects.	X	Involvement of the regulator into the process of operating experience feedback for nuclear installations will be outlined in this chapter taking account attributes mentioned in the proposal		
27	Annex I, Chapter 5	<p>INTERNATIONAL SYSTEMS FOR THE FEEDBACK OF OPERATIONAL EXPERIENCE</p> <p>5.1. ...</p> <p>5.2. Regulatory international system (IRS, IRSRR, FINAS, PROSPER)</p>	The Incident Reporting System (IRS) covers the feedback of OE gained from nuclear power plants. IRSRR and FINAS are broadly accepted reporting systems	X			

			for the feedback of OE gained from research reactors and nuclear fuel cycle facilities, respectively (see our related comment No. 4). With regard to PROSPER missions, see our comment No. 9.				
COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: ENISS Country/Organization: ENISS Date: 23 September 2013							
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
28	Page 3 Before last bullet	The revised NS-G-2.11 will place more emphasis on areas such as: The importance transferring information on event and/or lessons learned, from the operating organizations to designers / vendors for proper account at the design stage of similar facilities	When the designer/vendor of a nuclear installation is not the operator, event recurrence shall be avoided thanks to sharing OEF with the designer/vendor	X			
29	Section 6, bullet 7	Replace last sentence with the following: <u>The new NS-G-2.11 will emphasize the need for a blame free reporting culture within a safety conscious working environment to ensure that all issues and events are reported.</u>	This talks about “... emphasize the need for a blame free environment to encourage openness”. This is to be applauded but there is a contradictory position that if it is totally “blame free” then the significance of errors to	X			

			individuals becomes reduced (i.e. it doesn't matter if I get this right or wrong I won't be blamed anyway – so I don't need to bother to ensure I do it right). To overcome this we use phrases such as a “blame free reporting culture” within a “safety conscious working environment” to get the right balance between openness and accountability.				
30	Section 6, 8 th bullet		It would have been nice to see the "significance triangle" in the DPP. At least we will get to see it in the DS itself when it is sent for review.			X	Not relevant to DPP
COMMENTS BY REVIEWER				RESOLUTION			
Reviewer:		Page of 2					
Country/Organization: Japan/NRA		Date:20 Sep, 2013					
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modif./rejection

31	Section 3. After the last sentence.	Add the following sentence: <u>Moreover, it should be specified the lessons and learned from the Fukushima daiichi NPPs accidents.</u>	The reason why revision of NS-G-2.11 should be specified that the one of weak points of the OE reflection way became clear for lessons learned from the Fukushima Daiichi NPPs accident. If the OE was utilized in a State appropriately, there should also have been avoided some troubles.	X			
32	Section 5.	Add “ <u>SSG-25 Periodic Safety Review of Nuclear Power Plants</u> ” as a list of Safety Standards.	Already written in section 6, 10 th bullet, 3 rd sub-bullet as “The use of OE during periodic safety assessments/safety reviews”. In particular, in PSR, reflection of OE is one of the most important work so that the PSR guide SSG-25 should be listed here.	X			
33	Section 6. 1 st bullet L3	Reporting of OE as a minimum requirement should include E vents, Near Misses , Error Precursors , Low Level Events , and B est P practices <u>a</u> .	The “Lessons learned” from experiences are in a matter important as a report of OE. So it should be written in an OE report clearly. Moreover, it is something strange to state a “Near Misses” and a “Low Level Events” as a minimum requirement here. Much more important things should be required first.			X	Near misses, error precursors, low level events and any other information important to safety of the installation need to be reported to the OE system for further analysis aimed at identifying emerging trends and taking corrective/ preventive measures to avoid major events.

34	Section 6. 7 th bullet L5	It should be emphasized that management should be committed to the timely implementation of corrective actions from relevant operating experience.	The timely implementation of corrective actions may be sometimes difficult to perform it. Taking into account such a case, this guide should be stated accordingly.			X	"Timely" stands for - within the timeframe specified in the analysis of the event report. Until a corrective action is implemented and its effectiveness is assessed the installation is at risk of recurrent event.
35	Section 6. 8 th bullet L2	What does "significance triangle" mean?	Clarification.	X			
36	Section 6. 10 th bullet, the last sub-bullet	The utilization of common OE programmes in operating organizations <u>and vendors</u> with more than one facility	It should be stated the common OE program for the same design type at a vendor.	X			

<p>COMMENTS BY REVIEWER</p> <p>Reviewer: United States of America</p> <p>Country/Organization: US Nuclear Regulatory Commission Date: 24 September 2013</p>	<p>RESOLUTION</p>
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Comment No. / Reviewer	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
37	Section 6, Overview	The following subjects may be more accurately described as <i>conclusions derived from OE programs</i> . Reasonable though they are, these subjects may be ill-placed in this document since they do not speak directly to structural changes recommended for future OE programs: <ul style="list-style-type: none"> - Effective use of error prevention tools - Emphasis placed on the role of management in safety culture - The need for clear management 	Scope clarity and effectiveness. It is not clear where these insights are to be implemented in the document outline.			X	The subjects are the common weakness identified during the IAEA missions and other OE programs, which is not emphasized in previous guides. It is important to highlight the need to add these key attributes into the OE program.

		<p>expectations regarding the OE process</p> <ul style="list-style-type: none"> - Management commitment to timely implementation of corrective actions - Openness and a “blame-free environment” 					
38	Section 6, Overview	<p>The following subjects strongly pertain to core regulation responsibilities, but are apart from the desired goals of Operational Experience programs. Since these subjects are not central to the purpose of the proposed document, they should not be emphasized as being a framework component for OE programs:</p> <ul style="list-style-type: none"> - Improved guidance on the approval, time extension, or cancellation of important corrective actions - The use of OE for periodic safety assessments and safety reviews 	Scope clarity and effectiveness.		X		<p>The management of corrective action is one essential elements of the OE program. It fits into this document.</p> <p>The subject on OE for periodic safety assessment can be deleted.</p>
39	General Comment	<p>The review and updating, as necessary, of IAEA Safety Guide NS-G-2.11, “A System for the Feedback of Experience from Events in Nuclear Installations,” (2006) should be formally coordinated with the Organization for Economic Cooperation and Development/ Nuclear Energy Agency (NEA)/ Committee on Nuclear Regulatory Activities/ Working Group for Operating Experience (WGOE) and the community of IAEA/NEA International Reporting System for Operating Experience (IRS) National Coordinators (NC).</p>	<p>The Document Preparation Profile (DPP) for DS479 proposes entirely new subjects that expand the scope of NS-G-2.11; therefore, it is requested that these proposed changes be presented to the WGOE and IRS NC for consideration prior to formal approval of the DPP. Coordination with the WGOE and IRS National Coordinators should be reflected in the “Production Schedule” that is included in the DPP. We recommend proceeding with</p>		X		<p>This DPP was distributed to all the Member States and relevant organizations for comments, all inputs were solicited and considered on a prudent basis.</p>

			the proposal to update NS-G-2.11, if changes would be limited to the existing structure of the Safety Guide. However, we do not agree with the other proposed content changes until they are formally considered by the WGOE and IRS NC.				
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