

DS547 “Regulatory Experience Feedback Management”
Status: STEP 11

COMMENTS BY REVIEWER					RESOLUTION			
Review Committee: NUSSC Date: 24.10.2025								
Country	Comment No.	Para/ Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
China	1.	General	It is suggested to standardize the terminology such as “findings”, “regulatory experience findings”, and “experience findings” throughout the document. It is suggested to use “regulatory experience findings”.	/		X As the term ‘regulatory experience finding’ is defined on page 6, footnote 2, where it is stated that this term will be referred to as ‘findings’, we will replace ‘regulatory experience findings’ with ‘findings’ to ensure consistency throughout the document.		
Japan	1.	General	Please clarify usage of the term “senior management.” In accordance with the IAEA Nuclear Safety and Security Glossary 2022, the term “senior management” is defined as “the person or persons who direct, control and assess an organization at the highest level.” In this draft, some paragraphs are not preferable to use term “senior management.”		X			

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			For example, bullet (b) of para 2.24 describes; “Assessment of each finding to identify the relevant aspects such as human, technical, legal, financial and managerial aspects. Internal parties should be consulted, including process owners, senior management and technical experts. External interested parties should also be consulted, such as operating organizations, vendors and other regulatory bodies to gather diverse perspectives and feedback on the findings.” In this text, the term “senior manager” would be preferable than “senior management”, as the same level of position of process owners and technical experts in an organization may be senior manager.					
Japan	2.	General	The term “personnel” which is used in this draft safety guide is not used for individual(s) who belong to regulatory body in GSR Part 1 (Rev. 1) and supporting two GSGs (GSG-12 and GSG-13). Rather, the term “staff” is used in these GSGs. Therefore, suggested to replace “personnel” by “staff”.		X			
Germany	1.	1.3	Requirement 15 of IAEA Safety Standards Series No. GSR Part 1 (Rev. 1), Governmental, Legal and Regulatory Framework for Safety [2] states: “The regulatory body shall make arrangements for analysis to be carried out to identify lessons to be learned from operating experience and regulatory experience, including experience in other States, and for the dissemination of the lessons learned and for their use by	A definition of both types of experiences at the very beginning of this safety Guide is useful and makes the text more user-friendly, we therefore suggest moving this text passage from Annex I here .			X	Section ‘Background’ explains what we currently have and what is required by IAEA safety standards. The definitions are included in Section 2, where concept of regulatory experience is explained. We propose to retain the original structure.

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			authorized parties, the regulatory body and other relevant authorities.” <u>It should be specified that the operating experience refers to insights and lessons learned from the review of information related to the operation of facilities and activities, including events, while regulatory experience refers to insights and lessons learned from the analysis of information gathered from all activities relating to the regulatory process, including lessons learned from external sources of regulatory experience.</u>					
Saudi Arabia	1.	1.5/ 1	Please consider changing ‘practical guidance’ to ‘practical examples’ to read: “Reference [4] provides practical examples to regulatory bodies [,,]”	Consistency with SPESS. Para. 1.5 should be reformulated for 2 reasons: - A TECDOC does not provide guidance; The reference to a TECDOC is questionable.		X “Reference [4] provides practical information to regulatory bodies....”		To make it in line with the objective of IAEA-TECDOC-1899.

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Saudi Arabia	2.	1.10/8	Please consider adding ‘of the effectiveness’ after ‘analysis’ to read: “[...]Section 4 provides recommendations on performing the analysis of the effectiveness of these arrangements a [,,]”	Editorial/ consistency with previous paragraphs and Section 4 title and content.	X			
China	2.	para 2.21 line 4 ; para 2.22(a) line 3	There are limited descriptions of screening thresholds in this guide. Considering the importance of the “screening thresholds”, it is suggested to provide detailed guidance on the requirements for screening thresholds or provide illustrative examples.	/			X	Providing examples is beyond the scope of this Safety Guide, as approaches may vary among Member States. Practical examples of how Member States implement such arrangements are usually provided in informational publications, such as IAEA-TECDOC-1899.
China	3.	/	It is suggested to replace the term “operating experience feedback” with “feedback from regulated facilities and activities, such as operating experience feedback.”	This guide describes the relationship between operating experience feedback and regulatory experience feedback, but feedback from licensees may also come from other stage, such as construction or decommissioning.			X	We carefully evaluated the comment and concluded that the term “operating experience feedback” is used consistently with IAEA Safety Standards Series No. SSG-50 and GSR Part 1 (Rev. 1). This term encompasses feedback

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								obtained from the operation of regulated facilities and activities, including relevant insights from other lifecycle stages such as construction, commissioning, and decommissioning and used in the same sense in para 2.15, 2.5 and Annex 1 of the draft safety guide. Therefore, we propose to stick with the already used terminology in the guide to maintain consistency with existing IAEA usage.
Germany	2.	2.4	The regulatory body should adopt a proactive approach to managing regulatory experience. This involves systematically collecting and analysing findings, and applying lessons learned from their own experience as well as from other sources of national and international experience, <u>including —and—relevant information regarding evolution of science and technology developments</u> . This should then be used as a basis for implementing changes in	Evolution of science and technology has been identified as a source of lessons learned as well. Please add.		X 2.4. The regulatory body should adopt a proactive approach to managing regulatory experience. This involves systematically collecting and analysing findings, and applying		

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			regulatory requirements and modifications to regulatory practices thereby strengthening the regulatory framework.			lessons learned from their own experience as well as from other sources of national and international experience, including information from relevant science and technology developments. This should then be used as a basis for implementing changes in regulatory requirements and modifications to regulatory practices thereby strengthening the regulatory framework.		

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Saudi Arabia	3.	2.4/3	Please consider adding 'relevant' before 'lessons learned' to read: “[...]and applying relevant lessons learned from their own experience as well as from other sources of national and international experience [...]”	Clarity. Not any lesson learned can be applied within a given regulatory framework, the relevance being one factor to be considered before application.	X			
Germany	3.	2.5	In implementing Requirement 15 of GSR Part 1 (Rev. 1) [2], the regulatory body should differentiate between regulatory experience and operating experience. For the purpose of this publication, regulatory experience refers to insights and lessons to be learned from the analysis of information gathered from all activities related to the implementation of regulatory functions and processes. This includes lessons learned from both national and international sources as outlined in Appendix I <u>and incorporate:</u> (a) <u>national</u> (b) <u>international and</u> (c) <u>non-nuclear sources of regulatory experience</u> Operating experience refers to insights and lessons to be learned	Appendix I acknowledges three types of sources, please harmonize. Additionally, text dealing with regulatory experience – the main subject of this Safety Guide – should be of similar size as the one, dealing with operational experience.	X			

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			from the operation of regulated facilities and activities. These include (see para 2.23 of SSG-50 [3]): (a) Events, including low level events and near misses; (b) Potential problems relating to equipment and human performance; (c) Safety related concerns;					
Saudi Arabia	4.	Figure 1, 2 nd step in the process	Please consider changing 'Assessing findings' in the 1 st bullet to read: Analyzing findings	Consistency in terminology.	X			
Japan	3.	2.5.	In implementing Requirement 15 of GSR Part 1 (Rev. 1) [2], the regulatory body should differentiate between regulatory experience and operating experience. For the purpose of this publication, regulatory experience refers to insights and lessons to be learned from the analysis of information gathered <u>collected</u> from all activities related to the implementation of	In the context of getting information (experience, findings, feedback, etc.), both 'collect' and 'gather' are used. If the aim of DS547 is to highlight the regulatory body's active involvement in obtaining information, the term 'collect' should be used throughout the document.	X			

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			regulatory functions and processes. There are the same comments on 2.7, 2.24 (b), 2.28 (c) and annex I-1.	For reference, GSG-12 and GSG-13, DS513 step 12 primarily use 'collect'.				
Germany	4.	2.11	The regulatory body should determine how to establish arrangements for managing regulatory experience within its management system. This may involve creating specific arrangements <u>and new processes</u> dedicated to collecting and analysing findings, implementing the action plan, and disseminating lessons learned from regulatory experience. Alternatively, such these arrangements could be integrated into the existing or new processes.	Clarification. Integration can be carried out to existing issues only.		X The regulatory body should determine how to establish arrangements for managing regulatory experience within its management system. This may involve creating specific arrangements dedicated to collecting and analysing findings, <u>developing and</u> implementing the action plan, and		

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						disseminating lessons learned from regulatory experience. Alternatively, such these arrangements could be integrated into the existing or new processes.		
Germany	5.	2.12	The regulatory body should collaborate with other national organizations in cases where the responsibility for regulating safety (including technical safety matters) and security is shared among multiple organizations.	Clarification.	X			
Germany	6.	2.16 (d)	Paragraph 5.43 of GSG-12 [6] states that “The regulatory body should also provide convenient means for staff to suggest improvements”. The regulatory body should establish arrangements that actively encourage personnel at all levels to identify and report findings. Key elements of this approach include: ...	Add examples of such mechanisms. (see our suggestion)	X			

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			(d) Being proactive and avoiding complacency: The management should establish mechanisms (<u>e.g. regular review meetings, feedback sessions, internal audits...</u>) to ensure that personnel at all levels are consistently prompted and encouraged to regularly evaluate and enhance regulatory functions and processes.					
Saudi Arabia	5.	2.17/ 2	Please consider changing 'though' into 'through'	Editorial/Clarification.	X			
Saudi Arabia	6.	2.22(a)/ 4	Please consider adding 'of both' at the end of the bullet to read: “ [...] The criteria may be quantitative (e.g. risk-informed) or qualitative, or a combination of both.”	Editorial/ Clarification.	X			
Germany	7.	2.22 (c)	In order to ensure effective screening and categorization of the findings, the regulatory body: ... (c) Should establish a structured method for categorizing findings based on predefined criteria that ensure effective classification by type, significance, and relevance to regulatory objectives. The categorization should facilitate	Reference to Section 4.2.1.4 of IAEA-TECDOC-1899 (listed as [4]) might be useful, please add.	X			

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			prioritization, trend analysis, and identification of appropriate actions to enhance the arrangements for managing regulatory experience. <u>General guidance is given in Section 4.2.1.4 of [4].</u>					
Germany	8.	2.24	The regulatory body should implement the following arrangements for the analysis of findings and for developing the associated action plan: ... (b) Assessment of each finding to identify the relevant aspects such as human, technical, legal, financial and managerial aspects. Internal parties should be (c) Development of an action plan to address the findings. This plan may include actions ranging from minor adjustments to significant changes in the regulatory functions or processes.	Tautology. Please find better wording.	X	The regulatory body should implement the following arrangements to ensure thorough analysis of findings and effective development of an action plan:		
Saudi Arabia	7.	2.24 (a) and (b)	Please consider revising bullets (a) and (b) to read as follows: “(a) Involvement of suitably qualified personnel to conduct an analysis of findings. This analysis should include a thorough examination from	Consistency. The proposed formulation addresses the consistency with respect to:		X		Regrading para 2.24 (a) These are the few examples of perspectives that is why the statement starts with “such as..... We propose to keep these

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			multiple perspectives, such as technical, operational and organizational. It should also involve experts from diverse disciplines and consider the impact of the findings on regulatory functions and processes. (b) Assessment Analysis of each finding to identify the relevant aspects such as human, technical, legal, financial and managerial aspects. Internal parties should be consulted, including process owners, senior management and technical experts. [...]”	- Analysis vs Assessment (see comment No. 4); ‘technical, operational and organizational’ in bullet (a), which becomes ‘human, technical, legal, financial and managerial’ in bullet (b).				in the text. The proposal to replace the term ‘assessment’ with ‘analysis’ is agreed.
Saudi Arabia	8.	2.24 (d)/ 3	Please clarify ‘cost-benefit analysis’, which is usually considered for the operating organization, by at least referring to the elements of paragraph 4.7.	Clarification				‘Cost-benefit analysis’ involves evaluating the value the identified action can add to the regulatory functions and processes enhancing the safety over the cost due to the consumption of time and resources (financial and technical) for the regulatory body. This in turn could impact the

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								effectiveness of the whole of the arrangements for managing regulatory experience feedback.
Japan	4.	2.24(d)	The regulatory body should implement the following arrangements for the analysis of findings and for developing the associated action plan: (d) Review and approval of the action plan by the senior management of the regulatory body. This should take into account factors such as the safety implications of the identified actions; the outcomes of consultations; a <u>cost-benefit analysis</u>; the impact on interested parties; and follow-up actions. <u>These factors should be considered with</u> giving safety the highest priority.	It is not denied that the regulatory body perform a cost-benefit analysis to streamline its function, however attitude giving safety the highest priority should be also applied in performing cost-benefit analysis.		X <u>analysis</u> ; the impact on interested parties; and follow-up actions. <u>These factors should be considered with</u> safety given the highest priority.		
Saudi Arabia	9.	2.32/ 1	Please add ‘a’ before mechanism to read: “The regulatory body should establish a mechanism for dissemination [...]”	Editorial/ consistency with paragraph 2.34.	X			

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Korea	1.	Paras 2.37, 2.38, II.1, II.6, Table 4	Suggest to replace of “regulatory experience management” with “regulatory experience feedback” throughout the document, except where explicitly referring to <i>management arrangements</i> (e.g., “arrangements for managing regulatory experience feedback”).	The term “regulatory experience feedback” is the central concept defined in the title, objective (paras 1.6–1.7), and Requirement 15 of GSR Part 1 (Rev. 1), which states that “The regulatory body shall make arrangements for analysis to identify lessons to be learned from operating experience and regulatory experience, and for dissemination of the lessons learned.” The expression “regulatory experience management” appears in several paragraphs (e.g., 2.37, 2.38, II.1, II.6, Table 4) without clear distinction from “regulatory experience feedback.” However, the use of “management” may imply a broader or different function (such as general organizational	X			

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				management or administrative control) rather than the feedback process itself. To ensure terminological consistency and conceptual precision, and to align with other IAEA Safety Standards (e.g., SSG-50 on Operating Experience Feedback and TECDOC-1899 on Effective Management of Regulatory Experience for Safety), the term “regulatory experience feedback” should be used consistently throughout the document. This will also maintain parallelism between operating experience feedback and regulatory experience feedback, which are complementary systems described in Annex I.				

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Germany	9.	3.3	The regulatory body should ensure that the arrangements for managing regulatory experience feedback are also commensurate with its objectives, needs and priorities, and its size and organizational structure.	Editorial.	X			
Saudi Arabia	10.	4.3/ 2	Please correct the quotation to read: “Paragraph 6.7 of GSR Part 2 [9] states: “The management system should shall include evaluation and timely use of the following: [...]”	Incorrect quotation using ‘should’ instead of ‘shall’. This mistake prompts the need to check the correctness of all the quotations.	X			
Japan	5.	4.7(f)	The regulatory body should address the following in terms of the impact on the effectiveness of regulatory experience feedback management: (f) Demotivation: The regulatory body should ensure recognize that the additional workload associated with managing regulatory experience feedback does not demotivate personnel, and result in less active	Proper wording.			X	Replacing “ensure” with “recognize” would weaken the prescriptive intent of the recommendation. The regulatory body should take active measures to prevent demotivation, and “ensure” aligns with IAEA normative style and maintains clarity and accountability.

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			participation. Management should consider					
Russia	1.	4.7(i)	Propose to delete bullet or elaborate it	Not clear which risks are managed by Regulatory body. Please kindly add explanations which risks are meant here.	X			
Germany	10.	5.2	The regulatory body should provide training to help personnel develop the knowledge, skills and attitude needed to effectively <u>carry out identification</u> identify, analyse <u>usage</u> and use <u>usage by</u> regulatory experience feedback.	Can one identify regulatory experience feedback? Or are they sources, which are identified? Please check. We made a suggestion.			X	The initial text is clearer and more readable. A slight modification has been made to harmonize the terminology with the draft Safety Guide: The regulatory body should provide training to help staff develop the knowledge, skills, and attitude needed to effectively identify <u>collect</u> , analyse, and use regulatory experience feedback
Saudi Arabia	11.	Appendix I, Table 3	Please consider moving 'International conventions, treaties and agreements' from Table 3 to Table 2.	Consistency. The conventions, like the CNS, are usually nuclear. Therefore, International conventions, treaties and agreements are better placed in Table 2.	X			

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Germany	11.	II.2	The regulatory body should provide appropriate guidance and training to personnel to ensure that only relevant regulatory experience findings <u>are</u> captured.	Editorial.	X			
Germany	12.	After II.2 Title	TEMPLATES <u>TOOLS</u> TO GUIDE THE IDENTIFICATION OF REGULATORY EXPERIENCE FINDINGS	According to the text following this title “tools” are meant here. Please verify.	X			
Germany	13.	Table 4 Topic 3 Last lines	... • International organizations • Associations, forums and networks of regulatory bodies • <u>International conventions (as for example, the Convention of Nuclear Safety CNS)</u>	Please add conventions – CNS is one of the best possibilities to learn about regulatory experience worldwide.	X			
Saudi Arabia	12.	Appendix II, Table 3, bullet ‘External sources’	Please consider modifying the text to read: • External sources: • <u>National and international</u>	Clarification and consistency. The external sources are divided into two groups: national and international.	X			

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			-Research and development in the field of nuclear and radiation safety • National: -Non-nuclear legislation and policy -Non-nuclear regulatory bodies -Non-nuclear industries -Industry standards • International -International Safety Standards -International industry codes and standards -International nuclear research, including research and development in the field of nuclear and radiation safety.”					
Germany	14.	Annex I I-1.	Both regulatory experience and operating experience can contribute to the enhancement of regulatory processes as well as to the safety and security of facilities and activities. However, the two concepts are different yet correlated: this annex describes the connections	Definition of both types of experiences is very valuable. We therefore would like to suggest moving this text passage from Annex I to the main text, to “Introduction”, see comment 1.			X	It is explained in Section 2 “the concept of regulatory experience”

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			and differences between them. The operating experience refers to insights and lessons learned from the review of information related to the operation of facilities and activities, including events, while regulatory experience refers to insights and lessons learned from the analysis of information gathered from all activities relating to the regulatory process, including lessons learned from external sources of regulatory experience.					
Japan	6.	APPENDIX II TABLE 4.	Topic 3: Sources of regulatory experience Subjects to cover, as appropriate: ▪ Internal sources: ▪ External sources: - National and international ○ Research and development in the field of nuclear and radiation safety - National: ○ Non-nuclear legislation and policy ○ Non-nuclear regulatory bodies ○ Non-nuclear industries ○ Industry <u>codes and standards</u>	National external sources should also include industry ' <u>codes and</u> ' standards, as is the case for international sources.	X			

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			- International Safety Standards - o International industry codes and standards - o International nuclear research					
Saudi Arabia	13.	Annex II, Table II-1	Please consider modifying the first paragraph in strengths to read: “The regulatory process sets an example of how to achieve the <u>principles-policy, strategy</u> and goals of the organization.”	Clarification. The ‘principles of the organization’ is vague and needs clarification.	X			

DS547: Regulatory Experience Feedback Management

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Korea	1	Page 1, Para. 1.6/ Line 6	The following is suggested. (before) ~~~ to facilitate continuous improvement and enhanced regulatory effectiveness for ensuring ~~~. (after) ~~~ to facilitate continuous improvement and enhance regulatory effectiveness for ensuring ~~~.	o In my opinion, it is needed to modify it for the better understanding.	X			
China	1	Par 1.6/ Line 6-7	“...and enhanced regulatory effectiveness for ensuring the safety of nuclear facilities and activities”	Better aligning with the background and scope of the guide			X	DS547 is applicable to all types of facilities and activities as mentioned in para 1.8. Mentioning nuclear facilities will limit the scope, as the draft guide is also applicable for radiation facilities. Furthermore, the term ‘facilities and activities’ is used in the same meaning as of the IAEA safety and security Glossary 2022.
Korea	2	Page 2, Para 1.10/ Line 8	The following is suggested. (before) ~~~performing the analysis of these arrangements and Section 5 ~~~. (after) ~~~ performing the analysis of the effectiveness of these arrangements and Section 5 ~~~.	o In my opinion, it would be better to add it based on the table of contents.	X			
China	2	Par 1.11/ Line 3	“...Annex I describes the link between regulatory experience and operating experience”	Correcting the spelling	X			

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Korea	3	Page 3, Para 2.6/ Line 3	The following is suggested. (before) ~~~, with the aim of improving the regulatory process. (after) ~~~, with the aim of improving the regulatory framework .	o In my opinion, it would be proper to modify it in the context.	X			
China	3	Fig.1	“ Collecting , recording and sorting all the associated information”	The conjugation pattern of the three verbs remains consistent	X			
China	4	Par 2.33/ Line 1-2	“The regulatory body should apply an openness and transparency approach when deciding about disseminating lessons learned”	Expressing more clearly		X The regulatory body should apply an approach based on openness and transparency when deciding about disseminating lessons learned		
Korea	4	Page 10, Para 2.34/ Line 3	The following is suggested. (before) (a) Identifying the lessons to be disseminated ~~~. (after) (a) Identifying the lessons to be disseminated ~~~ for dissemination and what kind of a regulatory experience findings and actions are disseminated .	o In my opinion, it is necessary to decide the type of the regulatory experience findings and actions for dissemination. Or the regulatory body should have the official plan and procedure to disseminate the lessons learned.		X Identifying the lessons to be disseminated. This involves establishing criteria to determine when a finding and associated actions qualify for dissemination and which findings and actions are to be disseminated.		
Korea	5	Page 13, Para 4.7/ Line 7	The following is suggested. (before) (b) Complacency: The regulatory body should ~~~ that the management of regulatory experience feedback adds value	o In my opinion, it would be better to modify it in the context.			X	The original version seems clearer, consistent with IAEA drafting style, and technically sound. We

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			by enhancing the effectiveness and efficiency of regulatory processes. (after) (b) Complacency: The regulatory body should ~~~ that the management of regulatory experience feedback creates additional value and reasonable confidence by enhancing the effectiveness and efficiency of regulatory functions and processes.					propose to keep the original wording.
China	5	ParI-1/ Line 3	“The sources listed in Tables 1~Tables 3 should be consulted”	Expressing more clearly			X	The formatting is as per IAEA style Manual for publications.
China	6	Table 2/ last line	“Associations, forums and networks of nuclear regulatory bodies and of safety-related activities”	Expressing more clearly	X			
China	7	Table 4/ Topic 3, page 21	“International safety standards ”	It should be the international standard in the general sense, rather than a specific reference.	X			
China	8	Table 4/ Topic 4, page 22	“ Approaches and methods used for managing regulatory experience”	Correcting the spelling	X			
China	9	Table 4/ Topic 5, page 22	“This topic is intended to illustrate how the management of the regulatory body commits to an effective and efficient management of regulatory experience. ”	Adding a full stop at the end of the sentence	X			

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France	1.	1.7	This Safety Guide might also be useful for operating organizations, vendors, designers and supply chain organizations particularly regarding their internal supervision and/or audit functions for ensuring safety.	There are dedicated Safety Guides on this topic, specifically oriented at the licensees and industry....			X	Paragraph 1.7 is consistent with Requirement 15 of GSR Part 1 (Rev. 1), which encourages dissemination of lessons learned to authorized parties. The phrase “might also be useful” is deliberately non-prescriptive and does not extend the scope of the guide. Its inclusion supports harmonization across IAEA Safety Standards and reflects the interconnected nature of regulatory and operating experience feedback.	

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Sweden	1.	Para 2.2	Suggested addition to para 2.2 Implementing an effective experience feedback is influenced and dependent on a well-functioning management system [6].	The connection with management issues—and thus GSG-12—is strong, as the conditions for implementing effective experience feedback depend on a well-functioning management system. The experience feedback should be integrated in the management system. This cannot be underestimated. This is to some extent addressed in para 2.35-2.41. In DS457, the recommendations relate to management throughout the document. It may therefore be valuable to highlight this strong connection more explicitly at an early stage in the report, for example through an addition in para. 2.2.		X Implementing effective arrangements for regulatory experience feedback is influenced by, and dependent on, a well-functioning management system.		

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France	2.	2.4	... This should then be <u>considered, and when relevant</u> used as a basis for implementing changes in regulatory requirements and modifications to regulatory practices thereby strengthening the regulatory framework.	Consideration should be systematic but decision to used should be on a case by case basis	X			
France	3.	2.9	... Some opportunities for improvements can be achieved externally by <u>result from</u> learning from best practices in other national authorities with regulatory functions, as well as from international organizations and regulatory bodies in other States.	Clarification	X			
France	4.	2.10 b)	Analysing findings and, <u>when appropriate</u> , developing an action plan to address the gaps and identify opportunities for improvement (see paras 2.23–2.26);	Analysis should be systematic but decision to do/change things should be on a case by case basis.			X	The original wording reflects the structured and proactive approach to managing regulatory experience feedback. Adding “when appropriate” is redundant, as the existing text already implies that action plans are developed to address identified gaps and opportunities for improvement.
France	5.	FIG 1	Proposing, <u>when needed</u> , action plan	See previous comment on systematic vs when needed...			X	Please see above explanation

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France	6.	2.13	Delete 2.13	Redundant. No added value as already expressed in §2.1			X	Paragraph 2.13 is not redundant with paragraph 2.1. While paragraph 2.1 cites a requirement from GSR Part 1 regarding the regulatory experience setting the foundation, paragraph 2.13 provides a specific recommendation for maintaining a structured and retrievable dossier to support regulatory experience feedback management. This adds practical value and complements the broader requirement by guiding implementation.
France	7.	2.14		The footnote 2 defining the mean of “findings” would be worth inserted in the main text as, usually, “findings” have a negative status (~shortcomings, non conformities...)	X			

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France	8.	2.14	The regulatory body should ensure that the collection process clearly identifies how to recognize and document the relevant information including clarity and on how to collect, record, store, screen and categorize this information.	Simplification	X			
France	9.	2.16	Paragraph 5.43 of GSG-12 [6] states that “The regulatory body should also provide convenient means for staff to suggest improvements”. The regulatory body should establish arrangements that actively encourage personnel at all levels to identify and report findings. Key elements of this approach include...	Redundant and little added value considering the previous sentence and the following bullet list.			X	The opening is a verbatim from IAEA safety guide. The following sentence is then recommendation in the context of DS547. We propose to keep the original text.

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France	10.	2.17	Relocate 2.17 after 2.22	Determining the safety significance of a “ finding” is at the next step of the process (screening and categorizing)			X	Paragraph 2.17 is intentionally placed before the screening and categorization steps to ensure that any safety significant issues identified during the collection of findings are addressed without delay. While screening and categorization provide a structured process for evaluating findings, they do not replace the need for immediate action when safety significance is evident.

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France	11.	2.17	The regulatory body should take immediate measures to ensure that any safety significant issues identified though the arrangements for collecting screening findings are addressed <u>in a timely manner</u> .	Considering the previous comment (screening phase), also insist on the timeframe for addressing a significant finding (some may need and immediate action, some may be on a longer term...)		X The regulatory body should take immediate measures to ensure that any safety significant issues identified though the arrangements for collecting and screening findings are addressed in a timely manner .		

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France	12	2.20	Delete 2.20	Redundant with last sentence of 2.14 and with 2.37 to 2.41			X	Para 2.20 provides specific recommendation on the storage of regulatory experience findings, including considerations for access, security, retrievability, and retention. While paragraph 2.14 mentions storage in general terms, and paragraphs 2.37–2.41 address broader integration and knowledge management, none of these offer the detailed guidance found in 2.20. Therefore, the paragraph is not redundant and we propose to retain this.

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France	14.	2.22 (c)	Should establish a structured method for categorizing <u>screened-in</u> findings based on predefined criteria that ensure effective classification by type, significance, and relevance to regulatory objectives...	Clarification and consistency with 2.22 (b)			X	The categorization should be applied to all findings, not just those screened-in, to maintain clarity, transparency, and alignment with the systematic regulatory feedback approach.
France	15.	2.22 (d)	Should establish arrangements to identify instances where similar findings have been raised previously. It should then be determined whether there are existing action plans to address these findings or if additional analysis and actions are needed.	Simplification	X			
France	16.	2.23	The regulatory body should conduct a comprehensive analysis of the screened-in findings, using a graded approach. Based on this analysis, <u>if necessary</u> , an action plan should be developed to address the gaps and list the actions to be taken to improve regulatory functions and processes.	The analysis may conclude that no additional action should be initiated. Simplification to focus on the goal.			X	Please see comment No. 4 and comment No. 20.
France	17.	2.24	The regulatory body should implement the following arrangements for the analysis of findings and, <u>when necessary</u> , for developing the associated action plan:	The conclusion of the analysis is not known a priori. No additional action may be needed (for example, one reason may be that an action to address the matter is already on-going)	X			.

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France	18.	2.24 (a)	Involvement of suitably qualified personnel to conduct an analysis of <u>screened-in</u> findings. This analysis should include a thorough examination from multiple perspectives, such as technical, operational and organizational. It should also involve experts from diverse disciplines and consider the impact of the findings on regulatory functions and processes.	Consistency with 2.23. Superfluous as this idea is already covered by the two previous sentences	X			
France	19.	2.24 (b)	Assessment of each <u>screened-in</u> finding to identify the relevant aspects such as human, technical, legal, financial and managerial aspects. Internal parties should be consulted, including process owners, senior management and technical experts. <u>Whenever appropriate</u> , External interested parties should also be consulted, such as operating organizations, vendors and other regulatory bodies to gather diverse perspectives and feedback on the findings.	Consistency with 2.23. Decision to involve external stakeholders should should be a systematic consideration but not a systematic a priori decision.	X			

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France	20.	2.24 (c)	Development, <u>when necessary</u> , of an action plan to address the findings. This plan may include actions ranging from minor adjustments to significant changes in the regulatory functions or processes. The regulatory body should ensure that the action plan identifies the personnel responsible for its timely implementation and monitoring.	The conclusion of the analysis is not known a priori. No additional action may be needed (for example, one reason may be that an action to address the matter is already on-going) 12/19			X	The comment is appreciated, as not all findings require actions as some may already be addressed or may not warrant further action. However, DS547 does not require a separate action plan for each finding. It is up to Member States to establish arrangements that suit their context, whether by developing a consolidated action plan that integrates actions arising from multiple findings for better follow-up and monitoring, or by creating separate plans. In the case of a consolidated action plan, the regulatory body should identify which actions are necessary to address the identified gaps. Adding the qualifier “when necessary” may soften the intent of the recommendation and introduce ambiguity regarding the

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France	21.	2.24 (d)	Review and approval of the action plan by the senior management of the regulatory body. This should take into account factors such as the safety implications of the identified actions; the outcomes of consultations; a cost-benefit analysis; the impact on interested parties; and follow-up actions giving safety the highest priority.	The bullet is on the initiation of the action plan, including the approval of such initiation, not its follow- up...	X	'Giving safety the priority is retained'		

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France	22.	2.28	The regulatory body should make the following arrangements for implementing the approved action plan: (a) Coordinating the implementation of the action plan by confirming the availability of necessary resources and involving third party or external interested parties, as necessary. This coordination might include collaboration with multiple authorities responsible for safety, cooperation with regulatory bodies of other States, or engagement with external technical support organizations. (b) Monitoring the implementation of the action plan by systematically tracking the status of each action, resolving any delays or obstacles, and ensuring timelines and responsibilities are adhered to effectively. This monitoring process should involve regular updates, documentation of progress, and communication to an appropriate management level of any significant deviations. (c) Evaluating the impact of actions on the regulatory functions and processes, assessing their effectiveness by using methodologies such as analysing performance metrics, gathering feedback from the target audience, comparing results to baseline data, and providing updates to senior management.	Too detailed.			X	While the proposed simplification is appreciated, the original wording of paragraph 2.28 provides essential implementation-level guidance that supports effective coordination, monitoring, and evaluation of the action plan. DS547 is intended to offer recommendations to regulatory bodies, and the level of detail included is appropriate for supporting consistent and effective application. Removing these details may reduce the clarity and utility of the guidance for Member States. Some of the details have been added in response to the feedback received from Member States.
				14/19				

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France	23.	2.38	The regulatory body should provide in its policy a basis for formally documenting its intent and the senior management's commitment to maintaining effective regulatory oversight through continuous review and improvement , and through the use of regulatory experience feedback. Senior management should use these high level policy and leadership statements to underline the role of regulatory experience management within the organization's culture for safety.	Too directive. Various way could be used to expressed intend.... The topic of the Safety Guide is regulatory experience management		X The regulatory body should provide in its policy a basis for formally documenting its intent and the senior management's commitment to maintaining effective regulatory oversight through continuous review and improvement, and through the use of regulatory experience feedback. Senior management should use these high level policy and leadership statements to underline the role of regulatory experience management within the organization's culture for safety.		

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France	24.	2.40	Delete 2.40	Duplicate other § of this safety guide...			X	Paragraph 2.40 is not redundant. It provides a distinct recommendation on establishing knowledge management processes to capture, retain and make accessible the results of regulatory experience feedback. This complements related guidance on documentation and integration, and reinforces the importance of systematic learning and accessibility of lessons learned.
France	25.	3.2	The regulatory body should take into account these criteria when identifying, <u>screening</u> and analysing the findings from the management of regulatory experience feedback, and when defining and prioritizing the actions arising.	Consistency with the process described in the Safety Guide	X			

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France	26.	4.7 (e)	Fear of personal consequences: The regulatory body should foster a ‘no-blame’ ⁵ working environment by establishing individual and institutional expectations towards managing regulatory experience. Management should ensure that personnel do not face any negative consequences when conducting assessments and reporting regulatory experience feedback findings.	Superfluous as already expressed in the first sentence. Furthermore, considering footnote 2 setting the definition of “findings”, it is quite strange to fear negative consequences for reporting a good practice....			X	The second sentence of paragraph 4.7 (e) is not superfluous. While the first sentence introduces the concept of a no-blame environment, the second reinforces its practical application by explicitly stating that personnel should not face negative consequences when reporting findings. This is essential to encourage open reporting of both positive and negative feedback, in line with the broader definition of “findings” provided in Footnote 2.

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France	27.	4.7 (e) footnote 5	⁵ In general, a ‘no-blame’ environment refers to a workplace culture where staffs are encouraged to speak up about mistakes, problems, or failures without fear of blame, retaliation or negative consequences.	The balance of “no blame” should also be made clear. Deliberate violation of rules or conducts not consistent with staff with similar position in the organization and similar level of experience if rules are unclear/interpretable may lead to sanctions...	X	Footnote will be modified as: In general, a ‘no-blame’ environment refers to a workplace culture where staff are encouraged to speak up about mistakes, problems, or failures without fear of blame, retaliation or negative consequences. This approach does not preclude accountability in cases of deliberate violations or gross negligence.		

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France	28.	4.7 (g)	Overly bureaucratic or unsuitable design: The regulatory body should rationalize regulatory experience feedback management, ensuring transparency and traceability effectiveness while minimizing any administrative burden. The approach should be proportionate to the radiation risks associated with facilities and activities.	Transparency and traceability are only a part of the overall process... This sentence is related to the graded approach and the implementation of this approach is better addressed in §3.1 to §3.4		X Overly bureaucratic or unsuitable design: The regulatory body should rationalize regulatory experience feedback management to ensure effectiveness and minimize administrative burden, taking into account the application of a graded approach as described in Section 3 of this Safety Guide.		
France	29.	4.7 (i)		Quite unclear recommendations. Deletion suggested.	X			
France	30.	5.2	The regulatory body should provide training to help personnel develop the knowledge, skills and attitude needed to effectively identify, <u>screen</u> , analyse and use regulatory experience feedback....	Consistency with the process described in the Safety Guide	X			