	COMMENT					RESOLUTION			
Committee	Country	Com Num	Para	Proposed new text	Reason	Accepted	Accepted, but modified as follow	Rejected	Reason for modification/rejection
NUSCC	Korea	8	General	Proposes revising and expanding Section 8 to clarify the role of the global assessment as a documented safety case for LTO, including structured integration logic, traceability, and treatment of uncertainties—in consideration of the recently developed in SRS-121 Chapter 4	The current text lacks sufficient structure and clarity on global assessment methodology, especially in the context of long term operation decision-making.			X	The intent of Section 8 is not to transpose the information from SRS-121, but rather to provide a guidance on the main aspects of the PSR global assessment. This was the objective of the revision of the original text, i.e., to provide additional high-level guidance consistent with the recently published SRS-121. Specific considerations with regards to the LTO decision-making are included in Section 9. The objective of SRS-121 document is to provide additional practical information that is consistent with the guidance as presented in Section 8. Notwithstanding the practicality of the information provided in SRS-121, there should be a reasonable degree of flexibility given to Member States to develop alternative, but equally effective approaches that are consistent with the guidance provided.
NUSCC	Indonesia	1	General	Optimization of the cost (including downtime during maintenance), reliability, availability, and other factors as maintainability and safety, must be considered in establishing of scheduled maintenance program	Good practice in industry			X	The comment is valid for the establishment of the maintenance programme at the nuclear power plant. However, DS535 provides recommendations on periodic safety review for nuclear power plants where, among other aspects safety performance of the plant, including processes such as work planning, or maintenance, is reviewed. DS535 provides a reference to specific safety guides on maintenance where valuable information can be found about performance indicators for maintenance. Therefore, it is understood that the comment is implicitly addressed.
NUSCC	Canada	1	General	General Recommendation (no new text): Ensure that the document itself is aligned with SSG-75, Recruitment, Qualification and Training of Personnel for Nuclear Power Plants.	Multiple "training" terms were mentioned throughout the document. In some sections of Annex I (TYPICAL INPUTS, OUTPUTS AND RELEVANT PUBLICATIONS FOR THE REVIEW OF SAFETY FACTORS FOR A NUCLEAR POWER PLANT), the document lists SSG-75 Recruitment, Qualification and Training of Personnel for Nuclear Power Plants as a relevant IAEA publications.	X			
NUSCC	Japan	1	General	Clarification for the terminology. The term "module" is used in Section 2, while only the term "unit" is used in Sections 6 and 7, without reference to the modules. Therefore, descriptions about modules should be included in the applicable paragraphs of Sections 6 and 7.		X			Definition added
NUSCC	Sweden	1	General		Para 2.1 says that developments should be considered in the interests of continuous safety improvement. For SF9, this is clearly stated in para 7.139 (h). Some other SFs refer to current standards and/or research and development outcomes. But this is not the case for all SF. Please consider to include research results and/or development in the scope for SF4, SF10, SF11 and SF14.			X	hank you for the comments. Indeed, industry developments and research findings should be considered in the interest of continuous development of safety. Although these are relevant for many safety factors, the PSR approach focuses on the review of the whole concept of the identification, collection and the use of research findings in plant operations through operating feedback. This is captured in SF9.
NUSCC	China	1	General	It is recommended to clarify whether the requirements apply to transportable reactor and other new reactor types	the DS532 already include such reactor	X			This safety guide is not providing any requirements. The document is intended to be applied for existing NPPs and through a graded approach to be applicable to other nuclear installation as well. Some aspects of relevance for SMRs are included as well, considering that these might become operational in short term. With judgement, the safety guide can be applied to non-water cooled reactor technologies with due consideration being given to applicability of underlying IAEA safety standards used in support of DS535 drafting (listed in References) in the context of SRS-123. As far as new reactors in large land-based WCRs are considered, the guidance is fully applicable and it was developed with this intent (the text is harmonized with the current set of IAEA safety standards). With regards to transportable NPPs, the guidance is applicable with judgement. It was not within the objectives of the revision to cover transportable NPPs explicitly.
NUSCC	China	2	General	It is recommended to adjust chapter 5"activities following periodic safety review of nuclear power plants "to chapter 10				X	The format of the safety guide follows the structure agreed in the DPP.
NUSCC	Netherlands	1	General		We support the improvements made to the guidance document. We only have 2 minor points, and 1 more substantial.	x			Thank you
NUSCC	USA	1	General	Consider using consistent terminology throughout the document regarding effluents/discharges.	Consistency	X			
NUSCC	Netherlands	2	Figure 1 Figure 5		Terminology: Agreement (startingpoint PSR) and Approval (end point of PSR) are not in line with the terms used in figure 5.	x			Terminology harmonized in both figures.
NUSCC	Netherlands	2	1.6		We miss the reference to SRS-99 on PSR's for research reactors.	X			Reference added as footnote together with SRS-124.
NUSCC	Sweden	2	1.9	[Remove the last sentence of para 1.9 or add Annex II]	There is no Annex II in the draft (but according to the DPP, there should be one).	X			Sentence removed. Annex II was originally considered, however during the development of the revision, it was decided to include relevant information directly into Section 8 and drop Annex II.
NUSCC	ENIS	1	2.1	Please define what a module is for example via footnote.	Definition needed for better understanding and application of the recommendation		X		Footnote added to para 2.7: Reactor module (sometimes abbreviated as 'module') is a nuclear reactor with its associated structures, systems and components. Multi-module unit/plant is a unit/plant having the possibility of including more than one reactor module.
NUSCC	ENIS	2	2.1	Change to be considered: This para should be revised to ensure PSR for 2 «independent» modules can still be performed independently and/or at different times if this is more relevant. This is particularly true for 2 different units of different types or for 2 independent buildings (e.g. interim storage building)	Necessary to ensure all cases are adequately covered and no unnecessary constraint is set		X		Para 2.7 was modified as follows: 2.7.In case of plants with multiple identical modules plants, to achieve consistent PSR results across individual modules, it should be preferred to conduct a PSR considering all the operational modules on site, even if these modules have been commissioned over time. This approach might result in some modules undergoing the first PSR in a shorter timeframe. However, for plants with different module types or sites with multiple independent facilities, a PSR should be conducted separately, as appropriate.
NUSCC	Germany	1	2.2	Requirement 12 of GSR Part 4 (Rev. 1) states: "The safety assessment shall cover all the stages in the lifetime of a facility or activity in which there are possible radiation risks.". Additionally, Requirement 12 of SSR-2/2 (Rev. 1) [2] states: "Systematic safety assessments of the plant, in accordance with the regulatory requirements, shall be performed by the operating organization throughout the plant's operational lifetime, with due account taken of operating experience and significant new safety related information from all relevant sources."	The current para states the basis for this guide. However, Requirement 12 of SSR-2/2 (Rev.1) addresses NPP in operation (throughout plant's operational lifetime), while this guide also includes decommissioning. Therefore, a similar basis, i.e. a corresponding require-ment, needs to be stated for decommissioning or – as an alternative - for all the stages in the lifetime of a facility as well. We made a suggestion, please verify.	X			Thank you very much for this suggestion. Included, although in a different order as proposed.
NUSCC	ENIS	3	2.4	PSR should be used to provide an overall view of actual plant safety and the quality of the safety documentation, and to determine corrective actions to ensure safety or reasonably practicable safety improvements to enhance safety to an appropriate high level at least for the next PSR period	The begin of the para makes it clear that the review to be done aims at assessing current situation (i.e. from the current PSR period that is ending) to identify improvements for the next PSR period (and even longer).		X		Minor modification to the proposed text: "… at least until the next PSR period"
NUSCC	Sweden	3	2.5	"A PSR should be performed about ten years after the start of plant operation, and then at ten year intervals until, where appropriate, the end of decommissioning ~~operation~~…"	Para 2.5 does not reflect the new section 10. "Where appropriate" refers to the comment on section 10 below.			X	Yes, correct, para 2.5 does not reflect inclusion of Section 10. However, the intent of Section 10 is considered as an option for consideration and a para has been added into Section 10 to emphasize that there are alternative arrangements in Member States.
NUSCC	Sweden	4	2.5	(c) "…occurrence of major events…"	There is no reason to limit lessons learned to external events. At the same time, it is impossible to consider all lessons learned, but the major events will be known to the international community.	X			
NUSCC	China	3	2.5	It is recommended to modify the description "PSR should be finished about ten years after the start of plant operation, and then at ten year intervals until the end of operation"				X	The original wording is kept as Member States used various definition for the duration of a PSR. In some Member States, finishing a PSR does not necessarily mean the completion of the review and its acceptance by the regulatory body.
NUSCC	Saudi Arabia	1	2.5	Add a new letter (k): (k) Changes in requirements for operational flexibility within national electric grids	In general the optimal operation of the NPPs consists of keeping the NPPs stable at their 100% designed power level. However, these days, as a response to greater use of renewables, there is a strong tendency in some regions to require the NPPs be more flexible in their operation. This leads to more transients, more thermal and pressure cycles impacting the technology. Therefore, more attention needs to be paid to integrity and functionality of the SSCs important to safety.			X	This is not explicit objective of the PSR, although it is implicitly included within the scope of the review of SF1 through the review of Requirement 41 of SSR-2/1 (Rev. 1).
NUSCC	Belgium	1	2.6		The purpose of this paragraph is really unclear - the two sentences in the § seem contradictory	X			Para slightly modified and a footnote added to define the reactor module. This is a new para added to address gaps from the applicability review of IAEA safety standards to novel advanced reactors as captured in SRS-123

NUSCC	ENIS	4	2.6	The period between PSRs should not be defined based on the lengths of refuelling cycles or other fuel or core considerations. For example, in cases of significantly longer refuelling cycles, periodic replacements of reactor cores, or even periodic replacements of whole power modules, the design, operational, and ageing aspects of such SSCs should be subject to PSR at appropriate periods, taking into account the factors listed in para. 2.5.	To be corrected: First time the abbreviation SSC (for "structures, systems and components") is used without explanation. The first definition of SCC is found in 2.10. (a)	X			
NUSCC	Belgium	2	2.7		The § describes the case of SMRs with different modules. Similar considerations could be given to the case of "identical" reactors (on the same site or on different sites) (case of French "palier for example). (NB: some considerations of this topic are mentioned in §4.18 --- such considerations could also be added in §6.21)	X			Para modified to reflect the comment and similar comments from other members.
NUSCC	Korea	1	2,7	In case of nuclear power plants with multiple units – including modular reactors – to achieve consistent PSR results across individual units, it should be preferred to conduct a PSR considering all the operational units on site, even if these units have been commissioned over time. This approach might result in some units undergoing the first PSR in a shorter timeframe	Although the term module appears only in 2.7 throughout DS535, its use is intended to address modular reactor configurations, which may involve multiple reactor units per site.			X	Paras 2.6 and 2.7 were included specifically to address gaps identified in SRS-123 with regards to SMRs.
NUSCC	Saudi Arabia	2	2.7	It is proposed to modify the first part of the first sentence as follows: "In case of multiple modules of the same type at the site ~~plants~~, to achieve…".	Achieving consistent PSR results across individual modules is possible for modules of the same or (very) similar type.		X		Text of para 2.7 modified to address comments from several other NUSSC members.
NUSCC	Sweden	5	2.10	(a) "The adequacy and effectiveness of the arrangements and of the structures, systems and components (SSCs) that are in place to ensure plant safety until the next PSR or, where appropriate, until the end of decomissioning ~~planned operation (that is, if the nuclear power plant will cease operation before the next PSR is due);"~~ "The PSR should address the period until the next PSR or, where appropriate, until the end of decomissioning planned operation,…"	Para 2.9 does not reflect the new section 10.			X	Please see the response to the comment no. 3.
NUSCC	WNA CORDEL	1	2.10	The objective of PSR is to determine by means of a comprehensive assessment: The adequacy and effectiveness of the arrangements and of the safety related provisions that are in place to ensure plant safety until the next PSR or, where appropriate, until the end of planned operation (that is, if the nuclear power plant will cease operation before the next PSR is due);	The notion of "structures, systems and components (SSCs) that are in place to ensure plant safety ..." should be replaced with that, more generic, of "provisions that are in place to ensure plant safety ..." which covers material and immaterial provisions which contribute to the safety of the installation. The notion of "safety related provisions" complies with the IAEA standards, e.g. IAEA N SF1 - 1.10. Safety measures and security measures have in common the aim of protecting human life and health and the environment. The safety principles concern the security of facilities and activities to the extent that they apply to measures that contribute to both safety and security, such as: Appropriate provisions in the design and construction of nuclear installations and other facilities; ---------- IAEA GSR Part 4 Rev. 1 : 4.4 The safety assessment shall include an assessment of the provisions in place for radiation protection, to determine whether radiation risks are being controlled within specified limits and constraints, and whether they have been reduced to a level that is as low as reasonably achievable. Requirement 9: Assessment of the provisions for radiation protection 4.37 The provisions made for the decommissioning and dismantling of a facility or for the closure of a disposal facility for radioactive waste shall be specified, and it shall be determined in			x	The concept of the PSR as established in the IAEA safety standards distinguishes between hardware provisions (SSCs) and non-hardware provisions related to safety as can be seen from the definition of individual safety factors. There are safety factors that are SSC related safety factors, while other are related to "arrangements", e.g., operational programmes, processes, etc. The objective of the revision of SSG-25 was to update the current guidance with the lessons learned from conducting PSRs in the past, and to harmonize the content with the current set of IAEA safety standards that were published after the publication of SSG-25.
NUSCC	WNA CORDEL	2	2.14	Safety factors relating to the plant (1) Plant design; (2) Actual condition of safety related provisions; (3) Provisions' qualification; (4) Ageing.				x	Proposed changes to the concept of the PSR within the WNA comments go beyond the fundamental elements of the PSR assessment as decomposed in individual safety factors. This will introduce a broad inconsistency with the current approaches to PSR in Member States. Given the above, the comment is rejected.
NUSCC	Saudi Arabia	3	2.11	Add a new letter (f): (f) In support of licensing major modifications or replacements of the SSCs at the plant.	This element is not on the list, yet.			X	This is not an objective of the PSR, although such activities might be outcomes from the PSR, but not the other way round.
NUSCC	Saudi Arabia	4	2.12	It is proposed to modify the para by adding additional text as follows: The operating organization has the prime responsibility for ensuring that ~~an~~ adequate ~~PSR~~ systematic safety assessments of the plant are performed. Safety reviews such as periodic safety reviews or safety assessments under alternative arrangements shall be carried out throughout the lifetime of the plant, at regular intervals and as frequently as necessary (see Requirement 12 of SSR-2/2 (Rev. 1) [2]).	Requirement 12 of the SSR-2/2 refers explicitly to systematic safety assessments of the plant. Further in para 4.44. the SSR 2/2/ states: "Safety reviews such as periodic safety reviews or safety assessments under alternative arrangements shall be carried out throughout the lifetime of the plant, at regular intervals and as frequently as necessary."			X	DS535 provides recommendations on the conduct of PSR. The PSR is established by Requirement 12 of SSR-2/2 (Rev. 1). Once this is done, we can use this term throughout the safety guide. Requirement 12 from SSR-2/2 (Rev. 1) is cited in para 2.2. Afterwards DS535 speaks only about PSR as it is clear from para 2.2 onwards what particular systematic safety assessment is being described
NUSCC	UK	2	2.13	A PSR should provide a comprehensive and proportionate assessment of the safety of the nuclear power plant.	The PSR guidance can be used for facilities other than nuclear power plant, using a 'graded approach'. This inclusion reflects that for facilities that carry lower risks the applied PSR process can reflect this.	X			
NUSCC	UK	3	2.14	The grouping, order and numbering of the safety factors listed above is not intended to imply any order of importance. Suggest moving this to the top of 2.14, after the first sentence.	This message may be presented/received more strongly if read before the safety factors.	X			
NUSCC	Pakistan	1	2.15		".....Some operating organizations may decide to review physical security as a separate safety factor within the PSR. Aspects related to the interfaces of safety, nuclear security and safeguards are expected to be addressed within the PSR as a means of ensuring compliance with Requirement 8 of IAEA Safety Standards Series No. SSR-2/1 (Rev. 1), Safety of Nuclear Power Plants: Design [5], and Requirement 17 of SSR-2/2 (Rev. 1) [2]". Guidance may be provided regarding interfaces of safety and nuclear security for safety factors other than Design and Emergency Preparedness. For example. Such interface can be provided for Safety factor "Organization, the management system and safety culture" to include security culture. Moreover, safety factor of "human factor" may also describe elements of interface between safety and security.			X	The intent of the para 2.15 is not to highlight interfaces of safety with security and safeguards safety factors 1 (design) and 13 (emergency preparedness). The intent is that these interfaces should be comprehensively elaborated in the context of cited requirements from SSR-2/1 (Rev. 1) and SSR-2/2 (Rev. 1) which are not related to design or emergency preparedness only.
NUSCC	Pakistan	2	2.15		The new IAEA safety guide "Management of the interfaces between nuclear and radiation safety and nuclear security (DS533)" is being developed to explain interface between safety and security. The reference of this draft guide may be added to this para. This reference may highlight probable review areas that can be used for review of this aspect in PSR.		X		DS533 is a new safety guide under development. The comment is noted and the reference will be added at later stages based on the status of DS533 in the future.
NUSCC	Russia	1	2.15	Exclude the first sentence.	This paragraph provides requirements for nuclear security which is out of scope of this document.			X	There is no requirement on nuclear security provided in the paragraph. The sentence is the original text from SSG-25 provided a general statement and referring to standard practices in Member States. The text of the whole para was amended to reflect comments received from NSGC during the approval of the DPP.
NUSCC	Belgium	3	2.17	add "In particular, when lifetime is a given for a study, the verification of this study should take the entire lifetime into account"	§3.7 the text "If the PSR is to be used to justify long term operation or licence renewal, the entire planned period of long term operation should be considered, and not just the ten years until the next PSR" in the section for LTO is more stringent/explicit. We suggest specifying that for studies that use the plant lifetime as hypothesis/data, the validity of these studies we should be verified/reassessed for this lifetime, if necessary. This is particularly important for hazard studies.			X	Para 2.17 states "end of planned operation". This is considered universal enough to cover LTO considerations of extended plant lifetime and any concerns regarding any time limited assessment, e.g., TLAAs. Section 9 provide specific guidance for cases when PSR is used in support of LTO. The comment is explicitly addressed by para 9.7 item d).
NUSCC	Saudi Arabia	5	2.17	It is proposed to modify the first sentence by adding additional text as follows: "The PSR should consider operating experience and safety performance of the plant as well as all changes that took place since the last PSR and it should address the period until the next PSR or, where appropriate, until the end of planned operation. It should also consider whether there are any foreseeable circumstances that could affect the safe operation of the nuclear power plant."	The PSR should take into consideration all changes of the SSCs, operational procedures, safety requirements, standards and codes, practices, etc. that took place since the last PSR. The results of the PSR should be among principal input for the decision-making process for approving further operation of the plant.			X	The proposed scope is implicitly covered in the scope of PSR as established in DS535 (and before in the current SSG-25). The objective of para 2.17 is not to described details of the scope of PSR, but rather focus on the context of the assessment period and general limitations that could affect such a period.
NUSCC	Sweden	6	2.17	"The PSR should address the period until the next PSR or, where appropriate, until the end of decomissioning ~~planned operation,…~~"	Para 2.17 does not reflect the new section 10.			X	Please see the response to the comment no. 3.
NUSCC	ALGERIA	1	2,19	Remove (e) and start a new paragraph	Five items are listed from item (a) to (e). Since (e) is not considered as a phase, the paragraph (e) has to not to be itemized and we will get four phases.	X			
NUSCC	Saudi Arabia	6	2.19	It is proposed to include a new item after the item (b) as follows: (c) Drafting reports from the review and assessment of individual safety factors and the PSR report, including the integrated implementation plan by the operating organization: In this phase, the operating organization prepares a draft of the PSR report, which summarizes the results from the review and assessment of individual safety factors and includes an integrated plan for implementing safety improvements at the plant.	The PSR report is explicitly mentioned in the current text, phase (c). In case this proposal is approved the introductory sentence should mention five phases instead of four.			X	there are many other tasks to which individual areas are further decomposed, however, within the context of para 2.19 it is not practical to provide further subdivision, specifically when these tasks are to be carried out by one responsible entity.

NUSCC	Korea	2	2,19	<Delete sub-item (e)> The PSR should be conducted in four phases, which may overlap or be further subdivided as appropriate: … (d) Finalization of the integrated implementation plan: The integrated implementation plan, comprising corrective actions and reasonably practicable safety improvements to be implemented in accordance with a time schedule agreed with the regulatory body, should be finalized in this phase. The phase following PSR in which the safety improvements are implemented is not considered an activity of PSR and so is not addressed in detail in this Safety Guide. Further recommendations on the phases of the PSR are provided in Section 4.	In the paragraph, it is stated that the PSR should be conducted in four phases; however, the final sentence is presented as item (e), which causes confusion. Therefore, it is proposed that the item (e) be removed, as in the SSG-25, para 2.18	X			
NUSCC	ENIS	5	2.19 b)	Conduct of the PSR: In this phase, the operating organization should conduct the review in accordance with an agreed 'basis document' for the PSR (see para. 6.6). The review should identify findings (which may be positive (strengths) or negative (deviations)) and should lead to proposals for corrective actions ~~(in cases of non compliance with the current licensing basis)~~ or safety improvements and an integrated implementation plan. The corrective actions and safety improvements resulting from the PSR might overlap to a certain extent with actions and/or activities from previous recent safety assessments. The operating organization might decide to avoid repeating activities from previous assessments (if nothing has changed) but any actions identified in there should be endorsed in the integrated implementation plan of PSR. In the specific cases of identifying findings of potential non-compliance with the current licensing basis, the operating organization should take immediate action(s) to ensure that the licensing basis remain valid even if PSR is not finalized.	1.Delete the text between brackets from Lines 4-5. The case on noncompliance with the current licensing basis shall be only for exceptions (very specific cases). Maintaining it like that it creates the perception that no any safety analysis, verification, review has been made in the plant since last PSR and it even put a question mark on the safety culture of the operating organization. 2.Add text for making clear that in some objective cases the review could conduct to some results as previous assessments and the PSR takes into the action(s). In addition, if a non-compliance indicates that the current licensing might be jeopardized, an immediate action should be taken.		X		1. For the distinctions between a corrective action and a safety improvement, the drafting team proposed to use the term corrective action specifically for cases where gaps to the current licensing basis are identified. In other cases, using the term corrective action somehow lacks clarity, because if the gap goes beyond the licensing basis, addressing it is considered a safety improvement (with regards the current licensing basis). Therefore, it is proposed to keep the text as is. 2. The proposed text added as a new para 2.20 in the following form: 2.20.The corrective actions and safety improvements resulting from the PSR may partially overlap with actions or activities from recent safety assessments. The operating organization may choose not to repeat activities from previous assessments if no changes have occurred. However, any actions identified in those assessments should be incorporated into the integrated implementation plan of the PSR. In cases where potential non-compliance with the current licensing basis is identified, the operating organization should take immediate action to ensure the licensing basis remains valid, even if the PSR has not yet been finalized.
NUSCC	USA	2	2.19	This paragraph suggests that the regulatory review happens in a different step, or in series to the development of the PSR and its reports. However, later in the document, it seems apparent that these may happen in parallel, with Figure 1 suggesting a more parallel approach. Please consider clarifying words in both 2.19 and Figure 1 to be clear on how the regulatory review occurs as the PSR is being conducted.	Confusion on order of regulatory review.			X	The introductory sentence to para 2.19 says "The PSR should be conducted in four phases, which may overlap or be further subdivided as appropriate". Therefore both options are relevant. Either the regulatory review after the PSR completion, or in parallel. Typically, parallel option is used in Member States.
NUSCC	UK	4	2.19	Regulatory review: The regulatory body should proportionately review the PSR report prepared by the operating organization …….	In the same way that the PSR approach can be graded proportionate to associated risks, the regulatory consideration should also be proportionate to risk.	X			
NUSCC	Saudi Arabia	7	3.2	It is proposed to modify the first sentence by adding additional text as follows: "Depending on ~~regulatory requirements~~ legal and regulatory framework, the regulatory body has…"	In general "regulatory requirements" are understood to be regulatory requirements towards the licence applicant, licensee and licensee`s suppliers.	X			
NUSCC	UK	5	3.2	Depending on national regulatory requirements, the regulatory body has the responsibility for:	This aligns with equivalent text in current SSG-25 (section 7) and reflects that some member states have different regulatory requirements.	X			
NUSCC	Saudi Arabia	8	4.2	It is proposed to modify the para by adding additional text as follows: "The activities of the operating organization can be divided into ~~three~~ four steps: (1) Preparation for the PSR project; (2) Conduct of the reviews of safety factors; (3) Analysis of the findings (including the global assessment) and preparation of the PSR report and a plan for implementing corrective actions and safety improvements at the plant. (4) Implementation of corrective actions and safety improvements. The regulatory body's activities are performed throughout the PSR project.	To maintain consistency of the text of the revised SSG-25 (e.g. in relation to para 2.19 and paras that follows)			X	The text of para 4.2 of DS535 is consistent with the original text of para 8.2 of SSG-25. Only implementation of corrective actions was included as it is believed to be part of the PSR process. However, in general, the PSR approach as established in IAEA safety standards does not consider implementation of safety improvements to be part of the PSR process. It is the preparation of the plan only.
NUSCC	UK	6	4.9	To improve overall efficiency and consistency, an updated and coherent set of databases may be developed for use within the ~~should be used for~~ safety factor reviews.	Change to provide flexibility and align with current text in SSG-25 (para. 4.9).	X			
NUSCC	ALGERIA	2	4,12	If the operating organization identifies a finding that poses an immediate and significant risk to workers, the public or the environment, prompt corrective actions should be taken and reported to the regulatory body.	To improve clarity and ensure consistency in interpretation, it is proposed to revise the term module to the conventional term "units", (which also alignment with terminology used in SSR-2/2 (Rev. 1)."	X			
NUSCC	Korea	3	4,12	If the operating organization identifies a finding that poses an immediate and significant risk to workers, the public or the environment, prompt corrective actions should be taken without delay and independently of the PSR timeline.	To emphasize that immediate and significant safety issues must be addressed independently of the PSR timeline, a clarification is proposed in para 4.12 to state that such corrective actions should be taken without delay and not be deferred until the PSR process is completed. (This addition aligns with the intent expressed in para 6.19.)			X	Para modified to include the reporting to the regulatory body. It is understood that "prompt" means immediate without any additional considerations that could cause an unnecessary delay.
NUSCC	Korea	4	4,3	In the event that the PSR identifies a finding that poses an immediate and significant risk to workers, the public or the environment, the regulatory body should verify that the operating organization takes prompt corrective action without delay and does not wait for the completion of the PSR process.	To emphasize that immediate and significant safety issues must be addressed independently of the PSR timeline, a clarification is proposed in para 4.12 to state that such corrective actions should be taken without delay and not be deferred until the PSR process is completed. (This addition aligns with the intent expressed in para 6.19.)			X	Para modified to include the reporting to the regulatory body. It is understood that "prompt" means immediate without any additional considerations that could cause an unnecessary delay.
NUSCC	Pakistan	3	4.9	To improve overall efficiency and consistency, an updated and coherent set of databases should be used for safety factor reviews. These databases should include the necessary input data for the safety factor reviews, for example, relevant design information and safety analyses, operational history data, operating events data, design modification data, data from on-site monitoring networks, nonconformance data, and maintenance and testing data.	Design Modification data may also be included. This information may be necessary for assessment of equipment qualification and component and overall assessment of design in the light of modifications carried out.		X		Para modified to read: 4.9 To improve overall efficiency and consistency, an updated and coherent set of databases should be used for safety factor reviews. These databases should include the necessary input data for the safety factor reviews, for example, relevant design information and safety analyses, **including information on design modifications,** operational history data, operating events data, data from on-site monitoring networks, non-conformance data, and maintenance and testing data.
NUSCC	Saudi Arabia	9	4.23	It is proposed to modify the first sentence by adding additional text as follows: The regulatory body should appoint a project manager for independent regulatory assessment of the PSR.	Regulatory role is to independently assess/review the PSR.			X	It is recognized that the regulatory review is independent. This is implicitly considered within the context of IAEA safety standards. The term independent review/independent verification is considered only in the context of operating organization/licensee (please consult GSR Part 4 (Rev. 1) for further details).
NUSCC	India	1	4.25	The plan should state the…….. The regulatory body should define a timeline for completion of the PSR review process.	The regulatory review process should also be completed in a time bound manner so that the required safety improvements can be initiated & completed within time. Also, PSR can be used for license renewal, which needs to be completed in a stipulated timeframe.			X	The timelines for completion are implicitly included in the operational license. There is not need for the regulatory body to define a dedicated timeline.
NUSCC	India	2	4.27	To do this, the regulatory body may use its own analysis methods …….. The review & assessment process should be completed within the defined timeline	Timed review.			X	See answer to 4.25
NUSCC	Japan	2	4.31	Using the reports from the review and assessment of individual safety factors, the regulatory body (~~usually the PSR project manager~~ a project manager for assessment of the PSR) should prepare an integrated PSR review report. The integrated PSR review report should present, in a concise way, the following: The regulatory body's view of the adequacy of the PSR as documented in the reports submitted, including the safety improvements already implemented by the operating organization;	The expression 'the PSR project manager' could be confused with someone from the operating organization. It should be made clear that this person belongs to the regulatory body.	X			
NUSCC	Belgium	4	4.32	"The regulatory body should then take appropriate licensing or other regulatory action consistent with national regulation, in particular to impose requirements when agreement has not been reached on safety issues".	As agreement will not always be possible, it would be advisable to provide for the case where the RB imposes certain requirements - this can be done by completing the last sentence.			X	This is an authority of the regulatory body established in regulatory framework of a State. Adding this statement doesn't seem to bring a practical benefit at the level of a safety guide.
NUSCC	Pakistan	4	4.32	The regulatory body should discuss the integrated PSR review report with the operating organization. This may involve several meetings but should lead to an agreement from both parties on an updated integrated implementation plan of safety improvements. The regulatory body should then take appropriate licensing or other actions consistent with regulatory requirements. Any subsequent changes in integrated implementation plan of safety improvements should also be subject to agreement with regulatory body.	There may be changes in implementation integrated plan for safety improvements due to limitations like unavailability of spares, long outages, etc. There may be agreement between licensee and regulatory body regarding these changes.	X			The following sentence added (small modifications for a better readability): Any subsequent changes in integrated implementation plan of safety improvements should be discussed and agreed with the regulatory body.
NUSCC	Belgium	5	5.1	Add "In this case, as well as in the event of difficulties in achieving improvements requiring adaptation of their scope, the implementation plan should be reassessed and rediscussed with the RB for agreement or approval "	Not only can delays occur, but it's not impossible that an improvement may turn out during a more detailed study to be unfeasible as originally planned.		X		Para 4.32 is amended with the following sentence: "Any subsequent changes in integrated implementation plan of safety improvements should be discussed and agreed with the regulatory body." This statement covers both options.

NUSCC	Canada	2	6.1	"…The review should cover the operation of all facilities and SSCs on the site covered by the operating licence (including, if applicable, waste management facilities and on-site simulators), including a review of the operating organization and its staff. In addition, any accepted exemptions from code requirements in the licensing basis at the time of the code cut-off date should be documented and re-assessed or re-validated."	Suggest adding to scope a specific item for validating/updating specific variances, concessions, and/or exemptions to national requirements that may be in place at the station at the time of the PSR code freeze date.	X			
NUSCC	Sweden	7	6.1	"When performing PSR of a nuclear power plant with multiple units, aspects such as radiation protection, emergency planning and radiological impact on the environment…"	The word "radiological" has been removed compared to the current revision of SSG-25. Concerning analyzing the impact on the environment, the impact should be limited to radiological impact, since other kind of impacts are out of scope of of IAEA standards in general and is not required in the Swedish Act on Nuclear Activities. Moreover, the DPP does not state that the scope of the PSR should be broadened to cover all sorts of environmental impact, instead of the usual radiological impact. Therefore, this change is inconsistent with the DPP. Also, the PSR is not, and should not be, an Environmental Impact Assessment, that is another instrument.	X			
NUSCC	ENIS	7	6.3	The conduct of a generic PSR of multiple units of the same design and operation (whether or not on the same site) can decrease the resources and effort needed.	Adding "(whether or not on the same site)" in the 1st sentence ensures coverage of all possible cases where conducting a generic PSR may be possible	X			
NUSCC	China	4	6.5	The referenced section should be 4.6,			X		The reference in para 6.5 is correct, however, the reference in para 4.24 was incorrect. It is corrected now.
NUSCC	Belgium	6	6.6	Add "However, it is a good idea to include a process for taking into account major developments or events during the course of the project, as failure to do so could jeopardize the PSR results."	An (recent) internal or external event can highlight major weaknesses or the need for important improvement. Not taking them into account, because they are beyond the cut-off date, can give an erroneous view and does not allow to define an appropriate implementation plan. This may be related to internal or external feedback - or a national regulation with a short implementation deadline.			X	Should this case occur, although considered rare, the regulatory body has the authority to request adding of such a case within the scope of ongoing PSR, or request a separate assessment which outcomes might be integrated later in the PSR. It is considered not practical to have a dedicated process for such rare cases when the national regulatory framework allows to cover these scenarios.
NUSCC	India	3	6.7	The PSR should apply all relevant regulations and standards within the State. Other requirements such as international safety standards and operating practices, and national or international guidance ~~should~~ may be ~~met~~ applied to the ~~fullest~~ extent practicable	As per para 2.10, one of the objectives of PSR is to determine the extent to which the plant conforms to current safety standards and operating practices. In that case, application of guidance in PSR can be voluntary.			X	The comment contradicts the intent of para 2.10.
NUSCC	Canada	3	6.14	"… However, a subsequent PSR should consider explicitly whether the earlier PSR continues to remain valid. The impact of the change should be assessed at the system level (rather than at the component level). Note that Management System is a system with interrelated and complex interactions that a change in one component of the management system cannot be assessed independently from the rest of the management system. A management system with changes since the first or previous PSR needs to be reassessed completely."	The current text in Sec. 6.14 can lead to a wrong-minded conclusion that only the changed portions of the management system need to be reviewed for subsequent PSRs. Management System is a system with interrelated and complex interactions that a change in one component of the management system cannot be assessed independently from the rest of the management system.		X		Para amended with the following sentence (text modified slightly for a better flow): "This is particularly important in management systems, where a change in one component cannot be evaluated in isolation from the rest. Any changes made to the management system since the initial or previous PSR should be reassessed in a comprehensive manner."
NUSCC	ENIS	7	6.23	Safety improvements should be implemented in accordance with the integrated implementation plan submitted to the regulatory body for agreement or approval. For a PSR of ~~nuclear power plants with for~~ multiple units (on the same site or on different sites), safety improvements may be implemented in a lead unit and lessons learned may then be used for the implementation of safety improvements in the other units.	Clarification to cover all cases: A NPP with multiple units (one site) A fleet of NPPs (several sites)	X			Text of para 6.23 modified as follows: 6.23Safety improvements should be implemented in accordance with the integrated implementation plan submitted to the regulatory body for agreement or approval. For a PSR of nuclear power plants with multiple units, or in the case of a PSR for multiple plants of identical rector design, safety improvements may be implemented in a lead unit and lessons learned may then be used for the implementation of safety improvements in the other units.
NUSCC	USA	3	6.23	For a PSR of nuclear power plants with multiple units, safety improvements may be implemented in a lead unit and lessons learned may then be used for the implementation of safety improvements in the other units. This process should be described in the implementation plan	Adding the sentence for traceability on how the plan should be documented	X			
NUSCC	Belgium	7	7.2		Is there more feedback on the elements relating to radiation protection during PSR? In Belgium, it's usually integrated into SF 14 (with interfaces to other SFs). Are there any countries that do this in an integrated way across all SFs? Shouldn't the basic approach be to consider radioprotection as a 15th SF (or part of the 14th), leaving the possibility of doing it transversally as a second choice?			X	Numerous discussion were held within the team or drafts where to address radiation protection. In the end, the decision was made to include radiation protection, together with other relevant programmes, within SF8 as it falls under the safety performance of the plant in general. It is recognized that some countries use different arrangements of topics within safety factors and that some have dedicated safety factors for radiation protection. However, to stay within the objectives of the revision of SSG-25, the team focused on more precise scope setting of individual factors and to eliminate potential overlaps when compared to SSG-25.
NUSCC	Sweden	8	7.4	"The review should determine the status of each safety factor at the time of the PSR and should assess future safety at the nuclear power plant at least until the next PSR and, where appropriate, up to the end of decommissioning ~~planned operation~~."	Para 7.4 does not reflect the new section 10.			X	Please see the response to the comment no. 3.
NUSCC	Pakistan	5	7.5		"The level of detail of the review could vary from safety factor to safety factor. For some safety factors, a high level or programmatic review could be performed. Where such an approach is adopted, this should be set out and justified in the PSR basis document". The extent of high level or programmatic review may be provided in this para.			X	It is for the operating organization to propose and justify such cases individually. It is not feasible to provide a universal guidance in IAEA safety guide
NUSCC	China	7	7.5 7.22	It is recommended that the "high level or programmatic" need to be described more clearly, such as the meaning,how to use it				X	In this case, the approach should not go into individual details of reviewed SSCs, but rather focus on approaches and programmes used. As stated in the text, such approach should be justified to be fit for purpose. These are original statements from SSG-25.
NUSCC	USA	4	7.7	Section 7.7 – Due to the importance of this statement as it pertains to planning the review of the safety factor, suggest moving this near the top of these introductory statements	Movement of this may help in planning the review of the safety factors	X			Moved up to become 7.5
NUSCC	Belgium	8	7.10	To be deleted/ moved to the section global assessment and reworked	The classification of "negative findings" is not appropriate at this time. In particular, the notion of "reasonably feasible" seems more directly linked to global assessment. The assessment of necessity, apart from purely regulatory reasons, is also linked to global assessment.			X	On the contrary. When individual safety factors are review, whenever a gap is identified, a dedicated, if available, safety improvement should be defined. These are used afterwards as inputs into global assessment.
NUSCC	India	4	7.10 b	Negative findings should be divided into a)Deviations for which no reasonably practicable safety improvements can be identified; ~~b)Deviations for which identified safety improvements are not considered necessary;~~ c)Deviations for which safety improvements are considered necessary.	If safety improvements are not considered necessary, then it need not be termed as 'Deviation'			X	It is always a deviation, because it is a non-compliance with the dedicated review basis. This is the text originally used in SSG-25 and an approach used in Member States.
NUSCC	WNA CORDEL	3	7.12	7.12 In the case of negative findings for which no reasonably practicable safety improvements can be identified, the reason(s) should be documented and the issue revisited after an appropriate period of time to determine whether a practicable solution is available. Practical immediate actions have nevertheless to be defined (e.g. downgrade the users requirements (?)) to address and correct this situation.	Can we accept the fact that discrepancies have been identified and that nothing be planned or done?			X	Many thanks for the comment. The statement in para 7.12 is not accepting the fact that nothing is planned or done. It is requesting the adequate reasoning to be provided and documented and a revision after a period of time to confirm if no reasonably practicable improvements cannot be identified later.
NUSCC	Belgium	9	7.12		In addition, if negative finding has no solution, it should be mentioned that this may lead to a decision not to continue operating.			X	This might be outcome of the global assessment, but not of the identification of a single gap. It is not expected that a single finding will lead to a decision to discontinue plant operations.

NUSCC	Belgium	10	7.16	Modify the end of the sentence: "…have been reduced as far as possible"	"…and that plant states that could lead to high radiation doses or to a large radioactive release have been 'practically eliminated'" The requirement of practical elimination of large radioactive releases is not a requirement for existing NPP – the conclusion of the PSR would probably not be positive with regard to a tue practical elimination of large releases			X	The terminology in the revised safety guide should be consistent with the terminology of the IAEA safety standards. The concept of practical elimination is introduced in SSR-2/1 (Rev. 1). As stated in para 1.3: "It might not be practicable to apply all the requirements of this Safety Requirements publication to nuclear power plants that are already in operation or under construction. In addition, it might not be feasible to modify designs that have already been approved by regulatory bodies. For the safety analysis of such designs, it is expected that a comparison will be made with the current standards, for example as part of the periodic safety review for the plant, to determine whether the safe operation of the plant could be further enhanced by means of reasonably practicable safety improvements." The text of the guide should be interpreted in this context. It is also important to note that there are new reactor designs under construction for which the revised safety guide should be applicable as well. Therefore, the objective of SSG-25 revision was to revise the concept of PSR and to harmonize it with the current IAEA safety standards.
NUSCC	WNA CORDEL	4	7.17	The design basis of safety related provisions should be made available to provide for the safe operation and maintenance of the plant throughout its operating lifetime and to facilitate plant modifications	see comment 2			X	Rejected based on the grounds provided in the resolution of the comment no. 1.
NUSCC	Korea	5	7.19	7.19 (b) Identification of differences between codes and standards met by the design (e.g. the standards and criteria in force when it was built) and the current nuclear safety and design standards (e.g. the safety and design standards formally adopted or endorsed by the regulatory body as applicable at the time of the PSR)	For the consistency, the concept of the current should be defined and for the users of this SSG-25. Terminology including 'current (e.g. current nuclear safety and design standards, current safety standards and regulatory requirements, etc.) is reviewed and explanation should be added, if applicable)			X	"Current" should be understood as the latest revision applicable for the plant undergoing PSR. It is recognized that Member States use various approaches and an agreement on the PSR review basis, including the selection of the current nuclear safety and design standards, between an operating organization and a regulatory body does not need to formalized.
NUSCC	China	5	7.19	7.19 (g) "an assessment of the condition of the storage facilities, the records management and the inspection regimes being used ", need to be adjust into "Safety factor 2: Actual condition of SSCs "				X	It is placed correctly because it should be reviewed to confirm that the assumptions of the plant design remain valid.
NUSCC	Finland	1	7.21	The review should be performed systematically by means of a clause-by-clause review of national and international requirements and standards listed in the PSR basis document and other requirements and standards identified as relevant during the course of the review. Where this would assist the review, the evolution of these requirements and standards from the versions used for the original design should be evaluated to assess the impact of changes on the plant design. The impact of climate change to design basis should be considered.	In the document climate change is considered in context of hazards. However, the environmental factors as highest temperatures and availability of ultimate heat sink may chance due to climate change.	X			
NUSCC	Finland	2	7.22	In some cases, comparison with requirements and standards may be best performed by means of a high level or programmatic review. If this approach is to be adopted, the PSR basis document should clearly indicate this intention and, where appropriate, this should be agreed with the regulatory body.	Please clarify. What is meant by high level or programmatic review?	X			In this case, the approach should not go into individual details of reviewed SSCs, but rather focus on approaches and programmes used. As stated in the text, such approach should be justified to be fit for purpose. These are original statements from SSG-25.
NUSCC	Korea	5	7.24	7.24 The review of this safety factor should be conducted for all SSCs important to safety. The review should seek to identify deviations between the plant design and current safety standards and regulatory requirements (including relevant design codes) and to determine their safety significance.. (General comment) Add a footnote or a dedicated glossary entry to define the term "current" as used in relation to codes, standards, and regulatory expectations—e.g., "current" means those standards formally adopted or endorsed by the regulatory body as applicable at the time of the PSR.	For the consistency, the concept of the current should be defined and for the users of this SSG-25. Terminology including 'current (e.g. current nuclear safety and design standards, current safety standards and regulatory requirements, etc.) is reviewed and explanation should be added, if applicable)			X	"Current" should be understood as the latest revision applicable for the plant undergoing PSR. It is recognized that Member States use various approaches and an agreement on the PSR review basis, including the selection of the current nuclear safety and design standards, between an operating organization and a regulatory body does not need to formalized.
NUSCC	WNA CORDEL	5	7.24 7.25 7.34	The relevance of replacing the concept of SSC with that of safety related provision should be analyzed / assessed each time SSCs are discussed.				X	Rejected based on the grounds provided in the resolution of the comment no. 1.
NUSCC	China	6	7.25	It is recommended the "f.Programmatic Defense-in-Depth" should be added	"Programmatic Defense-in-Depth" is also the important aspect for DID			X	SF1 is related to the review of the plant design. Other aspects of DiD should be reviewed within the Global Assessment. Please consult Section 8, specifically paras 8.14 – 8.23.
NUSCC	Pakistan	6	7.25 (d)	Defence in depth in the design of systems, **structures and components;**	Defense in dept for structure has been mentioned. However, defense in depth for system and component have not beenmentioned. The text is added to include this aspect.	X			
NUSCC	WNA CORDEL	6	7.27	Where the plant has undergone a significant number of modifications over its lifetime or in the period since the last PSR, the cumulative effects of all modifications on the design should be examined. Adequate means should be available to easily track the progress of changes. The availability of a comprehensive representation of the safety architecture is interesting.	Adequate means should be available to easily track the progress of changes. From this point of view, the availability of a comprehensive representation of the safety architecture is certainly interesting.		X		Para extended with the following text: "Adequate means should be available to allow for effective tracking of these effects."
NUSCC	ENIS	8	7.30	The review should aim to verify that the design ensures that the generation of radioactive waste and discharges are kept to the minimum practicable in terms of both activity and volume, by means of appropriate design measures and operational ~~and decommissioning practices~~.	"and decommissioning" deleted since PSR during decommissioning is dealt with in chapter 10			X	The plant should be designed and operated in a way that it can be safety decommissioned. Therefore, any waste generated during the operation of the plant should not bring unnecessary challenges to future decommissioning. Therefore, decommissioning practices known at the time of PSR should be taken into account when performing the review. Therefore, original wording is kept.
NUSCC	Sweden	9	7.31	[please clarify]	The new para 7.31 addresses "adequate safety margins" but it is not clarified what margins are meant here. See also comment on para 7.80. Pleas clarify.	X			Regarding para 7.31: The para deals with margins in the response of the plant with regards to external hazards. Requirement 17 of SSR-2/1 (Rev. 1) should be consulted in connection with this paragraph. Regarding para 7.80, it is a general statement relating to deterministic safety analysis. Please consult Requirement 13, para 4.48A from GSR Part 4 (Rev. 1), or Requirement 42, para 5.73. Further information can be found in SSG-2 (Rev. 1)
NUSCC	Russia	2	7.32	Exclude reference to nuclear security and rephrase paragraph: "The potential impact on safety due to design changes related to safety measures, nuclear security measures, and arrangements for the State system of accounting for and control of nuclear material should be reviewed within the PSR. Recommendations on managing the interfaces can be found in Ref. [9][17]."	his paragraph provides requirements for nuclear security which is out of scope of this document.			X	There is no requirement on nuclear security provided in the paragraph. The text of the para was included to reflect comments raised by NSGC during the approval of the DPP to specifically include the review of interfaces of safety with security and with safeguards. As these are required by the requirement 8 of SSR-2/1 (Rev. 1) to be addressed in the design of the plant, the para is kept.
NUSCC	India	5	7.35. a,b&c	The review of the actual condition of SSCs important to safety, including spent fuel storage facilities, should include examination of the following aspects for each SSC: ~~a)Actual ageing effects and processes against anticipated and predicted ones;~~ ~~b)Obsolescence;~~ ~~c)Design requirements and standards including design basis assumptions~~ d)□…..	These aspects will be assessed in Safety Factor-4 (ageing management) and Safety Factor-1 (Plant design). Hence need not be repeated here			X	These aspects as in fact mainly covered in SF2 and are used as relevant inputs/interfaces with SF1 and SF4.
NUSCC	ENIS	9	7.35 (b)	Change to be considered: Obsolescence is also included in the scope of SF4 - Need to decide where it should be covered and remove it from the scope or the other SFs (see comment on 7.65). Both options, in SF2 or in SF4, seem to be relevant but it may be left open by keeping obsolescence in both SF and mentioning here "(if not included in the scope of SF4)"	Clarifying where obsolescence should be considered – see comment on 7.65 (i)		X		Obsolescence is a cross-cutting issue relevant for several safety factors. Obsolescence review falls mainly within the scope of SF2 (consistent with SSG-48), however, specific information should be used also in the evaluation of SF4 and SF3 as inputs. A reference in SF3 added (consistent with SSG-69).
NUSCC	Japan	3	7.35 (d)	The review of the actual condition of SSCs important to safety, including spent fuel storage facilities, should include examination of the following aspects for each SSC: …… (d) Plant programmes, including the chemistry programme (see SSG-13 (Rev.1) [xx]);	Add reference SSG-13 (Rev.1) for chemistry programme.	X			
NUSCC	Japan	4	7.39 7.40	7.39 The frequency of maintenance, testing, surveillance and inspection is required to be determined considering the importance to safety of the component, supported by probabilistic assessments; its reliability and availability for operation; its potential for degradation due to ageing; operating experience, or recommendations from vendors (see para. 8.5 of SSR-2/2 (Rev. 1) [2]). The operating organization is specifically required to establish maintenance programmes for non permanent equipment to be used for accidents more severe than design basis accidents, in order to maintain high reliability of this equipment (see para. 8.14A of SSR 2/2 (Rev. 1) [2]). ~~7.40 Paragraph 8.14A of SSR-2/2 (Rev. 1) [2] states that 'The operating organization shall establish maintenance programmes for non-permanent equipment to be used for accidents more severe than design basis accidents'~~.	The purpose of para 7.40 is that a maintenance programmes for non-permanent equipment is necessary, but it is merely a copy of a higher-level document and does not provide any specific recommendations. Since para 2.3 of SSG-74 is considered to be in line with the purpose, it is proposed that the second sentence of para 2.3 will be added to para 7.39 and para 7.40 will be deleted.			X	The intent of the comment is clear, however, given the approach adopted for the style of citation of safety requirements in safety guides, a separate para is typically used. This is also the case with para 7.40.
NUSCC	Sweden	10	7.43	[Add example]	Para 7.43 is hard to understand. What more specifically is meant by "safety assessment" here?	X			This para is related to Requirement 23 and 24 of GSR Part 4 (Rev. 1). Specifically, para 5.5.

NUSCC	WNA CORDEL	7	7.53	Safety factor 3: Qualification of safety related items 7.53 Requirement 13 of SSR-2/2 (Rev. 1) [2] states: "The operating organization shall ensure that a systematic assessment is carried out to provide reliable confirmation that safety related items are capable of the required performance for all operational states and for accident conditions." Qualification of safety related items should take into account the prevailing environmental conditions, throughout the design life, with due account taken of plant conditions during maintenance and testing.	The notion of safety related items used by the NSSR2/1 Rev.1 is perfectly consistent with that of "safety related provisions" which, both, material and immaterial, should be qualified.			X	Rejected based on the grounds provided in the resolution of the comment no. 1. The concept of equipment qualification as established in IAEA safety standards, namely SSG-69, relate only to hardware provisions.
NUSCC	China	8	7.56	~~(d) Qualification for the effects of internal hazards and external hazards;~~	Editorial The effects of internal hazards and external hazardsi si ncluded inthe (a) Equipment qualification programme and (c) Environmental qualification,etc.			X	It is an important aspect that should be mentioned explicitly to avoid its potential omission. The bullet is kept.
NUSCC	WNA CORDEL	8	7.58	The review of this safety factor should confirm whether the equipment qualification is an active and ongoing process. The review should verify whether: a) A list of safety related provisions subject to qualification is available and up to date.	N.B. The availability of the "safety architecture" will be useful to fulfil this indication.			X	Rejected based on the grounds provided in the resolution of the comment no. 1.
NUSCC	Germany	2	7.58		Some paras of DS535 repeat large section of other standards. For example, para 7.58 repeats practically complete para. 6.5 of SSG-69 "Equipment Qualification for Nuclear Installations". Is it really necessary? Wouldn't a reference be better?			X	In these cases, the drafting team considered useful to use the information directly rather than only refer to paras themselves.
NUSCC	WNA CORDEL	9	7.62	Safety factor 4: Ageing 7.62 All provisions important to the safety — and other SSCs whose failure might prevent SSCs important to safety from fulfilling their intended functions …..	A question can be raised about the applicability of the "aging" to the immaterial provisions (?) E.g. the feasibility of a given procedure due, for example, to the degradation of the environmental conditions due to the aging (?)			X	Inconsistent with the scope of ageing as established in IAEA safety standards, namely SSG-48.
NUSCC	ENIS	10	7.65 (i)	Change to be considered: In SF2 scope it is indicated that obsolescence is to be included in. It should then be removed if it is decided that obsolescence is to be in the scope of SF4 (see comment made on 7.35). Both options, in SF2 or in SF4, seem to be relevant but it may be left open by keeping obsolescence in both SF and mentioning here "(if not included in the scope of SF4)"	Clarifying where obsolescence should be considered – see comment on 7.35 (b)		X		See the comment above. (7.35)
NUSCC	Korea	6	7.70	Structures and components that are periodically replaced or refurbished in accordance with predefined rules may be considered for exclusion from the scope of ageing management provided that the replacement or refurbishment programme demonstrably addresses relevant ageing mechanisms, and the exclusion should technically justified and agreed with the regulatory body to avoid unjustified exclusions.	While the intent of para 7.70 is seemed to streamline the ageing management review, it may allow exclusion of certain SSCs solely by the operating organization, based on routine replacement or refurbishment without adequate demonstration that ageing effects are properly addressed. To avoid the risk of unjustified exclusions, it is recommended to clarify that such exclusions should be subject to technical justification and regulatory acceptance.			X	The original text of the cited para is referring to "predefined rules" that are governing the periodic replacement/refurbishment of the equipment. These rules should be established by the plant designer/vendor of the equipment in question and the should be included in the plant's design documentation. It is understood that the concern expressed in this comment is implicitly included in the original text of the para.
NUSCC	Belgium	11	7.70	Add "the suitability of the predefined rules should be assessed"	It's logical not to consider ageing components that are regularly replaced. However, it's important to ensure that the frequency of replacement is adequate.	X			
NUSCC	ENIS	11	7.73 (c)	~~(c) Review of the adequacy of the safety assessment in terms of addressing the planned decommissioning actions and potential incidents related to decommissioning, including radiological hazards and personnel exposure;~~	Bullet point to be deleted as per previous comment on para 7.30, PSR during decommissiong is dealt with in Chapter 10 (and to be checked if this bullet point has to be moved to Chapter 10).			X	Accepted, text updated accordingly in Section 10.
NUSCC	China	9	7.73 (j)	Analysis of: the functional adequacy, reliability, redundancy…	Editorial It is suggested to add a comma between reliability andredundancy.	X			
NUSCC	Ukraine	1	7.74	The review of safety factor 5 should consider at a minimum Requirements 14-18 ~~15~~ of GSR Part 4 (Rev. 1)	It is not evident why only requirement 15 of GSR Part 4 (Rev.1) is mentioned. It is proposed to refer other requirements relevant to deterministic assessment	X			
NUSCC	ENIS	12	7.74	The review of safety factor 5 should consider at a minimum Requirement 15 of GSR Part 4 (Rev. 1) [3], Requirements 5, 10, 13, 16, 19, 20 and 42 of SSR-2/1 (Rev. 1) [5], ~~and Requirement 3 of IAEA Safety Standards Series No. GSR Part 6, Decommissioning of Facilities [12].~~ Recommendations on deterministic safety analysis are provided in IAEA Safety Standards Series No SSG-2 (Rev. 1), Deterministic Safety Analysis for Nuclear Power Plants [13].	As per previous comment on para 7.30 and para 7.73 (c), PSR during decommissiong is dealt with in Chapter 10. This reference to GSR Part 6 should therefore be removed from here and if needed moved to Chapter 10.	X			Accepted, text updated accordingly in Section 10.
NUSCC	ENIS	13	7.77	Change to be considered "any major weaknesses as well as strengths" How do these differ from positive and negative findings? If those terms are kept, they should be defined and the way they are considered in the PSR should be clarified	Clarification needed.	X			This is the original text from SSG-25. Para 2.16 is speaking about positive/negative findings as strengths and deviations. Therefore, the text is modified to replace "weakness" with "deviation" for consistency. Adjective "major" is kept to provide a guidance for screening.
NUSCC	Ukraine	2	7.80	If the earlier approach is still used, its continuing validity should be verified explicitly in the review, including the assumptions used, the degree of conservatism applied, consideration of uncertainties and the availability of adequate margins ~~and the inherent uncertainties~~ in the analysis to avoid cliff edge effects.	Editorial	X			
NUSCC	ENIS	14	7.80	Change to be considered "If it is necessary to repeat the analysis" What are the conditions that would make it necessary to repeat the analysis? More up-to-date analytical method is not one condition for that, isn't it?	Clarification needed.			X	It should be the outcome of the review whether the analysis should be repeated or not. Current analytical methods can be one of the drivers to repeat the analysis. Of course, the repetition of the analysis might be as part of the integrated implementation plan.
NUSCC	Sweden	11	7.80	"...including the assumptions used, the degree of conservatism applied, well motivated acceptance criteria ~~the availability of adequate margins~~ and the inherent uncertainties in the analysis to avoid cliff edge effects."	"Adequate margins" have been added in para 7.80. It is not clear which margins that are addressed here. Safety margins is not defined in the IAEA glossary (2022), therefore it is important to explain exactly what is meant, what margins are addressed, when using the expression "safety margins". The text in para 7.80 implies that it is the margins between the analysis results and the acceptance criteria that are addressed. But the safety margins to cliff-edge effects should be handled by proper margins between the acceptance criteria and the cliff-edge effect. A clarification is therefore proposed.			X	Regarding para 7.80, it is a general statement relating to deterministic safety analysis. Please consult Requirement 13, para 4.48A from GSR Part 4 (Rev. 1), or Requirement 42, para 5.73. Further information can be found in SSG-2 (Rev. 1)
NUSCC	Sweden	12	7.81	"…improvements are practicable ~~available~~."	In the current para 5.60 the chosen word is "practicable". This is a good choice and more like the established "practical and reasonable".	X			The text of the para modified for consistency to read: "…and whether any reasonably practicable safety improvements are available."
NUSCC	Ukraine	3	7.82	~~With regard to design extension conditions~~, the extent of the inclusion and evaluation of combinations of events and their consequential effects, which could lead to anticipated operational occurrences or to accident conditions, should be reviewed.	It is not clear why consideration of event combinations is linked to DECs			X	The para relates to the definition of design extension conditions from multiple failure events. It is important to distinguish whether any event in the event sequence is consequential, and should be considered as part of the AOO/DBA, or it is independent event that could be coupled with the initiator to derive credible DEC.
NUSCC	Sweden	13	7.83	[No proposal, please clarify]	It is unclear if the text "and that this verification is being performed" means that it should be performed within the PSR project or if this verification could be performed on other occasions. Please clarify.	X			The recommendation in this para is aimed to confirm within the PSR whether the independent verification of deterministic safety analysis is performed by the operating organization as required by Requirements 20 and 21 of GSR Part 4 (Rev. 1). The objective of PSR should not be the perform this verification, but to confirm that it is being performed.
NUSCC	Japan	5	7.99	For sites with multiple units, it should be confirmed that the following are implemented to the extent practicable: all risk significant multiple unit initiating events3 and hazards, as well as all plant operating modes are addressed, and that relevant risk metrics for multiple unit PSA are defined to capture different combinations between the reactor cores and spent fuel pools on the site, to facilitate the use of the results of the multiple unit PSA for decision making.	The assessment of multi-unit PSAs are still in the research stage in most Member States. They should be implemented to the extent practicable in accordance with the actual situation.			X	The text of this para is harmonized with the updated PSA guidance, as established in SSG-3 (Rev. 1). The objective of SSG-25 revision was to align recommendations for the PSR with the latest set of IAEA safety standards.
NUSCC	WNA CORDEL	10	7.103	Safety factor 7: Hazard analysis 7.103 To ensure the fulfilment of required safety functions and operator actions, provisions important to safety, including the control room	The indication is applicable to the "provisions important to safety"			X	Rejected based on the grounds provided in the resolution of the comment no. 1.
NUSCC	India	6	7.106	If it has not been previously done, a list of relevant internal and external hazards that might affect safety over the lifetime of the plant should be established taking into account current regulatory requirements, applicable international practice, operating experience from other plants, changes in plant design, climate change, and changes in transport and industrial activities near the plant site. Where such a list has already been established, this should be reviewed for completeness	To make requirement more comprehensive			X	This is the objective of the PSR, so there is no need to repeat it specifically in this para.
NUSCC	India	7	7.107 k	Release of hazardous substances inside the plant	More enveloping that existing 'Toxic and/or corrosive liquids and gases;'			X	There are other items in the list that fall under this category.
NUSCC	India	8	7.108 a	Floods, including tsunamis and storm surge	Self-explanatory	X			
NUSCC	India	9	7.108	Hazards from floating objects and hazardous liquid on water intakes and components of the ultimate heat sink.	New addition, In line with SSG-77 list (Protection Against Internal and External Hazards in the Operation of Nuclear Power Plants)	X			

NUSCC	Sweden	14	7.111	"...Both aleatory uncertainties and epistemic uncertainties are required to have been considered in the establishment of site specific design parameters ~~analysis~~..."	The reference to SSR-1 seems not to be correct. Para. 4.21 of SSR-1 says that "Adequate account shall be taken of both aleatory uncertainties and epistemic uncertainties in the establishment of site specific design parameters". That means, once these design parameters are established, it is possible to make a deterministic hazard analysis. As para 7.111 is written now, the hazard analysis can only be probabilistic, since the aleatory uncertainty is taken into account by representing a phenomenon in terms of probability distribution model (definition in IAEA glossary 2022). Therefore, the text needs to be changed. If we have misunderstood the text, a clarification is needed.	X			
NUSCC	India	10	7.115	To be deleted	May not be required as we have to assess the safety of the plant for each hazards. Hence their grouping with respect to sensitivity may not be required			X	The sensitivity is discussed in the context of the climate change The para is kept.
NUSCC	Belgium	12	7.116		Instead of "at a minimum, up to the next PSR " it should be written "at least up to the next PSR plus a period of time sufficient to allow the implementation of measures that would only be defined at the next PSR".			X	Para 7.116 is recommending time period of 20-30 years to be considered for application of specific margins. Therefore, the intent of the comment is considered implicitly included in the current text.
NUSCC	Belgium	13	7.116		Replace "Where appropriate, international data, in particular from the Intergovernmental Panel for Climate Change (IPCC), should be used as relevant input." By a reference to SSG-18 – this recommendation seems too specific			X	IPCC is a international reference providing relevant input data. Therefore it is recommended to be kept and it is not considered as too specific. Reference to SSG-18 is already provided in para 7.118.
NUSCC	Sweden	15	7.116	[No proposal, please clarify]	This new paragraph mentions "specific margins". Please elaborate on this, since it is not clear what kind of margins which is intended here. See also comment on para 7.80.	X			Thank you very much for the comment. Margins referenced in para 7.116 are different margins that those considered in para 7.80. While margins in para 7.80 relate to design of the plant, margins in para 7.116 relate to definition of external natural hazard values sensitive to climate change. It is expected that when evaluating the predicted external natural hazard values for future, if they are subject to climate change, the derived values, e.g., for 1/10000 year return period might be different if evaluated 20 years from now. And the different might go beyond statistical uncertainties. Therefore, it is expected that additional margin being incorporate to provide a buffer for the impact of the climate on the values to avoid potential significant sudden changes to external natural hazard values in subsequent PSRs.
NUSCC	USA	5	7.119	Safety performance is determined from assessment of continuous monitoring of the safety of the plant, assessment of operating experience, including safety related events, and records of the unavailability of safety systems, occupational radiation doses and the generation and management of radioactive waste.	To provide clarity and distinction between SF 8 and SF 14.	X			
NUSCC	India	11	7.120	The objective of the review of safety performance is to determine whether the plant's safety performance, including operation experience & outcome of root cause (plant under consideration), radiation doses and the generation and management of radioactive waste indicate any need for safety improvements.	To make it more comprehensive and as the element under review includes review of incidents occurred at plant			X	The proposed additions are included in SF9.
NUSCC	Japan	6	7.121	The review of safety performance should evaluate whether the plant has in place appropriate processes for the routine recording and evaluation of safety related operating experience, including: ... (g)Reactivity management (core reactivity control and subcriticality for fuel spent pool); (h) Fuel management ; (ih)Radiation monitoring, including assessment of occupational exposure and workers' health surveillance; (ji)Generation and management of radioactive waste, including characterization and classification and processing of radioactive waste; (kj)Storage of radioactive waste, including arrangements for subsequent disposal; (lk)Monitoring for verification of compliance with regulatory requirements.	Clarify reactor management with some examples. Fuel management should be added.		X		Paras 7.121, 7.129 and 7.136 modified to be aligned with SSG-73 wording
NUSCC	Canada	4	7.121 (k)	"(k) Monitoring (including of discharge of effluents) for verification of compliance with regulatory requirements."	Discharge of effluents has been removed from the scope of Safety Factor 8. It is not clear if this was intentional. SF8 considers performance trending and benchmarking, whereas SF14 mainly focuses on actual results and effectiveness.			X	This was intentional. The revision focused on elimination of unnecessary overlaps between individual safety factors. The intent of the comment is captured in para 7.195 item (a).
NUSCC	ENIS	15	7.129 (f)	Management of radioactive waste , including generation, characterization and classification, processing and ~~accumulation~~ storage;	Word "accumulation" is not used in IAEA RWM terminology.	X			
NUSCC	ENIS	16	7.132	Requirement 20 and paras 5.10–5.16 of SSR-2/1 (Rev. 1) [2] establish the requirements for a radiation protection programme in a nuclear power plant, including requirements on the assessment of occupational exposure. Requirement 21 and paras 5.17–5.20 of SSR-2/1 (Rev. 1) [2] establish requirements for the management of radioactive waste and effluents arising from the operation of a nuclear power plant. SSG-70 [30] provides relevant recommendations ~~and further guidance with regard to small modular reactors is provided in Ref. [31]~~. These publications should be considered when reviewing records relating to radiation doses and the generation of radioactive waste.	This SF is the only one to consider SMR specific requirements, and it seems very odd to refer to a TECDOC for that (in addition a TEDCOC that is not published).	X			
NUSCC	Sweden	16	7.132	"...Requirement 21 and paras 5.17–5.20 of SSR-2/1 (Rev. 1) [2] establish requirements for the management of radioactive waste ~~and effluents~~ arising from the operation of a nuclear power plant. ~~SSG-70 [30] provides relevant r~~Recommendations and further guidance with regard to small modular reactors is provided in Ref. [31]...."	Effluents have been removed from SF8 in all other paras. The next sentence is incomplete.	X			Accepted and text of para 7.132 modified further to incorporate comments from other NUSSC members.
NUSCC	India	12	7.134	Where the review indicates a weak performance or trend, the possible root causes (e.g. deficiencies in procedures, training or safety culture), action implemented / planned to overcome the deficiencies should be identified.	'action implemented / planned to overcome the deficiencies' has been added to make the clause more comprehensive			X	Implementation of actions is not part of the safety factor review. This is the objective post-PSR activities.
NUSCC	India	13	7.138	The objective of the review of this safety factor is to determine whether adequate processes are in place to establish, implement, assess and continuously improve the operating experience programme at the plant to prevent or minimize the risk of future events by learning from events that have already occurred at the plant or elsewhere and new research findings & technical development.	'new research findings & technical development' has been included to make it more comprehensive		X		Para modified as follows for a better flow: "7.138The objective of the review of this safety factor is to determine whether adequate processes are in place to establish, implement, assess and continuously improve the operating experience programme at the plant to prevent or minimize the risk of future events by learning from research findings and from events that have already occurred at the plant or elsewhere."
NUSCC	Korea	7	7.139(h) 7.141(h) 7.144	<Delete or revise references to "research findings">	Safety Factor 9 has been renamed from "Use of experience from other plants and research findings" to "Feedback of operating experience," seemed to focus the scope as on operational experience. However, the current draft retains several references to research findings and technical developments (e.g. paras 7.139(h), 7.141(h), and 7.144), which seemed to fall outside this revised scope. +In order to maintain internal consistency and clarity of scope, it is recommended that these references be removed from Safety Factor 9. If the use of research findings is deemed necessary, their inclusion should be considered as part of a future revision.			X	SF9 title was to be harmonized with SSG-50 that provides guidance on operating experience feedback for nuclear installations. This, as per SSG-50 guidance, includes consideration of research findings.
NUSCC	WNA CORDEL	11	7.141	7.141 The review of the operating experience programme should verify whether: …… (e) Corrective actions are defined, prioritized, scheduled and followed up to ensure effective implementation and effective improvement of safety and reliability; the availability of the safety architecture could help facilitate the monitoring of this recording activity				X	The objective tree method for assessment of implementation of DiD, consistent with the IAEA safety standards, is provided in SRS-46
NUSCC	India	14	7.146 Safety factor 10:	Organization, Leadership, the management system and safety culture	Leadership has been added to make title in line with objective			X	Leadership is implicitly covered in Organization.
NUSCC	ENIS	17	7.149 (b)	Introduce a Preliminary (b) Management system including: (viii) Management of radioactive waste; (ix) Preliminary decommissioning plan …	Add "preliminary decommissioning plan" since the scope of standard is extended to transition and decommissioning, too.	X			
NUSCC	India	15	7.149 (b)	Process for organizational changes and its assessment	May be added as 'xi'… New attribute for review			X	The proposed additional is implicitly included in item (iii).
NUSCC	ENIS	20	7.151	Change to be considered The list of points to verify is very long. It is recommended to reduce it to key aspects and then complement this list of main points by the list of less important aspects in another para to be added just after this para.	Clarity and help operators focus on the important aspects			X	The review of SF10 is a major task, therefore the list is long. The development team focused on the main aspects only that were included in the text of para 7.151.
NUSCC	ENIS	18	7.151 (f)	All elements of management, including safety, health, radiation protection environmental, preliminary decommissioning plan, quality, social and economic elements, are integrated in the management system and it is ensured that safety is not compromised.	Add "preliminary decommissioning plan" since the scope of standard is extended to transition and decommissioning, too.	X			

NUSCC	ENIS	19	7.151 (x)	The management system includes arrangements for radiation protection and the management of radioactive waste, as well as it enables the planning of decommissioning throughout the lifetime of the plant.	Add "it enables the planning of decommissioning throughout the lifetime of the plant" with SS since the scope of standard is extended to transition and decommissioning, too. It is in accordance with GSR Part 6	X			
NUSCC	Canada	5	7.151 (g)	" Processes and activities are defined~~developed~~, effectively managed, documented and kept up-to-date to ensure that requirements are met without compromising safety." 	'Developed' is the action of establishing the processes and activities, whereas 'defined' infers that these processes and activities are already developed and in place. Since a PSR is at least 10 years after the first operation, the PSR should be confirming that these processes and activities are already in place. Requirement 10 of GSR Part 2 states "Each process shall be developed and shall be managed to ensure that requirements are met without compromising safety". "Without compromising safety' on its own does not ensure that requirements are met	X			
NUSCC	Canada	6	7.151	Add new sub-bullet: "Suitable arrangements are in place for maintaining the configuration of the nuclear power plant and operations are carried out in accordance with the safety analysis of the plant."	This review element was in SSG-25 and is an element of Requirements 3 of SSR-2/1.		X		Bullet added, text modified as follows: " (y)Arrangements are in place to manage plant design modifications to ensure that all modifications are properly identified, specified, screened, designed, evaluated, authorized, implemented and recorded. (z)Arrangements are in place for maintaining the configuration of the nuclear power plant and operations are justified by the safety analysis of the plant"
NUSCC	Canada	7	7.151	Add new sub-bullet: "The management system is adequate, effective and meets regulatory requirements for ensuring the safe operation of the nuclear power plant."	This review element was covered by Items 5.112 and 5.113 of SSG-25 and an element of GSR Part 2 Requirement 6.			X	SSG-25 review focused to expansion of the technical content of the review items to replace them with general statements. It is believed that the intent of the comment is met implicitly if the complete list of review items is considered.
NUSCC	Sweden	17	7.152	"The review of safety culture is an assessment of commitment to safety and should verify include the following…" [all the items need to be rewritten too]	7.152 has been moved from "Scope" to "Methodology" (former 5.115), but the wording is still about the scope and needs to be changed. All the items need to be reformulated to reflect verification instead of review scope.		X		Text of the para updated to reflect the intent of the comment.
NUSCC	Sweden	18	7.152	[please exemplify]	7.152 (g): how can a behaviour be correct and unsafe at the same time? Please exemplify, especially in comparison with "unsafe practices" in the same sentence.	X			The word 'correct' is used in this case as a verb, not as a noun.
NUSCC	WNA CORDEL	12	7.155	Safety factor 11: Operational limits and conditions and operating procedures 7.155 Procedures important to the safety of the nuclear power plant should be comprehensive, validated, formally approved, appropriately distributed and subject to rigorous management control. ….	Note that "Operating procedures" are integral part of the "safety related provisions".			X	Rejected based on the grounds provided in the resolution of the comment no. 1.
NUSCC	ENIS	21	7.157 e	Procedures for fuel handling and storage, including reactivity management	Add "storage" since this step in SFM impacts safety performance and other important aspects at NPP	X			
NUSCC	Canada	8	7.157	add "(g) Procedures for controlling modifications to the plant design, procedures and hardware, including the updating of documentation; and (h) Procedures for controlling the operating configuration."	Items for controlling procedures related to configuration management have been removed. Not clear if this was absorbed by another item (suggested last item probably is). Suggest re-adding them to ensure configuration management is covered in scope of this task.		X		The intent was to absorb this item within SF10. SF10 updated with modification of paras 7.149, 7.150 and 7.151.
NUSCC	India	16	7.157	•Mechanism for regular review and revision of important procedure •Availability of updated procedures •Mechanism for identifying new procedure and weeding out outdated procedures	These two aspects may be added additionally as 7.157 (g), (h) and (i)			X	Para 7.157 is providing a list of documentation that should be reviewed in SF10. Aspects described in para 7.157 are explicitly covered by items in para 7.159.
NUSCC	India	18	7.164 e	Human factors in all important activities including maintenance are assessed to promote error-free execution of work;	Modified to make it more comprehensive as human factors are important in all areas including maintenance.			X	This item is specifically related to maintenance
NUSCC	India	19	7.164	Assessment of use of human performance improvement tools to promote error free execution of work	New addition to paragraph			X	Implicitly covered in para 164 item (e).
NUSCC	India	20	7.175	•Evaluate the capability for emergency radiological surveillance, source term estimation and dose projection. •Evaluate the effect of additional facilities built at site	New addition to paragraph may be considered		X		A generalized items ((d) and (f)) added in the review scope of SF13 aligned with Requirement 5 and 9 of GSR Part 7 (as identified to be within the review scope of SF13 as per para 7.176) to explicitly highlight the need of taking urgent protective actions and other response actions.
NUSCC	Sweden	19	7.175	[please clarify]	(d) mentions "managing radioactive waste", but it is not clear what waste this refers to - waste stored on site or waste generated during an emergency (the latter is written in para 7.185). Maybe it is both of them? Please clarify.	X			This related only to radwaste generated during emergency.
NUSCC	Russia	3	7.179	Change paragraph as follows: "Emergency plans should be reviewed to evaluate their interfaces and integration with security plans."	This paragraph provides requirements for nuclear security plans which is out of scope of this document.			X	There is no requirement for security provided by this para. The para is a recommendation on how emergency plans should be reviewed, considered security arrangements on site. The text is kept.
NUSCC	Germany	3	7.190	The arrangements for monitoring the radiological impact on the environment outside the site area in normal operation is the subject of the review.	The review focuses on the arrangements to monitor discharges etc. (see para 7.194) rather than the actual limits.	X			
NUSCC	USA	6	7.192	The statement "the review should verify that the radiological impact of the plant on the environment is not significant compared with that due to other sources of radiation" is vague and should be revised to provide clarity on what is meant by "other sources of radiation."	To provide clarity			X	This para is the former para 5.150 from SSG-25. The reasoning behind is that NPP operations should have comparable impact on the environment as other naturally occurring radiological impacts, e.g., background shine.
NUSCC	ENIS	22	7.194 (g)	(g) Calculation of doses to the public and assessment of radiological environmental impacts based on effluents monitoring and considering pathways of releases and uncertainties during the lifetime of the plant meet regulatory requirements and reflect international good practice;	The basis stated for carrying out the calculations and assessments is unclear and may not be representative of all the current practices. If deemed relevant this could be detailed in a specific para. "Uncertainties during the lifetime of the plant" is too vague. If deemed relevant this could be detailed in a specific para.		X		These calculations are regularly performed by NPPs to confirm that radiological impact during the normal operation is kept within the authorized limits. Text slightly modified to increase the clarity.
NUSCC	ENIS	23	7.194 (j)	(j) ~~Specific restrictions and procedures are followed to ensure that dose limits are not exceeded owing to possible combinations of doses from exposures due to different authorized practices;~~	This should be deleted or at least clarified as it may mean consideration of doses from medical origins, flights, etc.	X			Authorized practices relevant for the plant's site. Text updated.
NUSCC	USA	7	8.6	Section 8.6 says, "In performing the global assessment, the findings from other relevant safety reviews should be incorporated as appropriate, for example, findings from long term operation studies if the PSR is performed to support long term operation." It is unclear if this means from the unit relevant to the PSR or other similar units, that may have significant findings	To improve clarity	X			
NUSCC	China	10	8.7	~~Practical elimination of plant event sequences that could lead to an early radioactiverelease or a large radioactive release.~~ Assessment of practical elimination	Editorial It is recommended that the title be changed to "Assessment of practical elimination", which is in parallel with the other "Assessment" below.	X			
NUSCC	Finland	3	8.19	The assessment of the implementation of defence in depth should determine whether the ~~necessary~~ levels of protection, including physical barriers to confine radioactive material at specific locations, are in place and whether supporting administrative controls for achieving defence in depth are implemented.	IAEA Glossary (2022) is using term level in definition of Defence in Depth. [A hierarchical deployment of different levels of diverse equipment and procedures to prevent the escalation of anticipated operational occurrences and to maintain the effectiveness of physical barriers placed between a radiation source or radioactive material and workers, members of the public or the environment, in operational states and, for some barriers, in accident conditions.] Do not see added value with word ~~necessary~~ in this context? If necessary, please clarify.			X	The wording is aligned with the Requirement 13 from GSR Part 4 (Rev. 1), specifically para 4.46.
NUSCC	WNA CORDEL	13	8.20	8.20. Paragraph 4.46 of GSR Part 4 (Rev. 1) [3] in relation to the identification of necessary layers of protection in the safety assessment of defence in depth states: Safety functions that have to be fulfilled; Potential challenges to these safety functions; Mechanisms that give rise to these challenges, and the necessary responses to them; Provisions made to prevent these mechanisms from occurring; Provisions made to identify or monitor deterioration caused by these mechanisms, if practicable; Provisions for mitigating the consequences if the safety functions fail."	Note that the description of these steps is perfectly consistent with the notion of Objective provision Tree (OPT) as proposed by the GIF Risk and safety working Group and correspond to the construction of the comprehensive "safety architecture" compliant with the defence in depth, suggested as an innovative tool, with the comments above.			X	The objective tree method for assessment of implementation of DiD, consistent with the IAEA safety standards, is provided in SRS-46.
NUSCC	Finland	4	8.20	Paragraph 4.46 of GSR Part 4 (Rev. 1) [3] in relation to the identification of necessary layers of protection in the safety assessment of defence in depth states: Safety functions that have to be fulfilled; Potential challenges to these safety functions; Mechanisms that give rise to these challenges, and the necessary responses to them; Provisions made to prevent these mechanisms from occurring; Provisions made to identify or monitor deterioration caused by these mechanisms, if practicable; Provisions for mitigating the consequences if the safety functions fail." "This shall include identification of:	Please see comment 3.for 8.19 above			X	see answer to 8.19

NUSCC	Finland	5	8.21	Reference [46] provides a comprehensive approach to the assessment of the implementation of defence in depth, covering all aspects including siting, design, manufacturing and construction, commissioning, operation, accident management, and emergency preparedness.	Ref. 46 is SRS publication. The para 8.21 could be shifted to annex.			X	It is only informative para and a reference to IAEA document that is considered useful in carrying out the assessment. Para is not providing any recommendation. It is suggested to be kept as is.
NUSCC	Germany	4	8.23	In order to obtain a complete picture of the plant's defence in depth, all identified gaps should be included in the PSR global assessment, ~~including any findings related to long term operation.~~	Is it necessary to point out long time operation (LTO) here? LTO is addressed in section 9. Please verify.			X	We wanted to emphasize this specifically as in some cases, there are separate studies performed
NUSCC	Sweden	20	8.26	"A method for determining the safety significance of negative findings (deviations), their ranking, and the prioritization of corrective measures and safety improvements should be established prior to performing the global assessment and, where required, agreed with the regulatory body."	In Sweden, we do not do agreements with the licensee. Either, an approvement is required, or it is not.	X			
NUSCC	Sweden	21	8.39	"Corrective measures and proposed safety improvements should be included in the integrated implementation plan with the implementation timing reflecting the results of the global assessment and, where required, agreed with the regulatory body."	In Sweden, we do not do agreements with the licensee. Either, an approvement is required, or it is not.	X			
NUSCC	Netherlands	3	8.40		In this context we must be aware that the term 'justification' can be interpreted in multiple ways. We have experience that the term 'justification' in this context by some parties is seen as the (legal) justification of a nuclear activity (one of the principles of radiation protection). In order to avoid misunderstandings, it should be clear from the text of this articles that in this context the term 'justification' has the meaning of substantiation, proof or demonstration.	X			Thank you very much for the comment. Well received. While drafting DS535, the review team discussed several options of wording to be used. As we looked into a large set of IAEA safety standards while harmonizing the text, the drafting team decided to use justification instead of other synonyms. Justification is used in an equivalent meaning throughout the IAEA safety standards family, e.g., Requirements 8, 16 of SSR-2/2 (Rev. 1).
NUSCC	Sweden	22	9.2 Table 2, SF5, 7, 8, 12	"...When the periodic safety review is used to apply for support long term operation, this review should consider the entire intended period of long term operation, particularly regarding the predicted state of SSCs important to safety"	In Sweden, the licenses are not time limited. Therefore, the licensees do not have to apply for LTO. Ageing issues are handled, but the PSR scope is not required to be longer than the usual time period just because you are going into, or are already in, LTO.			X	The intent of the para is not bringing any limitation on the operational license. As recommended, there are aspects that need to check for a longer period within the framework of PSR should the PSR is intended to be used to support justification of long term operation. This is the general approach being following in Member States
NUSCC	Sweden	23	9.2 Table 2, SF11	"Operational limits and conditions and operating procedures"	There is a new heading for SF11 in chapter 7.	X			
NUSCC	Sweden	24	9.2 Table 2, SF11	[please consider]	LTO might be a reason to consider operational limits especially. Please consider to add something about this			X	This is correct, however, this is not within the scope of SF11, but rather of SF1. The intent of the comment is considered implicitly included within the recommendation to SF1.
NUSCC	Japan	7	9.9 T. 9.1	9.9The 14 safety factors presented in Section 2 and detailed in Section 7 should be considered relevant for long term operation. The related objectives and scope of these safety factors should be adapted to include aspects that have the potential to challenge or question the safe long term operation. These should be clearly outlined in the PSR basis document and agreed with the regulatory body, and included in the PSR assessment reports. Table 9.1 shows examples of long term operation considerations for the most relevant safety factors (i.e. 1–4) that should be used to support the justification of long term operation.	Table 9.1 shows some practices by Member States taking into account a graded approach.	X			
NUSCC	Japan	8	9.10 T. 9.2 SF7	Hazard analysis The review of this safety factor should determine to what extent the existing protection against internal and external hazards remains adequate, taking into account the plant design, site characteristics, the current condition of the in-scope SSCs important to safety, their predicted state at the end of the PSR period, and the potential for hazards to change over time. When the periodic safety review is used to support long term operation, this review should cover the entire intended period of long term operation, particularly regarding the predicted state of SSCs important to safety and the impact of climate change, considering notably knowledge evolution and available information on future climate conditions, as appropriate. In addition, monitoring climatic parameters, if they found a large impact based on the hazard analysis from the previous PSR, relevant safety guides should be applied.	Although it is challenging to apply the current climate models to the assessment to certain period at this moment, it should be linked to relevant safety guides such as DS541 (under developing).		X		Reference to SSG-18 revision added in the table.
NUSCC	india	21	9.10 Table 9.2	Safety factor 11 title: Safety factor 11: Operational limits and conditions and operating procedures	To consistent with title used elsewhere in the document	X			
NUSCC	Belgium	14	10		Section 10 should also address the case of a site with reactors/facilities in operation and others being (prepared for) dismantled.			X	This is implicitly addressed. In this case, PSR will likely be conducted separately for each facility, taking into account relevant interfaces from site perspective.
NUSCC	China	11	10	This section covers three distinct scenarios—permanent shutdown, undergoing decommissioning, and decommissioning, which may have different requirements for periodic safety reviews. It is recommended to explicitly differentiate these in this publication				X	The objective of Section 10 was to provide generalized recommendations on how to apply the concept of the PSR to non-operational NPPs in case Member States decide to do so. Given the specifics and differences in national approaches, it was decided to provide only a high level guidance in this revision and continue with further refinement in future once more experience from Member States is gathered.
NUSCC	Sweden	26	10	"If a facility in decommissioning is being dismantled in a short time period, i.e. a few years, and if the fuel has been removed from the site, the recommendations provided in this section do not apply."	When the dismantling phase is done over a short time period, i.e. a few years, there is no point in doing a PSR since there will be exhaustive changes during the time the PSR is done and continuing exhaustive changes while the regulator is reviewing the PSR. In para 10.6 there is an exemption for certain facilities to apply section 10. A similar exemption should be written for nuclear reactors undergoing fast dismantling, as long as all fuel has been removed from the site. In Sweden, the six reactors that are now being dismantled all have exemptions from doing a PSR.			X	Please see the above. It is not a requirement to perform PSR for plants under decommissioning. However, some Member States follow this approach. Therefore, it was decided to include a guidance on this option.
NUSCC	Sweden	25	10	Remove section 10 [or update other sections, see comments].	The DPP states, in section 5 "SCOPE", that "This publication will apply to operating nuclear power plants". Decommissioning is not included in the term "operation" (compare para 2.5 SSG-25 or IAEA safety and security glossary 2022). Even so, the DPP later states that there will be a new section on decommissioning. So the DPP is inconsistent. The easiest way to solve this would be not to include section 10 in the new revision of SSG-25. However, if section 10 is kept, other sections has to be updated to include decommissioning in the PSR scope.			X	The intent of the section 10 is to provide a guidance if the decision is taken to use the concept of PSR to support decommissioning as well. The DPP was created and approved with this intent. It is believed that the text provided in Section 10 provides this concept as an option and is building on experience from Member States that are using PSR to support the decommissioning. Updated wording is provided in para 10.2 and para 10.5. was added in this regard.
NUSCC	ENIS	24	10.1	These two stages have common characteristic…	The text lists two stages – operation and decommissioning of a facility.	X			
NUSCC	ENIS	25	10.2	…and the launch of decommissioning. ~~programme.~~	For clarification. Programme is a new word/terminology in the chapter 10.	X			
NUSCC	ENIS	26	10.2	It is usual for the decommissioning stage to be divided into a number of phases depending on the selected decommissioning strategy, with a systematic transition phase between operation and decommissioning, where defueling activities and preparations for decommissioning typically take place. In some cases, the transition phase might be considered as the last phase of the operational stage. This transition phase should normally be covered in the last operational PSR, if any or in the safety documentation supporting the ~~authorization~~ regulatory approval for final shutdown. and the launch of the ~~decommissioning programme~~ transition phase. As early as possible the operating organization should clarify the way the transition phase would be addressed. This section provides recommendations for the PSR that addresses the transition phase, referred to as the 'last operational PSR', and also for the PSR conducted during the decommissioning phase for a nuclear power plant.	Add "During the decommissioning planning, as early as possible, the operating organization should clarify the way the transition phase would be addressed. "since the countries have different approaches for safety assessments potentially different from the situations mentioned here.	X			
NUSCC	ENIS	28	10.3	~~The review process, key principles, and recommendations in this section apply to nuclear power plants. They may also be applicable to research reactors, radioactive waste management facilities, or nuclear fuel cycle facilities under decommissioning, using a graded approach that considers different levels of residual radiological risks for each decommissioning phase of these facilities.~~	Paragraph to be deleted. This paragraph, referring to "other facilities" by a graded approach, is not effective without a more detailed explanation of the subject matter or the approach itself			X	SSG-25 is used broadly for other nuclear facilities and further practical guidance, utilizing the graded approach has been developed. The intent of this para is to follow this practice and to provide flexibility in application of these recommendation to other facilities as relevant. Text is kept.

NUSCC	ENIS	29	10.4	It is recognized that some States may prefer alternative arrangements to a PSR. Such arrangements can, if applied with appropriate scope, frequency, depth and rigour, achieve the same outcomes as the process recommended in this Safety Guide. They allow safety to be appropriately managed. This Safety Guide is not intended to discourage such alternative arrangements or set unnecessary burden on operators or regulators. ~~The PSR scope and objectives should be determined considering the expected duration of the de-commissioning, SSCs important to safety, the remaining radioactive source term and the risk profile for the entire review period. A graded approach should be applied to an sure adequate scoping and objectives setting. A graded approach should be used to focus the PSR on ensuring safety improvements are directed towards relevant safety or environmental protection issues for a plant under decommissioning with due consideration of relevant uncertainties. Where available, the safety case for decommissioning should be used as the baseline for setting the scope of the PSR and defining its objectives.~~	To clarify the scope and objectives of PSR for decommissioning and emphasize on the need for a graded approach		X			New para added with the proposed text modified as follows: 10.5.It is recognized that some States may prefer alternative arrangements to safety assessment during decommissioning than PSR. Such arrangements can, if applied with appropriate scope, frequency, depth and rigour, achieve the same outcomes as the process recommended in this Safety Guide. They allow safety to be appropriately managed. This Safety Guide is not intended to discourage such alternative arrangements or set unnecessary burden on operators or regulators.
NUSCC	ENIS	30	10.4	(…) Where available, the safety case for decommissioning should be used as the baseline ~~for~~ when setting the scope of the PSR and defining its objectives.	The scope will be determined by various aspects including regulatory requirements – this should be done against the baseline of the safety case, but the case itself does not fully set the scope or define objectives of the PSR.	X			
NUSCC	USA	8	10.4	A bit more detail on the suggested "graded approach" for PSRs in decommissioning is needed. Section 10.4 states that a graded approach should be used that is directed toward safety issues in decommissioning, while table 10.1 on the safety factors only mentioned graded approach for hazards and radiological impact. Are these the only one where a graded approach is suggested?	To improve clarity	X			Text updated throughout the whole table to address comments of other NUSSC members.
NUSCC	Pakistan	8	10.5		"Regulatory processes for final shutdown and decommissioning plans may overlap with or replace this PSR, making it potentially redundant or part of the application for authorization". The meaning of sentence is not clear. Please explain the sentence by adding necessary elaboration.	X			Para was updated to address comments from other NUSSC members.
NUSCC	ENIS	31	10.5	Regulatory processes for final shutdown and decommissioning ~~plans~~ may overlap with…	Clarification.	X			
NUSCC	ENIS	32	10.5	Defueling, spent fuel management, and preparatory decommissioning activities should be included in the last operational PSR, as they ~~are~~ might be essential for starting decommissioning. Regulatory processes for final shutdown and decommissioning plans may overlap with or replace this PSR. In cases of overlaps, the PSR ~~should~~ might be replaced by the process of license application for authorization.	The legal framework in many countries allows going into decommissioning before defueling is completed. This has been used by several NPPs.	X			
NUSCC	ENIS	33	10.6	Any other facility on the decommissioning site that is in the operational stage (e.g. interim storage facilities for intermediate level radioactive waste or spent fuel interim storage facilities) should be reviewed against relevant standards, guides, and good practices consistent with the operational status of the facility. The recommendations provided in this section, therefore, do not apply to such other operating facilities	For clarification	X			
NUSCC	UK	7	10.6	he recommendations provided in this section, therefore, do not generally apply to such operating facilities unless justified in appropriate circumstances.	For other facilities (e.g. nuclear fuel cycle sites) there are sometimes risk based drivers (e.g. significantly degraded fuel ponds) where deviations from good practice may be justified for new support facilities, on balance of risk grounds, to support prompt delivery.	X			
NUSCC	Germany	5	10.7	… A facility under permanent shutdown or undergoing decommissioning has significantly reduced nuclear and radiological hazards, when compared to facility in operation. However, conventional and chemical hazards are generally more significant during decommissioning activities and depend on the decommissioning phase of the facility. Conventional and chemical hazards are not in the scope of current Safety Guide, unless they impact nuclear safety. …	Clarification	X			
NUSCC	ENIS	34	10.7	The approach to safety assessment in decommissioning differs to that for operational facilities because of differences in a number of key aspects, for example, risk profile, staff experience and hazard analysis. A facility under permanent shutdown or undergoing decommissioning has significantly reduced nuclear and radiological hazards, when compared to a facility in operation. ~~However~~ Moreover, conventional and chemical hazards ~~are generally more significant~~ may be of higher importance during decommissioning activities and depending on the decommissioning phase of the facility. It is also recognized that the risk profile of the facility under decommissioning progressively decreases throughout the decommissioning process, while for a facility in operation, the risk profile does not significantly change over the entire operating lifetime.	Occupational safety is certainly an issue to focus on when a lot of people start to dismantle the systems. But this has been also true during outages in the operational phase. The amount and type of chemicals needed for a full system decontamination (FSD) differs from normal operations. But FSD is not limited to decommissioning and has been done also at sites in operation to lower the source term. After final shutdown it is possible to get rid of e.g. hydrazine that had been used to regulate oxidation in the systems. Therefore "are generally more significant" is not systematically supported by facts.	X			
NUSCC	Sweden	27	10.7	Remove the whole sentence "However, conventional and chemical hazards are generally more significant during decommissioning activities…"	Analyzing conventional and chemical hazards is unjustified from a radiation safety point of view and therefore out of scope of this guide (as it is out of scope of IAEA standards in general). Compare with SF14 which is limited to radiological impact on the environment.		X		Para was modified to address comments from other NUSSC members.
NUSCC	ENIS	35	10.8	Move to earlier in section 10	The principle of the graded approach is crucial to decommissioning PSR, so should be mentioned earlier (it is first referred to for non-NPP sites in clause 10.3).	X			Graded approach to PSR for decommissioning is mentioned in para 10.4. Original para 10.3 is moved to the bottom to ensure that the graded approach is first mentioned with the reference to scope setting of the PSR for decommissioning.
NUSCC	UK	8	10.8	……. profile or anticipated throughout the PSR period. Cognizance should also be taken of the planned decommissioning program, particularly where this is extensive.	Where the decommissioning phase spans a significant time period the PSR requirements could be greater. For fuel cycle sites decommissioning can span several decades.	X			For information: para moved to 10.3.
NUSCC	ENIS	36	10.9	…in para 2.14.	Clarification.	X			
NUSCC	Japan	9	10.9 T. 10.1	10.9. The PSR for an operating plant should be structured around the 14 safety factors listed in para 2.15. A similar approach could be adopted for plants in permanent shutdown, in the transition phase or under active decommissioning. In general, only a subset of these safety factors is expected to be relevant for consideration for such facilities and this subset is highly likely to vary throughout the whole decommissioning period. ~~These safety factors, their relevance for the last operational PSR and for PSRs in decommissioning, as well as the key principles to be considered for their review are presented in Table 10.1. Table 10.1 shows examples of subset of the safety factors, their relevance for the last operational PSR and for PSRs in decommissioning, as well as the key principles to be considered for their review.~~ For each safety factor, the reviews should address the associated risks and hazards and their expected evolution over the PSR period. A graded approach should be applied, considering the expected reduction of hazards and risks that will occur during the PSR period, due to the transition from operation to final shutdown or by the progress of the decommissioning activities.	As stated in para. 10.9, this subset is highly likely to vary throughout the whole decommissioning period", contents of subset would be vary, and then topics to be reviewed in table 10.1 also vary accordingly.	X			
NUSCC	ENIS	37	10.11	~~It is recommended that an updated safety case for permanent shutdown and decommissioning reflecting the current site configuration or decommissioning progress is used to realign PSR timelines with any major changes in the facility and corresponding hazards.~~	**paragraph to be deleted**. Acknowledging the current plans of several utilities to complete decommissioning of a NPP within 10 to 15 years this recommendation would lead to an infinite loop in adjusting the PSR documents.		X		If a NPP can be decommissioned in the period of 10 – 15 years, this guidance might be irrelevant in such a case. However, for generally longer decommissioning times, the text is kept adding "where relevant" at the end.
NUSCC	Pakistan	7	10.13	Table 10.1 (safety Factor 10) ~~Considering potential changes in staffing and organization, as well as multiple and diverse operations and activities, it might not be practical to perform a review of this safety factor in the PSR.~~	This factor is quite important to be reviewed as a part of PSR because during decommissioning phase, significant changes in management system and safety culture are expected. Therefore, details regarding tailored review of this safety factor such as consideration of safety culture in decommissioning phase, organizational changes impacting safety, etc. may be added in the draft.			X	The current para does not prevent the review of safety factor 10. It is only stating that it might not be practical, given the anticipated changes. Of course, this is individual for every facility undergoing decommissioning.Therefore, there might be cases where the review of SF10 could be performed.
NUSCC	ENIS	39	10.13 Table 10.1	For each safety factor (except number 6): The recommendations on safety factor x in Section 7 might be considered as applicable to some extent. When these are considered, a graded approach should be applied and be commensurate with the activities to be performed on site for the next PSR period	The requirements for PSR defined for an operating nuclear power plant cannot be fully transferred to a decommissioned nuclear power plant, especially with regard to the ongoing decommissioning activities – dismantling, demolition of the SSC and release of space for other uses within the PSR period. The notion of a graded approach should be clearly introduced		X		The following text added into SF1-5, SF7-9 and SF12: "When these recommendations are taken into account, a graded approach should be applied, commensurate with the activities planned on site for the upcoming PSR period." For SF10 ad SF11, the text clearly states that including these in the PSR might not be practical. In case of SF13 and SF14, graded approach is already mentioned.
NUSCC	ENIS	40	10.13 Table 10.1 SF1, SF2	Remove "including cooling systems and buildings."	The sentence "The review should also cover site infrastructure and its configuration" is sufficient as such and there is no particular reason to put a focus on cooling systems and buildings. Moreover, the meaning of cooling buildings in this context is rather unclear.	X			

NUSCC	ENIS	41	10.13 Table 10.1 SF4	Add "At some point during decommissioning, this safety factor may no longer be relevant."	This statement is, as for SF 3 "Equipment qualification" and SF 5 "Deterministic safety analysis", also relevant for SF4.	X			
NUSCC	ENIS	42	10.13 Table 10.1 item 12	~~This safety factor is of high important for decommissioning, including the transition phase. The recommendation for safety factor 12 provided in Section 7 are applicable.~~	Human Factor is a factor but this wording overstates the importance. Sentence not needed.			X	Given the nature of activities during decommissioning, it is believed that this should be emphasized. Comment 43 doesn't request deletion of this sentence. Sentence kept but updated to reflect the comment no. 43.
NUSCC	Germany	6	10.13 Table 10.1 SF7	… The recommendations on safety factor 7 in Section 7 are applicable. The list of relevant hazards may vary over the course of decommissioning, considering: The reduction in the probability of occurrence, and hence in the hazard level; The use rate, which for some components might be higher during the decommissioning phase than in the operational phase (e.g. cranes), inducing a higher hazard rate.	It is not clear why a reduction in the probability of occurrence should be stressed here. For most hazards (e.g. external hazards) the probability of occurrence does not change. For some hazards (e.g. fire hazard, load drop) the probability of occurrence might even increase. The risk level decreases due to the lower amount of radioactivity in the facility once the fuel has been removed. Please verify.	X			Correct. Reduction replaced with change to stay at the general level.
NUSCC	Germany	7	10.13 Table 10.1 SF8	This safety factor should be considered and incorporated into the PSR. The recommendations on safety factor 8 provided in Section 7 are applicable. The review of this safety factor should cover: Review of feedback from operating experience; Inventory of the remaining radioactive waste; Review of site programmes, for example radiation protection. Analysis of trends.	The analysis of trends (see 7.130) is of particular interest during decommissioning in order to identify any safety concern due to the changed activities and tasks on site. Please add.	X			
NUSCC	Germany	8	10.13 Table 10.1 SF9	…. ~~Benchmarking against~~ Taking into account lessons learnt from defuelling and decommissioning activities from other nuclear power plants should be considered where relevant and possible.	Benchmarking is not the purpose of operating experience. The goal is to improve the plant by taking into account relevant lessons learnt.	X			
NUSCC	Germany	9	10.13 Table 10.1 SF10	Considering potential changes in staffing and organization, as well as multiple and diverse operations and activities, it might not be practical to only perform a review of this safety factor in the PSR.	Clarification	X			
NUSCC	ENIS	43	10.13 Table 10.1 SF12	In the text, "This safety factor is of high important for decommissioning, including the transition phase. The recommendation for safety factor 12 provided in Section 7 are applicable.", "important" should read "importance" and "recommendation" should be "recommendations".	Spelling mistake/typo to be corrected.	X			
NUSCC	ENIS	44	10.13 Table 10.1 SF14	This safety factor is relevant to all decommissioning phases…	Clarification (harmonization of used terminology).	X			
NUSCC	ENIS	38	10.18	A graded approach should be systematically applied for PSR of facilities under permanent shutdown, in the transition phase or undergoing active decommissioning. In particular, the scope and depth of the PSR for these facilities should be tailored depending on the ~~decommissioning phase of~~ activities on the facility and be commensurate to the current hazards and risk profile or anticipated throughout the PSR period.	Delete "decommissioning phase" (This comment is corroborated with comment on Para 10.2, from above)		X		Modified to "decommissioning activities" to be more specific.
NUSCC	Japan	10	Appendix I T. 1	TABLE 1. MATRIX OF INTERFACES BETWEEN SAFETY FACTORS Clarification of the removed 'X's in row SF8-10, column SF11.	Are there no interactions between SF8 (Safety performance), SF9 (Feedback of operating experience), SF10 (Organization, the management system and safety culture) AND SF11 (Operational limits and conditions and operating procedures) as Safety factors providing input?			X	Interactions between these factors are included. These were updated based on the revision of content of individual safety factors.
NUSCC	Finland	6	Appendix I I.11	SSR-2/2 Req. 1-5 should be added to the relevant requirements.	The purpose of the SF 10 is according to 9.2 " The review of this safety factor should determine whether the organization, the management system, and the safety culture are adequate and effective to ensure the safe operation of the NPP." SF10 the safety requirements related to this factor from SSR-2/2 are missing. Please add.			X	The referenced SSR-2/2 (Rev. 1) requirements are considered in para 7.150 as a leading requirements for the review of SF10. Requirements listed in para I.11 are provided the assessment context for interfaces of SF10 with other identified safety factors.
NUSCC	Ukraine	4	Appendix II	Paragraphs numbering need to be corrected	Editorial	X			
NUSCC	ENIS	45	Appendix II SF8	Inputs […] Plant specific documents: Records of operating experience relevant to safety, including the following: […] Relevant incidents, events and situations with consequences relevant to the future transition to decommissioning and decommissioning, including site cleanup Any dismantling, decontamination and radioactive waste management activities already performed for on-site structures and buildings ; Any potential presence of and contamination of underground structures (e.g. pipes and tanks), any groundwater contamination and surface contamination as well as any non-radiological contaminants that might require cleanup during transition to decommissioning or decommissioning, including site cleanup.	Add this text that makes clear what type of information is relevant to be retained by the operating organization throughout the lifetime of the facility for transition to decommissioning or decommissioning, including site cleanup. It is in accordance with GSR Part 6, GSR Part 1 and DS 542.	X			The requested text added (slight modification only for a better readability).
NUSCC	USA	9	Annex I Safety Factor 8	Under the Inputs column for the Safety Factor 8 Table the plant specific documents include "Data from off-site radiation monitoring" and "Quantities of radioactive effluents produced". However, these documents seem more appropriate under Safety Factor 14.	To provide clarity and distinction between SF 8 and SF 14.	X			Text updated, removed from SF8 and amended in SF14.
NUSCC	Sweden	28	Annex I, SF11	[please align with chapter 7]	SF11 in chapter 7 has been revised in many ways. These changes are not reflected in Annex I.			X	Annex I was updated during the drafting to reflect changes in all SFs. If you have specific examples regarding SF11, please provide them. Thank you.
NUSCC	Sweden	29	Annex II	[please add Annex II]	The DPP states that there will be an Annex II "IMPLEMENTATION OF THE PSR SAFETY IMPROVEMENTS PLAN".	X			During the development of DS535 it was decided that there is no need for specific Annex II as all the relevant information at the level of the IAEA safety guide is provided in Section 8.