

Leadership, Management and Culture for Safety - DS513

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: All comments Page 1 of 12 Country/Organization: Date: 2025-11-26							
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
ARG-1	Title of the Document	Leadership, Management and Safety Culture	In the document it is used “Safety Culture” not “Culture for Safety”. It might be appropriate to homogenize, (although in GSR Part 2, point 5 it is written Culture for Safety).			Rejected	The new development in the area is using the term culture for safety. Secondly, the guide needs to be aligned with GSR Part 2 terminology.
ARG-2	1.12	Requirements on the management system for the transport of radioactive waste are established in IAEA Safety Standards Series No. SSR-6 (Rev. 2), Regulations for the Safe Transport of Radioactive Material, 2025 Edition [6].	In the near future and probably before the publishing of this document, the updated SSR-6 (Rev. 2), 2025 might be published, as mentioned in Reference (6) of the DPP.	Accepted			
ARG-3	1.16	— Section 4 provides recommendations on how to meet Requirements 3–5 on responsibility for integration of safety into the	In GSR part 2 Requirement 3 is on <i>Responsibility of senior management for the management system</i> Rq 4 is on <i>Goals, strategies, plans and objectives</i> Rq 5 is on <i>Interaction with interested</i>		Accepted, changed to responsibility for the integrated management system.		

		<p>management system.</p> <p>— Section 5 provides recommendations on how to meet Requirements 6–8 on the integration of the management system.</p>	<p><i>parties</i></p> <p>Rq 6 is about <i>Integration of the management system</i>.</p> <p>Rq 7: is on <i>Application of the graded approach to the management system</i></p> <p>Rq 8: <i>Documentation of the management system</i></p> <p>Note: Section 4, establishes the responsibilities for Senior Managers, from 4.1 to 4.20.</p>				
ARG-4	2.1	<p>Senior management should ensure commitment to the achievement of the fundamental safety objective, applying a graded approach, primarily through formal and documented commitment. This should be communicated within the organization and to interested parties</p>	<p>It seems that “formal” is a redundancy. If the fundamental safety objective is documented in policies, procedures and other documents, it is formal.</p>			Rejected	<p>A graded approach can be documented without being formal.</p>
ARG-5	2.3	<p>The arrangements for achieving the fundamental safety objective should take into account any interfaces between safety, security and safeguards. Besides, safety, security and safeguards do not affect in the compliment of the other.</p>	<p>Incorrect usage of vice versa with three items (safety, security and safeguards):</p> <p>"Vice versa" is not used for three items because the phrase explicitly reverses the order of two things. It is not designed to accommodate more than two.</p>		<p>Accepted, instead changed to “safety, security and safeguards do not compromise each other”.</p>		

ARG-6	3.1	“...and continual improvement of programmes for leadership, management and for safety culture.”	See comment 1			Rejected	See response on comment 1
ARG-7	3.4	“Senior management should apply a long term view when formulating and aligning policies, objectives, goals, strategies and plans”.	Although the text follows GS Part 2 Requirement 4, it is suggested a change in the word order as objectives are of a wider scope than the goals and the goals are established once the objectives are formulated. The suggestion is to place objectives after policies.			Rejected	The order is aligned with GSR Part 2 and should remain in that order. In the revision of GSR Part 2 this point can be considered.
ARG-8	3.5	The communication methods used by managers to ensure staff awareness and commitment should encourage mutual and honest feedback on behavioral expectations.	For better clarity it is suggested to replace “candid feedback” by “honest feedback”.			Rejected	Honest does not have the same meaning as candid.
IND-1	Section 3.8	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.	For Clarity			Rejected	Managers cannot totally ensure, though they can help to ensure.
ARG-9	4 - Title	MANAGEMENT FOR SAFETY: RESPONSIBILITY FOR INTEGRATION OF SAFETY INTO THE MANAGEMENT	See comment 3 on 1.16		Accepted, changed to responsibility for the integrated management system.		

		SYSTEM					
ARG-10	4.3	<p>Senior management should take actions to:</p> <p>(a) “Establish a work environment that supports effective implementation of the management system and its continuous improvement; ...”</p> <p>(b)</p>	It is suggested to eliminate “... <i>to implement the following:</i> ”, as the bullets start with a verb in infinitive without to.			Rejected	This is the normal IAEA editorial style
ARG-11	4.4	If any part of the management system is developed or updated by an external organization, top management shall ensure that such parts are consistent with the organization's overall management system. Responsibility and authority for such parts rest with top management.	It is suggested to modify for grammatical reasons: any + singular.	Accepted			
ARG-12	4.5	Senior management should ensure that suppliers' management systems are appropriate to the scope of their activities, comply with relevant regulatory	It is suggested to shorten the paragraphs as shown, for clarity.		Accepted, Senior management should ensure that		

		requirements and are consistent with the organization's overall management system where appropriate.			suppliers' management systems are appropriate to the scope of their activities, that they comply with the relevant regulatory requirements and that they are consistent with the organization's overall management system where appropriate.		
ARG-13	4.6	Senior management should ensure that the safety policy (or the set of policies containing the safety policy) is documented and disseminated throughout the organization. The safety policy should have the following characteristics:	It is suggested to: <ol style="list-style-type: none"> 1. move backwards the parenthesis and to add “the” before “set”, 2. replace “across” by “throughout” and 3. replace features by characteristics. 	Accepted			
ARG-14	5- Title	MANAGEMENT FOR SAFETY:	See comment 3 on 1.16 As a second suggestion on the title, it		Accepted and modified as: MANAGEM		

		<p>INTEGRATION OF THE MANAGEMENT SYSTEM</p> <p>Or</p> <p>MANAGEMENT SYSTEM FOR SAFETY: INTEGRATION AND DOCUMENTATIONR</p>	<p>also might be considered if the title should include “DOCUMENTATION” as it is developed through points 5.10 to 5.30.</p> <p>On the other hand, GRADED APROACH is included in many points throughout the whole documents (points 1.9, 4.7, 4.14, 4.20, 5.8,5.13, 5.19, 5.24, 6.4, 6.10, 7.1, 7.11, 7.18, 8.16, 9.2, 9.10, 9.16). For that reason, it might be omitted from the titles.</p>		<p>ENT FOR SAFETY: INTEGRATI ON AND DOCUMEN TATION</p>		
ARG-15	5.17	Ifjustified	It is suggested to remove “Ifjustified”.	Accept ed			
ROK-1	Para. 5.17 1 st line	Ifjustifed → If justified	There seems to be a spacing error between these two words.	Accept ed			
ARG-16	6 - Title	<p>MANAGEMENT SYSTEM FOR SAFETY: MANAGEMENT OF RESOURCES</p> <p>Or</p> <p>MANAGEMENT SYSTEM FOR SAFETY: RESOURCES</p>	It is suggested to add “system”			Rejected	Each section is presenting management for safety and needs to follow the same logic.

ARG-17	7- Title	MANAGEMENT SYSTEM FOR SAFETY: MANAGEMENT OF PROCESSES AND ACTIVITIES Or MANAGEMENT SYSTEM FOR SAFETY: PROCESSES AND ACTIVITIES	It is suggested to add “system”			Rejected	Each section is presenting management for safety and needs to follow the same logic.
ARG-18	7.2	Managers at all levels should promote and support a common understanding of process management, what processes should be established, managed, and how these processes interrelate.	It is suggested to replace “advocate” by “promote”, and “management of processes” by “process management” for clarity.	Accepted			
ARG-19	8 –Title	SAFETY CULTURE	See comment 3- 1.16			Rejected	See response to comment 1.
ARG-20	9.21	Paragraph 6.11 of GSR Part 2 [2] states that (reference omitted) .	It is suggested to remove (reference omitted) as the reference is 6.11 GSR Part 2.			Rejected	This is IAEA standard style.
JPN-1	APPENDIX X	APPENDIX <u>ANNEX</u> SAFETY CULTURE FRAMEWORK	The Appendix "Safety Culture Framework" should be made into an Annex. The reasons are shown below. (1) The contents are merely explanatory texts of the elements that make up safety culture (i.e., textbook-like descriptions) and do not include recommendations on how to implement each element in line with GSR Part 2 (please see ①).	Accepted			

(2) SPESS-C states that this is a working document without the IAEA logo and should not be cited. However, the quoted “INTERNATIONAL ATOMIC ENERGY AGENCY, A Harmonized Safety Culture Model, IAEA Working Document, Vienna (2020) [harmonization_05_05_2020-final_002.pdf](#)” does not have the IAEA logo and is clearly stated as a working document, making its citation inappropriate. (please see ②).

(3) The cover of this book clearly states, "This is not an official document and should not be cited." (please see ③).

①DS513 Step 12 Appendix SAFETY CULTURE FRAMEWORK

A.1 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 should be 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.

This appendix is based upon the work previously done; A Harmonized Safety Culture Model was published as IAEA Working Document in 2020, see [harmonization_05_05_2020-final_002.pdf](#) (iaea.org). [11]

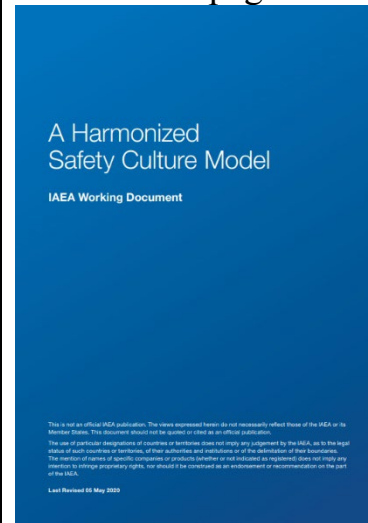
			Safety Culture Traits	Safety Culture Attributes		
			<p>IR. Individual Responsibility</p> <p>All individuals are personally accountable for safety.</p> <p>All individuals feel it is their duty to know the standards and expectations and rigorously fulfil those standards and expectations. There is personal ownership for safety. All individuals have a commitment to promoting safety both individually and collectively.</p>	<p>IR.1 Adherence: Individuals understand and accept the importance of standards, processes, procedures, expectations and work instructions. Individuals at all levels of the organization adhere to standards and expectations.</p> <p>IR.2 Ownership: Individuals demonstrate personal commitment to safety in their behaviours and work practices. They promote safe behaviours in all situations and coach others when necessary.</p> <p>IR.3 Collaboration: Individuals and work groups help each other achieve goals by communicating and coordinating their activities within and across organizational boundaries. Individuals understand and accept the value of diverse thinking in optimizing safety.</p>		
			<p>QA. Questioning Attitude</p> <p>Individuals remain vigilant for assumptions, anomalies, conditions, behaviours or activities that might adversely impact safety, and appropriately voice those concerns.</p> <p>Individuals are watchful for and avoid complacency. They recognize that minor issues might be warning signs of something more significant. Individuals are aware of conditions and alert to potential vulnerabilities, and report them.</p>	<p>QA.1 Recognition of unique risks: Individuals understand the unique risks associated with facilities and activities. They understand that the technologies may be complex and might fail in unforeseen ways with significant consequences.</p> <p>QA.2 Avoidance of complacency: Individuals recognize and plan for the possibility of mistakes, unforeseen problems and unlikely events, even when past outcomes were successful. Individuals recognize that complacency often comes with success and continually strive to avoid it in themselves and others.</p> <p>QA.3 Questioning in the case of uncertainty: Individuals stop when uncertain and seek advice. The situation and risks are evaluated and managed before proceeding.</p> <p>QA.4 Recognition and questioning of assumptions: Individuals question assumptions and are prepared to offer different perspectives when they believe something is not</p>		

[illegible]

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2. Page 3/ line 9 from bottom , The writing style of Safety Guides may be less formal than that of Safety Requirements. Safety Guides may contain explanatory and background information in annexes, if this is considered necessary for the interpretation of the recommendations.
3. Page 10/ line 7: Annexes and footnotes to the main text are used to provide practical examples or additional information or explanation. Annexes and footnotes are not an integral part of safety standards or nuclear security guidance publications, and should not contain requirements, recommendations or guidance. Annex material published by the IAEA is not necessarily issued under its authorship; material that is under other authorship may be generalized as necessary and presented in annexes.

Model, IAEA Working Document
in the Cover page.



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