

Joint Resolution Table for DPP DS553

COMMENTS BY REVIEWER				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1	General comments	Please provide gap analysis. (PNRA, Pakistan, WASSC)	In section 3 , JUSTIFICATION FOR THE PRODUCTION OF THE PUBLICATION’ of the DPP, it is mentioned that several Safety Standards Series publications have been revised since 2013, and new safety standards that affect the contents of GSG-3 have been published..... GSR Part 1 (Rev 1), GSR Part 3, GSR Part 4 (Rev 1), GSR Part 6, and GSR Part 7. However, gap analysis is not provided which reflects the gaps based on these publications. Furthermore, the gap analysis report highlights the changes to be incorporated in the revised document and according to the SPESS B it should be the part of DPP. Moreover, it was agreed during the consultancy meeting on the review process for developing Safety Standards and Nuclear Security Guidance - SPESS B, held in August 2022 that IAEA and review committees (and CSS)			Rejected	According to SPESS Brevision-23-05-23-clean, a gap analysis report is an input for a new publication, while for the review of an existing publication or batch of publications a feedback analysis report is used. Justification for revision of GSG-3 is done in Section 3. Feedback analysis is presented in the Annex to DPP DS553. Details are available on the Nuclear Safety and Security Online User Interface platform (NSS-OUI). More detailed analysis of the publications listed in Section 6 will be done during review process.

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			should ensure that these reports are included in the DPP and that these reports are well elaborated. However, such report is not included in the subject DPP. Please include the same.				
2	2. Background/ 1 st para	Radioactive waste is produced by a variety of facilities and activities, including nuclear facility commissioning, operation, and decommissioning; nuclear technology applications in medicine, industry, agriculture, research, and education; mining and milling operations; the processing of materials containing naturally occurring radionuclides; radioactive effluent discharges; <u>nuclear and radiological emergencies</u> ; and remediation of contaminated areas. This waste must be managed prior to disposal through predisposal radioactive waste management facilities and activities. (Canada, EPR _{SC})				Rejected	To be discussed and clarified if radioactive waste is produced directly by nuclear and radiological emergencies or in result of remediation of objects and areas contaminated after such emergencies. Open both to accept and to reject.
3	2/ First four lines of First paragraph	“Radioactive waste is produced by a variety of facilities and activities, including nuclear facilities; commissioning, operation, and decommissioning; nuclear technology applications in medicine, industry, agriculture, research, and education; some mining and milling raw material processing facilities; the production, process, use and handle of radionuclides for industrial, research and medical purposes; operations; the-	Considering the first sentence, it comes to the mind that there should be a list of facilities and activities that produce radioactive waste. But according to the IAEA Safety and Security Glossary, for example, “nuclear facility commissioning” is not an activity or facility. Please			Rejected	Nuclear facility commissioning, operation etc. are example of activities attributed to facility as stated before the word “including”. It might be polished to become clearer. If (just if) been used in the text of intended publication it will be

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		processing of materials containing naturally occurring radionuclides; the discharge of radioactive effluents; the decommissioning of nuclear facilities; and the remediation of contaminated areas. Also radioactive waste may arise from the processing of materials that contain naturally occurring radionuclides. (EPREM/IRNA, Iran, EPRESC)	clarify the first sentence.				improved on the editorial stage.
4	2/ 2nd Para/ two first lines	“A safety case and a supporting safety assessment are essential as support to demonstrating demonstrate safety in developing the development and operating operation of facilities and activities for predisposal radioactive waste management.” (EPREM/IRNA, Iran, EPRESC)	Please clarify this sentence as suggested.		Addressed taking into considerations all comments for this text		
5	2/ 2nd Para/ first lines/ Page 1	A safety case and a supporting safety assessment are essential for issuing license and as support to demonstrating safety in developing and operating facilities and activities for predisposal radioactive waste management. (IRNA, Iran, WASSC)	The main aim of developing safety case and safety assessment is getting license or authorization.			Rejected	This publication is about safety case and safety assessment but not about decision making including authorization and licensing
6	2/ 2nd Para/ first lines/ Page 1	A safety case and a supporting safety assessment are essential as support to demonstrating safety in developing, operating and decommissioning facilities and activities for predisposal radioactive waste management. (UK, Louise Gray – not identified)	Consideration of all lifecycle stages of the facilities and activities for radioactive waste management including decommissioning.		A safety case and supporting safety assessments are essential as support to demonstrating safety for predisposal radioactive waste management facilities and activities.		Other steps in facility lifetime are mentioned below. Recommendations on safety assessment for decommissioning are in WS-G-5.2.

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7	2/ Line 7/ Page 1	A safety case and a supporting safety assessment, <u>as part of the safety case</u> , are essential as support to demonstrating safety in developing and operating facilities and activities for predisposal radioactive waste management. (BMUV/GRS, Germany, NUSSC)	Both safety case and safety assessment support demonstrating safety. We understand it in such a way, that, according to GSR Part 5, Requirement 13, para. 5.4, a safety assessment should be part of the safety case and suggest to state this clearly in text.			Rejected	This terminology is now and use and will be corrected in line with parallel revision of GSR Part 5 (DS 548). Requirement 13 as it is now also uses “the safety case and supporting safety assessment”
8	2/ Line 7/ Page 1	A safety case and a supporting safety assessment are essential as support to demonstrating safety in developing, and operating <u>and decommissioning</u> facilities and activities for predisposal radioactive waste management. ... The process of developing these documents follows a step-by-step approach for collecting, analysing, and interpreting relevant technical data, developing design and operation <u>and decommissioning</u> plans, and developing the safety case for operational <u>and decommissioning</u> safety. (Ukraine, SSTC NRS)	To take into consideration all lifecycle stages of facilities and activities for radioactive waste management including decommissioning.			Rejected	Safety assessment for decommissioning is to be performed in line with recommendations provided in WS-G-5.2. To avoid misleading and contradictions decommissioning is not mentioned here.
9	2/ Line 8/ Page 1	In accordance with the regulatory body's requirements, the operator prepares the safety case and the supporting safety assessment. <u>It is the operator's responsibility to prepare the safety case and its safety assessment in accordance with the requirements of the regulatory body.</u> (BMUV/GRS, Germany, NUSSC)	We suggest to adjust the wording slightly to be more in line with GSR Part 5.			Rejected	DPP isn't a Safety Guide, and the used wording isn't in contradiction with GSR Part 5, because it is about the performer but not about responsibilities. The text in revised guidance will be according to GSR Part 5 being under

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Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection revision now.
10	2/ Para 2/ Line 4/ Page 1	The scope and depth of the safety case and safety assessment need to be commensurate with the complexities of the operations and the magnitude of the radiation risks associated with the facility and activities, and also with the current stage of facility lifetime. (IRNA, Iran, WASSC)	Radiation risk is general and inclusive of the hazards.			Rejected (for DPP)	This will be addressed in the publication according to GSR Part 4 (Rev. 1) using terminology of graded approach.
11	2/ Para 2/ Line 4/ Page 1	The scope and depth of the safety case and safety assessment need to be commensurate with the complexities of the operations and the magnitude of the hazards <u>and combinations of hazards</u> associated with the facility and activities, and also with the current stage of facility lifetime. (BMUV/GRS, Germany, NUSSC)	Please include combination of hazards as well.	Accepted			
12	2/ Para 2/ Line 6/ Page 1	The process of developing these documents follows a step-by-step approach for collecting, analysing, and interpreting relevant technical data, developing design and operation plans, and developing the safety cases for <u>design, for operational safety and for decommissioning, if applicable.</u> (BMUV/GRS, Germany, NUSSC)	Clarification			Rejected	We use to say about ‘evolving of the safety case’ rather than multiple safety cases developed for each stage of facility lifetime.

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13	2/ Para 2/ Line 6/ Page 1	The process of developing these documents follows a step-by-step approach for collecting, analysing, and interpreting relevant technical data, developing design and operation and decommissioning plans, and developing the safety case for operational safety and future decommissioning safety. (UK, Louise Gray – not identified)	Consideration of all lifecycle stages of the facilities and activities for radioactive waste management including decommissioning.			Rejected	This publication is not intended to provide recommendations on safety assessment and safety case for decommissioning
14	2/ Para 2/ Line 9/ Page 1	The primary goal of the safety case and supporting safety assessment is to demonstrate the high level of safety of the facility and activities to ensure protection provided to the public and the environment while also assuring the regulatory body that safety requirements will be are met. (BMUV/GRS, Germany, NUSSC)	It should be stated what exact level of safety should be met. Actually, according to SF-1, Principle 5: “Protection must be optimized to provide the highest level of safety that can reasonably be achieved”.		The primary goal of the safety case and supporting safety assessment is to demonstrate the level of safety of the facility and activities to ensure protection provided to the public and the environment while also assuring the regulatory body that safety requirements are met.		This isn’t about optimization and this isn’t a safety standard. It seems uncertain to identify what is “high”. SC and SA should demonstrate that safety requirements are met.
15	3 Justification/ Paras 2, 3, 5 4 Objective/ Para 1 5 Scope/ Para 1	This revision will go in parallel and in full coordination with revision of GSR Part 5 (DS548) and WS-G-6.1 (DS550) and will provide guidance and recommendations in compliance with the latest requirements on predisposal waste management. The proposed publication will provide coherent guidance and recommendations for complying with the requirements for the safe predisposal management of radioactive	The proposed document is a guide and this will provide guidance to the users for the implementation of requirements not only the recommendations.			Rejected	IAEA Safety Guides provide recommendations, but not the guidance (not manual or cook-book). In the draft publication it will be solved on the editorial stage.

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		<p>waste based on the latest revisions of other IAEA safety standards in this area and operational experience.</p> <p>The proposed publication will incorporate guidance and recommendations on the implementation of requirements for preparedness and response to a nuclear or radiological emergency pertaining to the design and implementation of safety measures in the safety case and supporting safety assessments.</p> <p>The objective of this Safety Guide is to provide guidance and recommendations for the development and review of the safety case and supporting safety assessments for facilities and activities dealing with the predisposal management of radioactive waste.</p> <p>The proposed Safety Guide provides guidance and recommendations on the development and review of the safety case and supporting safety assessments prepared...</p> <p>(PNRA, Pakistan, WASSC)</p>					
15	3/Page 2/ Line 8	<p>Among these publications are IAEA Safety Standards Series Nos GSR Part 1 (Rev 1), GSG Part 2, GSR Part 3, GSR Part 4 (Rev 1), GSR Part 6, and GSR Part 7.</p> <p>(IRNA, Iran, WASSC)</p>	<p>In all process of predisposal, compliance with GSG-Part 2, requirement is very important and compulsory.</p>	Accepted			
16	3 /1st para/ Line 6	<p>“...GSR Part 1 (Rev 1), GSR Part 2, GSR Part 3, GSR Part 4 (Rev 1)...”</p> <p>(EPREM/IRNA, Iran, EPRESC)</p>	<p>Considering the scope of GSR Part 2 (paragraph 1.11), this publication should be included.</p>	Accepted			

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17	3/ 2nd Para/ Line 2	Please provide more detailed information regarding how “ <i>this revision will go in parallel and in full coordination with revision of GSR Part 5 (DS548)</i> ”	This coordination is of high importance.			Rejected <i>(for the text of DPP but done here)</i>	<i>DPPs for revision of GSR Part 5 (DS548) and WS-G-6.1 (DS550) are already approved and the publications are planned for 2028. Only after general safety requirements are approved and safety recommendations for storage are approved this publication on how to evaluate and demonstrate safety might be finalized (in 2029). From the other side, DS550 will refer to this publication (in its Chapter 6), so, development of this part might cause delay in DS550 publication and they both will be published the same time. All three revisions are to be performed in one unit. It is supposed to create a core group of external experts to be involved into revision process and to have one of two of them taking part in revision of all three standards.</i>

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18	3/ 3rd para/ First line	“The proposed publication will provide coherent recommendations for complying in compliance with the requirements...” (EPREM/IRNA, Iran, EPRcSC)	Editorial comment to make the sentence clear.			Rejected (for DPP)	This publication is intended to provide recommendations on how to comply with the requirements i.e., ‘for complying’, but this might be improved on the editorial stage if used in the text of publication.
19	3/ Pare 4/ Page 2	Propose to elaborate more on the elements and application of a graded approach in the development and review of the safety case, both in terms of the waste management facility and activity, as well as in the facility lifecycle stage. and supporting safety assessment for all predisposal radioactive waste management facilities and activities. (CNSN, Canada, WASSC)	The content for safety case and assessment should be commensurate in extent and complexity for varied facilities and activities. The magnitude would also very be depending on the facility lifecycle state.			Rejected	The topic is indicated in Chapter 7 (6.1) and will be considered during revision in the same light as indicated in reasoning. Proposed text doesn’t look clearer and leaves SA out of the scope that is wrong.
20	3/ 5th para/ Page 2	The proposed publication will incorporate recommendations on the implementation of requirements for preparedness and response to a nuclear or radiological emergency pertaining to the design and implementation of safety measures in taking into account due consideration of differences between the safety case and supporting safety assessments with regards to emergency preparedness and response. The differences and complementarity of both approaches will be enhanced consistently with corresponding standards (GSR part 4 and GSR part 7)	Safety case/assessment and emergency preparedness and response are of different nature and have different objectives. The structure of IAEA requirements are fully clear on this aspects (GSR part 4 for assessment and part 7 for EPR) even though safety assessment may provide some useful input data for EPR.	Accepted			

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		(IRSN, France, EPRéSC)					
21	3/ 5th Para/ Page 2	The proposed publication will incorporate recommendations on the <u>how to</u> implementation of requirements for preparedness and response to a nuclear or radiological emergency pertaining to the design and implementation of safety measures <u>into</u> the safety case and <u>its</u> supporting safety <u>assessments</u> . (BMUV/GRS, Germany, NUSSC)	It might be recommendable to make this sentence more easy to read. As there is more than one safety assessment, please check the feasibility to use the same form (singular or plural) all over the document.		The proposed publication will incorporate recommendations <u>on addressing the requirements</u> for preparedness and response...		“How to implement” is to be provided in safety guides on EPR. This publication is on SC and SA and it is not going to replace or duplicate other safety standards, but address the links with EPR.
22	3/ Last Para/ Page 2	<u>The sequential construction of new power reactors or other nuclear facilities will be considered during the revision of GSG-3 based on the experience of Member States. In addition, the link between the safety assessment for predisposal waste management facilities and the safety analysis for the power reactors or other nuclear facilities at the single site will be considered</u> (BMUV/GRS, Germany, NUSSC)	Please insert this statement from page 9 into the main text of DPP.		The link between the safety assessment for predisposal waste management facilities and the safety analysis for the power reactors or other nuclear facilities at the single site will be considered		Consideration of sequential construction of new power reactors or other nuclear facilities itself isn’t the main subject of this publication but an additional information is intended to be used during revision.
23	4/ Para 2/ Page 2	The revised Safety Guide is intended to assist operating organizations, regulatory bodies, <u>and</u> technical support organizations throughout the lifetime of a facility [...] (BMUV/GRS, Germany, NUSSC)	Adding “and” to terminate the series of items facilitates understanding of the sentence.	Accepted			

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24	4/Para 2/ Page 2	The revised Safety Guide is intended to assist operating organizations, and technical support organizations throughout the lifetime of a facility with predisposal management of radioactive waste and for regulatory bodies providing and assessing regulatory issues. (IRNA, Iran, WASSC)	Regulatory body does not take any actions with predisposal management of radioactive waste.			Rejected	This publication is not intended to assist regulatory bodies in assessing regulatory issues. <i>(Language issue is supposed taking place here)</i>
25	4/ Para 2/ Line 4, end	Add at the end "...where spent fuel is being managed as radioactive waste." (DSA, Norway, WASSC)	Presumably this Guide does not address storage of spent fuel before reprocessing.			Rejected	Different strategy is used in different countries for SF management and no other recommendations on safety case and safety assessment exists. It is proposed to delete this last sentence from Objectives, because this aspect is addressed in Scope.
26	4/ Para 2/ end	It should make clear from the text whether the radioactive waste predisposal management includes spent fuel management if the spent fuel is considered to be waste. (SEC NRS, Russia WASSC)	Clarification of the Objective			Rejected	It is stated in the Scope that SF management is covered without respect to consideration it as waste
27	4/ End of Section	The Safety Guide is also applicable for safety cases and supporting safety assessments for the storage of sealed sources in centralized storage facilities. (UK, Louise Gray – not identified)	Sealed sources need to be managed safely when in storage even if they have not been formally declared waste.			Rejected	This is already noted in the scope (5, page 3, line 3)
28	5/ Scope/	We consider it necessary to supplement	To clarify that			Rejected	As soon as GSG-3

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	General	<p>the text with provisions similar stated by GSG-3 in paras 1.7 and 1.8 as they are important for understanding the Scope of the Guide.</p> <p><i>1.7. The Safety Guide applies to the planning and, in particular, throughout the design, construction, commissioning, operation and modification of the facility.</i></p> <p><i>1.8. The Safety Guide provides recommendations and guidance on a systematic methodology for evaluation of the adequacy and acceptability of waste management arrangements and the radiological impacts on workers, the public and the environment from planned activities and from accidents at a predisposal waste management facility or in a related activity.</i></p> <p>(SEC NRS, Russia WASSC)</p>	<p>recommendations for development and review of the safety case and supporting safety assessment could be applied <u>during all stages</u> and for assessing impact from <u>planned activities and from accidents.</u></p>				<p>isn't going to be completely re-written and all actual statements will be kept, it seems to be unreasonable to copy statements on scope, objective etc. and duplicate them here.</p> <p>Facility lifetime, including all relevant stages, is indicated in Objectives (Para 2).</p> <p>While requirements on what shall be assessed are to be taken from DS548 revise in parallel with this publication.</p>
29	5	<p>Safety guide applies to the different stages of the predisposal facility like siting, design, construction, commissioning, operation, decommissioning, and any kind of modification, etc.</p> <p>(PNRA, Pakistan, WASSC)</p>	<p>The safety case and supporting safety assessment will be prepared and or revised for each stage of the predisposal facility.</p>			Rejected	<p>Application of this publication through facility lifetime is stated in Objective (Para 2) and no need to be repeated.</p> <p>Decommissioning is out of the scope of this publication.</p> <p>Reassessment and update of the safety case is required in GSR Part 5 – no need to be repeated in DPP.</p>
30	5	<p>Safety guide applies to the transport of</p>	<p>Section 6, bullet 15 of</p>			Rejected	<p>Application of this</p>

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		radioactive waste, SNF and DSRS. (PNRA, Pakistan, WASSC)	proposed DPP describe the interface with transport regulations i.e. International Atomic Energy Agency, Regulations for the Safe Transport of Radioactive Material, 2018 Edition, IAEA Safety Standards Series No. SSR-6 (Rev. 1), IAEA, Vienna (2018). (Under revision, DS543).				publication to SF and DSRS is stated in the Scope, page 3, para 1, last sentence. Transport is out of the scope of this publication and DS543 is listed to address the interface in waste management when needed.
31	5	Safety Guide provides guidance on a systematic methodology for review and evaluation of safety case and safety assessment of predisposal facility. (PNRA, Pakistan, WASSC)	The review process should be reflected in the scope of safety guide as Section 7 (Chapter-8) of proposed DPP described REGULATORY REVIEW PROCESS FOR THE SAFETY CASE FOR PREDISPOSAL MANAGEMENT OF RADIOACTIVE WASTE.			Rejected	This publication will not provide any guidance and will not contain systematic methodology for review of safety case for predisposal facility but only recommendations on the regulatory review of the safety case. A systematic methodology should be another document.
32	5 Scope/ Para 2	The revised Safety Guide is intended to assist operating organizations, regulatory bodies, technical support organizations to develop and review of the safety case and supporting safety assessment throughout the lifetime of a facility with predisposal management of radioactive waste. (SEC NRS, Russia WASSC)	The objective of this Safety Guide is to provide recommendations for development and review of the safety case and supporting safety assessment and not to perform predisposal management of radioactive waste.			Rejected	The text doesn't contain intentions for this publication to provide direct recommendations on predisposal waste management. Any unclarity will be managed in the draft publication on editorial stage – not

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							in DPP. The statement on developing and reviewing SC and SA is given in the paragraph before.
33	5. Scope. General	Add text to clarify the interface with WS-G-5.2. (DSA, Norway, WASSC)	WS-G-5.2 addresses safety assessment specifically for decommissioning, which will include extensive predisposal management of waste. The respective scopes of the Safety Guides should be clear to avoid undue overlap or gaps.			Rejected	This publication doesn't address decommissioning. No overlapping expected. WS-G-5.2 will be revised in due time.
34	5. Scope. Line 1	“The proposed Safety Guide provides recommendations on the development and content of the safety case...” (DSA, Norway, WASSC)	The Guide is primarily about what the safety case and safety assessments should contain and demonstrate, not the regulatory process of reviewing them.			Rejected	Current version of GSG-3 in 1.4 states that “The objective of this Safety Guide is to provide recommendations for development and review of the safety case and supporting safety assessment...”. It includes Chapter 8 REGULATORY REVIEW PROCESS, which is supposed to be kept in this revision if consensus on other solution not achieved.
35	5. Scope	The proposed Safety Guide provides recommendations on the development and review of the safety case and				Rejected	Proposed text is not clear: emergency isn't a facility and isn't an

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		supporting safety assessments prepared or conducted for a predisposal waste management facility or activity both for the case where it's a standalone facility or activity and where it's a part of another facility, such as a nuclear power plant, research reactor or critical assembly, other nuclear installation or activity, including emergencies , resulting in generating or predisposal management of radioactive waste. It is applicable for all types of radioactive waste, spent fuel and disused sealed radiation sources. (Canada, EPRESC)					
36	5.SCOPE/1st paragraph/ Fifth line	“...installation or activity resulting in generating the generation of radioactive waste or and the predisposal management. of radioactive waste.” (EPREM/IRNA, Iran, EPRESC)	This part of the sentence is about predisposal waste management facility or activity that is a part of another facility so “ or ” between “generating” and “predisposal management of radioactive waste” should be replaced with “ and ”. Also please consider editorial comment too. It makes the sentence clear.				There are facilities like storage facilities that manage but do not generate waste. Conditioning or reconditioning facility that also doesn't generate RAW might be a part of that facility or collocated on the same site. That's why “or” is used here.
37	5/ Page 3/ line 3	It is applicable for all types of radioactive waste, spent fuel and disused sealed radiation sources declared as radioactive waste. (Ukraine, SSTC NRS)	The management of spent fuel and disused sealed radiation sources may differ from the management of radioactive waste if they are not declared as waste			Rejected	Management differs, but no special recommendations for <i>safety assessment</i> and <i>safety case</i> exist.
38	5/ Page 3/ Para 1, end	Clarify reference to spent fuel. (DSA, Norway, WASSC)	As comment 1 (<i>if not waste</i>).			Rejected	It is clearly stated that this publication is supposed to be

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							applicable to SF and DSRS independently from declaration of them as waste (at least until and if special guide on SC and SA is developed).
39	5. Scope/ Page 3, Para 2/ Line 3	radiological consequences of non-radiological events or hazards, such as fire, or sabotage attempts , are addressed. (SSM, Sweden, NSGC)	In the Swedish national legislation “sabotage attempts” are included in a similar manner as hazards. Furthermore, the proposed text is in line with the current version of GSG 3 and its ANNEX I, where “sabotage” is given as an example on hazards and initiating events.			Rejected	It might be considered depending on the object and national regulation and legislation and on the objective of development of the safety case and performing the safety assessment. “Such as” lives the door open for any relevant non-radiological events or hazards – why should we add ‘sabotage attempts’ here? To be discussed during revision if this is to be addressed for all facilities and activities or only where appropriate.
40	5. Scope/ Page 3/ Para 2	“...Facilities or activities that deal with radioactive material might have impacts of both a radiological and non-radiological nature , but the focus of this Safety Guide is on the radiological impacts. However, the radiological consequences of non-radiological events or hazards, such as fire, or sabotage attempts , are addressed.” (NNEC, Brazil, NSGC)	I agree with Mr Pär Lindahl, Analyst / Ms Jenny Järlnäs Blom, Analyst , from Sweden, in their comment although, I think, from a little different perspective. If the document take into account that non-radiological events can have radiological impacts, and as sabotage is			Rejected (for DPP)	If getting such information from safeguards, it might be transformed into scenario(s) for safety assessment. From the other side, safety report as the main output or part of the safety case in many countries is usually publicly available while the

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			a possible physical protection event one could not ignore it.				measures to prevent and manage sabotage attempts are in most of the cases confidential. To be discussed during drafting.
41	5. Scope/ Page 3/ Para 2	...such as fire and explosion (Nuclear Regulation, Japan, WASSC)	Explosion due to hydrogen or heat buildup is also one of the representative non-radiological events.			Rejected	The number of potential non-radiological events or hazards is high. Any list of such items might mislead the reader that's why it was decided to use only one illustrative and clear example and use "such as" leaving it open.
42	5/ Page 3/ Para 2	Facilities or activities that deal with radioactive material might have impacts of both a radiological and non-radiological nature, but the focus of this Safety Guide is on the radiological impacts. However, the radiological consequences of non-radiological events or hazards, such as fire, are addressed. Furthermore, although the assessment of non-radiological hazards is outside the scope of this Safety Guide, it is important that due consideration be given to such hazards, as required in national legislation. (Ukraine, SSTC NRS)	Radioactive waste, in particular, waste from uranium mining may contain potentially hazardous non-radioactive components in significant concentrations (e.g. heavy metals, pathogens etc.). It is desirable to clarify whether this aspect is out of scope of the Safety Guide or not.			Rejected	"...although the assessment of non-radiological hazards <u>is outside the scope of this Safety Guide</u> , it is important that due consideration be given to such hazards, <i>as required in national legislation</i> ". This might be discussed during revision.
43	5 Scope [new]	Safety guide describes the application of graded approach in preparation the safety case and supporting safety assessment for predisposal facility.	As mentioned in the para 1 of the scope of proposed DPP, it is applicable for a predisposal waste			Rejected (for DPP, but to be considered	Examples for application of safety guides or principles more often are

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		(PNRA, Pakistan, WASSC)	management facility or activity both for the case where it's a standalone facility or activity and where it's a part of another facility, such as a nuclear power plant, research reactor or critical assembly, other nuclear installation or activity resulting in generating or predisposal management of radioactive waste. In such case, the level of information and supporting safety assessment may vary from facility to facility so graded approach will be utilized.			in revision)	published in Informational publications like TECDOCs. If brief and clear illustration from the practice will be available, it might be e.g., added as appendix, but it's impossible to promise this in advance. Initiation of new TECDOC might be discussed during drafting this publication.
44	6/ Para 1/ Page 3	Add the following sentence: The proposed publication will interface at least with the following IAEA safety standards and other IAEA publications (this is not, and cannot be, regarded as an exhaustive list).: For issues concerning the interface between safety and security, the Nuclear Security of Materials and Facilities Section and the Information Management Section for related computer security issues in the Department of Nuclear Safety and Security will be consulted. (DOE, USA, NSGC)	Recommend inclusion of this sentence to note the interface between safety and security. Recommended also since secure information and computer systems should be considered.		...For issues concerning the interface between safety and security, Nuclear Security Series publications will be used.		This section is about publications but not the IAEA Departments or Sections.
45	6/ Publications/ Page 3	Suggest addition of the following: INTERNATIONAL ATOMIC ENERGY AGENCY, Nuclear Security	Understanding there was a caveat that the list was not meant to be exhaustive, would like to go ahead and	Accepted			

COMMENTS BY REVIEWER				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
		<p>Recommendations on Radioactive Material and Associated Facilities, IAEA Nuclear Security Series No. 14, IAEA, Vienna (2011).</p> <p>INTERNATIONAL ATOMIC ENERGY AGENCY, Security of Radioactive Material in Use and Storage and of Associated Facilities, IAEA Nuclear Security Series No. 11-G (Rev. 1), IAEA, Vienna (2019).</p> <p>INTERNATIONAL ATOMIC ENERGY AGENCY, Security Management of Radioactive Material in Use and Storage and of Associated Facilities, IAEA Nuclear Security Series No. 43-T, IAEA, Vienna (2022). (DOE, USA, NSGC)</p>	<p>recommend listing these three publications to ensure security consideration for radioactive materials as appropriate.</p>				
46	6. PLACE IN THE OVERALL STRUCTURE OF...	<p>Please add GSG-11 to the list: “INTERNATIONAL ATOMIC ENERGY AGENCY, Arrangement for the Termination of a Nuclear or Radiological Emergency, IAEA Safety Standards Series No. GSG-11, IAEA, Vienna (2018).” (EPREM/IRNA, Iran, EPReSC)</p>	<p>For the remediation of contaminated areas, radioactive waste is produced.</p> <p>Paragraph 4.182 of GSG-11 states: “While each emergency will be specific, and detailed planning for all aspects of waste management might not be possible, arrangements should be made as part of overall emergency preparedness to address these expected issues and</p>				<p>The referred text is about waste management activities but not about safety case and safety assessment. As soon as these activities and facilities are identified they become a subject for this safety guide but not remediation itself.</p>

COMMENTS BY REVIEWER				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
			<p>challenges in radioactive waste management following the emergency.”</p> <p>“Methodologies should be developed for the initiation of predisposal management activities for radioactive waste (e.g. segregation, packaging, transport, storage) in a timely and appropriate manner following the emergency.”</p>				
47	6. PLACE IN THE OVERALL STRUCTURE OF...	<p>Please add GSG-13 to the list.</p> <p>“INTERNATIONAL ATOMIC ENERGY AGENCY, Functions and Processes of the Regulatory Body for Safety, IAEA Safety Standards Series No. GSG-13, IAEA, Vienna (2018).” (EPREM/IRNA, Iran, EPRcSC)</p>	<p>Please take into consideration the paragraph 1.10 of GSG-13.</p>			Rejected	<p>This publication is not intended to provide any recommendations on the functions and processes of the Regulatory Body.</p>
48	6. Place in the overall Structure [...], bullet 26	<p>INTERNATIONAL ATOMIC ENERGY AGENCY, The Management System for the Processing, Handling and Storage of Radioactive Waste, IAEA Safety Standards Series No. GS-G-3.3, IAEA, Vienna (2008). (BMUV/GRS, Germany, NUSSC)</p>	<p>GS-G-3.3 has been superseded by GSG-16. GSG-16 is already included in the list (bullet 28).</p>	Accepted			
49	6.	<p>Delete 4th bullet (GS-G-3.3) (Nuclear Regulation, Japan, WASSC)</p>	<p>Editorial. GS-G-3.3 was superseded by GSG-16 ((p. 5) 6th bullet).</p>	Accepted			
50	6. Place in the overall Structure	<p>INTERNATIONAL ATOMIC ENERGY AGENCY, Review and Assessment of Nuclear Facilities by</p>	<p>GS-G-1.2 has been superseded by GSG-13.</p>	Accepted			

COMMENTS BY REVIEWER				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
	[...], bullet 27	the Regulatory Body Functions and Processes of the Regulatory Body for Safety, IAEA Safety Standards Series No. GS-G-1.2 GSG-13, IAEA, Vienna (20022018). (BMUV/GRS, Germany, NUSSC)					
51	6.	Replace 5th bullet with “INTERNATIONAL ATOMIC ENERGY AGENCY, Functions and Processes of the Regulatory Body for Safety, IAEA Safety Standards Series No. GSG-13, IAEA, Vienna (2018).” (Nuclear Regulation, Japan, WASSC)	Editorial. GS-G-1.2 was superseded by GSG-13.	Accepted			
52	6, bullet 13.	INTERNATIONAL ATOMIC ENERGY AGENCY, Disposal of Radioactive Waste, IAEA Safety Standards Series No. SSR-5, IAEA, Vienna (2011). (PNRA, Pakistan, WASSC)	The scope of the guide is predisposal and therefore seems irrelevant.			Rejected	As soon as final output of predisposal waste management should fit with WAC for disposal this publication is mentioned to address the interface between predisposal and disposal where appropriate.
53	6, bullet 24	INTERNATIONAL ATOMIC ENERGY AGENCY, Release of Sites from Regulatory Control on Termination of Practices, IAEA Safety Standards Series No. WS-G-5.1, Vienna (2006) (DS542: Release of Sites from Regulatory Control) (PNRA, Pakistan, WASSC)		Accepted			(Under revision, DS542)
54	6. [...], new item	WS-G-6.1 Storage of Radioactive Waste (in revision as DS550). (BMUV/GRS, Germany, NUSSC)	Please add WS-G-6.1	Accepted			
55	6. new item	Recommend including Safety	The safety assessment			Rejected	Safety assessment

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Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
		Assessment for Decommissioning WS.G-5.2. (SNSC, Canada, WASSC)	should also consider the minimization of waste generated during decommissioning and compliance with the waste acceptance criteria.				should not consider the minimization of waste, because it isn't an activity. It's a subject for decommissioning as well as characterization of the waste from decommissioning and addressing the next step of waste management including WAC.
56	6. new items	Code of Conduct on the Safety and Security of Radioactive Sources Guidance on the Management of Disused Radioactive Sources (PNRA, Pakistan, WASSC)	Section 5 Scope (last sentence) mentioned that the proposed guide is applicable for all types of radioactive waste, spent fuel and disused sealed radiation sources.	Accepted			
57	6. (p. 4) last bullet (p. 5) 5th bullet from the bottom (p. 6) 1st and 2nd bullets	Add a period. (2018). (2022). (2022). (2004). (Nuclear Regulation, Japan, WASSC)	Editorial	Accepted			
58	7. Overview/ Sec 2	Information is missing (Ukraine, SSTC NRS)	It is desirable to include some information concerning the content of this Chapter of the Safety Guide.			Rejected	The table of contents and the structure of proposed publication can change during drafting; however, all

COMMENTS BY REVIEWER				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
							proposed topics will be included in the draft publication. This section as for now is supposed to follow GSG-3.
59	7/ page 6, subchapters 3.6-3.7	3.6 Documentation of the safety case and safety assessment 3.7 Use of the safety case and safety assessment (Ukraine, SSTC NRS)	It is proposed to be deleted. These aspects are considered in Chapter 7.			Rejected (in DPP)	In the current version of GSG-3 these subchapters are reminding what is required on corresponding subjects while chapter 7 provides recommendations on how to address that requirements. Merging these aspects might be considered during revision.
60	7. Overview/ Sec 3 or 6	Add new items. 3. SAFETY PRINCIPLES AND SAFETY REQUIREMENTS FOR PREDISPOSAL MANAGEMENT OF RADIOACTIVE WASTE 3.1 Safety principles ... 3.7 Use of the safety case and safety assessment 3.8 Safety-Security interface assessment - OR - 6. SPECIFIC ISSUES FOR THE SAFETY CASE AND SAFETY ASSESSMENT FOR PREDISPOSAL MANAGEMENT OF RADIOACTIVE	The document does not approach Safety-Security interface issue (see next comment).		Addressed		The table of contents and the structure of proposed publication can change during drafting; however, all proposed topics will be included in the draft publication. This particular topic will better fit in section 6 .

COMMENTS BY REVIEWER				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
		WASTE 6.1 Graded approach 6.2 Defence in depth ... 6.9 Safety-Security interfaces (NNEC, Brazil, NSGC)					
61	7/ 4/ 4.1-4.2 (marked as General)	It is proposed in table of contents for the proposed publication, in 4, after 4.1 “Role and development of the safety case” 4.2 is added and titled with “Authorization and safety case” for describing Authorization (License and license conditions regarding safety case) for integrity of the text. (IRNA, Iran, WASSC)				Rejected	Authorization and decision making is out of the scope of this publication. They might involve much more aspects and quite often are prescribed in national regulatory procedures.
62	7/ 4/ 4.3	4.3 Interacting processes	Editorial. Consistency with GSG-3.	Accepted			
63	7/ 5/ 5.1	Introduction: - classification of radioactive waste to be applied - description of predisposal radioactive waste management stages from waste generation up to transfer for disposal - selection and justification of activities and facilities for predisposal waste management (Ukraine, SSTC NRS)	To clarify the general aim of radioactive waste management prior disposal			Rejected	This publication is on safety case and safety assessment – not on predisposal management. The mentioned aspects are important as a link between content of the safety case and the national policy and strategy on waste management while 5.1 is the introduction into the safety assessment to be performed as a part of the safety case.
64	7 Overview/	SAFETY ASSESSMENT FOR	There is no reference to			Rejected	Fire as other external

COMMENTS BY REVIEWER				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
	5	<p>PREDISPOSAL MANAGEMENT OF RADIOACTIVE WASTE</p> <p>5.1 Introduction</p> <p>5.2 Overall approach</p> <p>5.3 Assessment context</p> <p>5.4 Description of the facility or activity and of the waste</p> <p>5.5 Development and justifications of the scenarios</p> <p>5.5.1 Fire, sabotage, explosions</p> <p>5.6 Formulation and implementation of assessment models</p> <p>5.7 Performance of calculations and analysis of results</p> <p>5.8 Analysis of assessment results (ISC, Brazil, NSGC)</p>	<p>non-radiological events with radiological consequences</p>				<p>potential initiating events are addressed in a systematic approach for scenario generation and justification. The same might be done for explosions and sabotage if it is relevant for evaluated facility. No need to add sub-subchapter.</p>
65	7/ 5/ 5.8	<p>5.8 Analysis of assessment results</p> <p>Refinement of the assessment model</p> <p>5.9 Comparison with assessment criteria</p> <p>(Ukraine, SSTC NRS)</p>	<p>Analysis of results is included in i.5.7.</p> <p>Iterative approach needs to be considered.</p>			Rejected	<p>5.7 is about “mathematical” or “logical” analysis of all calculated results, sensitivity analysis and uncertainty management. The title is kept as is now in GSG-3 and might be discussed during revision.</p> <p>5.8, as it is now, includes iteration aspects, review and modification of the assessment models and comparison with assessment criteria. It will be revised is more than only</p>

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Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
							comparison with safety criteria.
66	7 Overview/ 6.2	Defence in depth is to be dealt in an adequate chapter to guarantee that this concept will be a basis for safety assessment and not just a “specific issue” (IRSN, France, EPRéSC)	Defence in depth is a large part of content of principle 8 of SF-1 and, as mentioned by INSAG-10, “is fundamental to the safety of nuclear installations”. As such, this concept is not to be considered only as a specific issue for safety assessment			Rejected	Defence in depth is an important principle usually realized in design, operational procedures, organizational, protective and other measures which are the subject of the safety assessment and safety case. It is addressed in GRS-3 as specific issue, will be considered and if the better way to address it will be developed during revision, it will be done.
67	7	Recommend providing additional details in the revised guide on consideration in the safety case for long term storage. (CNSC, Canada, WASSC)	Long term storage is relevant to many member states and should be provided as a consideration for specific safety assessments.			Rejected	The topic is indicated in 6.5 and will be considered. Additional details in DPP before revision starts look pre-mature or unreasonable.
68	7	Recommend providing additional details in the revised guide on waste acceptance criteria and acceptable inventory levels that are derived from the safety assessment. (CNSC, Canada, WASSC)	Waste acceptance criteria and inventory limits derived from the safety case needs to be clearer on the importance of the WAC for the practical implementation of a storage.			Rejected	This publication is supposed to touch WAC only as a part of limits, controls and conditions in existing safety case structure in particular in 4.2, 5.3, 6.5.

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Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
69	7 Overview/ 6.6	“6.6 Evolution of the safety case over the facility lifetime of the facility or activity ” (EPREM/IRNA, Iran, EPRReSC)	It is not clear why activity is not considered. Evolution of the safety case over the lifetime of the activity is possible too.			Rejected	The term “lifetime” is now used instead of “life cycle” for facilities, and usually not used for activities
70	7 Overview/ 6.8	“6.8 Considerations for emergency preparedness and response to a nuclear or radiological emergency ” (EPREM/IRNA, Iran, EPRReSC)	Considering the following paragraph in 3. JUSTIFICATION, it is suggested to make the title more clear by adding the part in red. “The proposed publication will incorporate recommendations on the implementation of requirements for preparedness and response to a nuclear or radiological emergency pertaining to the design and implementation of safety measures in the safety case and supporting safety assessments.”		Preparedness and response <i>for</i> a nuclear or radiological Emergency		As in GSR Part 7
71	7. OVERVIEW /8./ Title	“REGULATORY REVIEW PROCESS FOR THE SAFETY CASE AND SAFETY ASSESSMENT FOR PREDISPOSAL MANAGEMENT OF RADIOACTIVE WASTE” (EPREM/IRNA, Iran, EPRReSC)	As it is stated in GSG-3: “The regulatory review of safety assessment is important in order to determine whether safety assessment has been developed to an acceptable level (in terms of its quality and the detail and depth of understanding displayed) and whether it is fit for purpose.”			Rejected	Safety assessment is reviewed as the essential part of the safety case but not as a standalone application documentation.

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Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
72	7/ 6/ 6.8.	6.8 Considerations of safety assessment for emergency preparedness and response – limits and complementarity (IRSN, France, EPReSC)	...Safety assessment may provide some useful input data for EPR.			Rejected	Safety case/assessment and emergency preparedness and response are of different nature and have different objectives. It seems unreasonable to predefine in advance the interlinks between EPR and SC/SA. The topic is fixed and will be addressed.
73	8 Production Schedule (general)	Production schedule of this document is behind comparing with DS548 and DS550. So, for consistency DS553 with DS548 and DS550, some coordination of production schedule for both documents would be useful. (Nuclear Regulation, Japan, WASSC)	To keep consistency with DS548 and DS550. For example, DS550 will include “Section 6, SAFETY CASE AND SAFETY ASSESSMENT FOR THE STORAGE OF RADIOACTIVE WASTE.”	Accepted			<i>All three revisions are to be performed in one unit. It is supposed to create a core group of external experts to be involved into revision process and to have one of two of them taking part in revision of all three standards. DS548 will establish safety requirements for predisposal, DS550 will provide safety recommendation for storage while this publication will provide recommendations for safety developing safety case and performing safety assessment, including some aspects of long-term storage. DS550 will cover not only this type of storage</i>

