

Japan WASSC/NUSSC Comments on DS477 “The Management System for the Predisposal and Disposal of Radioactive Waste”

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: Japan WASSC/NUSSC members		Page 1 of 1					
Country/Organization: Japan/NRA		Date: 26 Oct. 2017					
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1.	General	<p>1. Should be restructured the draft as clearly separated with the common part related to management system applied for all of facilities and activities, and specific part for the predisposal and disposal of radiation waste.</p> <p>2. Should be postponed to submit MS comments until completion of drafting the other guides such as revising GS-G-3.1 as the common part of management system. It is recognized that the DPP revising GS-G-3.1 and GS-G-3.5 will be presented in the next NUSSC meeting.</p> <p>3. For drafting the common part, should be reviewed very carefully by experts of management system.</p>	<p>1. This guide is a kinds of pilot project for applying the management system based on the new GSR Part 2 only specific facilities and activities as the predisposal and disposal of radiation waste, and this guide for management system is the common for all of facilities and activities.</p> <p>2. Note that GS-G-3.1 was drafted under the previous requirement GS-R-3 as the common guide for management system, and GS-G-3.2 to 3.5 were specific guides for facilities and activities.</p> <p>3. However, there are some findings as follows;</p> <ul style="list-style-type: none"> - Old descriptions in background (e.g. 1.2.) - Unbalanced depth of details (e.g. chapter 1 as introduction is too detail and too long.). - Just copied from GSR Part 2 with small modifications such as “shall” to “should”. (e.g. 5.3.) - Not enough information or practices how to adopt essentials such as “systemic approach”, ”leadership” and ”culture for safety”. - Used inconsistent terminologies with GSR Part 2 such as “systemic” and “systematic”. 		<p>1. The suggestion to re-structure the guide tends to go against the earlier decision of the WASSC to combine the two guides on pre-disposal and disposal, and it could also lead to considerable debate (over what applies and what does not apply to one or both types of facility and activity) and unnecessary repetition. The suggestion could be re-considered after MS comments.</p> <p>2. The suggestion to delay the guide until completion of drafting of other guides such as GS-G-3.1 would introduce a further delay that might be estimated at ~3 years given that the DPP for revising GS-G-3.1 and GS-G-3.5 has not yet come for committee approval, and this does not seem acceptable.</p> <p>3. The draft has been developed by and will continue to be reviewed by experts in the management system.</p> <p>4. The draft uses the term ‘systematic’ in all cases, and ‘systemic’ does not appear. Para 1.2 has been revised. The draft is deliberately consistent with, and structured based on, GSR Part 2. The other comments identified here are not specific.</p>		