

Form for Comments
DS 513 - Leadership, Management and Culture for Safety

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
	General	The quotes from GSR part 2 are partly difficult to read. Sometimes the text is cropped. Please consider changing the references to GSR Part 2. In some places the reference only specifies the paragraph and this may be sufficient for other parts as well (e.g. see paragraph 1.13 of GSR Part 2 [2]).				x	The IAEA quotes convention was agreed with Safety Standards and Security Guidance Development Section (the main methodologist)
	General	In accordance with the chapter 7 (Overview) in the DPP, application of a graded approach in small and medium sized organizations for leadership, management system and safety culture should be specified in appendix or annex.	There are less specific descriptions about a graded approach about small and medium sized organizations in the current DS513. Separate examples for nuclear installations and small and medium sized facilities/activities should be specified in this guide.			x	There was special consultancy meeting dedicated to graded approach. Finally, it was decided to distribute the text of the planned appendix / annex in safety guide and not to create specific one. This was decided during IAEA internal commenting process.
	General	It is necessary to unify the forms that refer to the requirements of GSR Part 2.	Editorial correction : increase the consistency and readability			x	The IAEA quotes convention was agreed with Safety Standards and Security Guidance Development Section (the main methodologist)

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
		Paragraph x.x of GSR Part 2 [2] state S: “~~~.”					
	General (also 1.11)	The Appendix presents a Culture of (or for) Safety framework, containing the traits and attributes that are present in organizations with a strong safety culture	the expression "Safety Culture" should be changed in all the document by the expression "Culture of (or for) Safety"			x	Both safety culture and culture for safety are used in GSR part 2
	General		The term “facility or activity with low radiation risk” has been used at multiple locations throughout the draft. There is need to provide guidance (taking insights from IAEA safety standards) for defining the term “facility or activity with low radiation risk”.			x	Intension was to keep it general, not to use categorization or numbers (which is applicable to facilities but not to activities)
	General		In different sections of the draft, it is mentioned that for facilities or activities with low radiation risk, the level of details may be adjusted accordingly. It is suggested to include elaborative examples such			x	Content of management system is described in section 5 and 7 in generic way which provides freedom to its application in different types of facilities

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
			as contents of management system, etc. for facilities and activities with low radiation risk as an appendix				
		Throughout the document, the word "radiation" is used, without specifying which type of radiation is referred to.	To ensure it is clear that the document refers to ionizing radiation, we suggest changing the word "radiation" to "ionizing radiation".		x		From IAEA Glossary <u>radiation</u> When used in IAEA publications, the term radiation usually refers to ionizing radiation only. The IAEA has no statutory responsibilities in relation to non-ionizing radiation.
	General	In our opinion the expression "culture for safety" is not the most appropriate and should be replaced with the expression "safety culture", when appropriate.	"Safety culture" is a well-accepted expression appearing also in IAEA Nuclear Safety and Security Glossary (2022).			x	Both expressions are used in parallel; linguistic aspects are considered
	General	Establish a Process of new government decision and/or Directions and its impact on culture for safety	To ensure that any new direction by the government is evaluated from a safety culture point of view.			x	Covered in GSR part 1 rev. 1 Governmental, Legal and Regulatory Framework for Safety

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
	General	To consider clarity of responsibility and delegation of authority	This to ensure no overlap of responsibilities and authority in decision making which in return could impact safety culture				Covered in GSR part 1 rev. 1 Governmental, Legal and Regulatory Framework for Safety, req. 5 and in GSR Part 2 req 1
	General	<p>Add guidance to:</p> <ul style="list-style-type: none"> GSR Part 2 requirement 1, point 2.2.(f) which states “The senior management of organizations, in accordance with their accountabilities: Shall ensure that adequate arrangements are made where appropriate for preparedness and response for a nuclear or radiological emergency”. GSR Part 7’s Requirement 1 and its integration or relation with GSR Part 3’s Requirement 6 <p>Alternatively, such guidance can be included in safety guides focused on emergency preparedness and response once they are revised.</p>	<p>Paragraph 1.7 refers “the scope includes the entire lifetime of facilities and the duration of activities, for all operational states and for accident conditions, and in a nuclear or radiological emergency”.</p> <p>However reference to nuclear and radiological emergencies is not detailed along the document.</p> <p>It is recognized, that such guidance could also be included in Safety Guides focused on Emergency Preparedness and Response; however GS-G-2.1 (the broader one), GSG-11, GSG-2, SSG-16, nor GSG-14 provide such guidance.</p>		x		<p>Several modifications related to emergencies and emergency preparedness and response was added in several parts of this document</p> <p>Anyway, detailed guidance in this area should be provided in relevant guides focused on emergency preparedness and response as mentioned. We have to maintain balanced approach in this guide supporting - GSR Part 2</p>

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
	general	A proposal has been made by FI at earlier stages, e.g. in a joint NUSEC-NSGC session, to change the scope of the publication to address safety and security, and to publish the same content in the two series with their respective numbers and covers. The comments here are a follow-up.	It would be better to manage safety and security under the same leadership, in the same integrated management system, and, to the appropriate extent, by the same or similar processes. (This idea is already included in the draft, e.g. in 5.1). It would be good to have an organizational culture that takes safety and security into account in a balanced, risk-informed manner. Overall risk management should take into account risks associated with malicious acts/unlawful or other [intentional] unauthorized activities.			x	This proposal was discussed many times during the development of draft document and has never been accepted for this guide at this stage. It was said many times that decision cannot be done only for this guide but also for security guidelines related to safety culture etc. Broader strategic decision is needed
	general	Missing examples or guidance how to implement GSR Part 2 in use of small scale (or low risk) activities with radiation sources. This was the request by RASSC in the discussions of the DPP.					There was an evolution; special consultancy meeting was called to elaborate appendix on graded approach. Appendix was prepared but not accepted internally. After many internal IAEA discussions it was decided to distribute the text to the whole document. Therefore there many recommendation describing graded

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
							approach in particular sections
	General comment	The document contains a high level of information – the positive is it is detailed, however potentially it becomes overwhelming and difficult to read, process and understand all the key information. Has the author considered some summary points which can be reviewed at a glance to re-emphasise the salient points? Commencing each section with quotations from GSR makes it difficult to read and understand the overall objective of the section.			x		The rule for writing safety guide says that it is a set of recommendations (no justifications, no summary) Quotations of GSR Part 2 was found as practical because it is not allowed to reword requirements into recommendations. So, GSR Part 2 quotes are used to introduce the recommendation relevant to certain part of GSR Part 2 is related
	General comment	Could the document indicate the key principles and objectives in a diagrammatic / model form to show the building blocks and interdependencies which help the reader navigate the key principles and understand how each of the recommendations support each key principle?				x	The safety guide elaborates requirements of GSR Part 2. The structure of the text follows the structure of GSR Part 2.

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
	General comment	The document suggests the principles can be applied as a graded approach to the recommendations in the document by judgement – how should a licensee apply the graded approach? – Does this document give the basis on ‘how to’ use the recommendations as a form of decision making to support the judgement?		x			Graded approach explanation is present in many particular recommendations. But the judgement itself stays with the organization. Different judgement can be done by: <ul style="list-style-type: none"> - NPP operators, - Fuel cycle facilities, - Hospital, - Veterinary clinic - NDT companies, - Oil industry - Research centre - University - Airport with security X-rays - A regulatory body
	General comment	The Leadership part is not enough developed. It needs more elements on managers in the field, decision making process, selection of leaders, networks of leaders				x	Leadership part is developed accordingly applicability scope – all facilities and activities (see examples above). This proposal can be reflected in potential revision of GS-G-3.5 dedicated to nuclear installations only

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
	General comment	<p>The part dedicated to the Responsibility for integration of safety into the management system should be more concrete; the formulations are too close to those of the GSR Part2. The human and organisational aspect are not enough taking into account</p>				x	<p>The safety guide is relevant for all facilities and activities and brings basic recommendations. IAEA explains more in many other publications like SRS, Teccdoc, NE series, INSAG -which are much more detailed and explanatory. But they do not have status of IAEA safety standard</p>
	General comment	<p>All the document includes the expression “safety culture” (including the Appendix). However, the title of the guideline and its chapter 8 refer to “culture for safety”.</p> <p>A definitions chapter would be highly helpful. What is understood by “organizational change”? Is the implementation of a new process an organizational change? What is an “interested party”?</p> <p>GS-G-3.1 includes more detailed and comprehensive appendices than this draft safety guide does. For some parts such as process management and graded approach, a how-to appendix could be insightful.</p>				x	<p>Safety guide uses terms according to IAEA Safety and Security Glossary and does not repeat definitions in text.</p> <p>GS-G-3.1 was shortened significantly because a lot of text was obsolete or not relevant as recommendations in safety guide or not relevant to all facilities and activities (more NPP oriented)</p> <p>Safety culture and culture for safety are used in parallel, see also in GSR Part 2. Linguistic aspects are considered</p>

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
	General		<p><u>Comment:</u> Some of the requirements are general in the sense that they are not specific to “senior management” but apply across organizations. Those requirements should be dealt with in the subject-specific documents.</p>				
	General		<p><u>Comment:</u> Training-related recommendations are found throughout the guide. There is no mention of the systematic approach to training (SAT) as a methodology to ensure essential worker knowledge, skills and attitudes/attributes are attained prior to carrying out tasks/activities on-the-job. Although it is part of the IAEA Nuclear Energy Series, NES No. NG-T-2.8 <i>Systematic Approach to Training for Nuclear Facility Personnel: Processes, Methodology and Practices</i> was published in 2021 and</p>				IAEA safety standards do not reference lower level IAEA publications Moreover SAT may not be applicable for all facilities and activities. It can be adjusted to the type of activity, it is just recommended framework.

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
			should be referenced (at minimum).				
	General	<p><u>Comment:</u></p> <p>The document is missing a link to certain IAEA documents. For users of nuclear substances and radiation devices, the IAEA code of conduct is very important and does link well with the purpose and intent of this proposed guide. Furthermore, the human performance aspects could be better represented; for example, a recently published IAEA TECDOC on this topic provides clarity around human performance, which is essential to nuclear safety.</p>	<p>A link to the IAEA code of conduct would be a useful addition, as well as a reference to the recently published IAEA TECDOC 1846 on Human Performance.</p> <p>Note: Human performance is mentioned in the background section of the standard in so far as the Part 2 requirements integrating all elements of management so that there is coherence with other requirements including human performance.</p>				<p>SPESS C: “Safety Guides and Implementing Guides should not reference TECDOCs”</p>
	General		Should there be reference to the safety culture of the regulatory body in terms of its ability to effectively carry out its mandated activities? It is not clear if regulatory oversight safety culture framework is to be				<p>Safety culture model is recommended for all facilities and activities, including regulatory body</p>

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
			used by both licensees and the regulator for assessment of their own safety culture. If the same framework is to be used by both, it is recommended that something be added to for regulators such as political independence, bureaucratic inertia, systems thinking etc.				
	Title	“Leadership and Management for Safety and Promotion of a Strong Safety Culture”	If comment No. 1 is accepted.			x	The current title is good
	Title	Leadership, and Management and Culture for Safety	The proposed title does not align with GSR Part 2 and introduces “culture for safety” as the apparent deliverable. Safety culture is an outcome of GSR Part 2 but Safety is the deliverable accomplished by management and leadership of people and management of activities etc.			x	The title was agreed in DPP and moreover safety culture is more visible in the title what is positive

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
	Title (page)	Modify: “Leadership, Management and Culture for Safety and Security DS513 and NSTXXX” (and other respective changes, such as the attribute “Nuclear Security Implementing Guide”)	Same as in comment 1.			x	Current draft supports and explains GSR Part 2 focused on safety; security is mentioned several times as interface
	Background, Objective, Scope, Structure	Modify to include security references and other content corresponding to the safety content.	Same as in comment 1.			x	Current draft supports and explains GSR Part 2 focused on safety; security is mentioned several times as interface
	Section 2. Responsibility	Add “and security” to the heading and where “safety” is mentioned.	Same as in comment 1.			x	Current draft supports and explains GSR Part 2 focused on safety; security is mentioned several times as interface
	Contents	Contents : “7. MANAGEMENT FOR SAFETY, MANAGEMENT OF PROCESSES AND ACTIVITIES, <u>MANAGEMENT OF THE SUPPLY CHAIN</u> ” Text : “7. MANAGEMENT FOR SAFETY: MANAGEMENT OF PROCESSES AND ACTIVITIES”	Inconsistency with the title of chapter 7 in CONTENTS andq the main body.	x			

COMMENTS			RESOLUTION				
The comments are listed according to their order of appearance in the text							
		<p>In the contents, (Before) 7. Management for Safety, Management of Processes and Activities, Management of the Supply Chain</p> <p>(After) 7. Management for Safety, Management of Processes and Activities, Management of the Supply Chain</p>	<p>o Based on the IAEA GSR Part 2, the management for safety includes several subjects. One of them is management of processes and activities. And the management of processes and activities also covers the supply chain. So, it is recommended that management of the supply chain is deleted.</p>	x			
		<p>4. MANAGEMENT FOR SAFETY; RESPONSIBILITY FOR INTEGRATION SAFETY INTO <u>THE</u> MANAGEMENT SYSTEM</p> <p>5. MANAGEMENT FOR SAFETY; THE MANAGEMENT SYSTEM</p> <p>6. MANAGEMENT FOR SAFETY; MANAGEMENT OF RESOURCES</p> <p>7. MANAGEMENT FOR SAFETY; MANAGEMENT OF PROCESSES AND CTIVITIES; MANAGEMENT OF THE SUPPLY CHAIN</p>	<p>Correction of typo - alignment between “Contents” and “main context”</p>	x			

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
		APPENDIX I IAEA SAFETY CULTURE FRAMEWORK					
	1.3 and 1.5	1.3 This Safety Guide provides recommendations on how to meet the requirements established in GSR Part 2 [2]. It considers that leadership, management, and culture for safety are interrelated concepts that support each other to achieve effective implementation.	To avoid duplication with 1.5 stating “The objective of this Safety Guide is to provide recommendations on how to meet the requirements established in GSR Part 2 [2].” And to avoid a mix between BACKGROUND and OBJECTIVE	x			
	1.3. 1.5.	1.3. This Safety Guide provides recommendations on how to meet the requirements established in GSR Part 2 [2]. It considers that leadership, management, and culture for safety are interrelated concepts that support each other to achieve effective implementation. 1.5. The objective of this Safety Guide is to provide recommendations on how to meet the requirements established in GSR Part 2 [2], <u>which considers that leadership, management, and culture for safety are interrelated concepts that support each other to achieve effective implementation.</u>	Duplication of para 1.3 and para 1.5 overlap. So, 1.3 should be included in 1.5.	x			

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
	1.3/3	interrelated concepts that support each other to achieve an effective implementation	The word “an” is missing (or effective <i>mutual</i> implementation)	x			
	1.3	“This Safety Guide provides recommendations on how to meet the requirements established in GSR Part 2 [2]. It considers that leadership, and management for safety and an effective management system are key to sustaining a strong safety culture; all three are interrelated and support each other to achieve effective implementation, and culture for safety are interrelated concepts that support each other to achieve effective implementation.”	GSR Part 2 provides clear language. As per 1.9 of GSR Part 2, “ ... in relation to establishing, sustaining and continuously improving leadership and management for safety, and an effective management system. This is essential in order to foster and sustain a strong safety culture in an organization.” Safety culture evolves from a good management system and effective leadership			<u>x</u>	Interrelations are in both directions, safety culture has an impact on quality of management system and efficient implementation
	1.6	Consider modifying this paragraph.	Paragraph 1.6 is not an OBJECTIVE. It is a SCOPE or INTENDED AUDIENCE statement.		x		This Safety Guide should assist to operating organizations and regulatory bodies in the application of the requirements of GSR Part 2 [2]. It will also be of interest to other organizations involved in ensuring safety, such as technical service

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
							providers and the supply chain.
	1.6/1	<p>This Safety Guide is mainly intended for:</p> <ul style="list-style-type: none"> operating organizations, to assist them in the application of the requirements of GSR Part 2, and regulatory bodies, to facilitate the evaluation of the operating organizations' compliance with these requirements. <p>It will also be of interest to other organizations involved in ensuring safety, such as technical service providers and the supply chain.</p>	<p>These objectives best reflect the content of the document. The recommendations in the document are primarily aimed at supporting the implementation of a management program in operating organizations. In addition, it should be stressed out that the IAEA has already developed similar guidance for regulatory bodies.</p>		x		<p>This Safety Guide should assist to operating organizations and regulatory bodies in the application of the requirements of GSR Part 2 [2]. It will also be of interest to other organizations involved in ensuring safety, such as technical service providers and the supply chain.</p>
	1.6	<p>Same text but move this para under SCOPE section (just below).</p>	<p>1.6 is not written as an objective, but in relation with a scope.</p>		x		<p>This Safety Guide should assist to operating organizations and regulatory bodies in the application of the requirements of GSR Part 2 [2]. It will also be of interest to other organizations involved in ensuring safety, such as technical service providers and the supply chain.</p>

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
	1.6	This paragraph should be placed in the scope section of this guide..	This paragraph deals with the scope of the guide, not its objective.		x		This Safety Guide should assist to operating organizations and regulatory bodies in the application of the requirements of GSR Part 2 [2]. It will also be of interest to other organizations involved in ensuring safety, such as technical service providers and the supply chain.
	1.6	This Safety Guide is mainly intended for regulatory bodies and operating organizations, to assist them in the application of the requirements of GSR Part 2 [2]. It will also be of interest to other the supporting organizations involved in ensuring safety, such as technical service providers and in the supply chain.	- For better clarity This para may be considered to be shifted from ‘Objective’ to ‘Scope’ and merged with para 1.7 to 1.9.		x		This Safety Guide should assist to operating organizations and regulatory bodies in the application of the requirements of GSR Part 2 [2]. It will also be of interest to other organizations involved in ensuring safety, such as technical service providers and the supply chain.
	1.6.	This Safety Guide is mainly intended for regulatory bodies and operating organizations, to assist them in the application of the requirements of GSR Part 2 [2]. It can will also be applied of interest to other organizations involved in ensuring safety, such as technical service providers, and the supply chain.	“... of interest” is unclear regarding application of this guide to “other organizations.” Although licensee has the prime responsibility for ensuring safety, suppliers also play important role and take responsibility for ensuring safety as para		x		This Safety Guide should assist to operating organizations and regulatory bodies in the application of the requirements of GSR Part 2 [2]. It will also be of interest to other organizations involved in ensuring safety, such as technical service providers and the supply chain.

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
			<p>1.11. (i) of GSR Part 2 and Principal 1 of Fundamental Safety Principle state.</p> <p>Thus, it should be clarified that the target of this guide includes the suppliers.</p>				
	Page 1, Para 7/ Line	<p>Behind the (see para. 1.13 of GSR Part 2[2]), the following is added.</p> <p>The lifetime of a facility includes its siting and site evaluation, design, construction, commissioning, operation and decommissioning (or closure and the post-closure period), until its release from regulatory control.</p>	<p>o Para. 1.7 does not look clear in regard to the scope. Particularly, the lifetime of facilities is not clear.</p> <p>o Based on the IAEA GSR Part 2, para 1.13, it is recommended that the lifetime of a facility is explained.</p>			x	no need to repeat the same information as in GSR Part 2
	1.7/ 1	<p>... it applies to organizations concerned with, and all facilities and activities that give rise to radiation risks.</p>	<p>To be in line with 1.1.</p>			x	wording in draft is good

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
	1.7	<p>The scope of this Safety Guide is the same as for GSR Part 2 [2]. Specifically, it applies to all facilities and activities that give rise to radiation risks (see para. 1.11 of GSR Part 2 [2]) <u>and Also apply in relation to the functions and activities of the regulatory body, as far as is appropriate (see para. 1.12 of GSR Part 2 [2]).</u> Furthermore, the scope includes the entire lifetime of facilities and the duration of activities, for all operational states and for accident conditions, and in a nuclear or radiological emergency (see para. 1.13 of GSR Part 2 [2])</p>	<p>To add the activities of Regulatory Body as mentioned in GSR Part 2 para 1.12.</p>		x		regulatory bodies added to the text
	1.7	<p>The scope of this Safety Guide is the same as for GSR Part 2 [2]. Specifically, it applies to all facilities and activities* that give rise to radiation risks (see para. 1.11 of GSR Part 2 [2])....</p> <p><u>*‘Facilities’ includes: nuclear facilities; irradiation installations; some mining and raw material processing facilities such as uranium mines; radioactive waste management facilities; and any other places where radioactive material is produced, processed, used, handled, stored or disposed of — or where</u></p>	<p>Add a footnote for clearer understanding of the scope (as was done in GSTR Part 2)</p> <p>User friendliness</p>			x	no need to repeat the same footnote as in GSR Part 2

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
		<p>radiation generators are installed — <u>on such a scale that consideration of protection and safety is required.</u> <u>‘Activities’ includes: the production, use, import and export of radiation sources for industrial, research and medical purposes; the transport of radioactive material; the decommissioning of facilities; radioactive waste management activities such as the discharge of effluents; and some aspects of the remediation of sites affected by residues from past activities</u></p>					
	1.8	<p>Please clarify the reference to [3] regarding waste management,</p>	<p>It should be made clear whether this reference supplements or replaces, as it is now, this can be misunderstood.</p>	x			<p>Reference <u>is</u> kept in reference list and erased from the text</p>
	Para 1.8		<p>This para refers to the GSG-16, which is a guide on leadership, management and culture for safety in radioactive waste management. Has the interface between these guides been analysed?</p>	x			<p>Reference is kept in reference list and erased from the text Nevertheless the GSG-16 was known to authors and no contradictions were found</p>

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
	1.8.	All the recommendations in this Safety Guide are generally applicable to all facilities and activities that give rise to radiation risks : nevertheless, judgement and the use of a graded approach are needed for the application of specific recommendations to different facilities and activities. ...	User-friendliness. It seems better to mention what this guide is applicable to.			x	It is in previous paragraph
	1.8	All the recommendations in this Safety Guide are generally applicable: nevertheless, judgement and the use of a graded approach are needed for the application of specific recommendations to different facilities and activities. Recommendations specific to the management of radioactive waste are provided in IAEA Safety Standards Series No. GSG-16, Leadership, Management and Culture for Safety in Radioactive Waste Management [3].	Although true, this is not the sole guidance where such recommendations appears.... It also exists for transport -TS-G-1.4, SSG-26). Delete reference to specific Safety Guides	x			TS-G-1.4 added to references
	1.8.	All the recommendations in this Safety Guide are generally applicable: nevertheless, judgement and the use of a graded approach are needed for the application of specific recommendations to different facilities and activities. Recommendations specific to management of radioactive waste and to transport of radioactive materials are provided respectively in IAEA Safety Standards Series No. GSG-16, Leadership, Management and Culture for Safety in	Reference should also be made to the specific recommendations for the management of radioactive material transport activities set out in IAEA documents SSR 6 (Rev.1) and TS G 1.4.		x		GSG-16 kept in references list, TS-G.1.4 added to reference list. SSR-6 added to reference list

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
		Radioactive Waste Management [3], and in IAEA Safety Standards Series No. SSR-6 (Rev. 1), Regulations for the Safe Transport of Radioactive Material, 2018 Edition [XX], and specific recommendations are provided in IAEA Safety Standards Series No. TS G 1.4, The Management System for the Safe Transport of Radioactive Material [XXX].					
	1.8	All the recommendations in this Safety Guide are generally applicable: nevertheless, judgement and the use of a graded approach are needed for the application of specific recommendations to different facilities and activities. <u>They are also necessary when regulatory bodies or other organization not designing or operating facilities and activities are concerned.</u>	The guide also applies to regulatory bodies, TSO, companies in the supply chain... Judgement and graded approach are also necessary.			x	The mentioned organizations are understood within activities
	1.8	All the recommendations in this Safety Guide <u>are based on the requirements, which generally applicable</u> ; nevertheless, judgement and the use of a graded approach are needed for the application of specific <u>requirements</u> recommendations to different facilities and activities.	Requirements are generally applicable. Does this also hold for recommendations? Please verify.			x	The paragraph explains that for some facilities and activities recommendations can be implemented accordingly graded approach; nevertheless recommendations describe how to apply requirements but alternative

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
							ways are acceptable
	1.9/1	... to be understood as <i>presented</i> and explained...	If the glossary is where the word is “set”			x	wording in draft is good
	1.10	... section 4 provides recommendations on how to meet Requirements 3–5 on responsibility for integration of safety into the management system management for safety.	For consistency: for all other sections the exact wording within GSR Part 2 is used, except for the section 4.			x	The draft text is correct
	1.10	- Section 9 provides recommendations on how to meet Requirements 13 and 14 on measurement, assessment and improvement of the management system	At the end of the paragraph “.....improvement of the management system” should be added for greater clarity.			x	The name of section 6 of GSR Part 2 is used
	Content	It is proposed to merge Chapters 4 to 7 into a single Chapter (4). The different topics: <i>Responsibility for integration safety into Management system; the management system; management of</i>	Consistency with recently published IAEA Safety Guide “ <i>Leadership, Management and Culture for Safety in Radioactive</i>			x	The current structure reflects subsections of management for safety in GSR Part 2 <ul style="list-style-type: none"> • Responsibility for integration of safety into the management system

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
		<i>resources and; management of processes and activities, management of the supply chain</i> can be integrated as Sections in a single Chapter as all are related to the same theme: Management for Safety.	<i>Waste Management”</i> GSG-16.				<ul style="list-style-type: none"> • The management system • Management of resources • Management of processes and activities
	1.11 & A.1	Please, add: [6] at the end of the sentence page 26 after the reference.	For greater precision.	x			
	Section 2	“ The board of directors should monitor through the Senior Management the overall Safety performance of the organization and should take necessary actions to achieve and maintain the highest level of safety within the organization.	The board of directors should also demonstrate strong and effective Leadership for Safety and should provide and support a strong Safety and Security Culture in the Licensee organization.			x	Board of directors may not be applicable to all organizations
	Section 2	The Senior Management should identify the Interested Parties for the organization and should develop for approval by the board of directors a strategy that should be implemented for interactions with the Interested Parties and the public.	The Senior Management should develop a strategy on basis for identifying the interested parties and seek approval from the board of directors.			x	Addressed in 4.15-4.21

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
	Section (2) RESPONSIBILITY FOR SAFETY	Senior management should ensure that they are aware of regulatory requirements as they apply to the facilities and activities under their control. Additionally, senior management should understand the need to apply relevant international codes and standards for safety. <u>Senior management in the organization should ensure provision is made for adequate resources and funding, adequate arrangements are made where appropriate for preparedness and response for a nuclear or radiological emergency</u>	To add commitment of Senior management in ensuring adequate resources and preparedness and response for nuclear or radiological emergency to fulfil the Requirement 1 item 2.2 (e) and (f) in GSR Part 2.			x	Included in 6.1 and 6.2
	2.2	“In the safety policy Senior management should provide an official and documented commitment to the achievement of the fundamental safety objective and communicate this consistently within the organization and to interested parties.”	It is recommended for more clarification.			x	Safety policy may not be always used for this purpose ; other type of document may be relevant
	2.2	Senior management should provide an official and documented commitment to the achievement of achieve the fundamental safety objective Fundamental Safety Objective. and communicate this consistently within the organization and to interested parties. This	Fundamental Safety Objective is specific term from IAEA SF-1. It should be capital letters. ‘documented’ includes official approval.			x	the same language convention applied in GSR part 2

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
		commitment should be consistently communicated within the organization and to interested parties.					
	2.2	Modification: Senior management should provide an official and documented <u>ensure</u> commitment to the achieving the fundamental safety objective, <u>applying a graded approach, primarily through</u> formal and documented commitment. This should be communicated consistently within the organization and to interested parties.	Graded approach is needed. This recommendation should apply also to registrants and licensees of 1-2 workers, such as dentists and other medical practitioners working alone, or industrial radiographers.	x			
	2.2	Suggestion: Consider adding definition of 'interested parties'. Perhaps in a footnote.	Initially unclear whether this refers to personnel internal or external to the organization.			x	Definition is in IAEA Glossary and we do not repeat definitions in guide interested party A person, company, etc., with a concern or interest in the activities and performance of an organization, business, system, etc.included the following: customers, owners, operators, employees, suppliers, partners and trade unions; the regulated industry or professionals; scientific

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
							bodies; governmental agencies or regulatory bodies (national, regional and local) ...whose
	2.3	Additionally senior management should understand the need to apply take into consideration the application of relevant international codes and standards for regarding safety.	It would be difficult to demonstrate that senior management understand the need to apply certain codes and standards, and it would be clearer to directly require the application of safety codes and standards. Additionally, Senior management should be responsible for selection of codes and standards, not understand the need.			x	The draft text is good
	Page 2, 2.3, last paragraph.	Additionally ... understand the need to apply the benefits of applying relevant international codes and standards for safety	The application of international codes and standards is subject to National regulatory approach, thus should be presented as beneficial and not mandatory.	x			

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
	2.3	Senior management should ensure that they are aware of regulatory requirements as they apply to the facilities and activities under their control. Additionally senior management should understand the need to apply <u>use</u> relevant international codes and standards for safety.	The application of relevant international codes and standards is not mandatory		x		Apply has the same meaning as use modification: Senior management should ensure that they are aware of regulatory requirements as they apply to the facilities and activities under their control. Additionally senior management should consider the need to apply relevant international codes and standards for safety and related benefit.
	2.4	This para refers to para 4.10 (Requirement 6 of GSR Part 2): I suggest deleting “as required by para. 4.10 of GSR Part 2 [2]” at the end of para 2.4.	If this draft explains - section after section - one or more requirements of GSR Part 2 by crossing requirements of sections of GSR Part 2, it does not help the user. This should be avoided through the entire draft.	x			

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
			<p>PS: something similar is also written in paras 5.7 and 8.20 of this draft: “The interface between safety, security and other elements...” without mentioning the para 4.10 of GSR Part2.</p>				
	2.4	<p>2.4. The arrangements for achieving the fundamental safety objective should take into account any interfaces between safety and security with the basic objective that safety is not compromised by security and vice versa, as required by para. 4.10 of GSR Part 2 [2]. <u>Similarly, when radiation risk is only a one of the risks to be managed at the facility or activity, interfaces should be taken into account to protect people and the environment from all risks.</u></p>	<p>It should also take into account the all-risks approach, especially when radiological risks are very low compared to other risks to be managed at the site.</p> <p>(consistent with the conclusion of RASSC end of Term report – para 23 “Towards an all-hazards approach”)</p> <p>For example, a level gauge in a refinery where the major risk is fire/explosion. Or a chemical lab with chemical and biological risks and using and ECD chromatograph...</p> <p>Consistency with 2.6</p>	x			

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
	2.4	Modify: “The arrangements for achieving the fundamental safety <u>and security</u> objective should take into account any interfaces between safety and security <u>in a risk-informed, balanced manner</u> with the basic objective that safety is not compromised by security and vice versa, as required by para. 4.10 of GSR Part 2 [2].	1. Same as in comment			x	New text based on comments of other MS : The arrangements for achieving the fundamental safety objective should take into account any interfaces between safety and security with the basic objective that safety is not compromised by security and vice versa. <u>Similarly, when radiation risk is only a one of the risks to be managed at the facility or activity, interfaces should be taken into account to protect people and the environment from all risks.</u>
	2.4	The arrangements for achieving the fundamental safety objective should take into account any interfaces between safety and security with the basic objective that safety is not compromised by security and vice	A significant change would be needed to provide some practical guidance on this aspect. Here it is just a rephrasing of the GSR Part 2 para. 4.10.			x	Guidance is planned to be given in different publication as proposed but we cannot reference the publication in the development stage.

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
		versa, as required by para. 4.10 of GSR Part 2 [2].	Either to be appropriately developed in this guide, and/or refer to DS533-NST067 “Management of the interfaces between nuclear and radiation safety and nuclear security”				
	Para. 2.5 4 th line	(a) The radiations <u>radiation</u> risks associated with ...	Correction of typo	x			
	(a) 2.5	The radiations-risks [...]	Editorial: typo.	x			
	2.5	To ensure that the fundamental safety objective is achieved, the operating organization should provide specific training and coaching for personnel at all levels (including managers), including the key officials of their Supply Chain partners to ensure an understanding of the following:			x		Suppliers included (d) not accepted

COMMENTS			RESOLUTION				
The comments are listed according to their order of appearance in the text							
		<p>(a) The radiations risks associated with specific facilities and/or activities, and their potential consequences;</p> <p>(b) The processes for managing radiation risks relevant to their responsibilities;</p> <p>(c) The interdependencies between different processes (in terms of radiation risks) and the need for effective risk management.</p> <p>(d) Possibilities and consequences of Latent failures in the activities performed in pre-operational phases of the nuclear/ radiation facilities</p>					
	2.5	<p>2.5. To ensure that the fundamental safety objective is achieved, the operating organization should provide specific training and coaching for personnel at all levels (including managers) to ensure an understanding of the following:</p> <p>(a) The radiations risks associated with specific facilities and/or activities, and their potential consequences;</p> <p>(b) The processes for managing radiation risks relevant to their responsibilities;</p> <p>(c) The interdependencies between different processes (including in terms of radiation risks)</p>	<p>It should also take into account the all-risks approach, especially when radiological risks are very low compared to other risks to be managed at the site.</p> <p>Better consistent with 2.6</p>			x	Draft wording is good

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
		and the need for effective <u>overall</u> risk management.					
	2.5	To ensure that the fundamental safety objective is achieved, the operating organization should provide specific training and coaching for individuals personnel at all levels [...] individuals	To be consistent with Footnote 4 in IAEA GSR Part 2 and the definition of “Individuals” as in FANR-REG-01 V1			x	Draft wording is good
	2.5(a)	Please, add “including a long term management policy” in “The radiations risks associated with specific facilities and/or activities, <u>including a long term management policy</u> , and their potential consequences;”	Important expectations of GSR Part 2 which should be mentioned in this draft.			x	Included in 2.6 4.6
	2.5(b)	Please, add “including radiological emergency” in “The processes for managing radiation risks, <u>including radiological emergency</u> , relevant to their responsibilities;”	Important expectations of GSR Part 2 which should be mentioned in this draft.			x	In GSR Part 2 2.2 (f); safety guide cannot repeat GSR Part 2 requirements as recommendations
	2.5.	To ensure that the fundamental safety objective is achieved, the operating organization should provide specific training and coaching for personnel at all levels (including managers) to ensure an understanding of the following: (a) The radiations risks associated with specific facilities and/or activities, and their potential consequences;	Add paragraph 2.5 Bis The management of competencies should be addressed as it’s the responsibility of the senior management throughout the period of time for which a person is employed by the organization.		x		It is covered in section 6 management of resources 6.3, 6.4 6.5 etc

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
		<p>(b) The processes for managing radiation risks relevant to their responsibilities; (c) The interdependencies between different processes (in terms of radiation risks) and the need for effective risk management.</p> <p><u>Paragraph 2.5 Bis</u> The operating organization should also take the necessary measures for the maintenance of skills and knowledge</p>					
	<p>Add another paragraph 2.5 Ter</p>	<p>The operating organization should direct and oversee the development, implementation, review and revision of on-site emergency plan for facilities or activities under its responsibility in accordance with paras 1.12, 4.5 and 4.12 of IAEA Safety Standards Series No. GSR Part 7, Preparedness and Response for a Nuclear or Radiological Emergency [XX]. Training, drills and exercises are also required to be provided for personnel relevant for emergency response, in accordance with Requirement 25 of IAEA. GSR Part 7[XX]</p>	<p>Managing the development, implementation, review and revision of the emergency plan, as well as training and exercising personnel involved in emergency response, are the responsibility of the operator. These aspects are essential to achieving safety objectives, and should therefore be addressed in this chapter.</p>			x	<p>This safety guides elaborates recommendation on GSR Part 2. The proposed recommendation is to detailed</p>
	2.5/	<p>To add the proposed element at the end of parag. “(d) The arrangements made for preparedness and response for a nuclear or radiological emergency”</p>	<p>To cover all elements of the fundamental safety</p>	x			

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
	2.5	Add a bullet: <u>“(d):Integration of management of risks associated with malicious acts/unlawful and other unauthorized [intentional] activities, including external and insider risks, into the overall risk management process.”</u>	Same as in comment 1.			x	Current draft supports and explains GSR Part 2 focused on safety; security is mentioned several times as interface
	2.5	(b) The processes for managing radiation risks relevant to in their area of responsibilities;	Clarification			x	The same meaning, the draft text is good
	2.5	To ensure that the fundamental safety objective is achieved, the operating organization should provide specific training and coaching for personnel at all levels (including managers) to ensure an understanding of the following: (a) The radiations risks associated with specific facilities and/or activities, and their potential consequences; (b) The processes for managing radiation risks relevant to their responsibilities; (c) The interdependencies between different processes (in terms of radiation risks) and the need for effective risk management.	Include training and coaching focused on ensure an understanding of the impact of leadership on safety and what leadership attributes are needed to ensure the fundamental safety objective.		x		Covered by section 6 mainly

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
	2.5	<p>“In order to achieve To ensure that the fundamental safety objective is achieved, the operating organization senior management should ensure that provide specific training and coaching for personnel at all levels (including managers) is provided for the to ensure an understanding of the following...”</p>	Suggested revision since senior management is not mentioned in this paragraph or in 2.4.	x			
	2.5	<p>To ensure that the fundamental safety objective is achieved, the operating organization should provide specific training and coaching for personnel at all levels (including managers), ideally in a structured manner [REF1,2,3], to ensure an understanding of the following:</p> <hr/> <p>[REF1] ISO 10015:2019 Quality management — Guidelines for competence management and people development</p> <p>[REF2] ISO 30422:2022(en) Human resource management — Learning and development</p> <p>[REF3] ISO/TS 30437:2023(en) Human resource management — Learning and development metrics</p>	Promote standardization and use of international consensus best practices.			X	<p>Please see 2.3: to apply relevant international codes and standards for safety.</p> <p>Concerning references: IAEA does not promote single sources,</p>
	2.6	<p>Senior management should express expectations regarding leadership, management and safety culture commensurate to the risks of the facility or activity, according to a graded approach [REF].</p> <hr/> <p>[REF] = IAEA TECDOC 1740</p>	Graded approach is discussed many times throughout the document. TECDOC 1740 is the key IAEA reference.		X		<p>Addition of graded approach ok.</p> <p>SPESS C: “Safety Guides and Implementing Guides should not</p>

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
							reference TECDOCs”
	After paragraph 2.6	<p>Please add the following paragraph:</p> <p>“2.7. The operating organization should ensure appropriate and adequate arrangements for on-site preparedness and response for a nuclear or radiological emergency for facilities or activities under its responsibility are established and maintained.”</p>	<p>GSR Part 2 in paragraph 2.2 [bullet (f)], under Requirement 1, states:</p> <p>“2.2. The senior management of organizations, in accordance with their accountabilities:</p> <p>(f) Shall ensure that adequate arrangements are made where appropriate for preparedness and response for a nuclear or radiological emergency.”</p> <p>Also GSR Part 7 in paragraph 4.16 states:</p> <p>“4.16. The operating organization shall establish and maintain arrangements for on-site preparedness and response for a nuclear or radiological emergency for facilities or activities under its responsibility, in accordance with the applicable requirements.”</p>			x	safety guide cannot reword GSR Part 2 requirements as recommendations

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
			Considering abovementioned paragraphs, it is suggested to add another paragraph to section 2 regarding the availability of adequate and appropriate arrangements for preparedness and response for a nuclear or radiological emergency.				
	2.6	Same text but move this para in SECTION 3 and replace current para 3.2 by para 2.6	Para 2.6 raises a fundamental statement, more related to the section 3 than the section 2, and it is at the end of the section 2. I suggest starting section 3 with this para (2.6 becomes 3.2) and the current 3.2 is deleted because it is only a copy/paste of a footnote (poor added-value).			x	This was a recommendation of technical meeting
	2.6	Senior management should express expectations regarding leadership, management and safety culture commensurate to the risks of the facility or activity and communicate them with all members of the operating organization	Expectations of the senior management should be communicated throughout the organization.	x			
	2.6	Senior management should express declare and communicate expectations regarding leadership, management and safety culture commensurate to the risks of the facility or activity.	Express toward whom? Please check if "communicate" is more suitable	x			

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
	3 Leadership	Add “and security” to the heading and where “safety” is mentioned; for references, add relevant higher-level security reference from the NSS or A/CPPNM.	Same as in comment 1.			x	Current draft supports and explains GSR Part 2 focused on safety; security is mentioned several times as interface
	3.2	Footnote 4 in GSR Part 2 [2] states <u>explains that</u> :	A footnote is not an official part of a Safety Guide, so formulation “footnote states” is not suitable.			x	States has the same meaning as explains (it is not a prescription if something is stated)
	3.3 Footnote 2	Paragraph 3.1 of GSR Part 2 [2] states (citation omitted): ... <u>While ‘responsibility’ (see Section 2 of this Safety Guide) is more related to managers completing specific tasks, ‘accountability’ highlights how a person takes personal ownership and feels a moral obligation to achieving the results of a specific task.</u>	Citation omitted, but footnote integrated in the quoted text of GSR Part 2, this is misleading. We suggest to incorporate statement of the footnote in para 3.3 directly.		x		Footnote 2 removed based on comments of MS
	3.3	Remove footnote 2 in (d) Consider rewording “moral”	Remove footnote 2 in (d). This footnote does not appear in GSR Part 2, but here appears within a direct quotation from GSR Part 2. May lead to confusion. Furthermore, accountability is not inherently about a “moral” obligation - it's possible to be accountable in a purely professional sense without a moral dimension.	X			

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
			Responsibility is task-oriented while accountability is results-oriented. Responsibility can be delegated, but accountability ultimately rests with the owner.				
	3.3	No new text: delete 3.3 If this draft is often a copy of GSR Part 2, users will only use this draft tomorrow instead of GSR Part 2 (SSR-2/2 Rev.2) first. Do not minimize this risk, please.	In addition, authors modified para 3.1(d) of GSR Part 2 by adding a footnote at “accountability” in this draft. This is not allowed. Nevertheless, the footnote can be kept in para 2.5(b) of the draft after “responsibilities” by adding “accountability”.	x			
	3.3	Paragraph 3.1 of GSR Part 2 [2] states (citation omitted)	Editorial: Citation is present.		x		Recommendation was deleted
	3.3 (b)	Acknowledging that safety encompasses interactions between people, technology and the organization technical, human and organizational factors;	To be consistent with Paragraph 1.2 in IAEA GSR Part 2		x		Recommendation was deleted
	3.3b	To consider climate and environment factor	This to ensure that environment factor is taken into consideration in safety impact.		x		Recommendation was deleted

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
	3.4	The organizational approach should encompass the commitment to the establishment, implementation, assessment and continual improvement of programmes for leadership and culture for safety. Related policies, strategies, plans and actions should clarify and support this organizational approach and should collectively establish clear expectations for all individuals in the organizations.	Section 3 is on leadership for safety. Potential transfer to section 8 (culture for safety) if needed			x	Leadership and safety culture are interrelated
	3.4	The organizational approach should encompass the commitment to the planning , implementation, assessment and continual improvement of programmes for leadership and culture for safety.	The term establishment is used to institutionalize the whole process, and in this sentence, it seems better to use the term planning before the word implementation.			x	Programme is general expression; we prefer to keep it here
	3.4/2	The organizational approach should encompass the commitment to the establishment, implementation, assessment and continual improvement of programmes for leadership and culture for safety	Leadership and culture for safety is integrated in all activities. May not require separate programme for these. Management system is such as to promote leadership and culture for safety.				

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
	3.4	The organizational approach to safety should encompass the commitment to the establishment, implementation, assessment and continual improvement of programmes for leadership and culture for safety.	Please put in line with para 3.1 of GSR Part 2. Wording “organizational approach” alone is not defined and thus misleading.	x			
	3.4	The organizational approach should encompass the commitment to the establishment, implementation, assessment and continual improvement of programmes for leadership, management and culture for safety”.	For the sake of consistency, include the management function in the statement	x			
	3.5	The organization’s expectations for leadership should be structured in a safety culture framework that defines the traits of a strong safety culture. This framework should be consistent with the safety culture framework described in the Appendix. A graded approach should be used in the establishment and application of such a framework, taking into account the type of facility or activity and the associated radiation risks.	section 8 (culture for safety) if needed	x			
	3.5, line 1	“The organization’s expectations for leadership should be structured in a safety culture framework that encompasses the successful management of all risks to the	Leaders have multiple priorities in their work. Safety is the priority however expectations of leaders are more complex. Culture, risks, leadership,		x		3.5 was deleted based on comments of other MS and is covered in section 8

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
		organization defines the traits of a strong safety culture....”	etc. are all included in effective management systems that hold safety as the paramount consideration.				
	3.6, line 2	“[L]eadership for safety... <u>management for safety, an integrated management system</u> and a systemic approach (i.e. an approach relating to the system as a whole in which the interactions between technical, human and organizational factors are duly considered) are essential to the specification and application of adequate safety measures.”	The incomplete quote changes the intent and meaning of what was originally written in GSR Part 2. Suggest to include paragraph section as written in 1.2. As written, it is lacking mention of the management system which GSR Part 2 is largely about (i.e., processes, practices and arrangements that ensure safety objectives (including the evolution of a strong safety culture) are met consistently).		x		The quote was deleted based on comments of other MS
	3.6	Delete 3.6	No added value compared to GSR Part 2 requirement.	x			

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
	3.6	This para refers to the para 1.2 of GSR Part 2 and it quotes it; I suggest deleting the quote and only keeping: "This systemic approach should ensure a holistic view of safety performance and the organization's overall performance. A graded approach should be applied to ensure that the overall approach is commensurate with the particular organization."	The quote is not needed, and it is clearer to only keep the para 3.6 as suggested (about systemic and graded approach), just after the para 3.5 which is about graded approach. For clarity.		x		Recommendation was deleted
	3.6/6	...holistic view of radiological safety performance...	For clarity		x		Recommendation was deleted
	3.6/1	The systemic approach should include system as a whole in which the interactions between technical, human and organizational factors are duly considered.....	Further explanation for practical implementation of systemic approach may be added (e.g. taking insights from IAEA TECDOC-1846). Moreover, the explanation may be generalized to make it applicable for facilities and activities. Further, other safety standards having explanation regarding implementation of systemic approach may be referred		x		Recommendation was deleted

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
	Para. 3.6 7 th line	<p>A graded approach should be applied to ensure that the overall approach is commensurate with the particular organization.</p> <p>→ A graded approach should be applied to ensure that the overall strategy is commensurate with the specific needs of the organization.</p>	<p>Editorial correction</p> <p>: suggest new words in the place of the “particular organization”</p>		x		Recommendation was deleted
	3.6	<p>Paragraph 1.2 of GSR Part 2 [2] states:</p> <p>“[L]eadership for safety...and a systemic approach (i.e. an approach relating to the system as a whole in which the interactions between technical, human and organizational factors are duly considered) are essential to the specification and application of adequate safety measures.”</p> <p>This systemic approach should ensure a holistic view of safety performance and the organization’s overall performance. A graded approach should be applied to ensure that the overall approach is commensurate with the particular organization.</p> <p>“Leadership for Safety”, “Management for Safety”, “Integrated Management System” and “Systemic Approach” are the four specifications that should be</p>	<p>- A very important aspect brought out by GSR Part-2, which needs to be clarified and elaborated in adequate details.</p>		x		Recommendation was deleted

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
		looked upon to evaluate if adequate safety measures are being implemented and a strong safety culture is being fostered in an organization.					
	3.6	A graded approach should be applied to ensure that the overall approach is commensurate with the activities of particular organization.	Clarification				Recommendation was deleted
6	3.6./L REFERENCE	<p>... This systemic approach should ensure a holistic view of safety performance and the organization's overall performance. [xx][xx] A graded approach should be applied to ensure that the overall approach is commensurate with the particular organization.</p> <p><u>[xx] IAEA-TECDOC-1846, Regulatory Oversight of Human and Organizational Factors for Safety of Nuclear Installations (2018)</u></p> <p><u>[xx] OECD NUCLEAR ENERGY AGENCY, Human and Organizational Performance in Nuclear Installations, NEA report No. 7579, OECD (2022)</u></p>	<p>More detailed explanation and implementation of systemic approach should be described. Two documentations could be useful.</p> <p>In addition, some examples of member states' systemic approaches are also useful. The attachment is the Japanese practice to implement a systematic approach to safety culture in "the guide to developing and fostering a strong safety culture</p>		x		<p>Recommendation was deleted</p> <p>Moreover:</p> <p>SPESS C:</p> <p>"Safety Guides and Implementing Guides should not reference TECDOCs"</p>

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
			(2019, in Japanese, 000304077.pdf (nra.go.jp))”, and it might be stated in an annex.				
	3.7	Delete 3.7	No added value compared to GSR Part 2 requirement. Senior managers are managers...			x	Role model emphasized
	3.7	Error: change 3.2(c) by 3.2(b) of GSR Part 2.	Typo	x			
	3.7, line 2	[d]evelopment development of individual	Editorial: brackets error “[d]evelopment”			x	Convention of quotations
	3.7	Paragraph 3.2(c) of GSR Part 2 [2] states that “Managers at all levels in the organization...shall ensure that their leadership includes...[d]evelopment of individual and institutional values and expectations for safety throughout the organization by means of their decisions, statements and actions”. Senior management and all other managers should demonstrate	managers at all levels are required to demonstrate their commitment to safety as an overriding priority	x			

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
		and act as role models in the promulgation of these values and expectations.					
	Page 4, Line. 30	are duly considered).”	No closing brackets	x			
	3.7	Senior management Managers at all levels should demonstrate and act as role models in the promulgation of these values and expectations.	to make it coherent with Paragraph 3.2(c) of GSR Part 2 and with paragraph 3.11 of DS513.	x			
	3.8	Incomplete quotation from GSR Part 2	The quotation from Paragraph 5.2(f) of GSR Part 2 is incomplete in a manner which makes it impossible to understand. “Senior managers... shall advocate and support...” What shall they advocate and support? The quotation does not include this information. The quotation also leaves the parenthesis (“ open without a closing “”).		x		Parenthesis :OK Quotation was proposed by Safety Standards and Security Guidance Development Section (the main methodologist)

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
	Items 3.8, 8.3, 8.12, 8.13, 8.17	Senior managers and all other managers” or “Managers at all levels”	It is recommended to use a unique combination in the text, i.e., “Senior managers and all other managers” or “Managers at all levels”. There is no difference between these two expressions.			x	Agree but we cannot change text of GSR Part 2 – it is a quotation
	3.8	Delete 3.8	<p>Leadership is more than decision making, as reminded in the definition in 3.2</p> <p><i>(‘Leadership’ is the use of an individual’s capabilities and competences to give direction to individuals and groups and to influence their commitment to achieving the fundamental safety objective and to applying the fundamental safety principles, by means of shared goals, values and behaviour.)</i></p> <p>In addition, the requirement quoted from GSR Part 2 is in the section dealing with safety culture, not leadership...</p>			x	This recommendation is mainly related to systemic approach which is applicable in leadership area as well in safety culture part

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
	3.8	This para refers to the para 5.2(c) of GSR Part 2, so the section related to the “Culture for Safety”. But the section 3 of this draft is related to “Leadership for Safety”. This para (3.8 of this draft) should be in the section 8 “Culture for Safety” for clarity.	Or the para 3.8 of this draft should only state: “The systemic approach should be complemented by specific assessments of individual elements as needed. This systemic approach should be applied as relevant by interdisciplinary teams that include members with diverse perspectives and expertise from different levels of management and staff.”			x	Draft text is good
	3.8	“Senior managers”	The definition of Senior managers (Paragraph 5.2(f) of GSR Part 2) should be provided in this Guide.			x	There is a definition in IAEA Glossary
	3.8	Paragraph 5.2(f) of GSR Part 2 [2] states: “Senior managers and all other managers shall advocate and support <u>use of...using</u> a systemic approach (i.e. an approach relating to the system as a whole in which the interactions between technical, human and organizational factors are duly considered.”	Clarification.			x	This is quote from GSR Part 2 we cannot change it
	3.8 Line 6	... This systemic approach should be applied as relevant by interdisciplinary teams that include members with diverse perspectives and expertise from different levels of management and staff.	Clarification.		x		This systemic approach should be applied, if relevant, by interdisciplinary teams that include members with diverse perspectives and expertise from

COMMENTS The comments are listed according to their order of appearance in the text				RESOLUTION			
							different levels of management and staff.
	3.8	These interactions should be taken into account in the organization's decision making process, utilizing relevant expertise and diverse perspectives. The systemic....staff.	Do not fully agree with the details provided. As efficient to remain at the proposed level. Reference to INSAG-25 could be provided.		x		INSAG publications cannot be referred in safety guide as they do it not undergo by consensus process of MS
	3.9, line 3	setting setting	Editorial			x	Convention of quotations
	3.9	Senior management should apply a long term view when formulating and aligning policies, goals, strategies, plans and objectives, and should also actively promote that a high level of safety performance <i>is an essential part of the overall performance and</i> is necessary to sustain a high level of the organization`s overall performance.	clarification	x			

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
	Page 5/ 3.9, first line, second paragraph	Senior management should apply a long term broad view when formulating ...	Goals, plans and objectives are not necessarily for long-term. In our opinion a broad view of all aspects is frequently necessary when considering all aspects mentioned.			x	The draft text is good
	3.10	Managers at all levels should seek the active involvement and consensus of all individuals <u>under their responsibility</u> within the organization (and, where appropriate, <u>beyond, especially within external organizations, such as contractors they are working with</u>) in the establishment and application of behavioural expectations. The communication methods used by managers to ensure staff awareness and commitment should support mutual and candid feedback on behavioural expectations .	Reaching consensus on behavioural expectations is not in the requirement... “all individuals” is very ambitious and is only applicable for senior managers. Feedback from staff is nice but implementation of expected behaviour from staff is also needed...			x	Draft text is good
	3.10	Managers at all levels should seek the active involvement and consensus of communicate with all individuals within the organization (and, where appropriate, within external organizations, such as contractors) in the establishment and application of behavioural	To keep consistency with the following paragraph.			x	Draft text is good

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
		expectations. The communication methods used by managers to ensure staff awareness and commitment consensus should support mutual and candid feedback on behavioural expectations.					
	3.10.	Managers at all levels should seek the active involvement and consensus of all individuals within the organization (and, where appropriate, within external organizations, such as <u>suppliers</u> contractors) in the establishment and application of behavioural expectations. The communication methods used by managers to ensure staff awareness and commitment should support mutual and candid feedback on behavioural expectations.	In this guide ‘contractors’ is not defined, and ‘suppliers’ is generally used. Consistency of using the word ‘suppliers’ instead of ‘contractors’.	x			
	3.10, line 1	“Managers at all levels should seek the active involvement and consensus support of from all individuals within the organization...”	Consensus of all individuals is unrealistic, especially across an organization and certainly with contractor organizations. Support from across an organization is achievable and expected.	x			

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
	Page 5/ 3.10, first line	Managers at all levels active involvement and consensus of all individuals...	Consensus can be counter- productive and jeopardize responsibility of Senior Management.	x			
	3.10	Managers at all levels should seek the active involvement and consensus of all the individuals within the organization their group (and, where appropriate, within external organizations, such as contractors) in the establishment and application of behavioural expectations. (...). + text modification to consider	For clarification. In addition it is suggested to revise the text to mention the objective of individuals taking ownership of the behavioural expectations, rather than the notion of consensus.				Consensus was deleted as proposed by some MS Recommendation is clear
	3.10	Managers at all levels should seek the active involvement and consensus of all individuals within the organization (and, where appropriate, within external organizations, such as contractors) in the establishment and application of behavioural expectations (and, as applicable, other organizational culture [REF2] and human governance objectives [REF2]). The communication methods used by managers to ensure staff awareness and commitment should support mutual and candid feedback on behavioural expectations. <hr/> [REF1] = ISO/TS 24178:2021 Human resource management — Organizational culture metrics cluster	Promote standardization and use of international consensus best practices.				IAEA does not promote and reference single sources, ISO standards do not undergo IAEA Member States consensus process

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
		[REF2] = ISO 30408:2016 Human resource management — Guidelines on human governance					
	3.11	Managers at all levels should be role models in terms of personal accountability by ensuring their actions demonstrate their words, ensuring safety is evidently the overriding priority in all work, holding themselves accountable for actions and decisions, and taking personal ownership of the results of their decisions and actions.	<p>2. Goes beyond GSR Part 2.</p> <p>For <u>senior</u> managers, GSR Part 2 para 3.1 states that “<i>The senior management of the organization shall demonstrate leadership for safety by: ... (d) Establishing the acceptance of personal accountability in relation to safety on the part of all individuals in the organization and establishing that decisions taken at all levels take account of the priorities and accountabilities for safety.</i>”</p> <p>With regard to managers, GSR Part 2 para 3.2 and 3.3 states that: “<i>Managers at all levels in the organization, taking into account their duties, shall ensure that their leadership includes:</i> <i>(a) Setting goals for safety that are consistent with the organization’s policy for safety, actively seeking information on safety performance within their area</i>”</p>			x	Please see Appendix A: IR Individual responsibility: <i>There is personal ownership for safety</i> ..for each individual and therefore also for managers.

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
			<p><i>of responsibility and demonstrating commitment to improving safety performance;</i></p> <p><i>(b) Development of individual and institutional values and expectations for safety throughout the organization by means of their decisions, statements and actions;</i></p> <p><i>(c) Ensuring that their actions serve to encourage the reporting of safety related problems, to develop questioning and learning attitudes, and to correct acts or conditions that are adverse to safety.”</i></p>				
	3.11	Managers at all levels should be role models in terms of personal accountability by ensuring their actions demonstrate reflect their words the directives they have issued , ensuring safety is evidently the overriding priority in all work, holding themselves accountable for actions and decisions, and taking personal ownership of the results of their decisions and actions.	It is proposed to replace the “their words” by “the directives they have issued”			x	The draft text is good
	3.12.	Managers at all levels should follow a risk informed decision making process commensurate to the risks of the facility or activity.	Delete. This is not about leadership for safety and this may not be true depending on the manager (one expectation is often to implement established procedures....)			x	The draft text is good

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
	3.12	Managers at all levels should follow a risk-informed based decision making process commensurate to the risks of the facility or activity.	The ‘risk’ in the document means ‘radiation risk’. However, ‘risk-based decision making’ is a generic common term used in other industry as provided in such as ISO 9001 standard. This provides a process to ensure that optimal decisions, consistent with the goals and perceptions of those involved are reached.			x	The draft text is good Both risk based or risk informed are used.
	3.12A	The risk informed decision making should include structured approach for making sound, risk informed decisions using existing procedures and protocols, and appropriate resources (e.g. expert panel, and technical specialists) commensurate with the importance of the decision being considered for an identified issue.....	There is need to provide guidance regarding methodology of utilizing risk informed decision making (e.g. taking insights from TECDOC 1909). Moreover, the explanation may be generalized to make it applicable for facilities and activities. Further, other safety standards having explanation regarding implementation of risk informed decision making may be referred.			x	The draft text is good SPESS C: “Safety Guides and Implementing Guides should not reference TECDOCs”

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
	3.12	Footnote RIDM: “to make the best decisions to achieve their goals, taking into account the constraints of social, technical, business, safety, security, and environmental requirements. Risk management requires making decisions about identification, analysis, assessment, control, prevention, mitigation, and communication of risks in a cost-effective way.” *	<p>“risk-informed decision making process” should be explained in a footnote.</p> <p>* Source: ScienceDirect; Copyright © 2023 Elsevier Inc. All rights reserved</p>			x	Not possible to refer to the source
	3.12	Managers at all levels should <u>make decisions in an integrated, risk informed manner</u> , follow a risk-informed decision-making process commensurate to the risks of the facility or activity.	<p>There is no such a requirement in GSR Part 2 to follow a risk-informed decision making process.</p> <p>Additionally, a definition of such a process would be helpful, as well as understanding that different regularities are following different processes. We suggest a rewording.</p>			x	This recommendation says in other words that risks should be considered when making decisions, what is essential for nuclear industry; the wording does not presume any methodology
	3.12. REFERENCES	<p>Managers at all levels should follow a <u>risk-informed decision making process [xx]</u> commensurate to the risks of the facility or activity.</p> <p>REFERENCES</p> <p><u>[xx] INTERNATIONAL ATOMIC ENERGY AGENCY, A Framework for an Integrated Risk Informed Decision Making Process, INSAG-25, IAEA, Vienna (2011).</u></p>	<p>Clarify “risk-informed decision making” by referring to INSAG-25 “A Framework for an Integrated Risk Informed Decision Making Process.”</p>			x	Safety guides cannot refer to INSAG publications – they do not undergo IAEA Member States consensus process

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
	3.12	Managers at all levels should follow a risk-informed decision making process commensurate to the risks of the facility or activity.	Decision making process is a major approach, it requires more details. And reference to INSAG-25 could be considered.			x	INSAG publications cannot be referred in safety guide as they do it not undergo by consensus process of MS
	3.13	Managers at all levels should implement actions to help ensure that all individuals make safety conscious choices so that actions are determined to be safe before proceeding.	This brings little added value compared to GSR par 2 as GSR part 2 para 3.3 states that “Managers at all levels in the organization: (a) Shall encourage and support all individuals in achieving safety goals and performing their tasks safely; ...”			x	It is about safety conscious choices before proceedings
	3.14	Managers at all levels should be personally involved in relevant training and coaching, and when needed in training, to ensure the understanding of and to reinforce personal accountability for safety by all members of the organization.	Is it realistic to recommend managers to be personally involved in relevant training sessions? This depends a lot on the training strategy of the company. Coaching, on the contrary, is feasible...		x		Managers at all levels should be personally involved in relevant training and coaching when needed to ensure the understanding of and to reinforce personal accountability for safety by all

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
							members of the organization.
	3.14	<u>Add:</u> Managers at all levels should take training and participate in learning to be aware of the evolving requirements, experience, best practices, and to set personal example to the organization's members.	Managers must be aware of the evolving requirements, which is accomplished by taking training.	x			
	3.15/3	...to consistently observe, coach and mentor staff to encourage a focus on safety	Appropriate coaching is also necessary to encourage a focus on safety	x			
	3.15.	Managers at all levels should promote and engage in frequent formal and informal open and effective communication with staff to remain aware of any concerns by staff in relation to safety. Managers should also frequently be present in the workplace to consistently observe and mentor staff to encourage a focus on safety. Managers should use various communication tools and monitor their effectiveness to engage individuals in enhancing safety performance.	It is proposed to add management's responsibility for promoting open, transparent and effective communication with staff on all safety-related matters. .			x	The draft text is good

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
5	3.15/	Managers at all levels should engage in frequent formal and informal communication with staff to remain aware of any concerns by staff in relation to safety. Managers should also frequently be present in the workplace to consistently observe and mentor staff to encourage a focus on safety. Managers should use various communication tools and monitor their effectiveness to engage individuals in enhancing safety performance. Manager should generate necessary record of their observations to identify and track the trends of common issues.	Necessary record should be generated on common observation and mentoring for future reference to conform with para 4.13 and para 9.5.			x	Not applicable for all facilities and activities. Graded approach needed
	3.15	Managers at all levels should engage in frequent formal and informal communication with staff to remain aware of any concerns by staff in relation to safety. Mechanisms could be used like surveys to estimate the safety climate and give the opportunity of exchanges between staff and managers on the safety culture of the organization. Managers should also frequently be present in the workplace to	Safety culture survey is the adequate tool in order to estimate safety climate Managers in the field is a major approach, it requires more details – need a specific article Too many repetitions on communication		x		Safety culture assessment (not only survey) is covered by section 9 Presence in the field is sufficient term (manager in the field is typical for nuclear installations but not in other facilities and in regulatory bodies etc.

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
		consistently observe and mentor staff to encourage a focus on safety, and also to better know the activities and working conditions. Managers should use various communication tools and monitor their effectiveness to engage individuals in enhancing safety performance.					
	3.15	Managers should also frequently regularly be present in the workplace to consistently observe and mentor staff to encourage a focus on safety.	The text currently says ‘frequently be present’. What is considered ‘frequently’? Many office-based workplaces have transitioned to a hybrid arrangement where staff regularly work from home. ‘Regularly’ or ‘from time to time’ may be more appropriate language in this section.	x			
	3.16		Relocate 3.16 under the safety culture section.			x	It belongs to demonstration of leadership for safety by managers

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
	(f) 3.16	Promote collective learning by maintaining a focus on the effective use of lessons learned, benchmarking and operating experience”.	To be more results focused	x			
	3.17	Delete 3.17	This brings little added value compared to GSR par 2 as GSR part 2 para 3.3 states that “ <i>Managers at all levels in the organization: ... (c) Shall communicate clearly the basis for decisions relevant to safety.</i> ”			x	Brings little bit more / how decisions affect their work
	3.17	Managers at all levels should communicate and help their staff understand comprehensively the basis for safety-related decisions to allow staff to understand why specific decisions were made and how these decisions affect their work.	- For better clarity		x		<i>Managers at all levels should communicate the basis for safety-related decisions to help the staff to understand why specific decisions were made and how these decisions affect their work.</i>

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
	3.24/1	Requirement 8 of GSR Part 2 [2] 8 states that “The management system shall be documented. The documentation of the management system shall be controlled, usable, readable, clearly identified and readily available at the point of use.”	Remove 8 after [2]	x			5.24 not 3.24
	Section 4	Add “and security” to the heading and where “safety” is mentioned; for references, add relevant higher-level security reference from the NSS or A/CPPNM. For the “interested parties” in the text of the draft (excluding quotations from references), “stakeholders” or similar might be better for safety and security together, as in security the relevant parties have other criteria than “interested”.	1. Same as in comment			x	Current draft supports and explains GSR Part 2 focused on safety; security is mentioned several times as interface
	4.2	Senior management should be fully committed to the management system and <u>ensure that the management system established under their responsibility allows for use it as a single framework for overall control of the organization. Senior management should foster the long term commitment and engagement of managers at all levels and of all individuals to the management system, through a process of participation and consultation</u>	1. Same as in comment	x			

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
	4.2, Line 2	“Senior management should be fully committed to the management system and should use it as a single <u>the</u> framework for overall control <u>management</u> of the organization <u>and the organizational process, which is key in ensuring safety and consistency</u> . Senior management should foster ...”	The management system is not really just about control, it is about managing resources (human, financial and infrastructure) to achieve consistently safe results aligned with the objectives. This includes influencing, supporting, leading etc. The scope of the impact of the management system should not be defined differently here compared to other documents.		x		Partially modified to keep simple sentence
	4.3	Paragraph 4.1 of GSR Part 2 [2] states that “Senior management shall retain accountability for the management system even where individuals are assigned responsibility for coordinating the development, application and maintenance of the management system”. If senior management assign staff members to coordinate parts of management system, clearly defined authorities and responsibilities should be established to achieve the following: (a) Coordination of the development, implementation and improvement of the management system;	- Retaining of accountability with Senior Management was not covered / clarified in the para.			x	<i>Retaining of accountability is a requirement of GSR Part 2 (see quote). This recommendation elaborates some details</i>

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
		<p>(b) Assessment and reporting of the effectiveness of the management system;</p> <p>(c) Integration of the various processes in the management system to meet safety objectives.</p> <p>Despite the above delegation of responsibilities, the accountability for the Management system would still remain with the Senior Management; and hence Senior Management should institute appropriate means to assess that the delegated responsibilities are being effectively carried out.</p>					
	4.3	<p>Last sentence, “If senior management assign staff members to coordinate parts of management system, clearly defined <i>tasks and authorities</i> should be established to achieve the following:”</p>	<p>The word responsibility in this context could be read as managers transferring responsibility to staff members. This is unfortunate.</p>			x	<p><i>Assignment for coordination is not the same as delegation of responsibility</i></p>
	4.4	<p>4.4. Senior management should take actions to implement the following:</p> <p>(a) To establish a work environment that supports effective implementation of the management system;</p> <p>(b) To cultivate a work environment in which all applicable elements of the management system are implemented in daily work;</p>	<p>All elements of the management system are not relevant for a specific task or duty...</p>	x			

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
		...					
	4.5	If any parts of the management system are developed or updated by an external organization, senior management <u>individuals responsible for coordinating the development of the management system</u> should ensure that those parts are consistent with the organization's overall management system. The responsibilities and authority for those parts should remain with senior management.	It is unlikely that senior manager will do that. It will probably be delegated to the management system unit.			x	<i>Senior management is still responsible it does not mean they will do that in person (should ensure)</i>
	4.5	If any parts of the management system are developed or updated maintained by an external organization, [...]	“develop and maintain’ is correct as describe in IAEA GSR Part 2, para. 2.2 (d), 4.28.			x	<i>The draft text is good</i>
	4.5	Senior management should ensure that the outsourced processes are consistent with management system. For this reason, the items: “such as through inspection of incoming items, monitoring and auditing” can be included in this para.	Ref. ISO/TS 9002:2015 (Section 8.4.1)			x	<i>Covered fully by 7.9</i>

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
	4.5/4	(see paras 3.8 and 3.9 of IAEA Safety Standards Series ... International Basic Safety Standards [5]).	close the parenthesis	x			
	(c) 4.6	It should include a commitment to comply with all regulatory and statutory requirements;	- For completeness	x			
	4.6	Senior management should ensure that the safety policy is documented and should disseminate this safety policy that the safety policy (or set of policies containing the safety policy) is disseminated across the organization. The safety policy should have the following features:	Senior management may not be the person disseminating the safety policy. Slight language change to reflect this.	x			
	(h) 4.6	It should include a commitment of management to provide adequate financial, material and human resources to effectively meet the safety requirements;	- Linkage with safety is needed in all features of the 'Safety policy'	x			

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
	4.6	<p>Adding the following features:</p> <ul style="list-style-type: none"> - It should include management's commitment to continuous safety improvement. - It should include management's commitment to promote safety leadership qualities among employees at all levels. <p>It should include management's commitment to promote organizational learning at all levels.</p>	<p>The topics of continuous improvement of safety, and improvement of leadership attitudes between all employees and attention to the learning of the organization are important issues that need to be mentioned in the organizational policy.</p>			x	<p><i>All these items belong to strong safety culture (g)</i></p>
	4.6	<p>Paragraph 4.2 of GSR Part 2 [2] states that "Senior management shall be responsible for establishing safety policy." Senior management should ensure that the safety policy is documented and should disseminate this safety policy (or set of policies containing the safety policy) across the organization. The safety policy should have the following features:</p> <ul style="list-style-type: none"> (a) It should stipulate the responsibilities for safety; (b) It should state clearly that the demands of the organization's overall performance and project schedules do not override safety; (c) It should include a commitment to comply with all regulatory requirements; 	<p>Policy are often quite short documents... Has there been a benchmark to compare current safety policies with these expectations, for all various types of licensees, such as:</p> <ul style="list-style-type: none"> - NPP operators, - Fuel cycle facilities, - Hospital, - Veterinary clinic - NDT companies, - Oil industry - Research centre - University - Airport with security X-rays 			x	<p><i>The logic is opposite. Recommendations are relevant for all facilities and activities and grading is in 4.7 .</i></p>

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
		<p>(d) It should promote the enhancement of safety performance;</p> <p>(e) It should include a commitment to develop, maintain and improve the management system in order to support the achievement of safety objectives;</p> <p>(f) It should stipulate the role of leadership for safety at all organizational levels;</p> <p>(g) It should promote a strong safety culture;</p> <p>(h) It should include a commitment of management to provide adequate financial, material and human resources;</p> <p>(i) It should include a commitment to the highest safety performance by all individuals, including suppliers.</p>	<ul style="list-style-type: none"> - A regulatory body - ... <p>Para 4.7 allows for some grading to account for this diversity. See also comment on 4.7.</p>				
	Page 7, Line. 22	International Basic Safety Standards [5]).	there is no closing bracket in Draft Documents	x			
	4.7	<p><u>For nuclear installations, the safety policy should have the following features:</u></p> <p><u>(a) It should stipulate that the organization is responsible for safety;</u></p> <p><u>(b) It should state clearly that the demands of the organization's overall performance and project schedules do not override safety;</u></p>	<p>Text initially in 4.6 is more applicable to nuclear installations and other large organizations.</p> <p>Responsibilities for safety lies with the organization.</p>			x	<i>The logic is opposite. Recommendations are relevant for all facilities and</i>

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
		<p><u>(c) It should include a commitment to comply with all regulatory requirements;</u></p> <p><u>(d) It should promote the enhancement of safety performance;</u></p> <p><u>(e) It should include a commitment to develop, maintain and improve the management system in order to support the achievement of safety objectives;</u></p> <p><u>(f) It should stipulate the role of leadership for safety at all organizational levels;</u></p> <p><u>(g) It should promote a strong safety culture;</u></p> <p><u>(h) It should include a commitment of management to provide adequate financial, material and human resources;</u></p> <p><u>(i) It should include a commitment to the highest safety performance by all individuals, including suppliers.</u></p> <p><u>For other facilities and activities, with in the application of a graded approach, the safety policy may be customized to reflect the level of risk of the facility or activity, for example based on whether it is required to be authorized by registration or licensing (see paras 3.8 and 3.9 of IAEA Safety Standards Series No. GSR Part 3, Radiation Protection and Safety of Radiation Sources: International Basic Safety Standards [5].</u></p>					<i>activities and grading is in 4.7 .</i>
	4.8	Senior management should ensure the participation and consultation of managers at all levels and all staff in the development and implementation of the safety policy, to enhance individual accountability.	- Participation and consultation in implementation is required as Managers at different levels are better positioned to suggest the implementation aspects			x	<i>This recommendation is about the process of development of safety policy not</i>

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
			(including the related challenges) in their field.				<i>about implementation</i>
	4.8	Senior management should ensure the participation and consultation of managers at all levels and all staff in the development of the safety policy, to enhance individual accountability active engagement and collaboration of managers representing various functional areas of the organization, so as to have a holistic and comprehensive formulation of the safety policy.	This recommendation is not reasonable (all staff to be included in the development of the safety policy).		x		<i>Participation and consultation opportunities should be given to the staff within the development</i> Senior management should ensure the participation and consultation of managers at all levels and the staff in the development of the safety policy, to enhance individual accountability.

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
	4.8	4.8. Senior management should ensure the participation and consultation of managers at all levels and all staff in the development of the safety policy, to enhance individual accountability	To allow some flexibility in the way the safety policy is developed.		x		Senior management should ensure the participation and consultation of managers at all levels and the staff in the development of the safety policy, to enhance individual accountability.
	4.8	Senior management should ensure the participation and consultation of managers at all levels and all representative of staff in the development of the safety policy, to enhance individual accountability.	Seek consultation with representatives of staff – not “all staff”, which would not be reasonable for the development of the safety policy			x	Safety guides cannot refer to INSAG publications – they do not undergo IAEA Member States consensus process
	4.8	Senior management should ensure the participation and consultation of managers at all levels and all representative of staff in the development of the safety policy, to enhance individual accountability.	Seek consultation with representatives of staff – not “all staff”, which would not be reasonable for the development of the safety policy	x			Senior management should ensure the participation and consultation of managers at all levels and the staff in the development of the safety policy, to enhance

COMMENTS The comments are listed according to their order of appearance in the text				RESOLUTION			
							individual accountability.
	4.9	The objectives should be Specific, Measurable, Achievable, Relevant and Time-bound. (SMART) therefore it is recommended to include the SMART for the goals.	Ref. ISO/TS 9002:2015 (Section 6.2.1)			x	<i>It is covered in 4.11 partially. But not explicitly as SMART</i>
	4.9	Delete 4.9	No added value. The requirement in GSR Part 2 is self-sufficient. In addition, as the goals strategies, plans and objectives for the organization have to be consistent with the organization's safety policy and that the safety policy include a goal to comply with regulatory requirements, no need for further details...			x	<i>It is an introductory recommendation enabling track to GSR Part 2</i>
	4.10	The organization's goals, strategies, plans and objectives should be developed, implemented and aligned in such a manner that their collective impact on safety is understood and managed and <u>safety</u> .	To fulfill Requirement 4 item 4.3 in GSR Part 2 adding statement that safety is not compromised by other priorities.	x			

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
		<u>is not compromised by other priorities</u> . A process for their evaluation should be part of the management system.					
7	4.10	A process for their evaluation (e.g. <u>internal audits [REF]</u>) should be part of the management system (See Section 9). <u>[REF] = ISO 19011:2018 Guidelines for auditing management systems</u>	Promote standardization and use of international consensus best practices.			X	Please see 2.3: to apply relevant international codes and standards for safety. Please see 4.13 for methodology and frequency. Concerning references: IAEA does not promote single sources.
	4.10 4.11 4.12	4.10 4.11 4.12 4.10 The organization's goals, strategies, plans and objectives should be developed, implemented and aligned in such a manner that their collective impact on safety is understood and managed, and the senior management should ensure that: - a process is established for their evaluation as part of the management system;	Replacement by a single paragraph as an editorial improvement and easier understanding.			x	The draft text is good

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
		- the various levels of the organization can define and monitor specific safety objectives; - that all individuals within the organization feel personally engaged in and accountable for meeting them.					
	4.12	Senior managers should ensure that all individuals within the organization understand the goals, strategies, plans and objectives relevant to their responsibilities, set by...	Individuals should understand these aspects from the point of view of their own roles and responsibilities. It is unreasonable and inexpedient to expect everyone to understand business strategies set by senior management.	x			Relevant was added
	4.12	Senior management should ensure that all individuals within the organization understand the goals, strategies, plans and objectives set by senior management, acknowledge its impact on safety, and feel personally engaged in and accountable for meeting them.	Impact of goals, strategies, plans and objectives on safety should be well acknowledged by all individuals.	x			
	4.12	Senior management should ensure that all individuals within the organization understand the goals, strategies and, according to their areas of responsibilities, plans and objectives set by senior management and feel personally engaged in and accountable for meeting them.	This goes beyond GSR Part 2 requirements. Not all personnel need to know everything...		x		Senior management should ensure that the staff understands the relevant goals, strategies, plans and objectives set by senior management and their impact on

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
							safety and feel personally engaged in and accountable for meeting them.
	4.13	<p>Paragraph 4.5 of GSR Part 2 [2] states: “Senior management shall ensure that goals, strategies and plans are periodically reviewed against the safety objectives, and that actions are taken where necessary to address any deviations.”</p> <p>The frequency and methodology for such reviews should be clearly communicated to all staff within the organization to ensure that they understand the process(es) involved. Any resulting actions should be documented along with the basis, and implemented as part of a corrective action or improvement programme (see Section 9 of this Safety Guide).</p>	The basis must be documented so that the individuals clearly understand the rationale behind the actions taken based on such reviews.			x	Draft text is good
	4.13/5	The frequency and methodology for such reviews should be clearly defined and communicated to all staff	Add: <u>defined and</u>	x			

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
	4.13, Line 8	“... Any resulting actions should be documented and implemented as part of a corrective action or improvement programme. <u>This includes actions from assessments of both leadership and safety culture performed periodically in order to monitor and evaluate trends and changes</u> (see Section 9 of this Safety Guide).”	It’s important to highlight that safety culture, effective leadership are all safety objectives. The outcome of an effective management system is to ensure organizational and human performance in achieving all safety objectives.			x	This recommendation is dedicated to review of goals, strategies, plans not generally to each type of review or assessment. The proposed text is partially covered in section 9
	4.14/4	To add the proposed element at the end of parag 4.14 : “The frequency and methodology for the review should be established and approved by senior management taking into consideration a graded approach.”	For more details.			x	This recommendation speaks about graded approach –
	4.14	In accordance with the application of a graded approach, the goals, strategies, plans and objectives, as well as the programmes for their review and improvement, should be documented to a level of detail that reflects <u>potential radiological hazard associated with as well as</u> the complexity of the facility or activity and the associated radiation risks.	Potential radiological hazard associated with the facility or activity is primary.			x	The draft text is good and similar wording is used in the whole text

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
	4.16	Paragraph 4.6 of GSR Part 2 [2] states that “Senior management shall identify interested parties for their organization and shall define an appropriate strategy (including the frequency) for interaction with them.” This strategy should be consistent with other strategies within the organization.	- Frequency must be determined so that the organization and the interested parties are well prepared for such interactions.			x	Quote from GSR Part 2, we cannot change it
	4.16A	This strategy should be developed considering guidance of IAEA GSG-6, SSG-72.... and should be consistent with other strategies within the organization.	Further guidance regarding interaction strategy may be provided (e.g. taking insights from GSG-6, SSG-72). Moreover, this explanation may be generalized for all facilities and activities.		x		GSG-6 added to references
	4.16	Paragraph 4.6 of GSR Part 2 [2] states that “Senior management shall identify interested parties for their organization and shall define an appropriate strategy for interaction with them.” This strategy should be consistent with other strategies within the organization <u>and with regulatory requirements.</u>	Interaction with interested parties, especially those living nearby the facility may defined, at least partially, in laws and regulations...		x		Paragraph 4.6 of GSR Part 2 [2] states that “Senior management shall identify interested parties for their organization and shall define an appropriate strategy for interaction with them.” This strategy should be consistent with other strategies within the organization and

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
							relevant legal requirements.
	4.17	Re-word or remove “emergencies”	<p>“emergencies” in (a) is problematic. Radiological emergencies always need to be communicated to interested parties. It should be clarified what is meant by emergencies.</p> <p>Possible references are: IAEA EPR-IEComm (Operations Manual for Incident and Emergency Communication)</p> <p>ISO 22329:2021 Security and resilience — Emergency management — Guidelines for the use of social media in emergencies</p> <p>Convention on Early Notification of a Nuclear Accident (Early Notification Convention) and the Convention on Assistance in the Case of a Nuclear Accident or Radiological Emergency (Assistance Convention)</p>			x	<p>In the IAEA Safety and Security Glossary (Interim Edition) 2022 the emergency is defined as</p> <p>A non-routine situation or event that necessitates prompt action, primarily to mitigate a hazard or adverse consequences for human life, health, property and the environment.</p> <p>This is in line with GSR Part 7, which provides comprehensive information concerning emergencies.</p>

COMMENTS The comments are listed according to their order of appearance in the text				RESOLUTION			
	4.17	“Senior management should ensure that expectations of interested parties are identified and understood” should be added before para 4.17.	According to section 4.7 (d) in GSR-Part 2.			x	Safety guide cannot reword GSR Part 2 requirements
	4.17/ (a) 2	To add the proposed element “emergency preparedness and response” instead of emergencies.	For more details				4.17 (a) is quote from GSR Part 2 and we cannot amend it newly
	4.17.a	Decide on the topics that are to be communicated to interested parties on a regular basis, and also on an infrequent basis including emergencies. Regular topics should include the organization’s safety performance, its overall performance, and the environmental impact, as appropriate; and on the topics that are to be communicated to interested parties on infrequent basis, including the response to emergencies.	The way it is written is a little bit confusing and leaves the response to emergencies without further clarification (as it happens for “regular topics”)		x		Decide on the topics that are to be communicated to interested parties on a regular basis, occasionally and in case of emergencies.
	4.18/1	In the communications with interested parties clear and unambiguous language should be used as per guidance of GSG-6	It is mentioned that in the communications with interested parties clear and unambiguous language should be used. Communication with interested parties should be performed based on		x		GSG-6 added to reference list

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
			honesty, openness, trust and fairness				
	4.18A	Expectations and concerns of the interested parties in relation of safety should be considered in decision making, to the extent possible in line with the national practices, for all facilities and activities considering graded approach.	Guidance regarding outcome of involvement of interested parties (Para 4.7(d) GSR Part 2) may be explicitly provided considering graded approach.		x		4.7 (d) of GSR Part 2 added, GSG-6 added to reference list
	4.18	Include 4.7 d) in the citation of GSR part 2.	4.7 d) is missing	x			
	4.18	Paragraph 4.7 of GSR Part 2 [2] states: “Senior management shall ensure that the processes and plans resulting from the strategy for interaction with interested parties include: (a) Appropriate means of communicating routinely and effectively with and informing interested parties with regard to radiation risks associated with the operation of facilities and the conduct of activities;	To be comply with Requirement 5 item 4.7 in GSR Part 2.	x			

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
		<p>(b) Appropriate means of timely and effective communication with interested parties in circumstances that have changed or that were unanticipated;</p> <p>(c) Appropriate means of dissemination to interested parties of necessary information relevant to safety”</p> <p><u>(d) Appropriate means of considering in decision making processes the concerns and expectations of interested parties in relation to safety</u></p>					
	4.18(c)	<p>Editorial comment</p> <p>(c) Appropriate means of dissemination to interested parties of necessary information relevant to safety.”</p>	<p>IAEA Style Manual IV.10 states, “The final punctuation in a quotation should normally be set before the final quotation marks.”</p> <p>The end stop belongs on the inside of the quotation mark, as it is part of the quoted text.</p>	X			
	4.18, line 3	Include footnote to define “interested parties”	The term” interested parties” is not clear in GSR Part 2 nor in this guide. Recommend quoting or referring to the glossary definition to make it clear to the reader.			x	Term is explained in Glossary as many other terms see in 1.9 and reference list

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
	4.19	Senior management should monitor whether the involvement of interested parties is adequately implemented. The results of this monitoring should be used as input for the continual improvement of interaction with interested parties and as feedback to the planning and decision-making process in the organization.	The feedback received from the interaction with the interested parties of the organization could not be a superficial action and should be taken into consideration in the future actions of the organization.			x	Draft text is good
	4.19	Senior management should monitor whether interested parties are adequately involved and engaged in the process.	The current text: “Senior management should monitor whether the involvement of interested parties is adequately implemented.” The phrasing is unclear; what does it mean for “involvement” to be “implemented”?		x		Interaction instead of involvement is used
	4.20	Suggestion to omit the last sentence. ”The designated staff should be aware that their communications might affect how the organization is perceived.”	The meaning can be misunderstood and the sentence is not unambiguous.	x			
	4.20	Senior management should ensure that the staff designated to interact with interested parties, <u>have the appropriate competences and are appropriately informed and updated on the risks generated by the facility or activity and on decisions and activities of the organization, including any unusual event, incident</u>	Clarifications	x			

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
		or accident and relevant risk information. The designated staff should be aware that their communications might affect how the organization is perceived					
	4.20, last line	Editorial comment 4.20. Senior management should ensure that the staff designated to interact with interested parties are appropriately informed and updated on the decisions and activities of the organization and relevant risk information.	Remove the unnecessary comma between parties and are.	X			
	4.20/2	...are properly trained, and appropriately informed and updated on the decisions and activities...	Proper training is necessary for the staff interacting with interested parties.		x		Competences included
	4.20		Some concern that the current text ' <i>The designated staff should be aware that their communications might affect how the organization is perceived</i> ' might make it seem that protecting the organization's reputation should supersede the need to prioritize safety. Query whether an extra sentence		x		The recommendation was modified based on comments of several MS Senior management should ensure that the staff designated to interact with interested parties have the appropriate competences and are appropriately informed on the

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
			should be added to say that safety remains paramount?				risks generated by the facility or activity and on decisions and activities of the organization, including any incident or accident.
	4.21	Transfer “ <i>For a facility or activity with a low risk or of low complexity, there is likely to be only a limited need for involvement of interested parties.</i> ” to a footnote	Although generally true, this may not always be the case, especially if an incident occurs...			x	Graded approach recommendations are distributed in the whole text (same principle). Footnote is not the right place for recommendation
	4.21 Line 3	... This strategy should be documented in a level of detail that reflects <u>potential radiological hazard associated with the complexity of the facility or activity and their complexity</u> the associated radiation risks. For a facility or activity with a low <u>radiation</u> risk or of low complexity, there is likely to be only a limited need for involvement of interested parties.	Potential radiological hazard associated with the facility or activity is primary. Same for paras 5.10, 5.25 and 9.2.			x	Graded approach recommendations are distributed in the whole text (same principle). Footnote is not the right place for recommendation
	New paragraph to Chapter 4	4.22: Senior management of the licensee organization should take responsibility for assuring that management systems of contracting organization performing safety-related activities are consistent with the licensee organization, adhere to	The licensee organization is responsible for safety, and must therefore assure that contracting organizations adhere to appropriate safety principles that are	<u>x</u>			New recommendation added (as 4.6)

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
		the same safety principles and meet relevant regulatory requirements.	aligned with the licensee organization.				
	5	Change the title of the para 5 of this draft “5. Management for Safety: The Management System” => “5. The Management System”	Editorial. To be consistent with the wording used in para 1.10 of this draft about the section 5 AND the wording used in GSR Part 2 “The Management System”.			x	The name is correct
	Section 5		Para. 5.1 reiterates Requirement 6 of GSR Part 2. However, within Section 5, there is limited guidance on societal elements, and particularly on integration of both societal and economic elements (i.e., socio-economic elements), within the management system; for example, as a consideration when applying the graded approach (in para. 5.2.1(b)). Additional guidance should be considered.			x	Yes, socioeconomic elements are mentioned only as those ones which should be integrated in the management system. The same approach is to environmental, health, security. This guide does not elaborate details on them.

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
	5	Add “and security” to the heading and where “safety” is mentioned; for references, add relevant higher-level security reference from the NSS or A/CPPNM.	Same as in comment 1.			x	Current draft supports and explains GSR Part 2 focused on safety; security is mentioned several times as interface
	5.1, line 5	“The management system should be a single framework for overall control of the organization, including management of the implementation and continuous improvement of all relevant processes. ”	The management system is more than about control. Control is better associated with quality control and work control.		x		Control replaced by management
	5.1	Throughout the draft: requirements of GSR Part 2 quoted in bold.	Editorial. For consistency. Same for other requirements of GSR Part 2 in this draft (to be checked; e.g., see para 8.1)	x			The main text of requirement is bold, paragraphs are not bold
	5.1	The management system should be a single framework coherent system for overall control of the organization, including management of all relevant processes	To be align with terms described in GSR Part 2.			x	Proposed by technical meeting

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
	5.1	<p>Requirement 6 of GSR Part 2 [2] states: “The management system shall integrate its elements, including safety, health, environmental, security, quality, human-and-organizational-factor, societal and economic elements, so that safety is not compromised.”</p> <p>The management system should be a single framework for overall control of the organization, including management of all relevant processes. <u>An effective management system supports the achievement of high levels of performance, including safety and the continual improvement of safety culture.</u></p>	Text was in 5.1	x			
	Page 9/ 5.1, second paragraph	<p>“The management system ... safety is not compromised” should be in bold</p>	Consistency	x			
	5.2	<p>An effective management system supports the achievement of high levels of performance, including safety and the continual improvement of safety culture</p>	Descriptive text transferred to 5.1	x			

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
	5.2	An effective management system supports the achievement of high levels of performance and, including safety and the continual improvement of safety culture- <u>The management system is be applied to achieve goals safely, to enhance safety and to foster a strong safety culture by</u>	To fulfil item 4.9 in GSR Part 2 where management system is applied to achieve goals safely not only high level of performance and it is important here to state that application of management system foster strong safety culture			x	Draft text is good
	Section 5.2	Arrangements should be made in the Management System for establishing an independent review committee to evaluate decision significant to Safety and formulate recommendations to the Senior Management and the board of directors of the organization as required.	The following should be specified in the Management System with regards to review committee : Engagement with the Senior Management and the board of directors as required for the recommendations of decision significant to Safety.			x	This approach is too specific and applicable to all facilities and activities
	5.2	“Senior management should oversee this alignment to ensure that the objectives of the organization are <u>consistently</u> achieved in a safe, efficient and effective manner.”	The word consistently is important; it is what a management system aims to do.	x			

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
	5.3	If an external project management organization is used to manage large projects (e.g. the development of a new facility or the major refurbishment of an existing facility), the project management should be consistent with the operating organization's management system, including its emphasis on safety as an overriding priority.	- Emphasis on safety			x	This is about project management and its consistency with the management system
	5.3	Please clarify the last sentence. In the last sentence it is stated: "the project management should be consistent with the operating organization's management system."	It is unclear what consistent in this context means.	x			
	5.3/3	If an external project management organization is used to manage large projects (e.g. the development of a new facility or the major refurbishment of an existing facility), the management system of project management organization should be consistent with the operating organization's management system.	The additional text is proposed to elaborate that the management system of external project management organization should be consistent with the operating organization			x	Covered in chapter 7 (supply chain management)
	5.3	If an external project management organization is used to manage large projects (e.g. the development of a new facility or the major refurbishment of an existing facility), the project management should be	Clarification			x	project management is another type of management which must be integrated within the management system; project management may be used within licensee

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
		consistent with the operating organization's management system.					
	5.4	(c) Establish priorities and time frames for <u>to ensure the full development and implementation of the elements of the management system with no undue delays.</u>	Clarification			x	Draft text is good
	5.4 (a)	"Identify regulations, standards and the organization's management and technical practices that apply to all its individuals , facilities, products, processes and activities to ensure that all the relevant requirements are adequately met (see also para. 4.12 of GSR Part 2 [2]);"	Should include people here as identified by "human resources" or "individuals"	x			
	5.4(b)	"Consider national expectations and international recommendations on management systems and other relevant safety related codes and standards " (See para 4.12 of GSR Part 2)	The IAEA issues standards and guides such as this draft and thus cannot mention other "international recommendations and relevant safety related codes and standards" without providing references.			x	Recommendation says consider...

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
	5.4	<p>(b) Utilize national or international standards on management systems.[FOOTNOTE]</p> <p>[FOOTNOTE] These may include, for example, international standards on quality management (ISO 9001), environmental management (ISO 14001), the supply of products or services important to safety (ISO 19443), business continuity management (ISO 22301), information security management (ISO 27001), anti-bribery management (ISO 37001) and occupational health and safety management (ISO 45001).</p> <p>REFERENCES: ISO 9001:2015 Quality management systems — Requirements ISO 14001:2015 Environmental management systems — Requirements with guidance for use ISO 19443:2018 Quality management systems Specific requirements for the application of ISO 9001:2015 by organizations in the supply chain of the nuclear energy sector supplying products and services important to nuclear safety (ITNS) ISO 22301:2019 Security and resilience — Business continuity management systems — Requirements ISO/IEC 27001:2022 Information security, cybersecurity and privacy protection — Information security management systems — Requirements ISO 37001:2016</p>	<p>The current text is unclear, what are “international recommendations” and what are “safety related codes and standards” – not present in the IAEA glossary.</p> <p>Promote standardization and use of international consensus best practices.</p>			X	<p>IAEA does not promote single sources, all mentioned references are out of control of IAEA and do not undergo IAEA Member States consensus process</p>

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
		Anti-bribery management systems — Requirements with guidance for use ISO 45001:2018 Occupational health and safety management systems — Requirements with guidance for use					
	5.4	When establishing the management system, the organization should undertake the following: (a) Identify regulations, standards and the organization’s management and technical practices that apply to its facilities, products, processes and activities to ensure that all the relevant <u>regulatory</u> requirements are adequately met (see also para. 4.12 of GSR Part 2 [2])	Specifying that this point is considered the Regulatory requirements	x			
	5.4	a) Identify regulations <u>regulatory requirements</u> , standards and the organization’s management and technical practices that apply to its facilities, products, processes and activities to ensure that all the relevant requirements are adequately met	Consistency – phrase regulatory requirements is used in rest of the text	x			
	5.5	Senior management should ensure that the management system clearly describes the division of responsibilities and the working relationships between all organizational units participating in	Where Paragraph 4.11 of GSR Part 2 require also the interfaces with the external organizations not oly the interfaces within the organization.		x		Senior management should ensure that the management system clearly describes the

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
		the organization's activities <u>and the procedure of interfaces with the external organization.</u>					division of responsibilities and the working relationships between all organizational units participating in the organization's activities including external organizations.
	5.5	Senior management should ensure that the management system clearly describes the division of responsibilities, and authorities , and the working relationships between all organizational units participating in the organization's activities	It seems that responsibilities, authorities and organizational relationships should be defined together and in relation to each other.	x			
	5.6	The management system should apply to all relevant individuals, each of whom <u>should be made aware of the parts of the management system relevant to his/her duties and of the importance of complying with the requirements of arrangements set in the management system.</u>	Clarification. Not all personnel need to know everything...	x			

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
	5.7	No new text. Para to be deleted. See comment number 9.	The content of this para should be merged with the one of the para 5.9 of this draft. PS: link with the comment number 5.	x			
	5.8	Relocate 5.8 after 5.4	Both para are addressing the design of the management system.			x	Location is OK
	5.8	<u>(c) Safety is paramount consideration, guiding decisions and actions</u>	To put emphasis that decision-making is first based on safety and then on other considerations such as economic consideration	x			
	5.9	Paragraph 4.10 of GSR Part 2 [2] states that “Arrangements shall be made in the management system for the resolution of conflicts arising in decision making processes.” <u>Potential impacts of security measures on safety and potential impacts of safety</u>	According to Paragraph 4.10 of GSR Part 2, it is required arrangement made in management system for “impacts of security measures on safety and safety measures	x			5.7 and 5.9 merged

COMMENTS		RESOLUTION			
The comments are listed according to their order of appearance in the text					
	<p><u>measures on security shall be identified and shall be resolved without compromising safety or security.</u> If conflicts between the elements of the management system are identified they should be solved by a structured, transparent and well communicated decision making approach. Senior management should encourage the involvement of individuals by active participation in decision making at all levels</p>	<p>on security” / Conflict between Safety and Security not only conflicts between the elements of the management system. And it is important to state that solving this conflict is done without compromising safety or security.</p>			
5.9	<p>Paragraph 4.10 of GSR Part 2 [2] states that “Arrangements shall be made in the management system for the resolution of conflicts arising in decision making processes...”</p>	<p>Editorial: statement is cut, so add three dots.</p> <p>In addition, the para 4.10 is about security and safety interactions; para 5.7 of this draft also; link with the comment 17.</p>	x		
5.10	<p><u>Considering the graded approach</u> For a less <u>the complex</u> facility or activity complexity and with a low <u>the level of</u> radiation risk, the management system may be simpler and less formal, but should still integrate all the necessary elements. Documentation may be limited to those tasks with a higher risk and to processes that are related to meeting regulatory requirements</p>	<p>In this way it is become more clear that application of management system in the facility or activity is based on graded approach where the statement of ” For a less complex facility or activity with a low radiation risk” is generic and sot clear.</p>	x		

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
	5.10/2	<u>...may be simpler and less formal...</u>	<u>No added value.</u>			x	Simple and formal are different things
	5.10	For a less complex facility or activity with a low radiation risk, the management system may be simpler and less formal, but should still integrate all the necessary elements. Documentation may be limited to those tasks with a higher risk and to processes that are related to meeting safety regulatory requirements.	The need should be to meet safety requirements.			x	Risks are interrelated with safety
	5.11	These provisions should ensure that all changes (i.e., technical modifications and organizational changes), are methodically identified, analysed, controlled and the records of changes are kept.	Keeping records of changes is crucial because they provide accountability, ensure transparency, and serve as a basis for auditing.			x	Covered generally in 5.33, 5.34

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
	5.11, line 5	“...These provisions should ensure that all changes (i.e. technical modifications, <u>documentation changes</u> and organizational changes), are methodically identified...”	All changes should also encompass changes to the documentation.	x			
	5.11 Line 6 For each change, the impact on the objectives of the organization — including those relating to safety, health, the environment, security and quality — should be considered within the context of applying a graded approach	Paragraph 4.13 of GSR Part 2, explained here, is dealing, among others, with the cumulative effects of minor changes. We don't think that graded approach is crucial here. Please delete. Graded approach is sufficiently treated in para 5.14.			x	Graded approach is needed here
	5.15	During the implementation of changes, attention should be paid to the new risks. In addition to the “adverse impact”, new risks which can be imposed shall be identified and controlled.	Ref. ISO/TS 9002:2015 (Section 6.3)			x	New risks are covered by considering safety aspects
	5.16	Senior management should ensure that individuals are aware of how their responsibilities will change both during and after organizational changes. Consideration should be given to the need for temporary additional resources and for compensatory measures to manage the impacts during a transitional phase.	Change management goes beyond the issue of responsibility to take into account the impacts in terms of resources & means requires, new organisation and training needs. The management of change guidance could be more developed.				Covered by 5.11, 5.12, 5.12, and others.. This paragraph is related to responsibility The draft text is good

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
			Reference to INSAG-18 could be considered.				
	5.17	Monitoring of changes should provide early insights of any negative effects on safety performance, thereby ensuring that there is sufficient time to take appropriate action before safety is could be compromised.	Clarification			x	Draft text is good
	5.18	Delete 5.18	Largely redundant with 5.13		x		Recommendation limited to interested parties only
	A 5.19	The scope of safety significant decisions for which independent review need to be performed should be documented in management system considering extent of risk involved in facility of activity by graded approach.	Since guidance regarding implementation of Para 4.14 GSR Part 2 is not covered is DS513 so it is elaborated here. The scope of safety significant decisions for which independent review will be required depend upon facility or activity considering graded approach.			x	GSR Part 2 4.14 is self-explanatory

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
	5.20, line 2	<p>“Requirement 7 of GSR Part 2 [2] states that “The management system shall be developed and applied using a graded approach.” <u>When a graded approach is used, all requirements shall apply but to varying degrees depending upon the safety significance and complexity of the work being performed.</u>”</p>	To ensure that a graded approach will not be interpreted as a selection of requirements.			x	It is already there and in many other places
	Page 11, Line. 37 5.21c	improperly carried out.	there is (“) in Draft Documents	x			
13	5.21, quoted text	<p>5.21. Paragraph 4.15 of GSR Part 2 [2] states [citations omitted]:</p> <p>“The criteria used to grade the development and application of the management system shall be documented in the management system. The following shall be taken into account:</p>	The beginning quotation mark is missing - though the end quotation mark is after (c).	X			
	5.21 (b)	<p>The hazards and the magnitude of the potential impacts (risks) associated with the safety, health, environmental, security, quality and economic elements of each facility or activity. Societal and human and organizational factors should be considered appropriately.</p>	This seems worth mentioning to ensure that the analysis does not focus on technical aspects only.			x	It is a quote of GSR part 2 We cannot change it

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
	5.23	Delete 5.23	Largely redundant with 5.22	x			
	Para. 5.24	5.24. Requirement 8 of GSR Part 2 [2] 8 -states that	Correction of typo	x			
	5.21	No new text. Para to be deleted. See comment number 9.	If this draft is often a copy of GSR Part 2, users will only use this draft tomorrow instead of GSR Part 2 (SSR-2/2 Rev.2) first. Do not minimize this risk, please.		x		5.21 merged with 5.22
	5.25	Senior management should ensure that the documentation of the management system is appropriate to the organization and to its facilities and activities, and is flexible enough to accommodate changes. For a less complex facility or activity with a low radiation risk, the scope of the documentation and its level of detail may be adjusted accordingly. Some of the management system processes and arrangements may be undertaken on a less formal basis, provided that the organization can demonstrate that	To be deleted and described with section of Graded Approach item 5.29 in applying the management system at the organization.			x	Text on graded approach is distributed in the whole document not only in part relevant to graded approach requirement 5.29 is relevant to document control process only

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
		these practices and arrangements are applied consistently. Quality manuals, operating procedures or similar documents may be considered as the equivalent of management system documentation.					
	5.26	Senior management should decide on the structure of documentation of the management system, which should be appropriate to the organization. This structure should support clarity and avoid repetition consistency of information.	Repetition is not an issue, inconsistency is. Avoiding repetition is one way to ensure an update of one part of the management system won't have to be replicated elsewhere...	x			
	5.25/7	Quality manuals, operating procedures, guidelines, working instructions, etc., or similar documents may be...	For clarity.	x			
	5.26/5	...a description of processes and procedures, and	Procedures should be part of the level 2 documentation.	x			
	5.28	Modify: "Using a graded approach, including information security requirements, senior management should decide on the level of control..."	Same as in comment 1. Specifically, to ensure confidentiality, integrity, and availability of information. (Information security management system is part of the integrated		x		It does not fit to 5.28, therefore new recommendation was created Senior management should ensure that

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
			management system, as part of (nuclear) security, see NST070.)				information security requirements are established and implemented.
14	5.28, paragraph 1	Editorial comment 5.28. Using a graded approach, senior management should decide on the level of control to be applied to different types of documents that support the management system.	The word “document” should be plural because it refers to the word “types”	X			
	Para-5.28	Using a graded approach, senior management should decide on the level of control to be applied to different types of document that support the management system. For example, different levels of control might be applied to the following: (a) Documents that define the management system, including roles and responsibilities of individuals at key positions; (b) Regulatory requirements; including regulatory clearances, authorisation for safe disposal of radioactive waste, license/ authorisation issued to operational staff, and other statutory clearances (c) Drawings and process descriptions;	(a) Suggested inclusion in the text – “including roles and responsibilities of individuals at key positions.” (b) Suggested inclusion in the text – including regulatory clearances, authorisation for safe disposal of radioactive waste, license/ authorisation issued to operational staff, and other statutory clearances (c) --.		x		Text was shortened

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
		<p>(d) Procedures and work instructions for normal and off-normal conditions;</p> <p>(e) Assessment reports;</p> <p>(f) Data file specifications and computer codes;</p> <p>(g) Contracts with suppliers.</p> <p>(h) Document defining the information related to nuclear security or physical protection systems</p> <p>(i) Safety documents such as, safety analysis report, Operational limits and conditions design basis reports, quality assurance plan, etc.</p> <p>(j) Training and certification requirement of staff and their records</p> <p>(k) Quality assurance/ surveillance checks to be done for the items important to safety</p> <p>(l) Documentation of important operational records including shift daily log book /sheets</p> <p>(m) Documentation of reports of Regulatory safety review meetings</p>	<p>(d) Suggested inclusion in the text – “Normal and off-normal conditions “</p> <p>(e) , (f) & (g) – No Change proposed</p> <p>to (o) are the additional Points suggested for inclusion in the text as these level of controls applied by the senior management of the operating organization, may be included.</p>				

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
		<p>(n) Maintaining the waste disposal/transfer records</p> <p>(o) Environmental monitoring and assessment</p>					
	5.29	Senior management should also ensure a graded approach to the document...	Either remove the word “that” or add “is applied” after the term graded approach.	x			
	5.29	Senior management should also ensure a graded approach is applied to the document...	completeness	x			
	Section 5.29	All Individuals responsible for preparing, reviewing, revising and approving documents of the Management System should be competent to perform the tasks and should be given access to appropriate information on which to base their work, input or decisions.	Guidance should be provided on the competency of the individuals responsible for preparing, reviewing, revising and approving documents of the Management System.			x	GSR Part 2 4.17 is self-explanatory

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
	5.2.9	<p>Senior management should also ensure that a graded approach to the document process for the management system is taken in respect of the following...</p> <p>OR</p> <p>Senior management should also ensure that a graded approach to the document process for the management system in respect of the following...</p>	Either a word is missing or there is an extra word in the current text, as it is not currently clear when reading.	x			
	5.30	The content of documents for the management system should be determined with the participation of the competent individuals who will use them and whose work will be affected by the documents and have access to appropriate information on which to base their input or decisions . These individuals should also be consulted during subsequent revisions of the documents:	According to GSR Part 2 item 4.17 that the individuals individuals responsible for preparing, reviewing, revising and approving documents shall be competent to perform the tasks and shall be given access to appropriate information on which to base their input or decisions			x	GSR Part 2 4.17 is self-explanatory
	5.31	Paragraph 4.19 of GSR Part 2 [2] states that “All records shall be readable, complete, identifiable and easily retrievable.” In general, the management system documentation should use a language that is coherent,	Identifiable and retrievable aspects of the records were not adequately elaborated.			x	Recommendation deleted

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
		clear and understandable. Methodologies should be established for unique identification and quick and easy retrieval of the records.					
	5.31	Delete 5.31	The guidance provided is not really addressing the quoted requirement	x			
	5.32 Line 3	Documents should be updated as necessary, and then are required to be reviewed and approved in the same way as <u>their initial versions</u> the initial documents (see para. 4.18 of GSR Part 2 [2]).	Editorial			x	The draft text is good
	5.33	Delete 5.33	Record keeping is one area, among many, where regulatory requirements are to be implemented... It was already said that one objective of the management system is compliance with regulatory requirements...	x			

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
	5.34(c)	They are made available and stored in a safe and secure environment with controlled access and in appropriate storage media medium with a clearly specified retention time.	Typo. ‘Y’ missing from first word. Query whether this should be ‘medium’ rather than ‘media’.	x			I believe media is correct
	Page 13, Line. 29 5.34 c	(c) They are made available.....	written as: (c) The are made available	x			
	5.34	Senior management (or the appointed process owner) should ensure that <u>In the management system, provisions should be developed to ensure retrievability of records are managed as follows:</u> (a) They <u>Records</u> are registered upon receipt, and categorized according to criteria established by the organization; (b) They are checked to ensure that they are readable and complete; (c) They a <u>Records</u> re made available and stored in a safe and secure environment with controlled access and in appropriate storage media with a clearly specified retention time.	Senior managers are unlikely to spend time on such issue. This is also the first time “process owner” appears in this guide. (b) does not bring any additional guidance to the requirement 4.19 of GSR Part 2.			x	Or the appointed process owner is mentioned

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
	5.34/6	(c) They are made available and stored in a safe and secure environment with controlled access and in appropriate storage media with a clearly specified retention time.	Write “They” instead of “The”	x			
	5.34(c)	“The are made available and stored in a safe and secure environment <u>to prevent from damage and loss</u> with controlled access and in appropriate storage media with a clearly specified retention time.”	To define what “secure environment” means.	x			
	5.35	The transfer of information from one type of media to another, <u>when needed to ensure that the records remain readable for the duration of the retention times specified for each record</u> , should include procedures for the control and verification that the information has been transferred as specified.	To clarify when such operation may occur (and link with para 5.35 of GSR Part 2)			x	It covers or potential transfers from database to database, from CD to database, there are many alternatives
	5.35		Note: if make a change in accordance with above recommendation, then the word ‘media’ should also be replaced to ‘medium’ in section 5.35.				I believe media is correct

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
	6	Change the title of the para 6 of this draft “6. Management for Safety: Management of Resources” => “6. Management of Resources”	Editorial. To be consistent with the wording used in para 1.10 of this draft about the section 6 AND the wording used in GSR Part 2 “Management of Resources”.			x	Draft text is correct
	Section 6	Include early in the guidance a sentence that indicates clearly what is meant by “resources”	The words resources, individuals, staff, knowledge are used in different places in this section. It’s not always clear what resources we are talking about. It would be advisable to explain that in the guidance.	x			
	6	Add “and security” to the heading and where “safety” is mentioned (apart from direct quotes), add relevant higher-level security reference from the NSS or A/CPPNM.	Same as in comment 1.			x	Current draft supports and explains GSR Part 2 focused on safety; security is mentioned several times as interface
	6.2/ Bullet (a)	“(a) The effective, efficient, and timely provision of resources throughout the duration of an activity or lifetime of a facility, and during an emergency response. ”	Requirement 9 covers emergency situation too. Please consider paragraph 4.21 of GSR Part 2. It is very important to have resources during emergency response. So it is suggested to add “... and during an emergency response ”.	x			

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
	6.2/(a) 2	To add the proposed element: “duration of an activity or lifetime of a facility or during an emergency response ”	For more detail	x			
	6.2	<u>(d) An assessment of predictable challenges and future demands on the resources required to accomplish planned activities and projects.</u>		x			
	6.3	Managers at all levels should contribute to the analysis of training needs, the review and approval of training programmes, the delivery of selected parts of the training and the evaluation of training effectiveness be involved directly or indirectly in development of training programmes and evaluation of its effectiveness.	Managers at all levels should involve in directly or indirectly the development of training program based on their responsibilities in IAEA GSR Part 2, para. 3.2 (b) and 3.3 (b).		x		Managers at all levels should contribute to the analysis of training needs, the development, review and approval of training programmes, the delivery of selected parts of the training and the evaluation of training effectiveness. Managers at all levels should ensure that appropriate periodic retraining or requalification is

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
							provided, to demonstrate that individuals continue to be capable of performing their assigned tasks.
	6.3	<p><u>Within their areas of responsibilities:</u> <u>(a) Managers at all levels should contribute to the analysis of training needs, the review and approval of training programmes, the delivery of selected parts of the training and the evaluation of training effectiveness and, whenever necessary the delivery of selected parts of the training.</u> Managers at all levels should ensure that appropriate periodic retraining or requalification is provided, to demonstrate that individuals continue to be capable of performing their assigned tasks.</p>	<p>To focus the contribution of managers to their areas of responsibilities.</p> <p>Being a trainer may not always be necessary.</p>			x	Recommendation says should contribute
	6.3/5	To add the proposed element; "including training, drills and exercise programmes for emergencies "	For more detail			x	It is not appropriate to emphasize one type of training (for emergencies) whilst the recommendation is formulated generally for all types of training

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
	6.3	Managers at all levels should ensure that appropriate periodic retraining or requalification is provided, to demonstrate ensure that individuals continue to be remain capable of performing their assigned tasks.	Training and requalification won't necessarily demonstrate that individuals are capable of performing tasks. For example – some training does not involve a practical assessment, so there is no demonstration. I suggest that retraining and requalification instead ensures employees can continue to perform the task.	x			
	6.4	Senior management should ensure that the organization develops and retains fundamental core competences. Core competences should be built up by means of engagement with industry experts, professional associations, research centres, and universities on a national and international level.	Superfluous	x			
	Page 14/ 6.4	In this page it says that “Senior management should ensure that the organization develops and retains fundamental core competences. Core competences should be built up by means of engagement with industry experts, professional associations, research centers, and universities on a national and international level.”	In this item, only industry specialists are mentioned, but it is also considered important to include medical specialists, since the leadership, management and culture for safety also applies to this area;	x			Senior management should ensure that the organization develops and retains fundamental core competences. Core competences should be built up by means

COMMENTS The comments are listed according to their order of appearance in the text				RESOLUTION			
							of engagement with relevant industry and branch experts, professional associations, research centres, and universities.
	6.4	“Senior management should ensure that the organization develops and retains fundamental core competencies. Core competencies should be built up by means of engagement with industry experts, professional associations, research centres, and universities on a national and international level.”	The term competences is used throughout section 6. In some cases the word should be competencies ie in 6.4. The rest of the section 6 should also be assessed that way.			x	Competences used throughout GSR Part 2
	6.5/5-6	Managers at all levels should strive towards having the internal capacity to at least maintain safe operations.	To clarify that the bullets a-d is for <u>if</u> senior management has determined certain tasks to be performed by external resources.			x	The text of 6.5 addresses comments
	6.6	Adequate contractual arrangements for activities conducted by external organizations or individuals should be established. Those personnel of external contracting organizations	It would be necessary to describe training to personnel of external contracting organizations as well as personnel within the organization	x			Covered in 2.5

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
		who are involved in implementing the activities should receive the appropriate training that is provided to operating personnel					
	6.6	Adequate contractual arrangements for activities conducted by external organizations or individuals should be established <u>to ensure protection and safety</u> .	Contractual arrangements are of many nature. We should put emphasis on safety.			x	Contractual arrangements cover many things not only safety, also commercial parts, quality parts, etc
	6.3 6.9 8.3	/ PS: same as comment number 18	Editorial. Statement is cut, so add three dots at the end or at the beginning of the quote.	x			
	6.7		It is unclear whether the topics for consideration are for the manager himself/herself or the staff working under his/her supervision.		x		Text modified slightly
	6.7	Consider adding a bullet: “(e) <u>Knowledge of nuclear security methodologies and situational awareness [to maintain an effective nuclear security system]</u> .”	Same as in comment 1. The list might benefit from elaborating the safety and security knowledge a bit in general?		x		New bullet: A knowledge of nuclear safety and security measures

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
							including their interface
	6.7	<p>To support the achievement and development of collective and individual competences, managers within the organization should consider the need for the following:</p> <p>(a) A knowledge of the facility and/or activity, and the associated radiation risks;</p> <p>(b) A knowledge of the management system and related documentation including the organizational structure, responsibilities and levels of authorities, process description, work procedures and instructions;</p> <p>(c) A knowledge of regulatory requirements;</p> <p>(d) An understanding of organization`s values and behavioural expectations, and the organization`s safety culture framework.</p>	<p>When referring to the needs for the development of competences, this paragraph only considers knowledge, while competences are also skills, behaviours and attitudes.</p> <p>This should be considered for inclusion in this paragraph.</p>	x			

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
	6.8	Senior management Managers at all levels should ensure the timely specification and acquisition of the competences necessary (e.g. for specific tasks) and should make provisions for the timely delivery of training and qualification.	Although the overall responsibility lies with senior management, operational responsibility lies with managers... Managers at all levels include senior management	x			
	6.9	The evaluation of training effectiveness should include individual performance (through observations in the workplace), training organization performance, and the timely relevance of the training process.	Individual and group performance should be assessed through observation in the workplace, not simply through performance appraisals from the supervisor. The word “effectiveness” is used to describe how effectiveness of the training process is evaluated. Being timely and relevant are important.		X		Text modified, observations not used because there are more tools
	6.13	“Managers at all levels should create a respectful working environment that has a positive influence on the motivation, satisfaction, and performance of individuals.”	This paragraph does not belong in Section 6 and would be better suited for inclusion under Section 2 or 12.			x	It belongs here, see definition of resources (work environment)
	6.14/3	To manage knowledge and information, senior management should undertake the following in the light of guidance provided in SSG-75.....	Knowledge management guidance may be further elaborated by referring relevant safety standards. One of the examples of SSG-75 mentioned in updated text. There may			x	SSG is relevant only for training of nuclear power plants

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
			be other safety standards which need to be reflected				
	6.9 6.10	Combine 6.9 and 6.10	Both are addressing evaluation of training		x		Content of 6.10 is related to graded approach mainly. modification of text was done
	6.11 (b)	(b) Any planned refurbishments of a facility (e.g. owing to equipment ageing or obsolescence), <u>major change in the techniques or equipment supporting the activities,</u> or organizational changes (e.g. owing to the departure of management or staff);	To also address changes in the activities and not only facilities	x			
	6.13		Consider transfer to section 8 as it does not directly address the management of resources...			x	it belongs to safety culture attributes- agree. but we would like to see it here in resources management as well

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
	7	Change the title of the para 7 of this draft “7. Management for Safety: Management of Processes and Activities” => “7. Management of Processes and Activities”	Editorial. To be consistent with the wording used in para 1.10 of this draft about the section 7 AND the wording used in GSR Part 2 “Management of Processes and Activities”.			x	Draft text is correct
	7.	MANAGEMENT FOR SAFETY: MANAGEMENT OF PROCESSES AND ACTIVITIES, <u>management of the supply chain</u>	Typo. “management of the supply chain” is missing, please compare with content			x	This is an exact name of subsection of GSR part 2
	7	Add “and security” to the heading and where “safety” is mentioned (apart from direct quotes), add relevant higher-level security reference from the NSS or A/CPPNM.	Same as in comment 1.			x	Current draft supports and explains GSR Part 2 focused on safety; security is mentioned several times as interface
	7.1, line 3	“... Senior management should ensure that these processes and activities are identified, developed, documented and managed in accordance with a graded approach <u>according to the risk to safety...</u> ”	This is a general comment that using a graded approach is over emphasized in this guide. Grading is done according to risk. When the risk is high, grading should not be used - requirements must be met. Processes are developed to deal with the level of risk associated with that activity.			x	Graded approach means that things are done accordingly to risk. No difference in the meaning

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
	7.1 Line 5	... This should be based on the nature of the organization’s activities, the associated radiation risks (<i>including from unintended events</i>) and the regulatory requirements that apply.	How to understand “unintended events”? Please clarify.	x			Replaced by emergencies
	7.2.	Managers at all levels should <i>advocate and</i> support a common understanding of what is a process, what is process management, which processes should be established, and how these processes interrelate.	It is essential for managers not only to support a common understanding of processes and their management but also to advocate them, which is written in para 5.2 of GSR Part 2 (Fostering a culture for safety). Therefore, ‘advocate’ should be added.	x			
	7.2	Managers at all levels should support a common understanding of what is a process, what is process management, which processes should be established, and how these processes interrelate.	Focus on the outcome, not on intermediate steps.		x		Managers at all levels should advocate and support a common understanding of process management, which processes should be established, and how these processes interrelate.

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
	7.2	“Managers at all levels should support a common understanding of what is a process <u>is</u> , what is process-management , which processes should be established, <u>how they are managed</u> and how these processes they interrelate.”	Processes are managed according to the management system. The term “process management” does not exist in GSR Part 2 and occurs only here in this guide. There is no definition for it in the safety glossary. It’s a term that should be avoided, especially when a key focus is management systems, which are designed to manage processes, people, organizations, resources, etc.		x		Managers at all levels should advocate and support a common understanding of management of processes, which processes should be established, managed and how these processes interrelate.
	7.4	Relocate 7.4 after 7.6	More logical order. First are described what are processes than is highlighted points of attention.	x			
	7.4	When establishing a process/ <u>activity</u> , the organization should consider factors such as the following:	Clarification			x	This paragraph is related to management of processes and not management of activities

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
	7.4(b)	“The effects of the process on safety, health, environmental, security, quality and socio-economic <u>societal and economic</u> elements;”	Requirement 6 of GSR Part 2 uses the term “societal and economic elements”. Edit proposed for consistency in terminology.	x			
	7.6	Adding these items: <u>Assignment of tasks and responsibilities of each formal individual and section of the organization in the execution of different parts of the process.</u>	Responsibilities and tasks of individuals and departments must be clear in the implementation of a process.			x	Covered by 7.7
	7.6 (e)	Identifying the resources needed for each process (e.g., people, equipment);”	Clarification of the type of resources.			x	Resources explained in GSR Part 2, footnote 10
	7.6	The following approach should be used to develop the processes of an organization: (a) Identifying the processes necessary for the organization; (b) Creating a logical structure of the processes specifying the				x	Covered by recommendations 7.6 and 7.7

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
		<p>sequence of and the interactions between the processes (see also para. 7.9);</p> <p>(c) Developing a process description, including inputs and outputs;</p> <p>(d) Addressing regulatory requirements and relevant codes and standards;</p> <p>(e) Identifying the resources needed for each process;</p> <p><u>(xx) Specifying the distribution of the process documents and records.</u></p> <p>(f) Identifying the indicators to measure and assess the effective implementation of each process</p>	Was initially appearing in 7.7				
	7.7	<p>For each process, the following should be performed, as appropriate:</p> <p>(a) Selecting a process owner (see footnote 3);</p> <p><u>(b) selecting individuals, teams or organizational units that will help defining the process, review the draft process and validate the process and its documents</u></p> <p>(b) Selecting a team that can contribute to defining and developing the process;</p> <p>(c) Specifying individuals and organizational units who will review the process and its documentation;</p>	Simplification		x		<p>For each process, the following should be performed, as appropriate:</p> <p>(a) Selecting a process owner (see footnote 3);</p> <p>(b) Selecting individuals, teams or organizational units that will</p>

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
		<p>(d) Specifying the criteria and methods for process validation;</p> <p>(e) Specifying the individuals and organizational units who will approve the process and its documents;</p> <p>(f) Specifying the distribution of the process documents and records.</p>					<p>contribute to defining and developing the process, review the draft process and validate the process and its documents;</p> <p>(c) Specifying the criteria and methods for process validation;</p> <p>(d) Specifying the distribution of the process documents and records.</p>
	7.7(a)	<p>Selecting a process owner (see footnote 3);</p>	<p>Delete item (a). The concept of process owner is also a dated one. The term is not defined in the glossary and doesn't exist in GSR Part 2. A process is managed; there is no need to define how an organization does it or even suggest they do it with a process owner</p>	x			

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
	7.7(e)	““Specifying the individuals and organizational units who will approve the process, <u>the associated documents and who will be responsible for its proper execution- and its documents;</u> ”	7.7 e) is a good place to add specifying the who will be responsible to run the process.		x		
	7.8/1	The procedures, instructions and drawings for carrying out processes Each process that could have implications for safety should be subject to review or and validation by the responsible organizational unit, as well as by other affected organizational units and by an independent organizational unit (within or outside the organization) before the process is implemented	Review and Validation both are essential elements as per para 4.32 of GSR Part-2 and statement may be modified as per intent of GSR Part-2			x	First paragraph of 7.8 is quote from GSR Part 2 The second paragraph explains recommendation on review and validation
	7.8, line 9	“Each process that could have implications for safety should be subject to review, <u>verification and or</u> validation by the responsible organizational unit, as well as by other affected organizational units and/or by an independent organizational unit (within or outside the organization) before the process is implemented.”	Verification and validation of processes are human performance practices. And/or instead of and an independent unit since it may not be needed.	x			

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
	7.9	Each process that could have implications for safety should be subject to review or validation by the responsible organizational unit, as well as by other affected organizational units and by an independent organizational unit (within or outside the organization) before the process is implemented.	Goes beyond the requirement Having independent verification for small size business in unrealistic.		x		Each process that could have implications for safety should be subject to review or validation by the responsible organizational unit, as well as by other affected organizational units and, if needed, by an independent organizational unit (within or outside the organization) before the process is implemented.
	7.9A	Interaction and sequencing between interfacing processes carried out within organization (core processes, management processes and support processes) and by external service providers should be ensured by specifying inputs, outputs, interdependencies and interconnections in understandable format (such as pictorial form, flow chart, etc.) to ensure safety is not	Elaborated information about interaction and sequencing of processes.			x	The proposal is too complicated The draft text in 7.9 is good

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
		compromised and all required prerequisites have been fulfilled before proceeding					
	After 7.10. New para.	<p><u>7.10A (NEW)</u></p> <p><u>Arrangement should be made with vendors and suppliers to ensure that the regulatory body is provided with safety related information that it has requested.</u></p>	<p>It would be necessary for operating organization to submit any materials, that support safety analysis report, when requested by regulatory body, even if those materials are asset of contractors.</p> <p>For example, this is already captured in other safety guides, for instance, SSG-80 para. 2.17.</p>			x	<p>It is a part of contractual arrangements.</p> <p>It is generally covered in 7.16 (d, e),</p> <p>It is a responsibility of an licensee organization to provide necessary documentation to a regulator.</p>
	L8 7.11./	<p>Managers within the organization should ensure that all relevant staff are aware that the final responsibility for safety remains with the organization itself, even when suppliers are used for receiving safety related items, products and services <u>from suppliers</u>.</p>	<p>It seems ambiguous the meaning of ‘suppliers are used’. It is better to use the expression consistent with para 4.33 of GSR Part 2, cited at the beginning of this para.</p>		x		<p>Managers within the organization should ensure that all relevant staff are aware that the final responsibility for safety remains with the organization itself, even when suppliers are used for the supply of</p>

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
							safety related items, products and services.
	7.12	Consider adding: "...based on a graded approach and have information security integrated into them."	1. Same as in comment		x		Added to 7.16
	7.13	Managers should establish coordination and interaction with suppliers to promote and facilitate <u>quality, safety and safety culture, quality, economical and other important aspects, with the aim of and continual improvement of supply related processes.</u> Clearly specified lines of communication should be established.	Keep focus on safety			x	Draft text is good; safety and quality of supply are always interrelated with financial aspects, keeping schedule etc.
	7.13	"Managers should establish coordination and interaction with suppliers to promote and facilitate safety and safety culture, quality, economical and other important aspects, with the aim of continual improvement of supply related processes. Clearly specified lines of communication should be	To demonstrate the plus value of having a safety culture in the vendors, contractors, and suppliers' organizations.				Vendors, contractors are understood as suppliers see GSR Part 2 footnote 11 The draft text is sufficient

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
		established. The promotion of safety culture in the vendors, contractors and suppliers' organization help to prevent the introduction of counterfeit, fraudulent and suspect items in the supply chain. "7.13					
	7.13	Managers should establish coordination and interaction with suppliers to promote and facilitate safety and safety culture, quality, sustainability[REF1], social [REF2] and environmental [REF3] responsibility, economical aspects and other important aspects, with the aim of continual improvement of supply related processes. [REF1] = ISO 20400:2017 Sustainable procurement — Guidance [REF2] = ISO 26000:2010 Guidance on social responsibility [REF3] = ISO 14001:2015 Environmental management systems — Requirements with guidance for use	Promote standardization and use of international consensus best practices.			x	IAEA does not promote single sources, all mentioned references are out of control of IAEA and do not undergo IAEA Member States consensus process
		Note: Economic factors alone should not take precedence over safety and performance in the supply chain.	Economic factors alone (e.g. low bidder) should not take precedence over safety and performance when selecting an outside provider				Covered generally in 7.16 And 7.13
	7.14	When Should the organization outsource processes associated with supply chain management to an external organization, senior management should ensure <u>adequate surveillance is put in place by the</u>	Outsourcing both the supply chain and the supply chain management should not be encouraged.			x	The draft text is good and it covers many options like an external organization provides procurement services or turnkey contractor procures all deliveries...

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
		<p>organization to be satisfied that the external organization complies with <u>contractual arrangements (both of technical and organizational natures) aimed at ensuring that suppliers of items, products and services important to safety adhere to safety requirements and meet the organization's expectations of safe conduct in their delivery. applicable management system requirements.</u></p>	<p>From GSR Part 2 para 4.36</p>				<p>The text is in compliance with GSR Part 2</p>
	7.16	<p>Add (f) In case of counterfeit, fraudulent or suspicious items detection, the organization should report according to a dedicated and well-defined process, and the national requirements.</p>	<p>CFSI must be clearly mentioned. Same in para 9.10(b).</p>	x			
	7.16	<p>Paragraph 4.35 of GSR Part 2 [2] states that "The management system shall include arrangements for qualification, selection, evaluation, procurement, and oversight of the supply chain." <u>To this aim, The organization should develop processes which for qualification, evaluation and selection of suppliers, for procurement and for oversight of supplier's performance. These processes should be communicated to potential suppliers and should include the following:....</u></p>	<p>Simplification</p>			x	<p>The draft text is good</p>

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
	7.16	<p>...</p> <p>(a) A description of how the supply specifications were <u>is to be</u> developed (e.g. design requirements, quality requirements, economic aspects);</p> <p>(b) A description of the qualification, evaluation and selection process to be used by <u>of</u> suppliers, including relevant approval criteria and how the results are administrated and communicated;</p> <p>(xx) <u>A description of the arrangements addressing the oversight of subcontracting by a supplier and of the supply chain;</u></p> <p>(c) A description of the contracting process;</p> <p>(d) A description of the oversight of suppliers (e.g. audits, inspections, witnessing and hold points, <u>reporting non conformances</u>, document review and approval);</p> <p>(e) A description of the receipt and acceptance <u>arrangements</u> criteria for items, products and services, <u>including to minimize the risk of counterfeit, suspect and fraudulent items.</u></p>	<p>Process is forward looking...</p> <p>The question is first on how suppliers are selected (not how supplier's suppliers are selected)</p> <p>To address subcontracting and supply chain.</p> <p>"Criteria" is restrictive</p> <p>To mention CSFI</p>		x		<p>(a) A description of how the supply specifications are developed (e.g. design requirements, quality requirements, economic aspects);</p> <p>(b) A description of the qualification, evaluation and selection process of suppliers, including relevant approval criteria and how the results are administrated and communicated;</p> <p>(c) A description of the contracting process;</p> <p>(d) A description of the oversight of suppliers in the supply chain (e.g. audits, inspections, witnessing and hold points, document review and approval);</p> <p>(e) A description of the receipt and acceptance criteria for items,</p>

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
							products and services (f) . A description of reporting process for detected counterfeit, fraudulent or suspicious items
	7.16, new item (f)	<u>(f) a description of the quality assurance and management system requirements the supplier must adhere too.</u>	This is a gap in the list in 7.16	x			(f) Item added
	7.16(b)/2	A description of the qualification, evaluation and selection process to be used by suppliers the organization, including ...	The qualification, evaluation and selection processes will be used by the organization for selection of suppliers, not by the suppliers	x			
	7.19	Add the footnote 12 of the para 4.34 of GSR Part 2, as done in para 7.11 of GSR Part 2 with the footnote 11.	Editorial and consistency.	x			
	7.20	<u>Comment:</u> Section 7.20 should talk about “informed customer” and how an organization can ensure they have that capability in house or from outside the organization.	There is nothing in 7 about guidance for being an informed customer. A paragraph on its own is needed.	x			

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
	Section 8	Add “and security” to the heading and where “safety” is mentioned (apart from direct quotes), add relevant higher-level security reference from the NSS or A/CPPNM.	Same as in comment 1.			x	Current draft supports and explains GSR Part 2 focused on safety; security is mentioned several times as interface
	Chapter 8	Include a development of GSR Part 2 5.2 (f), that requires “ <i>enhance safety and to foster and sustain a strong safety culture</i> ”.	Consider additional guidance in chapter 8 on methods of assessment of safety culture methods (self-assessments, independent evaluations)			x	Guidance on safety culture assessment is in lower level publications like SRS 83 Covered in section 3
	New paragraph to Chapter 8	<u>8.22 A mechanism should be established to periodically conduct assessments of the culture for safety and for implementing actions to address any opportunities for improvement.</u>	This is important to ensuring a strong safety culture throughout the operating life.		x		Covered in Section 9
	Page 19/ 8.1, second paragraph	“ Individuals in the organization... strong safety culture ” should be in bold	Consistency	x			
	8.2	Senior management should foster a strong safety culture by demonstrating a clear commitment to safety through their own management practices. They should ensure that their attitudes and behaviours are coherent and	Fostering safety culture is responsibility of all individuals in the organization not only senior management in accordance to GSR Part 2 item 5.1.	x			

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
		consistent and, most importantly, aligned with safety. <u>All individuals in the organization shall contribute to fostering and sustaining a strong safety culture</u>					
	8.3	Include the entire paragraph 5.2 (a)	The last sentence in missing	x			
	8.4	Senior management should establish, apply and support direct and open communication with all individuals, including suppliers, to promote and enhance a strong safety culture. Managers at all levels should use frequent communications (formal and informal) to convey the values related to safety to all individuals, including suppliers, and to explain how these values should be incorporated into organizational work practices.	Restrictive	x			
	8.4	8.4. Senior management should establish, apply and support direct and open communication with all individuals, including suppliers relevant to radiation safety , to promote and enhance a strong safety culture. Managers at all levels should use	In use of radiation there are many kind of suppliers, for example suppliers of mechanical tools, such as patient supports.		x		Suppliers were erased from this recommendation as proposed by some MS because supply chain management is covered in section 7, 7.12

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
		frequent communications (formal and informal) to convey the values related to safety to all individuals, including suppliers, and to explain how these values should be incorporated into organizational work practices.	The definition for a supplier in the section 7 is too far away to clarify the meaning, but alternatively here could be a reference to that.				
	8.5	The organizational policies, goals, strategies, plans, objectives and processes described in the management system should foster safety culture by being designed so that they help ensure that individuals are motivated, able to act in accordance with the expectations set for them and that an leadership for ownership of safety is evident at the organizational and individual levels.	Wording “ownership of safety” is rather unusual. Can it be changed to “leadership for safety” to stay in line with GSR Part 2?			x	Ownership is correct word, it explains more than leadership
	8.5 (new)	After 8.4, additional paragraph could be added (alternatively, inserted after 8.11?): 8.5 Paragraph 87 of 75-INSAG-4[REF1] states: “The important management provisions and individual attitudes which characterize an effective Safety Culture in an operating organization may be adapted to suit all supporting organizations, particularly through emphasis on the demand for product quality.” Safety culture within the supply chain can be reinforced by appropriate management system requirements, such as ISO 19443 [REF2], and/or through an emphasis on quality culture [REF3]. [REF1] = IAEA SAFETY SERIES No. 75-INSAG-4, Safety Culture [REF2]= ISO 19443:2018	Important message related to the nuclear supply chain, recognized by IAEA INSAG (i.e. quality culture/product quality = safety culture among supporting organizations, i.e. suppliers). Promote standardization and use of international consensus best practices.			x	IAEA does not promote single sources, all mentioned references are out of control of IAEA and do not undergo IAEA Member States consensus process Covered partially by 7.13. Safety guides cannot refer to INSAG publications – they do not undergo IAEA Member States consensus process

COMMENTS				RESOLUTION																	
The comments are listed according to their order of appearance in the text																					
		<p>Quality management systems Specific requirements for the application of ISO 9001:2015 by organizations in the supply chain of the nuclear energy sector supplying products and services important to nuclear safety (ITNS) [REF3] = ISO 10010:2022 Quality management - Guidance to understand, evaluate and improve organizational quality culture</p>																			
8.4.	After New Para.	<p><u>8.4A (NEW)</u> <u>Paragraph 5.2(b) of GSR Part 2 states:</u> <u>Acceptance by individuals of personal accountability for their attitudes and conduct with regard to safety;</u></p>	<p>Clarification for relationship between requirements and guides. See the below table;</p> <table border="1"> <tr> <td>GS R Part 2 Para . 5.2.</td> <td>Referred r DS513 paras. 8.3</td> </tr> <tr> <td>(a)</td> <td>Already re</td> </tr> <tr> <td>(b)</td> <td>Add in 8.4 #14</td> </tr> <tr> <td>(c)</td> <td>Already re</td> </tr> <tr> <td>(d)</td> <td>Already re</td> </tr> <tr> <td>(e)</td> <td>Already re</td> </tr> <tr> <td>(f)</td> <td>Add in 3.6 #6</td> </tr> </table>	GS R Part 2 Para . 5.2.	Referred r DS513 paras. 8.3	(a)	Already re	(b)	Add in 8.4 #14	(c)	Already re	(d)	Already re	(e)	Already re	(f)	Add in 3.6 #6			x	Overquoting of GSR Part 2 would not help the draft document
GS R Part 2 Para . 5.2.	Referred r DS513 paras. 8.3																				
(a)	Already re																				
(b)	Add in 8.4 #14																				
(c)	Already re																				
(d)	Already re																				
(e)	Already re																				
(f)	Add in 3.6 #6																				

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
			(g) Add in 8.19A as comment #15				
			(h) Add in 8.19C as comment #16				
			GSR Part 2 para. 5.2 (b) should be cited to clarify that the paras from 8.5 to 8.11. in DS513 explain 5.2 (b).				
	Para. 8.4 2 nd & 4 th line	Senior management should establish, apply and support direct and open communication with all individuals, including suppliers , to promote and enhance a strong safety culture. Managers at all levels should use frequent communications (formal and informal) to convey the values related to safety to all individuals, including suppliers , and to explain how these values should be incorporated into organizational work practices.	Editorial correction :suggest to delete the phrase “including suppliers” in this paragraph. The contents of the supply chain (suppliers) are covered in the Section 7.	x			
	8.6.	Senior management should ensure that performance indicators and other measures of performance have no negative impact on the behaviours necessary to ensure safety. <u>The indicators should be set for</u>	Clarify the purpose of setting and implementing performance indicators.			x	Some performance indicators are focused on production, schedule,... The purpose of this recommendation is to avoid situation that production focused indicators will have

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
		<u>establishing the acceptance of personal accountability.</u>					impact on safety behaviours
	8.9	<p>Managers should promote a strong safety culture in a visible and ongoing manner. Actions may include the following:</p> <p>(a) Engaging in periodic communications with staff where safety culture is discussed;</p> <p>(b) Maintaining a presence in the workplace, such as performing walk-downs of the facility and making observations of tasks where staff can be coached on the desired behaviours and attitudes <u>and where staff can express any safety concern or idea for improvement</u>;</p> <p>(c) Communicating clear expectations regarding personal accountability, teamwork, questioning attitudes, and safety focused decision making in meetings at all levels.</p>	Two way communications	x			

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
	8.10	Consider adding a bullet: “(x) Understanding of how safety and security culture can support the insider threat mitigation programme.”	Same as in comment 1.		x		Modified bullet added Understand the interface of safety and security culture
	8.13	No new text. Para to be deleted. See comment number 9.	If this draft is often a copy of GSR Part 2, users will only use this draft tomorrow instead of GSR Part 2 (SSR-2/2 Rev.2) first. Do not minimize this risk, please. Except if authors add something new.	x			Merged with quote of GSR Part 2 (8.13 + 8.14)
	8.14	“... These should not be only major concerns but also minor concerns, <u>any precursors, adverse trends</u> , as they might become major later...”	In reference of para 5.29 of SSR2/2 Rev.1	x			
	8.14 Also 9.9	Individuals should be encouraged to report concerns in a timely manner. The ability to report concerns to higher levels of management and anonymously should be provided.	If the immediate level of management (i.e. supervisor) or co-workers are the cause of the concern, workers may feel inhibited. They should be able to report anonymously to avoid retribution			x	The text is generic enough to cover anonymous tools, It is on the organization`s decision which tools should be used
	8.14	“Managers at all levels should implement and clearly explain the measures that support an individual’s rights and responsibilities to raise safety concerns <u>without fear of reprisal</u> to increase openness and decrease fear of raising concerns,	To add information that will put emphasis that individuals shall self-report problems without fearing blame.			x	Draft text is explanatory enough

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
		thereby building a trusting and continually learning organization.”					
	8.16	The organization should develop its capacity to learn not only from failures but also from success (see also para. 6.6 of GSR Part 2- [2]). The ...”	This additional reference here does not help the user. PS: link with the comment number 5.		x		Corrected to 6.8
	Para. 8.16 2 nd line	see also para. 6.6 6.8 of GSR Part 2	Correction of typo	x			
	8.17	No new text. Para to be deleted. See comment number 9.	If this draft is often a copy of GSR Part 2, users will only use this draft tomorrow instead of GSR Part 2 (SSR-2/2 Rev.2) first. Do not minimize this risk, please. Except if authors add something new.	x			Merged with the following article (8.17+8.18)
	8.18	First sentence. Operational experience from within the organization and from other organizations should be sought and used.	It is unclear what is meant by “The organization should”.			x	The draft text is good

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
	8.19 9.2	The assessment should be designed with the following aims: (a) To identify strengths, weaknesses, opportunities and threats (i.e. SWOT analysis); (b) <u>To identify signs of complacency, uncertainty and assumptions that affect safety;</u>	Is complacency the only problem? Other factors, such as peer-pressure, resistance to change, taking shortcuts, uncertainty, could influence behaviour (see Appendix, QA page 0)	X	x		8.19 is OK. 9.2 modified
	After 8.19. New para	<u>8.19A (NEW)</u> <u>Paragraph 5.2(g) of GSR Part 2 states:</u> <u>Safety oriented decision making in all activities;</u>	See the comment #14. GSR Part 2 5.2 (g) should be cited to clarify that the following para from explains 5.2(g).			x	Overquoting of GSR Part 2 would not help the draft document
	After 8.19B New para	<u>8.19C (NEW)</u> <u>Paragraph 5.2(h) of GSR Part 2 states:</u> <u>The exchange of ideas between, and the combination of, safety culture and security culture.</u>	See the comment #14. GSR Part 2 5.2(h) should be cited to clarify that para 8.20 and 8.21 in DS513 explain 5.2(h).			x	Overquoting of GSR Part 2 would not help the draft document
	After 8.19A New para	<u>8.19B (NEW)</u> <u>Individuals should be trained in how to recognize situations that are likely to give rise to errors, so that they can avoid making mistakes. In addition, there are various activities that could be carried out on an individual basis to prevent error. Conservative decision making should be applied when there are no</u>	Add explanation for GSR Part 2 para. 5.2(g).			x	Too detailed for the draft text

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
		<u>procedures in place or plans made for the activity.</u>					
	8.21	In application of a graded approach to a less complex facility or activity with a lower radiation risk or to small organizations, expectations concerning safety culture...	Not only the activity but also the size of the organization (a few or many people) will have a consequence on how safety culture related initiatives/arrangements are documented			x	This is covered by the word "less complex"
	8.21/2	safety culture may be communicated simpler and less formal;	Eliminate the risk of the communication being so informal that the message is missed.				
	8.21/3	and an undocumented process for reporting and resolution of safety concerns may be acceptable if they are applied consistently.	Documentation of reporting and resolution of safety concerns is necessary even for less complex facility or activity with a low radiation risk.	x			

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
	New Para 8.22 Новый пункт 8.22	The organization should provide a respectful, comfortable, collaborative working environment which ensures open, transparent, free and reliable dialogue, and promotes ability to raise safety concerns.	Establishing an atmosphere of trust and collaboration within the organization is one of the most important elements in fostering strong safety culture.		x		Covered in 3.13, 6.13, 8.4 and appendix
	Section 9	Add “and security” to where “safety” is mentioned (apart from direct quotes), add relevant higher-level security reference from the NSS or A/CPPNM.	Same as in comment 1.			x	Current draft supports and explains GSR Part 2 focused on safety; security is mentioned several times as interface
	8.21, line 3	“... and an undocumented process for reporting and resolution of safety concerns may be acceptable if <u>they are it is</u> applied consistently <u>and records are kept.</u> ”	There is a need for objective evidence that a process is being done consistently, otherwise it is not demonstrable (to a regulator for example). Many processes or procedures do not need much or any documentation according to the risk of the process. But records provide objective evidence that it is being done consistently to either a regulator, an auditor (internal or external) or someone within the organization		x		The last sentence was erased based on comments of other MS

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
	9.2, line 1	“The method of assessment of the effectiveness of the management system should take into account the purpose of the assessment, the organizational structure and the management system itself, and be applied using a graded approach... ”	Remove the reference to graded approach here. It is already been stated earlier in the document that processes are developed using a graded approach. Repetitiveness should be removed.			x	Graded approach is related to assessment of effectiveness of the management system
	Para. 9.2 6 th line	(b) To identify signs of complacency	Suggestion to delete subparagraph (b) of the aim of the assessment of the of the effectiveness of the management system “To identify signs of complacency” does not seem to be a key explicit element for evaluating the effectiveness of the management system, unlike the other provisions in (a), (c), and (d). Subparagraph (b) pertains more to expectations from the management system assessment process or outcomes.	x			

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
	9.2	<p>The method of assessment of the effectiveness of the management system should take into account the purpose of the assessment, the organizational structure and the management system itself, and be applied using a graded approach. The assessment should be designed with the following aims:</p> <p>(a) To identify strengths, weaknesses, opportunities and threats (i.e. SWOT analysis);</p> <p>(b) To identify signs of complacency;</p> <p>(c) To analyse trends;</p> <p>(d) To identify areas for improvement.</p>	<p>Signs of complacency are covered by (a) (as weaknesses or threats)</p>	x			
	9.3	<p>“Senior management should ensure both self-assessments and independent assessments of the management system <u>are conducted on a regular basis.</u>”</p>	<p>The sentence seems incomplete.</p>			x	<p>There is a quote from GSR Part 2 and recommendation explains of responsibility of senior management only.</p>
	9.4	<p>“Process owners <u>Managers</u> should periodically conduct self-assessments of processes and their effectiveness...”</p>	<p>Organizational managers should be doing self-assessments in their organizations. They can be more objective than those responsible for the process. However, it doesn't mean that individuals cannot do self-</p>		x		

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
			assessments of their own work.				
21	9.5	“Senior management shall conduct a review of the management system at planned Intervals...”	What should be included in this review?		x		See 9.2 added
	9.8	Delete 9.8	Too detailed. Somehow redundant with 9.9		x		9.9 deleted
22	9.10	Missing “be” between “to” and “evaluated” in first sentence.	Typographical error	X			
	9.10	Non-conformances and events to <u>be identified, reported and</u> evaluated should include the following: ...	Clarification	x			

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
	9.10/1	Non-conformances and events to be evaluated should include the following:	Typo	x			
	9.10A	The process for identification of issues (e.g. non-conformances, etc.) along with their grading criteria should be aligned and consistent for management of these issues throughout the organization and among different stakeholders including contractors.	To further elaborate the aligned framework for managing issues.			x	Covered partially in 9.6
	9.10	Non-conformances and events to be evaluated should include the following:	Seems like a word is currently missing from the text.	x			Non-conformances and events to be identified, reported and evaluated should include the following:
	9.11	“In the application of a graded approach, t The different elements of the non-conformance management process (e.g. recording, reporting) may be implemented at varying levels of detail...”	No need to include “in the application of a graded approach since the rest of the paragraph is a graded approach.			x	It is intended to emphasize graded approach

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
	9.12	Non-conformances and their causes should be analysed for trends to identify recurring events, root causes , generic issues and weaknesses before they generate a significant effect.	Put emphasis on analysing not only direct causes but also root causes (which are then mentioned in 9.14).		x		Non-conformances and their direct and route causes should be analysed for trends to identify recurring events, generic issues and weaknesses before they generate a significant effect.
	9.13	Non-conformances should <u>also</u> be regarded as opportunities for improvement, and they should be used for the improvement of the management system and its processes.	Non conformance may only be a non conformance....			x	Nonconformity must be resolved and this is correction; overall view on nonconformities can bring proposals for improvements, direct and route causes can be used for both – correction and improvement
	9.15	Typo “of safety culture for should be”	Typographical error	X			

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
	9.15 Line 4	... The assessments of leadership for safety and of safety culture for should be conducted together.	Typo	x			
	9.18	Senior management should ensure that both self-assessments and, <u>when relevant</u> , independent assessments, are managed by individuals and groups with sufficient expertise and experience in assessing leadership for safety and safety culture, including in the use of appropriate methods	Goes beyond requirement of para 6.9 of GSR part 2. Although this could be implemented by large organization, it is unlikely to be done by small organizations.	x			
	Page 25/ 9.19	In this page it says that “Multiple methods should be used in the assessment of leadership and safety culture. The assessment methods used, such as surveys or questionnaires, document review, interviews, observations and focus groups, should complement each other. The data collected should be representative of all functions and all levels of the organization.”	It is suggested that some examples of assessments that could be adopted by the regulatory authority and organizations be referenced (International Atomic Energy Agency, Culture for safety in organizations, facilities and activities linked to the use of ionizing radiation sources, IAEA-TECDOC-1995, OIEA, Viena (2022)) and/or be included as an appendix in the publication.			x	SPESS C: “Safety Guides and Implementing Guides should not reference TECDOCs”

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
	Section 9.21/9.22	Results of the assessments & findings of the Management System & Leadership for Safety should be communicated to all levels in the Licensee organization including the board of directors.	Guidance should also include results of the assessments and findings is also communicated to board of directors.			x	Not applicable in all relevant facilities and organizations
	Appendix	Transform Appendix into an annex	Information only			x	Committees should discuss it. The appendix represents safety culture model recommended by IAEA. As in case of all recommendations, there is freedom to find alternative ways how to follow GSR Part 2 requirements
24	Appendix Introduction	In response to challenges in complying with safety culture guidelines, the IAEA together with WANO, INPO, as well as government institutions from the United States, Japan, and Finland, drafted recommendations to enhance the alignment of their safety culture models.	Suggest explaining the origin of the “A Harmonized Safety Culture Model” document, and the international collaboration that created it. Wording can be borrowed from the 2020 working document.			x	reference to the document is sufficient
	Appendix A.1 / CO. Communication	CO.1.1 Individuals are encouraged by the management to communicate openly without the fear of shame or blame.				x	We cannot change the model except some minor wording

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
25	Appendix References in text	<p>In addition to mentioning the Appendix in clause 1.11, 3.5, and 8.1, the concepts in the Appendix can be used as examples in other sections. Examples:</p> <ul style="list-style-type: none"> Footnote 2 (page 4) and clause 4.3, refer to Individual Responsibility in A0. 3.16.(d) and 8.9(c) refer to QA in A0 3.10, 4.18, 8.4, refer to Communication in A1 3.8, 5.8 refer to Decision Making in A3 6.13, refer to Respectful Work Environment in A3 8.14, 9.1, refer to Continuous Learning in A4 3.16, refer to Raising Concerns in A5 	<p>General comment: The Appendix is the most useful part of this safety standard. It puts into a clear, concise, table form how to meet the requirements of GSR Part 2. Placing it as an appendix without directing the reader to its contents makes it look like an afterthought. Its importance could be highlighted by making more direct reference to it.</p>			x	<p>Although very good idea, we do not want to refer back to body text. References would never be complete because there many direct links but also indirect links</p>
	Appendix	<p>This appendix presents a safety culture framework which attempts to enhance the alignment of different safety culture models used in different States. This safety culture framework describes the traits and attributes that are present in organizations with a strong safety culture. A graded approach should be used in the application of this framework, taking into account the type of facility or activity and the associated radiation risks.</p> <p>This appendix is based upon the work previously done; A Harmonized Safety Culture Model was published as IAEA Working Document in 2020, see</p>	<p>In the cover page of the Working Document, it is written that “This document should not be quoted or cited as an official publication.”</p> <p>Are there any problems to this document directly?</p>		x		<p>Cover page explains the status of 2020 when the document was published as working document so not as official one. Using this model in safety guide is important step; If approved it becomes a part of safety standards and finally it can be quoted or cited</p>

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
		harmonization_05_05_2020-final_002.pdf (iaea.org)					
	Table	<p>IR: Individual Responsibility (IR)</p> <p>QA: Questioning Attitude (QA)</p>	<p>Please add a title to this Table.</p> <p>Changing of the order in subtitles (abbreviation after the term, not vice versa) could be more reader-friendly.</p>			x	Convention adopted when h Farmonized safety culture model was developed