

Revision of 7 closely interrelated Safety Guides on the Operation of Nuclear Power Plants: NS-G-2.2 to 2.6, NS-G-2.8 and NS-G-2.14 (DPP DS497 indice 2)

DS497F – NS-G-2.8: 5 comments / Accepted (fully or partially): 1 (20%) / Rejected: 4 (80%)

Some comments are multiple: one part can be accepted and another rejected; hence, total of “accepted” and “rejected” is not equal to number of comments

Country or Organization	Number of comments	Accepted	Rejected
ENISS	3	1	2
WNTI	0		
JAPAN	1		1
GERMANY	1		1

		COMMENTS BY REVIEWER			RESOLUTION			
		Reviewer: Federal Ministry for the Environment, Nature Conservation and Nuclear Safety (BMU) (with comments of GRS) Country/Organization: Germany			Pages: 2 Date: 9 October 2020			
Rele - vanz	Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1	1.	7.4.	<p>At a minimum, the persons who occupy the following positions should be formally authorized <u>by the regulatory body or other governmental body</u>:</p> <p>(a) The shift personnel that directly supervise the operation of the plant (or unit) and who decide on safety measures during normal operation, anticipated operational occurrences and accidents conditions. These personnel (normally the shift supervisor and the deputy shift supervisor) give commands to the other personnel in the shift and are responsible for the safe performance of the plant (or unit).</p> <p>(b) Operators who handle instrumentation and control equipment important to safety.</p> <p>In addition, individuals in positions such as plant manager, head of operations, head of maintenance, directors in technical support and engineering, and certain categories of operator (i.e. other than control room operators, such as fuel operators) should be formally authorized by the operating organization.</p>	<p>We would like to pay your attention that “authorization”, according to IAEA Glossary 2018, has the following definition: “Authorization is the granting by a regulatory body or other governmental body of written permission for a person or organization (the operator) to conduct specified activities”.</p> <p>Para 4.16 of SSR-2/2, Rev1 said that: „The operating organization shall clearly define the requirements for qualification and competence to ensure that personnel performing safety related functions are capable of safely performing their duties. Certain operating positions may require formal authorization or a licence”.</p> <p>We suggest to straight the issue of definitions: in</p>			X	<p>Para 4.16 of SSR-2/2 (Rev.1): “... Certain operating positions may require formal authorization or a licence.”. It is clear: <u>certain... may... As a result: not all... must...</u></p> <p>In addition, the para 7.1 of NS-G-2.8 already refers to the para 4.16 of SSR-2/2 (Rev.1). No need to duplicate this reference.</p> <p>At last, same comment from Japan, rejected too.</p>

COMMENTS BY REVIEWER					RESOLUTION			
Reviewer: Federal Ministry for the Environment, Nature Conservation and Nuclear Safety (BMU) (with comments of GRS) Country/Organization: Germany Pages: 2 Date: 9 October 2020								
Rele - vanz	Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
				spite of DPP decision to delete all references to the involvement of regulators in the operational activities, this case is a special one				

COMMENTS BY REVIEWER					RESOLUTION			
Reviewer: Japan NUSSC Member Page.1 Country/Organization: Japan / Nuclear Regulation Authority (NRA) Date: 9 October 2020								
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection	
1.	7.1.	The formal authorization of certain operating positions, as referred to in para. 4.16 of SSR-2/2 (Rev. 1) [1] this Section 7, is the granting of written permission for an individual to conduct specified activities and to meet specified responsibilities <u>by the operating organization or the regulatory body.</u>	Clarification for the formal authorization referred to para. 4.16 of SSR-2/2 (Rev. 1). It is not only granted by the regulatory body but also operating organization. So it should be clearly stated here.			X	One reason for revision this set of 7 safety guides is that there are several requirements in SSR-2/2 (Rev.1) which are not yet adequately addressed in these Safety Guides. So, deleting a relevant reference to SSR-2/2 (Rev.1) is not in accordance with the DDP497. In addition, the same DDP requests to delete all references to the involvement of	

							regulators in the operational activities.
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COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: P. Malesys, S. Edwards		Page 1 of 1					
Country/Organization: WNTI		Date: 9 October 2020					
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
		No comment					

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: ENISS		Page 1 of 1		ENISS			
Country/Organization: ENISS		Date: 9 October 2020					
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1	4.9/1,2	The plant manager operating organization should ensure the following with regard to personnel performing safety related activities:	The responsibility for the listed activities generally lies on the operating organization	X To be aligned with SSR-2/2 (Rev.1) Requirement 8			
2	4.10/2,3	Even if off-site training facilities are to be used, a training entity should still be included in the plant organization	Delete. The organizational inclusion of the training entity is the responsibility of the operating organization. Inclusion into the plant organization is only one of many options.			X	? Many (other) options? Comment in contradiction with SSR-2/2 (Rev.1) Requirement 7
3	4.16 (c)/1,2	Simulator based training for control room operators, shift supervisors, responsible managers and technical	It is not clear who the responsible managers are. Managers participate in			X	'responsible managers' are operating personnel as

		support personnel should be conducted.	simulator training, but not as trainees.				others mentioned hereand it is a terminology also used in paras 4.19 and 4.29 in the same way.
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