

**DPP for DS504: Arrangements for Preparedness and Response  
for a Nuclear or Radiological Emergency**

(Comments received based on the DPP DS504 version 3.0 dated 12/01/2017)

**Version 1.0 dated 27/04/2017**

Country/Org.	COMMENTS RECEIVED				RESOLUTIONS			
	Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
Canada	1.	General	Include IAEA Guidance Matrix in Revised GS-G-2.1	As noted in Appendix 1, in some cases current guidance is provided but is spread across several safety guides. Given the number of documents currently under development, this is likely to remain the case. It is suggested that the revised GS-G-2.1 include a matrix (similar to the matrix provided in Annex 1) such that Member States can easily find all material relevant to a given requirement from GSR Part 7.	✓			The coverage will be clearly explained in the Scope of the document and as appropriate, it will be supported with a Table in the text or as an Annex.
Japan	2.		DPP is well described on the basis of the review against each of the 26 overarching requirements in GSR Part 7, the analysis of Member States' feedback on usefulness of GS-G-2.1 and any changes they would like to see, and the discussion among the WG members. However, we would like to suggest the following two points.		✓			

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Romania	3.	General	<p>The draft standard is very well structured with the needed details, clearly specified, including the appendices and annexes.</p> <p>The existing gaps of GS-G-2.1 will be covered by the new DS 504 as it is intended.</p> <p>A few requirements from Annex no.1 referring for instance to <i>the Protection strategy, Taking mitigatory or urgent response actions and Hazard Assessment</i> ensure consistency with <i>GSR Part 7</i>, the fundamental aspects of <i>GS-G-2.1</i> and with the other new standards on the named topics.</p> <p>It is also well underlined the key factor related to <i>Communication with the Public in a Nuclear or Radiological Emergency</i>.</p> <p>Amongst functional requirements could be reminded about the operational intervention levels (OILs) considered, according to DS474, as initiators for adapting or lifting protective actions.</p>		✓			
Japan	4.		<p>The guidance and recommendations on emergency management system should be enhanced to provide practical considerations for use in radiation emergencies occurring in combination with a conventional emergency due to extreme natural events.</p>	<p>Although short guidance on integrated planning based on all-hazard approach is given in GS-G-2.1, combined natural disaster is one of the lessons learned from the Fukushima Daiichi accident.</p>	✓			<p>To be part of proposed Section 2 addressing Requirement 1 of GSR Part 7 on Emergency Management System (EMS). The all hazard approach is one of the requirements for the EMS to be supported with further guidance.</p>

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Japan	5.		The guidance and recommendations on protection strategy requirement should be addressed in the revised GS-G-2.1	The requirement on protection strategy is new and it is important to provide its guidance and recommendations not in the future revised GSG-2 but this revision of GS-G-2.1.			✓	In line with the analysis, agreed way forward from the activities during GS-G-2.1 review and the discussions at EPRESC. The topic will be addressed in EPR Series publication on the topic expected to be published in 2018, so that there is no longer gap in this area before GSG-2 is open for revision.
Switzerland	6.		Switzerland has no comments to the DDP and agrees with the proposal.		✓			
UK	7.		The United Kingdom has no substantive comments on DS504 (the DPP for the revision of GS-G-2.1) but very much supports the proposal and would like to take part in any development work.		✓			
WNA	8.	GENERAL COMMENT	It would be useful if the document(s) provide holistic guidance (at a conceptual level) on the arrangements to prepare and respond to a nuclear/radiological emergency, but it is not appropriate for these to include detailed guidance. It should be for the member states to develop their own detailed guidance.		✓			The level of guidance will be appropriate to a Safety Guide level and it will not substitute the guidance Member States need to develop taking account of national, local and site-specific considerations.

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UAE	9.	Point 2, para 2, last sentence	Refer also to the missing appendixes.	Tw appendixes are missing (dangerous sources and urgent protective actions off the site).	✓			
UAE	10.	Point 2, para 3, last sentence	These criteria superseded the concept of <b>generic</b> intervention levels and .....	As it is currently, it gives the wrong impression that intervention levels is not used (OILs are indeed intervention levels)	✓			
France	11.	§2	its revision to ensure it adequately supports the application of the recent safety requirements contained in GSR Part 7 with account taken of its relationship with other EPR related safety standards either published or under development <u>as well as other recently published Safety Standards and Security Publications.</u>	Not only EPR publications have to be taken into account...	✓			
UAE	12.	Point 3, para 1, point 5	“Addressing all five emergency preparedness categories”	“Equally” with “common guidance” seem contradicting. And in any case addressing all equally would not be practicable.	✓			
UAE	13.	Point 3, para 2	Is this para needed?	It is similar to point 5 in previous para.	✓			Paragraph is kept taking into account that no other comment is received. It contains appropriate information for this section from other perspective then previous paragraph.

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UAE	14.	Point 3, para 3	Proposed text: <b>“Thus, only general reference or not reference at all may be given to some topics which may be left for consideration under other guidance publication to be published later”</b>	The sentence is not clear and it can greatly affect the way the document is reviewed. The proposed text can be an option.	✓			
UAE	15.	Point 3, para 3. Second last sentence	It is suggested to remove “EPR medical” and “dealing with non-radiological consequences”	Those are not only “topics” but entire requirements. If we keep them as they are, the rest of the document may need to be modified to reflect this exclusion.			✓	The wording follows the first sentence in this paragraph making clarity that all the topics are related to requirements in GSR Part 7.
France	16.	§3	(3) ensuring appropriate cross-references are given to various EPR related safety standards <u>as well as other recently published Safety Standards and Security Publications,</u>	Not only EPR publications have to be taken into account...	✓			
France	17.	§3	Change the scope to include minimal guidance the listed areas so that, even without future Safety Guide, Members States do have some guidance.	The DPP states that “It should be recognized that even the revised GS-G-2.1 cannot provide complete guidance on all requirements in GSR Part 7, for example, either due to their specifics to certain type of emergency or to specific facility or activity or due to specifics of the topic (e.g. addressing very specific group of target audience). Thus, some topics in EPR would remain for consideration in other			✓	This is in line with the analysis performed, agreed way forward based on various activities during the GS-G-2.1 review and discussion held in EPRESC. Having all guidance in revised GS-G-2.1 will render the guidance impractical (not all areas can be well elaborated within limited time for document development and with limited

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				<p>future guidance publications. Such topics include, but are not limited to, mitigatory actions, emergency classification, assessment of the situation, medical EPR, dealing with non-radiological consequences etc.”.</p> <p>Why is guidance not developed on these topics</p>				resources from the Secretariat and Member States) and the document not user-friendly (too long document written for different target audience). While some of these topics are addresses in some other Safety Guides, some aspects would be considered to be developed in future to address them as appropriate in new Safety Guides.
France	18.	§4		<p>DPP states that “The target audience are emergency planners at various levels (governments, response organizations, operating organizations, regulatory bodies) with responsibilities to prepare adequately to respond effectively to any nuclear or radiological emergency.”</p> <p>Would guidance be also relevant for emergency responders? if yes, they should be mentioned</p>		<p>✓</p> <p>“...emergency as well as personnel of the response organizations, operating organizations and regulatory bodies involved in emergency preparedness and response.”</p>		Addition made for clarity as indicated.
str	19.	Section 6	Reference should be made to the EPR series document under construction,	Directly relevant reference	✓			

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			<i>Development of a Protection Strategy for Nuclear or Radiological Emergencies</i>					
Canada	20.	6. Place in the Overall structure...	<p>The Safety Guide will interface with the following documents under revision of development:</p> <p>...</p> <p>9. DS474: Arrangements for the Termination of a Nuclear or Radiological Emergency</p> <p>10. DS432: Considerations for the Development of a Protection Strategy for a Nuclear or Radiological Emergency</p>	<p>It is suggested to include DS432 as a document that will interface with the revised GS-G-2.1 as this will be the reason that Requirement 5 from GSR Part 7 is not included in the revision.</p> <p>Would also apply to other documents under revision referenced in Annex 1.</p>	✓			
Canada	21.	6. Place in the Overall structure...	<p>The following recommendations publication of the ICRP will also support the development of this Safety Guide:</p> <p>10. INTERNATIONAL COMMISSION ON RADIOLOGICAL PROTECTION, The 2007 Recommendations of the International Commission on Radiological Protection, ICRP Publication 103, Ann. ICRP 37 (2-4), Elsevier (2007).</p> <p>11. INTERNATIONAL COMMISSION ON RADIOLOGICAL PROTECTION, Application of the Commission's Recommendations for the Protection of People in Emergency</p>	<p>Revision to GS-G-2.1 should consider all ICRP publications relevant to emergency exposure situations (i.e. ICRP Publication 103 and ICRP Publication 109).</p>	✓			

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			<b>Exposure Situations, ICRP Publication 109, Ann. ICRP 39 (1), Elsevier (2009).</b>					
France	22.	§6	GSR Part 4 should be included in the list	The safety assessment is a key input for emergency preparedness	✓			
France	23.	§6	Specific Safety Requirements should be included in the references. Relevant Security Publications should also be included in the references	Not only EPR publications have to be taken into account...			✓	All relevant publications need not to be referenced in the DPP. Otherwise the list will be too long. The text indicates that the revised GS-G-2.1 will interface with at least these documents and does not exclude others to be considered during the drafting process and mentioned in the list of references in the revised GS-G-2.1. This was already done with the analysis and study of all relevant safety standards during the GS-G-2.1 review process. Nuclear Security publications are mentioned in the paragraph in this Section addressing the interface with nuclear security in EPR.

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France	24.	§6	Consider expanding the list of relevant IAE publication to incorporate Safety Guides with relevant information on emergency preparedness and response measures	Not only EPR publications have to be taken into account...			✓	All relevant publications need not to be referenced in the DPP. Otherwise the list will be too long. The text indicates that the revised GS-G-2.1 will interface with at least these documents and does not exclude others to be considered during the drafting process and mentioned in the list of references in the revised GS-G-2.1. This was already done with the analysis and study of all relevant safety standards during the GS-G-2.1 review process.
Australia	25.	Section 7, Point 3	Functional Requirements of the document do not include Requirement 12 (Medical response).  Guidance should be included, otherwise reference to current or in-development documents should be included.	Medical Response is identified as a gap in Appendix 1 and Annex 1.			✓	This is in line with the analysis performed, agreed way forward based on various activities during the GS-G-2.1 review and discussion held in EPreSC. Having all guidance in revised GS-G-2.1 will render the guidance impractical (not all areas can be well elaborated within limited time for document development

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								and with limited resources from the Secretariat and Member States) and the document not user-friendly (too long document written for different target audience). While some of these topics are addresses in some other Safety Guides, some aspects would be considered to be developed in future to address them as appropriate in new Safety Guides. The medical EPR is an area that requires a dedicated General Safety Guide in future but it was not identified as priority area considering that some limited guidance exists in GSG-2 and will be given in DS474 while detailed practical guidance exists within EPR Series publications.
France	26.	§7 2.		Why is requirements 3 (Responsibilities of international organizations in emergency preparedness and response) and 5	✓			This is in line with the analysis performed, agreed way forward based on various activities during the GS-

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				(Protection strategy for a nuclear or radiological emergency) of GSR Part 7) not addressed?				G-2.1 review and discussion held in EPRESC. Responsibilities of international organizations are stipulated in their mandates and statutes, and they are well elaborated in the Joint Radiation Emergency Management Plan of international organizations that is regularly updated. The Requirement 5 on Protection strategy will be addressed in EPR Series publication on the topic expected to be published in 2018, so that there is no longer gap in this area before GSG-2 is open for revision. Otherwise, the topic is within the scope of GSG-2 rather than in the scope of GS-G-2.1.
France	27.	§7 3.		Why are requirements 8 (Taking mitigatory actions), 11 (Protecting emergency workers and helpers in an emergency), 12 (Managing the medical response in a nuclear or radiological	✓			This is in line with the analysis performed, agreed way forward based on various activities during the GS-G-2.1 review and discussion held in EPRESC. Having all

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				emergency), 15 (Managing radioactive waste in a nuclear or radiological emergency) and 16 (Mitigating non-radiological consequences of a nuclear or radiological emergency and of an emergency response) of GSR Part 7 not addressed?				guidance in revised GS-G-2.1 will render the guidance impractical (not all areas can be well elaborated within limited time for document development and with limited resources from the Secretariat and Member States) and the document not user-friendly (too long document written for different target audience). While some of these topics are addresses in some other Safety Guides, some aspects would be considered to be developed in future to address them as appropriate in new Safety Guides.
France	28.	§7 Appendices or annexes	Reconsider the type of topics to be addressed in annexes or appendices and ensure that their content is appropriate for a Safety Guide.	Are all potential appendices and annexes relevant in a Safety Guide? Would some of them be better in another type of IAEA publication?	✓			Based on the current GS-G-2.1 and analysis performed, these were considered as needed and are expected for coverage in Appendices.
Czech Republic	29.	Annex1/5/Protection strategy/operational criteria.	The topic of operational criteria (OILs, EALs, observables) is addressed extensively in GSG-2. EPR-OILs document is under development to	Modify text. EPR-OIL document was issued, but is valid only for LWR. For other reactor types or for	✓			Footnote added with the update. Modification of the text is not appropriate as the

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			provide technical basis and methodology for derivation of OILs taking into account updates introduced in GSR Part 7.	radiological emergencies has to be adopted or additional publications may be issued.				analysis was done when the document was still under development.