

**DPP Draft Safety Guide DS486 “Establishing the Safety Infrastructure for a Nuclear Power Programme (Rev. 1)”
(Version April 2014)**

Status: STEP 3 Review of the DPP by the SSCs

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: Ricardo Waldman		Page..1. of..1.					
Country/Organization: Argentina , Nuclear Regulatory Authority		Date: 14-05-23					
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1	General	If this proposed Revision 1 progress and finally it is published, this future Safety Guide and NG-G-3.1 (one of the References of the DPP) should be considered by IAEA as complementary documents for the target audience.		YES			
2	General	This DPP should be endorsed by NUSSC at the forthcoming meeting.		YES			

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 3 Date: 2014-05-02			
Relevance	Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
2	1	Chapter 1	Document Category: “ Specific Safety Guide”	Clarification regarding the new classification system for publications issued in the IAEA Safety Standards Series.	YES			
3	2	Chapter 2	4 th para: “... to provide assistance to ‘embarking countries’ – those countries considering embarking and preparing to embark on a nuclear power programme.”	Simplification without loss of information.	YES			
3	3	Chapter 2	last sentence: “In March February 2014, a working group of NUSSC reviewed the Secretariat’s analysis and the Secretariat subsequently finalized DS462 for submission ...”	The meeting of the NUSSC working group was held from 24–28 February 2014.	YES			
3	4	Chapter 3	3 rd para: “In October 2013, the IAEA organized a consultants’ meeting CM (feedback report in annex) to review SSG-16 ...”	The abbreviation CM should be explained here because it is not introduced elsewhere in the document.	YES			
3	5	Chapter 3	4 th para: “The results of the consultants’ meeting CM indicated that that a revision of SSG-16, in line with the changes ...”	Editorial corrections.	YES			
3	6	Chapter 3	5 th para: “... the safety infrastructure for a nuclear power programme.”	Editorial.	YES			
2	7	Chapter 3	6 th para: “Moreover, the analysis of feedback from	The abbreviation IRRS should be explained	YES			

			applications of SSG-16 in Integrated Regulatory Review Service (IRRS) missions, workshops, self-assessments and peer reviews identified ...”	here because it is not introduced elsewhere in the document.				
3	8	Chapter 5	1 st para: “This Specific Safety Guide falls within the thematic areas of nuclear safety ...”	Editorial.	YES			
3	9	Chapter 5	2 nd bullet point: “GSR Part 1 Governmental, Legal and Regulatory Framework for Safety (2010) (Rev. 1 to be published before finalization of this safety guide revision)”	GSR Part 1 is currently under revision through amendment (DS462), as also stated in Chapter 2.	YES			
3	10	Chapter 5	3 rd bullet point: “SSR-2/2 Safety of Nuclear Power Plants: Commissioning and Operation (2011) (Rev. 1 to be published before finalization of this safety guide revision)”	SSR-2/2 is currently under revision through amendment (DS462), as also stated in Chapter 2.	YES			
2	11	Chapter 5	4 th bullet point: “GSR Part 2 Leadership and Management for Safety System for Facilities and Activities (to be published before finalization of this safety guide revision)”	This is the correct title of the latest version of the IAEA Draft Safety Requirements DS456 dated 13 July 2013 (future GSR Part 2).	YES			
3	12	Chapter 5	6 th bullet point: “GSR Part 4 Safety Assessment for Facilities and Activities (2009) (Rev. 1 to be published before finalization of this safety guide revision)”	GSR Part 4 is currently under revision through amendment (DS462), as also stated in Chapter 2.	YES			
3	13	Chapter 5	7 th bullet point: “NS-R-3 Site Evaluation for Nuclear Installations Safety Requirements (2003) (Rev. 1 to be published before finalization of this safety guide revision)”	NS-R-3 is currently under revision through amendment (DS462), as also stated in Chapter 2.	YES			
3	14	Chapter 5	8 th bullet point: “SSR-2/1 Safety of Nuclear Power Plants: Design; (2012) (Rev. 1 to be published before finalization of this safety guide revision)”	SSR-2/1 is currently under revision through amendment (DS462), as also stated in Chapter 2.	YES			
3	15	Chapter 5	10 th bullet point:	Citation of the full title	YES			

			“GSR Part 3 Radiation Protection and Safety of Radiation Sources: International Basic Safety Standards (Interim Edition, 2011)”	of GSR Part 3.				
3	16	Chapter 5	11 th bullet point: “NG-G-3.1 IAEA Nuclear Energy Series, Milestones in the Development of a National Infrastructure for Nuclear Power (2007) (Rev. 2 to be published before finalization of this safety guide revision)”	The revision of SSG-16 will also take into consideration the changes being introduced in Rev. 2 of NG-G-3.1, as stated in the last para of this Chapter.	YES			
3	17	Chapter 5	General note: The references in the list should be rearranged to follow a logical order. Proposal for new sequence: SF-1, GSR Parts 1 to 7, SSR-2/1, SSR-2/2, NS-R-3 (future SSR-1), NG-G-3.1	Rearrangement takes into account the hierarchy of publications issued in the IAEA Safety Standards Series and reflects the long term structure of the series.	YES			

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: M-L Järvinen		Page.... of....					
Country/Organization: STUK		Date 22.5.2014:					
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
	4. objective and scope first paragraph.	The objective of the revised SSG-16 Safety Guide will be to provide revised guidance on establishing the safety infrastructure for a nuclear power programme in line with the revision of the IAEA safety requirements. The focus will be on application of the revised safety requirements in the main phases of this process.	clarity phases application of the requirements could be interoperated many ways.	YES			

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Country/Organization: Japan/NRA		Date: 26 MAY. 2014					
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modif./rejection
1	General	<p>The <i>conclusion</i> in feedback report says that the changes propose by DS462 do not affect structure and scope of SSG-16 and that two IEM reports does not lead to the addition of “Action.” Furthermore, it says that GSR part 2 and GSR part 3 is under revision and other IEM report is being reviewed. These message means there is no need for a revision of SSG-16 at the moment.</p> <p>Besides, the feedback report says just only that experts support revision of SSG-15 without showing any specific evidence for justification of revision. Especially, both ballet 1 and ballet 3 do not include any specific shortcoming and any specific items to be discussed. It is suggested to present explicitly what is the problem in current SSG-15 and how the problem will be resolved.</p> <p><u>Proposal</u> It is hardly to recognize the need of revision of SSG-16 in the proposed DPP at the moment. This revision is suggested to be postponed.</p>				YES	A detailed table is attached indicating what specific changes in the safety requirements are not fully addressed in the existing SSG 16. Please refer to this table for justification of the need for revision. The milestones for the revision of SSG 16 will be consistent with that of the revision of the other safety requirements allowing for full consideration of the revisions of the relevant safety requirements.
2	General	The DPP says that the structure of current SSG-16, in which each set of “Actions” is described by being divided into three phase, will remain unchanged. However, applied “relevant Safety Requirements”				YES	The intention of SSG 16 is to facilitate the implementation of the safety

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		are common among three phases of most of a set of "Actions." Besides, the boundary of phase 1 and 2 and that of phase 2 and 3 are ambiguous in practices of each Action, although three phases exist conceptually. This current structure of description should be reviewed from the user point of view.					requirements. Indeed, the requirements apply to the 3 phases but their implementation can be phased and gradual through the 3 phases. This phased approach is implemented in SSG 16, considering that in phase 1 the focus is to ensure awareness of the government about the safety requirements to support an informed decision. In phase 2 focus is on the planning the and on the establishment of the various institutions (eg the regulatory body and the operator) and preparing to specify safety requirements for

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							the future NPP. In phase 3 NPP construction starts and the relevant safety requirements need to be fully implemented
3	Sec. 2. L.1	Refer to the document on "Action 6".		YES			
4	Sec. 2. Last Para. L.2	In March <u>February</u> 2014, ...		YES			
5	p.3/last paragraph	It is not preferable that SSG-16 is revised to keep consistency with revisions performed in NS-G-3.1. This approach does not meet safety-first approach. If there exist some items to be revised, at first SSG-16 is revised, then NG-G-3.1 should be revised with keeping consistency with revision of SSG-16. Safety consideration should come first at any time.			SSG 16 is being revised to keep consistency with safety standards not NS G 3.1. Staff of the Nuclear Safety and Security Department are involved in the revision of NS G 3.1 (already initiated by the Department of Nuclear Energy) to ensure consistency with the nuclear safety standards		
6	Sec. 5	Add INSAG report in section 5 • INSAG 22 : Nuclear Safety Infrastructure for a National Nuclear Power Programme Supported by the IAEA Fundamental Safety Principles	Missing of basic document	YES			

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Country/Organization: Japan/NRA		Date: 26 MAY. 2014					
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7	ANNEX 5th bullet	... at <u>the Tepco</u> Fukushima Daiichi NPP ...	Use the formal plant name.	YES			

COMMENTS BY REVIEWER

Reviewer: US NRC

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Country/Organization: USA

Date: 23 May 2014

Comment No.	Para/Line No.	Proposed new text	Reason	
1	<p>Page 7 Para 1.23 Line 11</p> <p>SSG-16 Page 18 Para 2.17</p>	<p>“The scope of this Safety Guide includes consideration of the interface between nuclear safety and nuclear security.”</p> <p>General</p> <p>2.17. A nuclear power programme in any State cannot be treated in isolation, owing to the potential transboundary effects of a radioactive release. A nuclear accident or radiological sabotage, could have consequences anywhere through the impact on public opinion. States have a shared need for universal safe operation of nuclear facilities and safe conduct of activities. The national safety and security policies and the strategies adopted by a government should therefore take full benefit of effective participation in the global nuclear safety and security regime. However, the prime responsibility for safety and security rests within each State and with the licensed operators of nuclear facilities.</p>	<p>Just as the nuclear power programme in any State cannot be treated in isolation, neither can the safety programme be treated in isolation from the security programme. For safety and security to be firmly interfaced and developed as a “Culture,” guidance documents such as SSG-16 should generally address safety/security together as part of the safety culture and philosophy, just as safety is part of the security culture and philosophy.</p> <p>General discussion should emphasize that <i>security is important to safety</i>. This is especially true for Principle 3, Leadership and Management for Safety. Only leadership and management can ensure a firm foundation for a safety/security culture. When deciding to embark on a new Nuclear Power Programme safety and security must be considered at the same time.</p> <p>Since, as stated in this document, the scope of SSG-16 includes consideration of the interface between nuclear safety and nuclear security, a review of the Actions 1-200 should be conducted and the phrase “<i>safety and security culture</i>” should be used where appropriate to address overall/general concepts.</p>	<p>Resolution:</p> <p>Accepted and will be considered during the revision drafting</p>

COMMENTS BY REVIEWER Reviewer: U. S. Nuclear Regulatory Commission Country/Organization: United States of America / NUSSC Date: May 23, 2014				RESOLUTION			
Comment No. / Reviewer	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1	General	The DPP is ambiguous regarding justification for development and amendment of DS486. The document listed the 5 safety requirement documents under DS462 that are being revised. However, the DPP did not identify, or outline any new safety requirements that the current guidance SSG-16 did not address or in short. In addition, the feedback provided in the ANNEX regarding “Report of the Consultants Meeting” did not specify any key reasons for revision of SSG-16. Therefore, we suggest providing additional information to identify new safety requirements that need to be addressed and provide explicit outline of changes to be developed. Gap analysis for justification of DS486 would also be useful.	Clarity and completion for justification of SSG-16 revision	YES (please refer to the table provided in annex)			
2	General	We suggest adding a Table of content in order to compare areas of amendment or development in DS486 vs. SSG-16.	Completeness, clarification, and harmony.		Table will be developed as part of the revision drafting process		
3	General	The schedule proposed for development of DS486 should be in	Harmony and consistency in schedules	YES			

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: U. S. Nuclear Regulatory Commission							
Country/Organization: United States of America / NUSSC Date: May 23, 2014							
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		harmony with the schedules of other key documents under development.					
4	Section 5	Add relationship to “ Establishing the Nuclear Security Infrastructure for a Nuclear Power Programme, ” IAEA Nuclear Security Series 19	For countries establishing safety infrastructure for NPP, it would be helpful to understand relationship with security infrastructure, too.		YES (however, related to nuclear security SSG-16 addresses only the area of safety security interface)		
5	Section 5	Add relationship to DS455, “ Establishing the Infrastructure for Radiation Safety ”	For countries establishing safety infrastructure for NPP, it would be helpful to understand relationship with radiation safety, too.	YES			
6	Section 7	Add discussion in overview to address relationship to above mentioned guidance especially in terms changes to infrastructure based on the likely case of existing radiation/security infrastructure needing to be expanded for NPPs	Experience gained from IRRS missions for embarking countries identified the overlapping scope of the many modules and the “tailored” module, and the need to highlight the necessary deltas – especially Modules 1 and 2 of the IRRS.		YES (existing para. 2.54 will be expanded)		