TITLE: DS558 Preparedness and Response for a Nuclear or Radiological Emergency, GSR Part 7 (Rev. 1)

COMMENT RESOLUTION TABLE

COMMENTS BY REVIEWER Reviewer Page.... of.... Country/Organization: South Africa/NNR			Date:	RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1.	Page 2, 2nd last para, 1st bullet	Significantly decrease the number of repetitions and cross-references in the document, and duplication of information with other IAEA safety standards	Duplication of information with other safety standards was also identified.	accepted			
2.	Page 4/ Section 5/ Last Paragraph	Consider introducing default intervention levels (e.g. Operational Intervention Levels, Emergency Action Levels) that can be used directly during a radiological or nuclear emergency without referring to other documents.	The Generic Criteria in the current revision of IAEA GSR Part 7 cannot be used directly during a nuclear or radiological emergency.			Rejected	These would be too specific for a general safety requirements document and are to be addressed under a safety guide (DS527)

COMMENTS BY REVIEWER Reviewer: ENISS Country/Organization: ENISS			Page 1 of 3 Date: 19 05 2025	RESOLUTION ENISS			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1 General comment		Care should be taken regarding the definitions which should not introduce requirements or recommendations.				Rejected	Not for the purpose of this DPP; Comment noted, to be considered in the drafting process
2	Section 3, last paragraph	Lastly, the graded approach currently elaborated in GSR Part 7 needs to be refined along with a revision of the emergency preparedness categorization (Table 1 in current GSR Part 7) in order to: - enable due account of progress made in design, manufacturing, construction and operation (e.g. enhancement of operating NPP safety, significant reduction in the risks of accident releases for Generation III NPP designs),	Refinement of the graded approach as presented at the level of GSR Part 7 should apply to existing installations and new designs, including large NPPs.		Accepted with modifications, as reflected in revised text		

		- ~~better fit and avoid any misunderstandings for the future deployment of~~ and appropriately account for the characteristics of small modular reactors and microreactors, generation IV nuclear power plants (NPPs), and fusion power plants, to ensure an adequate level of EPR arrangements ~~for these new or innovative reactor technologies~~, accounting for their respective levels of safety.					
3	Section 5, 3rd paragraph (p.3)	"…including to introduce an emergency classification system in order to…*.to be completed*"	The purpose of this classication system should be explained.			Rejected	The scope was kept as in GSR Part 7; Comment noted, to be considered in the drafting process
4	Section 6	Consider adding a general reference to the EPR series reports.	There is a significant amount of valuable information in the EPR series documents with interfaces which may be worth considering and possibly clarifying			Rejected	EPR series are often too technical, so we will consider them on a case by case basis
5	Annex 2, Common Findings for Both Options 2 and 3, Point A (p.9)	The existing three-part structure of GSR Part 7 (General Requirements/Functional Requirements/Requirements on Infrastructure) ~~should be removed as it is unhelpful~~ makes it difficult for navigating the document. Therefore in the frame of option 3 this three-part structure must be removed.	It is more than unhelpful when there are repetitions and cross references. In an overall organisation, functionnal and infrastructure cannot be clearly separated (it forms a system). This point is not relevant to option 2 because if the three-part structure is removed then the structure is changed.			Rejected	Annexes removed, they were not part of the DPP
6	Annex 2, Common Findings for Both Options 2 and 3, Point F (p.9)	[…] Furthermore, there are paragraphs that are simply explanatory text but appear in the same format as the requirements; the objectives (the intended effects) and the examples of arrangements to achieve the objectives should be clearly separated. […]	In order to avoid interference in the state organizations. The proposed additional text could also be stated in the subsequent parts on option 2 and option 3.			Rejected	Annexes removed, they are not part of the DPP

7	Table, page 11	Some of the activities of the response phase are also transition phase activities (ex : monitoring and radiological assessment, information…). They should be added in the list of transition activities.	Effectively some activities begun in the response phase have to be continued in the transition phase.			Rejected	Annexes removed, they are not part of the DPP

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: **Prof / Wael Elgammal** Page.... of....							
Country/Organization: **EGYPT** Date: **16 / 5 / 2025**							
Comment No.	Para/Line No.	Proposed new text	Reason				
1.	Section 4 – Objective	Include the following addition: "The emergency preparedness and response framework shall be fully integrated with the national nuclear security regime to ensure that safety and security measures are mutually reinforcing, particularly in response to malevolent acts leading to radiological consequences."	Emergencies may arise from malicious acts such as sabotage or unauthorized access. Integration with nuclear security ensures coordinated planning, optimal use of resources, and minimizes conflicting operational procedures that may compromise either function.			Rejected	The topic is covered under the revised scope
2.	Section 5 – Scope	Add: "The scope shall explicitly encompass emergency scenarios triggered by intentional malicious acts, including insider threats, sabotage, and theft of radioactive material, requiring comprehensive coordination with nuclear security stakeholders."	Many nuclear or radiological emergencies may stem from deliberate hostile actions. Including these scenarios ensures that preparedness and response mechanisms are robust, realistic, and consistent with a threat-informed, risk-based approach promoted by both safety and security standards.			Rejected	The topic is covered under the revised scope
3.	Section 6 – Interfaces	Insert a new subsection: "Effective emergency preparedness requires close coordination with nuclear security functions, including physical protection systems, access control, and security force integration during emergency response and transition phases."	During emergencies, security systems (e.g., access controls or perimeter protection) may be bypassed or affected. A formal interface prevents security degradation and ensures the integrity of safety functions while maintaining threat deterrence and response capabilities			Rejected	It is covered by the scope, and security publications are included in section 6 as references
4.	Section 3 – Justification	Add a paragraph: "In recent complex emergencies, such as cyberattacks combined with radiological risks or conflict-related scenarios, the convergence of safety and security responsibilities has become increasingly evident. These realities necessitate a cohesive, coordinated	Reflecting current international threats adds credibility and urgency to the revision, aligns the document with real-world conditions, and emphasizes the need for integrated safety-security governance.			Rejected	Not for the purpose of this DPP; Comment noted, to be considered in the drafting process

		framework reflected in updated requirements."					
5.	Proposed Structure – Emergency Response (Section 3.3 and 3.4)	Add a new requirement: "Emergency response actions, including protective and mitigatory measures, shall be planned and executed in coordination with law enforcement and physical protection personnel to address dual-use threats."	In practice, emergencies are often chaotic and may provide opportunities for security breaches. Coordinated decision-making ensures that responders are protected, that vital areas and materials are secure, and that safety-critical actions are not exploited by adversaries.			Rejected	Current structure of GSR Part 7 is kept for the revision
6.	Annex 2 – WG Findings and Role Allocation Table	Propose: "Include nuclear security authorities in the table of stakeholders with defined responsibilities in emergency preparedness, response, and transition. Their role in maintaining physical protection and managing malicious threats is critical."	Explicit assignment of responsibilities improves clarity, accountability, and ensures that all relevant stakeholders are included in drills, planning, and operational coordination. This reflects the multi-agency nature of real emergency situations.			Rejected	Annexes removed, they are not part of the DPP

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: **M. Tahril Azis** Page.... of.... Country/Organization: **Nuclear Energy Regulatory Agency of Indonesia (BAPETEN)** Date: **16 / 5 / 2025**							
Comment No.	Para/Line No.	Proposed new text	Reason				
1	General	In the development and review of emergency plans, particular attention should be given to facilities employing novel or advanced technologies. While such technologies may incorporate enhanced safety features and may be perceived as posing minimal risk of severe accidents, this should not lead to the assumption that emergency planning is unnecessary. Emergency preparedness arrangements should still be established to address scenarios, including lower-probability but	The increasing deployment of innovative technologies (example: small modular reactors) often comes with the claim of advanced safety systems, which may lead to the perception that emergency planning is less relevant. However, these technologies can still present risks, including the potential for incidents such as criticality accidents. Incorporating explicit guidance on emergency planning for new or			Rejected	Not for the purpose of this DPP; Comment noted, to be considered in the drafting process

		potentially harmful events. A graded approach should be applied, ensuring that the scope and extent of emergency arrangements are commensurate with the potential hazards, including those associated with new or emerging technologies. Furthermore, Indonesia is expected to adopt the revised GSR Part 7 to help build a modern and adaptable system for nuclear emergency preparedness and response. The revision also considers the needs of both remote or island areas and densely populated regions, which is in line with Indonesia's geographic and population distribution.	evolving technologies reinforces a cautious and safety-oriented approach, ensuring preparedness for both unlikely and less severe but plausible events.				
2	General	Indonesia expects that the revision of GSR Part 7 will provide a strengthened foundation for collaboration among national stakeholders in developing emergency preparedness and response policies. This includes the National Disaster Management Agency (BNPB), the Meteorological, Climatological and Geophysical Agency (BMKG), Regional Disaster Management Agency (BPBD), the Ministry of Health, the National Police (POLRI), and the Military (TNI), to ensure their roles and responsibilities are explicitly integrated into the national standard operating procedures for nuclear emergency management.	The current version of GSR Part 7 places primary emphasis on the responsibilities and functions of the regulatory body, while providing limited guidance on the roles of national civil protection and disaster recovery agencies in nuclear or radiological emergencies.			Rejected	Not for the purpose of this DPP; Comment noted, to be considered in the drafting process
3	General	Indonesia expects that the revision of GSR Part 7 will provide clearer guidance to support the alignment of nuclear emergency preparedness and response planning with national disaster response frameworks,	The revision of GSR Part 7 is expected to take into account the potential impact of non-radiological emergency situations, such as pandemics and civil emergencies (e.g., military emergencies), that			Rejected	Not for the purpose of this DPP; Comment noted, to be considered in the drafting process

		such as those issued by the National Disaster Management Agency (BNPB) for pandemics or natural disasters. This alignment is essential, particularly with regard to national medical and logistical arrangements, which are critical determinants of an effective emergency response.	may occur concurrently with a nuclear or radiological emergency				
4	General	Indonesia expects to receive clear guidance to facilitate the development of a national roadmap for nuclear emergency preparedness based on the three phases (Preparedness, Response, and Transition), to ensure greater alignment with IAEA standards and to support international evaluation processes, such as an Emergency Preparedness Review (EPREV) mission	GSR Part 7 is expected to be restructured based on the three phases to reflect operational realities in the field better.			Rejected	Not for the purpose of this DPP; Comment noted, to be considered in the drafting process

COMMENTS BY REVIEWER Reviewer: Jan Johansson and Peder Kock Page 1-4 of DS558 Country/Organization: Sweden, Swedish Radiation Safety Authority Date: 2025-05-19				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1	Sec. 3, page 1	Please consider to remove the first sentence in section 3 “GSR Part 7 was published almost …”	The typical “standard lifespan” is not in itself a justification for a revision.		Accepted, text modified accordingly		
2	Sec 3, page 3	Please consider to revise the last paragraph “Lastly, the graded approach…” in light of the conclusion in section 4.12.1, IAEA Report 123.	Section 4.12.1, IAEA Report 123 states “The safety requirements established in GSR Part 7 [14] apply for preparedness and response for any nuclear or radiological emergency that could occur in relation to a facility, an activity or a source, irrespective of the cause. They are written in a technology		Accepted, text modified accordingly		

			neutral manner and, thus, are applicable to any EID (Evolutionary and innovative reactor designs)."				
3	Sec 5, page 3	Please consider to rephrase the first sentence, as "The publication will establish safety requirements that apply to all ~~nuclear fuel cycle~~ facilities, ~~and~~ activities and acts, ~~as well as~~ including the use and transport of radioactive material and radioactive waste.	The scope of GSR Part 7 is to cover all foreseeable nuclear and radiological emergencies, including those occurring at non-nuclear facilities as well as acts.		Accepted, Scope kept as in GSR Part 7, modification done in the text		

COMMENTS BY REVIEWER Reviewer: **Federal Ministry for the Environment, Climate Action, Nature Conservation and Nuclear Safety (BMUKN)** (with comments of GRS) Page 1 of 1 Country/Organization: **Germany** Date: 2025-05-16				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1.	7. OVERWIEV	2.1 Planning basis 2.2 Protection strategy 2.3 Emergency planning 2.4 ~~Verification~~ Regular Reviews […]	The word "verification" is ambiguous. We expect statements to be made at this point about a quality management system, exercises and inspections of the existing emergency preparedness provisions, which shall be reviewed on a regular basis.		Accepted with modifications;		The message was addressed by keeping the actual structure of GSR Part 7
2.	7. OVERWIEV	3.1 Emergency assessment 3.2 Notification and communication 3.3 Decision-making and implementation of protective actions 3.4 Decision-making and implementation of other response actions 3.5 Review and amendment	We also propose statements on procedures for reviewing and adapting protective measures and other processes during an emergency.		Accepted with modifications;		The message was addressed by keeping the actual structure of GSR Part 7

COMMENTS BY REVIEWER Reviewer: **Rodrigo Salinas** Page **1of 7** Country/Organization: **UAE/FANR** Date: **2025-Apr-14**				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1	Page 2. Second bullet point	At EPReSC-16 (June 2023), EPReSC approved the establishment of 3 Working Groups (WGs) to conduct a feedback analysis of the three set of requirements defined in GSR Part 7 (i.e. general requirements, functional requirements, and requirements for infrastructure) to inform the nature, scope and magnitude of this revision.	GSR Part 7 has six different sections including introduction, interpretation, goals and the requirements as such. To avoid confusion in terms of current GSR Part 7 structure lets please make the said change.		Accepted with modifications;		The second bullet was removed; The message was addressed by keeping the actual structure of GSR Part 7 is kept for the revision
2	Page 2. Second last bullet point	Shorten requirements for clarity when applicable.	The sentence “schematically, a requirement should be one or two pages long” does not seem to reflect the IAEA’s standards approach. Requirements should not be limited in length. The presentation referred from the WGs does not refer to such statement either.		Accepted, text modified accordingly		
3	Page 2	Implement a new structure for a simpler navigation through the content.	I kindly recommend (as already done during the consultancy meeting in January 2024 that I had the pleasure to be part of) to be careful with an eventual re-structuring of requirements. Most Member States the Agency cooperates with, already follow the current structure for the respective arrangements and even within their respective regulations and guides (as in the UAE). While WG-2 referred to such changes the other WGs groups did not. Let’s just be cautious with significant changes that this sentence seems to imply.	Accepted			
4	Page 2 last paragraph and continuation in page 3	In terms of the audience, findings from the analysis highlighted that the current version of GSR Part 7 has a significant focus from a nuclear regulator perspective. Recognizing that other	Careful here. While the current version of GSR Part 7 includes several regulatory requirements, it does not mean it is mainly regulator-oriented. Actually, GSR Part 7 has significant references to the operating organization and first responders.		Accepted, text modified accordingly		

		organizations have key roles to play in the preparedness phase and/or the response phase, such as national civil protection services and national disaster management agencies, efforts will be made to include specific references to these entities.. In addition to explicitly expanding the audience of GSR Part 7, the revised publication will also include as much as possible references to specific audiences for every requirement	Let's consider that IAEA standards need to remain general for any country (e.g. some countries have civil defence, others civil protection with very different roles in nuclear and radiological emergency preparedness and response). About the table, let's consider that it is not simple to assign a requirement to an agency (reason why most IAEA requirements actually target to the Government). Such specific approach can be used in guides or other technical documents (e.g. EPR series). Actually, one example of such efforts is presented in the current version of IAEA services – EPREV Guidelines, but this level of detail may be too much for a GSR.				
Page 3		The prognosis of how an emergency might develop, which was introduced in the IAEA's response mandate in the 2011 Nuclear Safety Action Plan,	This is indeed a needed approach. However, GSR Part 7 was published after the referred document. It may be better to remove such reference or add additional guidance to explain the apparent inconsistency.		Accepted, text modified accordingly		
Page 3		Lastly, the graded approach currently elaborated in GSR Part 7 needs to be refined to better fit and avoid any misunderstandings for the future deployment of small modular reactors and microreactors, generation IV nuclear power plants (NPPs), and fusion power plants to ensure an adequate level of EPR arrangements for these new or innovative reactor technologies, accounting for their respective levels of safety.	Let's please add it as a bullet point part of the previous three for clarity		Accepted, text modified accordingly		

All document		Disaster management agencies	It is recommended to use Disaster management agencies here and along the document to make the reference broader			Rejected	Term 'response organizations' is used instead, as in IAEA terminology; Comment to be considered when drafting the document
Scope		The publication will establish safety requirements that apply to all nuclear fuel cycle facilities and activities, as well as the use and transport of radioactive material and radioactive waste. It will also add requirements in relation to situation where protective actions and other response actions are needed in response to emergencies in unforeseen locations.	Not adding such reference (or similar one) will imply that the publication focuses only on established facilities and activities and will not consider other hazards (e.g., category V and sources encountered)		Accepted, text modified accordingly		
Overview		Change the content closer to GSR Part 7	Let us respectfully highlight our concern about this significant change in relation to GSR Part 7. **From impact point of view.** As mentioned earlier, many of IAEA's MS already use not only the content but the structure of GSR Part 7 in their current arrangements, regulations, and guides (which is the case in UAE's). The proposed change would significantly modify the current basis in many IAEA MSs and based on the document the benefits of such change seem to be mainly to make it clearer for a broaden use which may overlook significant efforts from countries following IAEA standards consistently for a long time. The Agency secretariat needs to ensure that changes cause way more good than harm. **From the technical and implementation point of view**: let's remember that the previous version of GSR Part 7 (GS-R-2) also		Accepted with modifications		The message was addressed by keeping the actual structure of GSR Part 7 is kept for the revision

			had the approach of dividing requirements between preparedness and response (for the functional requirements). This approach has proven to add even more confusion when applying the standard, reason why GSR Part 7 deviated from that approach which this new proposal seeks to reintroduce. Operational experience and lessons learned need to be considered along the different cycles to avoid making the same mistakes (also in cycles). Complementing the above points, let us provide some examples about challenges with the proposed approach: - The items listed under 'Emergency Response' in the tentative table of contents have also a 'preparedness element' which is an evidence of our concern in terms of the challenges of adding this strict distinction between preparedness and response. - With this new structure key requirements focused on mitigation, medical response, protection of emergency workers, and information to the public among others, are being somehow demoted. We assume (as per slide titled "Actions from EPReSC-19 – GSR Part 7", in Annex 1), that these requirements will be included as part of emergency Planning, which again is part of the new 'Theme" named "Preparedness" and also presented in Annex 2. Again this is already a source of confusion. - Annex 2 refers that during the meeting of the full WG "participants agreed that the main advantage to Option 2 was that it would probably be less disruptive to implement than Option 3 for those countries whose EPR arrangements are closely aligned to the existing structure of GSR Part 7. It would also be better aligned with existing arrangements for assessing				

			countries' alignment with GSR Part 7, including the EPR Information Management System (EPRIMS) and the Emergency Preparedness Review (EPREV) service. However, the group concluded that these factors could easily be mitigated using a simple matrix to 'map' the requirements in the existing GSR Part 7 to those in the new structure." The said mapping between requirements in current GSR Part 7 and the "Proposed Structure for Option 3 approach" are simply not "easy to map". - Several new "elements" in the Proposed Structure for Option 3 Approach, pose challenges that undermine the intended clarity and easy of navigation. For example: o Mitigatory actions is considered under Planning and Decision Making o Emergency classification is considered under Protection Strategy and Accident Assessment) o There is an overarching requirement on Accident Assessment but there is also an associated requirement focused on Accident Assessment (point 3.A) o Monitoring and radiological assessment are part of Emergency Planning and Accident Assessment o Notification is part of Emergency Planning and Notification and Communication o Medical support and MHPSS are part of Response and Transition **General comment:** While it is understood that some changes are needed for clarity as identified by the different				

			working groups, significant changes in the structure may cause more harm than good to countries closely following and implementing IAEA standards. Also, the reference included in Attachment 1 slide on "Paragraphs discussed, in more details" states that more than 1/3 of requirements were recommended to be kept as is, which does not align with the significant changes proposed. The same attachment refers to 1 participant against a new structure (UAE representative actually).				

COMMENTS BY REVIEWER Reviewer: Shapovalov Albert, Vernik Alexey, Polyakov Roman Page 1 of. 2 Country/Organization: SECNRS, Russian Federation Date:				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
2	5	Write first paragraph as: «The publication will establish safety requirements that apply to all facilities and activities, used or undertaken for peaceful purposes, as well as the use and transport of radioactive material and radioactive waste. It will cover the three major phases, i.e. the emergency preparedness phase, the emergency response phase, and the transition phase (to either a planned or existing exposure situation).».	1. GSR part 7 (Rev. 1) requirements should be extended to all nuclear facilities as is done in GSR part 7, and not just nuclear fuel cycle facilities. 2. The principles of Safety Fundamentals № SF-1 (with account of its scope (para. 1.9) are applicable to facilities and activities utilized for peaceful (civil) purposes. 3. Without new formylation is not fully consistent with scope of Safety Fundamentals № SF-1 (para. 1.9) and Nuclear Security Fundamentals IAEA		Accepted, Scope modified accordingly		

			Nuclear Security Series No. 20 (para.1.14). 4. This new formulation is proposed in order to comply with the Statute of the IAEA, in particular, article III of the Statute, according to which «The Agency is authorized to encourage and assist the development and practical application of atomic energy for peaceful purposes throughout the world».				

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: Antero Kuusi Country/Organization: Finland, STUK			Page 1 of 2 Date: 19.5.2025				
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1	Ch 3, 1st para	Change the last sentence of paragraph 1 of Chapter 3 to "A summary of the successive decisions made by EPReSC in this regard is presented in Annex N." Move the following bulleted list (optionally with more detail) to a new annex.	The chapter should concentrate on identified needs for improvement, not the process how these were identified. Short introduction suffices here, with more background detail provided in an annex.			Rejected	We will have no annexes to the DPP; the annexes are document as contribution of EPReSC WGs on the revision of GSR Part 7
2	Ch 3	Move the current second-to-last and last paragraphs (starting "In terms of additional topics…" and "Lastly, the graded approach…") as second and third paragraph of the chapter.	Revision of GSR Part 7 is justified by changes needed in its contents. While increasing clarity and considering the different users of the document are important during the revision process, these carry less weight in justifying the revision process. Thus, the identified needs for content changes should be discussed first.		Accepted, text modified accordingly		

3	Ch 3	Add to the (current) last paragraph identified areas where changes would be needed for SMRs and microreactors (e.g. application of Emergency Preparedness Categories and determination of emergency planning zones).	In IAEA Safety Report No. 123 "Applicability of safety standards to non-water-cooled reactors and small modular reactors", no gaps or areas for additional consideration were identified. Thus, it would be worthwhile to list in the DPP the areas where changes or clarification are needed based on progress since publication of Safety Report No. 123.		Accepted, text modified accordingly		

COMMENTS BY REVIEWER Reviewer: Page.... of.... Country/Organization: IRAN/Iran Nuclear Regulatory Authority (INRA) Date:2025-05-18				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1	Title	1) "Preparedness for and Response ~~for~~ to a Nuclear or Radiological…" Or 2) "Preparedness and Response ~~for~~ to a Nuclear or Radiological…" Or 3) "Emergency Preparedness and Response ~~for~~ to a Nuclear or Radiological…"	Mostly "to" is used with "response". So a minor rewording is suggested. For third suggestion, it should be mentioned that the definition of "emergency preparedness" is included in IAEA Nuclear Safety and Security Glossary.			Rejected	Title remains as it is
2		Please use the following definitions from ICRP 146 and state them in the document as footnote: "***Reference level*** *A dose criterion used to guide the optimization process in existing and emergency exposure situations.*	It is a golden occasion to use the revised definition of the terms "reference level" and "residual dose" according to ICRP 146. The definitions of these two terms according to IAEA Nuclear Safety and Security Glossary are:			Rejected	Not for the purpose of this DPP; Comment noted, to be considered in the drafting process

		Generally expressed in terms of individual annual dose (mSv year^{-1}), the value of a reference level should be selected considering the appropriate time frame, individual dose distribution of the affected people, and the tolerability of risk in the circumstances. An objective is to facilitate the identification of people for whom protective efforts should be given priority." "***Residual dose*** *The dose received or expected to be incurred by an individual from a given source. It can be estimated or measured, taking into account any protective actions that have been applied to the source, pathway, or individual. Residual dose applies in an emergency exposure situation or in an existing exposure situation."*	"***reference level***. *For an emergency exposure situation or an existing exposure situation,* ***the level of dose, risk or activity concentration*** *above which it is not appropriate to plan to allow exposures to occur and below which optimization of protection and safety would continue to be implemented.*" "***residual dose.*** *The dose expected to be incurred after protective actions have been terminated (or after a decision has been taken not to take protective actions)."* Reference level is expressed in terms of residual dose typically as an effective dose. No standard could be found to express reference level in terms of **level of risk or activity concentration.** Also, considering the above mentioned definition of residual dose, it is not clear how residual dose can be used for optimization of protective actions. In other words its definition is not clear. It is suggested using the definitions of these terms from ICRP 146				
3		Add Glossary to this document for the terms such as: "**deployment scenarios"** Considering comment no. 2, the definitions of "reference level" and "residual dose".	As a general comment, it is suggested adding Glossary to this document for terms and definitions that are specific to this document and are either not provided in, or are different from, those provided in the IAEA Nuclear Safety and Security Glossary.			Rejected	Not for the purpose of this DPP; Comment noted, to be considered in the drafting process
4	3./ Page 3/ Second line	"…specific ~~**stakeholders**~~ interested parties, likely in an Appendix."	It is very important to use the terms that are suggested by IAEA Nuclear Safety and Security Glossary in			Rejected	Annexes were removed

			order to be in line with all IAEA Safety Standards. For example, changing "stakeholders" with "interested parties" because of the following reason: "***The term stakeholder has disputed usage, and it is misleading and too all-encompassing for clear use. In view of the potential for misunderstanding and misrepresentation, use of the term is discouraged in favour of interested party***."				
5	5./First para/ First and Second lines	"The publication will establish safety requirements that apply to all ~~**nuclear fuel cycle**~~ facilities and activities, as well as ~~**the use and transport of radioactive material and radioactive waste**~~ sources, with the potential for causing radiation exposure, environmental contamination or concern on the part of the public warranting protective actions and other response actions."	It is not clear why not using the term 'facilities and activities" as it is used in the scope of GSR Part 7. Considering the definition of "facilities and activities" in the IAEA Nuclear Safety and Security Glossary, facilities and activities include: ***"'Facilities' includes:*** ***(a) Nuclear power plants;*** ***(b) Other reactors (such as research reactors and critical assemblies);*** ***(c) Enrichment facilities and nuclear fuel fabrication facilities;*** ***(d) Conversion facilities used to generate uranium hexafluoride (UF6);*** ***(e) Storage facilities and reprocessing plants for irradiated fuel;*** ***(f) Facilities for radioactive waste management where radioactive waste is treated, conditioned, stored or*** ***disposed of;*** ***(g) Any other places where radioactive materials are produced, processed, used, handled or stored;***		Accepted, text modified accordingly		

			(h) Irradiation installations for medical, industrial, research and other purposes, and any places where radiation generators are installed; ***(i) Facilities where the mining and processing of radioactive ores (such as ores of uranium and thorium) are carried out.*** ***'Activities' includes:*** ***(a) The production, use, import and export of radiation sources for medical, industrial, research and other purposes;*** ***(b) The transport of radioactive material;*** ***(c) The decommissioning of facilities and the closure of repositories for radioactive waste;*** ***(d) The close-out of facilities where the mining and processing of radioactive ores was carried out;*** ***(e) Activities for radioactive waste management such as the discharge of effluents;*** ***(f) The remediation of sites affected by residues from past activities."*** If there is something new that is not included in the above mentioned definition, it can be explained separately. Also, activities include the use and transport of radioactive material, So it is not necessary to repeat it as a separate part. In addition, it is not clear what is meant by "radioactive waste" in " ***as well as the use and transpokrt of radioactive material and radioactive waste***". It comes to the mind it				

			means the use and transport of radioactive waste. The scope should be clear. Suggest using the scope of GSR Part 7 for this part.				
6	5./First para/ Second and third lines	"It will cover ~~**the three major phases, i.e.**~~ the emergency preparedness ~~**phase**~~ sttage, the emergency response phase, and the transition phase (to either a planned…"	The common term in IAEA Safety Standards also IAEA Nuclear Safety and Security Glossary is "preparedness stage". There are subtle differences between "stage" and "phase". A phase can end whereas stage is associated with an advancing process, e.g. preparedness. Also, a phase is a distinct and measurable period in a process or project. It represents a specific step that needs to be completed before moving on to the next one. But a stage is a point or period in a process or development.			Rejected	Scope kept as described in GSR Part 7; Comment noted, to be considered in the drafting process
7	6.	Please add: "• INTERNATIONAL ATOMIC ENERGY AGENCY, Arrangements for the Termination of a Nuclear or Radiological Emergency, IAEA Safety Standards Series No. GSG-11, IAEA, Vienna (2018). • INTERNATIONAL ATOMIC ENERGY AGENCY, Arrangements for Public Communication in Preparedness and Response for a Nuclear or Radiological emergency, IAEA Safety Standards Series No. GSG-14, IAEA, Vienna (2020)."	As there will be requirements regarding **communication with people** and **termination,** suggest adding GSG-11 and GSG-14 to the list.		Accepted, text modified accordingly		
8	6.	Please add: ""• INTERNATIONAL ATOMIC ENERGY AGENCY, Functions and Processes of the Regulatory Body for Safety, IAEA Safety Standards Series No. GSG-13, IAEA, Vienna (2018)."	As it is very important to assign responsibilities clearly, suggest adding GSG-13 for the responsibilities of regulatory body.			Rejected	Specific responsibilities of regulatory bodies are not under the scope of GSR Part 7

COMMENTS BY REVIEWER Reviewer: A Almén, P Frisk Page 1of 1 Country/Organization: Sweden Date: 19 May 2025				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1	General	We support the suggested structure, as shown in the tentative table of content, of the report. This increases the chances of a good result.				Rejected	The actual structure of GSR Part 7 will be kept
2	Section 3	Consider the possibility to let the content in the appendices be part on another level in the standards instead of being a part of the a GSR. If appendices include in the DPP specify stakeholder and scope of the appendices.	Section 3 mentions that several stakeholders will be affected by the requirement and that it is therefore planned to include appendices that will highlight specific provisions that are important for those stakeholders. The fact that requirements are affecting different stakeholders are not unique for this GSR. Furthermore, there is an apparent risk that if those stakeholders are not specified and the aim of the appendices more in detailed are not described in the DPP that the work and time table will be affected negatively. Furthermore, it is not apparent that such appendices are the most appropriate and effective structure.		Accepted, with modifications		Annexes removed from the DPP
3	Section 5	Last paragraph section 5: ~~In that sense,~~ consistency with ~~numerical values provided in~~ GSR Part 3 will be maintained.	The interrelation with GSR part 3 is mentioned and particularly that numerical values and that consistency with numerical values provided in GSR Part 3 will be maintained. We would like to more highlight that the revision should ensure not		Accepted with modifications		'Scope' changed in line with GSR Part 7

			only consistently with numerical values.				

COMMENTS BY REVIEWER Reviewer: Mazzammal Hussain Page 01 of 01 Country/Organization: Pakistan/PNRA Date: 16-05-2025				RESOLUTION			
Comment No.	Section/Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1.	7/1	Under section 1 "Introduction", two new sub sections "1.5 Interpretation, resolution of conflicts and entry into force and 1.6 Goals of emergency preparedness and response" may be added.	For harmonization with GSR Part 7		Accepted with modifications		The message was addressed by keeping the actual structure of GSR Part 7 is kept for the revision
2.	7/2.3	The heading "Emergency Planning" is suggested to be changed with "Emergency Preparedness Planning"	To harmonize the terminologies with GSR Part 7 and main heading		Accepted with modifications		The message was addressed by keeping the actual structure of GSR Part 7 is kept for the revision
3.	7/2.4	The heading "Verification" is suggested to be changed to "Maintaining Emergency Preparedness"	Maintaining emergency preparedness involves a continuous cycle of planning, training, and evaluation to ensure an organization is ready to respond to various emergencies. Verification is more stringent term and may not cover areas such as training, drills and exercises. Verification and maintaining emergency preparedness are two different areas which are suggested to be covered.		Accepted with modifications		The message was addressed by keeping the actual structure of GSR Part 7 is kept for the revision
4.	7/3.1	The heading "Emergency Assessment" is suggested to be changed to "Identification of a Nuclear or Radiological Emergency"	To cover identification of a nuclear or radiological emergency as a first step in response. Such an identification may be based on some assessments which will inherently covered in this term. This will also align with GSR Part 7.		Accepted with modifications		The message was addressed by keeping the actual structure of GSR Part 7 is kept for the revision

5.	7/3.3	The heading "Decision-making and implementation of protective actions" is suggested to be changed to "Implementation of protective actions"	The decision-making criteria is part of implementation of protection strategy and emergency preparedness planning and is suggested to be covered under section 2.2 and 2.3.		Accepted with modifications		The message was addressed by keeping the actual structure of GSR Part 7 is kept for the revision
6.	7/3.4	The heading "Decision-making and implementation of other response actions" is suggested to be changed to "Implementation of other response actions"	The decision-making criteria is part of implementation of protection strategy and emergency preparedness planning and is suggested to be covered under section 2.2 and 2.3.		Accepted with modifications		The message was addressed by keeping the actual structure of GSR Part 7 is kept for the revision
7.	7/4	The heading is suggested to be changed to "Transition and Emergency Termination"	As per GSG-11 (Fig. 1), emergency exposure situation consists of emergency response phase and transition phase. Transition phase come before termination of emergency as part of emergency exposure situation.		Accepted with modifications		The message was addressed by keeping the actual structure of GSR Part 7 is kept for the revision
8.	7 (new heading and sub-headings)	A new section with heading "Recovery and Analysis of Emergency Response" with following two sub headings is suggested to be included. 1. Protective and other response actions in planned and/or existing exposure situation 2. Analysis of nuclear or radiological emergency	To cover area of analysis of emergency situation as per GSR Part 7 and 4th phase of disaster management cycle i.e., recovery.		Accepted with modifications		The message was addressed by keeping the actual structure of GSR Part 7 is kept for the revision
9.	7 (new heading)	A new section with heading "Prevention and Mitigation" is suggested to be included.	As per disaster management cycle, the prevention or mitigation phase is the primary phase that addresses identification of potential hazards as well as reducing vulnerabilities to disasters. Under heading 1 "Planning Basis" somehow this is covered.		Accepted with modifications		The message was addressed by keeping the actual structure of GSR Part 7 is kept for the revision
10.	7 (new heading)	One new section "Roles of International Organizations in EPR" after section 1 is suggestion to be added.	For harmonization with GSR Part 7		Accepted with modifications		The message was addressed by keeping the actual structure of GSR Part 7 is kept for the revision

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: *12 March 2025 Comment from FAO observer at RASSC received via E-mail by L. Urso RASSC Acting Scientific Secretary* Page.... of.... Country/Organization: **FAO Observer** Date: **16 / 5 / 2025**							
Comment No.	Para/Line No.	Proposed new text	Reason				
	Page 6 of DPP DS558	Please consider deleting "are expected " and replace with "will be invited" The following organizations are current co-sponsors of GSR Part 7 and are expected will be invited to renew their co-sponsorship for the proposed publication: FAO, ICAO, ILO, IMO, INTERPOL, OECD/NEA, PAHO, CTBTO, OCHA, WHO, WMO.			Accepted, text modified accordingly		

COMMENTS BY REVIEWER Reviewer: WASSC Member Page 1 of 1 Country/Organization: Republic of Korea (ROK)/Korea Institute of Nuclear Safety (KINS) Date: May 16, 2025				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1	Page 5/	The general comment on the tentative table of contents in the section 7. OVERVIEW	o I really agree to and support the revision of GSR Part7. The tentative table looks so different from the existing GSR Part 7. The revision is going to be reorganized and restructured substantially. During the process of revision, I think that some of the existing requirements will be removed. I would like to ask you that justification on removing the existing requirements be needed in order to achieve the revision.		Accepted with modifications		The message was addressed by keeping the actual structure of GSR Part 7 is kept for the revision

COMMENTS BY REVIEWER Reviewer: Haruyuki Ogino (Japan RASSC) Page.... of.... Country/Organization: Nuclear Regulation Authority, Japan Date: 16 May 2025				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1	3. JUSTIFICATION FOR THE PRODUCTION OF TE PUBLICATION Last paragraph	Lastly, the graded approach currently elaborated in GSR Part 7 needs to be refined to better fit and avoid any misunderstandings for the future deployment of new types of reactors, such as small modular reactors and microreactors, generation IV nuclear power plants (NPPs), and fusion power plants to ensure an adequate level of EPR arrangements for these new or innovative reactor technologies, accounting for their respective levels of safety.	Clarification. Small modular reactors and microreactors, generation IV nuclear power plants (NPPs), and fusion power plants should be indicated as examples of "new types of reactors".			Rejected	Broader term used, to serve the purpose of all technologies, as GSR Part 7 includes general safety requirements on EPR
2	10.2 Objectives of Working Group	The WG was established at EPReSC-18 to explore the scope of the revision of GSR Part 7, taking into account the suggestions that had been made by the WGs that undertook the GSR Part 7 feedback analysis, established at EPReSC-16, and the consultancy meeting following EPReSC-17. The WG identified three potential options for undertaking the revision, which were then evaluated. This note summarizes the main findings of the WG's review and its recommendation to EPReSC-19 on the way forward.	Editorial			Rejected	Annexes were removed from the DPP

COMMENTS BY REVIEWER Reviewer: Kuniharu Kinoshita Country/Organization: World Nuclear Transport Institute (WNTI) Date: 13/05/2025				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
WNTI -01	Para. 6	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) (currently under revision)	GSR Part 7 sets the overarching framework, leading to detailed requirements in SSR-6 and guidance in SSG-65, for transport issues. As SSG-65 is listed in Para. 6, SSR-6 should also be listed, as it is the SSG-65's parent document.		Accepted, text changed accordingly		

COMMENTS BY REVIEWER Reviewer: Elisa PENDA Country/Organization: WNTI	Page 1 of 1 Date: 28 April 2025			RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
WNTI -01	Para. 6	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) (currently under revision).	GSR Part 7 sets the overarching framework, leading to detailed requirements in SSR-6 and guidance in SSG-65, for transport issues. As SSG-65 is listed in Para. 6, SSR-6 should also be listed, as it is the SSG-65's parent document.		Same as previous one, accepted, text changed accordingly		

COMMENTS BY REVIEWER Reviewer: SHASHI SHEKHAR PRASAD Page.... of.... Country/Organization: BARC, Mumbai, INDIA Date:				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1		A typical example of an integrated and coordinated emergency management system for preparedness and response for a nuclear or radiological emergency may be included as Annexure.	It may be helpful for better understanding and implementation by the new entrants.			Rejected	Not for the purpose of this DPP; Comments noted, to be considered in the drafting process
2.		Format of typical emergency preparedness and response plan may be included as Annexure for ready reference.	For better understanding				
3.		Important actions/steps for handling of off-site emergency may be summarized in tabular/ pictorial format and included as Annexure.	For better understanding				

COMMENTS BY REVIEWER Reviewer: Waters, Michael Page 1 of 1 Country/Organization: United States / NRC Date: 05/18/2025				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1	Section 3 Page 3	Remove bullet 3: "Crisis under national laws of exception (such as martial law), which might modify or decrease the oversight on nuclear facilities by the national regulator and, consequently, modify roles and responsibilities in a nuclear or radiological emergency"	The current conventions and IAEA safety standards are sufficient to address this matter.		Accepted, text modified accordingly		
2	Section 5-Scope Page 3	The publication will establish safety requirements that apply to all nuclear fuel facilities and activities, including advanced reactors, SMRs, and microreactors, as well as…	It should be clear that the updated standard will directly address newer technologies being pursued by member states, which may represent different types and scopes of hazards that are applicable to a graded approach.		Accepted with modifications		The message was addressed by keeping the actual Scope of GSR Part 7
3	Section 5. Scope (page 3)	Regarding activities involving the use or transport of radioactive material and radioactive waste, the current content in GSR Part 7 will be expanded, including consideration of an emergency classification system.	The practicality and benefit of developing an emergency classification system for transportation accidents and events needs to be investigated further - - before directly mandating the establishment of a special transportation emergency classification scheme. Transportation requirements for radiological materials are covered under other standards such as IAEA SSR-6 . In addition, creating emergency classifications for transportation incidents may		Accepted with modifications		The message was addressed by keeping the actual Scope of GSR Part 7

			not also be practical to the construct in other member states, such as the United States. The revision process should first make this determination of feasibility.				
5	Section 7 Overview (page 5)	Consider alternate term for "Verification" in table of contents and subsequent revision. (e.g., "oversight")	The term "Verification" is a specific term in the IAEA, and may have other meanings. For example, GSR-7 5.19 uses the term "verification" as a method to ensure trustworthiness between the communicator and recipient of a message. "This warning point shall be maintained in a state of continuous availability to receive any notification, request for assistance or request for verification and to promptly initiate a response or verification." It appears that the key elements listed for "verification" in the proposed option 3 approach (page 11) more directly refer oversight and confirmation functions provided by the national or state regulator.		Accepted with modifications		The message was addressed by keeping the actual structure of GSR Part 7
6	Section 7 (page 5)	Recommend adding text to Section 7 to clarify that any potential expansion of the scope of GSR-7 is limited to items within the purview of the radiological	Some of the items identified in Annex 2 could inadvertently be interpreted as an expansion of scope of emergency response considerations		Accepted with modifications		The message was addressed by keeping the actual structure of GSR Part 7

		consequence management function of the IAEA.	relative to the 2015 version of GSR Part 7 (e.g., expansion of scope to include organizations beyond national regulatory bodies, adding additional guidance for compensation as part of transition phase planning (see the Annex 2 Option 3 table)).				
7	Section 7 “Overview” (Page 6)	Add text to section 7 to ensure that the revision includes documentation such as "... a simple matrix to ‘map’ the structure and new requirements to the current GSR Part 7.”	The matrix may be beneficial to member states whose EPR arrangements are closely aligned to the existing structure of GSR Part 7; and existing arrangements for assessing countries, including the EPR Information Management System (EPRIMS) and the Emergency Preparedness Review (EPREV) service.			Rejected	It is not under the scope of the DPP; it will be considered when drafting the document

COMMENTS BY REVIEWER Reviewer: Kyuwon Choi (EPReSC) Page 1 of Country/Organization: Korea, Republic of/KINS(Korea Institute of Nuclear Safety) Date: May 13, 2025				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1	Page 4, 2nd paragraph	Lastly, it should be noted that it is not expected for this new publication to introduce new, or modify existing, suggested numerical values used for radiation protection in an emergency (reference levels and generic criteria). In that sense, consistency with numerical values provided in GSR Part 3 will be maintained. However, the potential need for modification will be appropriately reviewed and discussed.	EPReSC-15, WG II, non-radiological consequence management, questioned the practicality of existing recommendations and suggestions on numerical values by the IAEA and the ICRP, and this is also being discussed during recent the INEX-6 by the NEA. Therefore, the possibility of discussions on updating these suggested values among the relevant international organizations cannot be neglected, especially in view of the 5-year revision process.			Rejected	Para removed; it will be considered when drafting the document
2	Page 5	3.1 ~~Emergency~~ Accident assessment	As indicated in Annex of the DPP, in the approved proposal by the WG, the title for 3.1 was accident assessment.			Rejected	Annex has been removed from the DPP