TITLE: Site Survey and Site Selection for Nuclear Installations (DS559)

	COMMENTS BY REVIEWER Reviewer: NUSSC, EPReSC, RASSC, WASSC, NSGC Country/Organization: All Received Comments Date: May 29, 2025				RESOLUTION			
Comment No.	**Country**	**Para/Line No.**	**Proposed new text**	**Reason**	**Accepted**	**Accepted, but modified as follows**	**Rejected**	**Reason for modification/rejection**
1.	Belgium (NUSSC)		Add a paragraph on SMRs - for which there could be no site selection (a 'customer' choses to install an SMR on its existing industrial site)			**x** DPP Section 5, para. 3, sentence 2: "The updated publication will cover new nuclear installations, including new installations at existing sites, as defined in the IAEA Nuclear Safety and Security Glossary…"		Scope of the document (Page 5, para. 3) is modified to cover the new installations (e.g. SMRs) on existing nuclear installation sites. Selecting a site without a proper site selection process (such as a 'customer" choosing a site as mentioned in the comment) is not recommended for the reasons described in the Background.
2.	Finland (NUSSC)	DPP 7. section (SSG-35 paras 7.2-7.7)	Please provide revised guidance on Application of Quality Management (Quality assurance and Quality control) by the **responsible organization for site survey and site selection** – not only operating organization (future licensee).	Present guidance speaks on responsibilities of operating organization (future licensee). Please note, that during the siting the operating organization (future licensee) could not be chosen. That is a challenge, which could be solved with responsible site survey organization quality management (programme). Please note that in future (e.g. in SMR siting) there might be other business models, where other companies that operating		**x** Annex Table A.1, Section 7, Bullet 2: "Roles and responsibilities for individuals or groups in the project may be clarified, particularly by considering different business models in SMR siting."		This comment will definitely be considered during the drafting process. As the DPP does not contain the detailed analysis of expected changes in each paragraph, a note is added to Table A.1 for Section 7 regarding this comment.

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				organizations are carrying out the Site survey and Site selection. *Present SSG-35 7.2. As a part of the management system, a quality management programme should be established by the operating organization (future licensee), and the contractors that carry out the work for selection of the site for a nuclear installation*				
3.	France (NUSSC)	7	6. 7. Siting of Nuclear Installations within the application of the Integrated Management System for the ~~Siting of Nuclear Installations~~	The notion of integrated management system is essential in GSR part 2	**x**			
4.	Germany (CSS, NUSSC)	Section 2, Line 2	…Poor planning and execution, ~~and~~ lack of information on the safety aspects and disregard of related safety standards could lead to faulty decision making and cause major delays, either at the construction stage or at the operational stage of the nuclear installation.	Is it meant that related safety standards are being ignored? Please clarify.	**x**			

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5.	Germany (CSS, NUSSC)	Section 4, Line 5	… This Safety Guide would also provide recommendations on establishing a systematic process for site survey and site selection for a number of preferred candidate sites, from which one could be selected by making an informed and justifiable decision for the design, construction, ~~and~~ operation and decommissioning of a nuclear installation.	Please put in line with Requirement 4 of SSR-1, which refers to lifetime - with 6 defined stages - of the facility.	**x**			
6.	Germany (CSS, NUSSC)	Section 5, Line 1	The current version of SSG-35 addresses the safety aspects to be considered during ~~consideration of safety in~~ the site survey and site selection processes for nuclear installations.	Clarification. Alternative: *The current version of SSG-35 provide recommendations and guidance on meeting the requirements for the consideration of safety in the siting process for nuclear installations.*		**x** Section 5, Line 1: "The current version of SSG-35 provides recommendations and guidance on meeting the requirements for the consideration of safety in the site survey and site selection processes for nuclear installations."		Proposed alternative version is used with slight modification.
7.	Germany	Section 5, Line 16	…	It is not clear how the site selection should apply to	**x**			

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	(CSS, NUSSC)		This revision is not intended to significantly change the scope of the Specific Safety Guide. The updated publication will cover ~~both~~ new ~~and existing~~ nuclear installations (including new installations at existing sites) as defined in the IAEA Nuclear Safety and Security Glossary, 2022 (Interim) Edition: Terminology Used in Nuclear Safety, Nuclear Security, Radiation Protection and Emergency Preparedness and Response.	existing installations. (The site survey aspect for re-evaluation of existing installations is fully covered by the Safety Guides on evaluation listed in Section 6.) And SSG-35 is intended to cover only this site selection phase as stated quite clearly in the paragraph before: "SSG-35 covers the process that eventually terminates in the site selection for one or more nuclear installations." This is also true for the current version of SSG-35 that does not include recommendation for existing installations (but only recommendations for new installations at sites of already existing installations). Nevertheless, the applicability to new installations at already existing sites could be mentioned.				
8.	Germany (CSS, NUSSC)	Section 6, No. 1, No 4, and No. 17	~~EUROPEAN ATOMIC ENERGY COMMUNITY, FOOD AND AGRICULTURE ORGANIZATION OF THE UNITED NATIONS,~~ INTERNATIONAL ATOMIC ENERGY AGENCY, ~~INTERNATIONAL~~	Please check the issuing organization part of the reference. It seems that also under these bullets it should be just INTERNATIONAL ATOMIC ENERGY AGENCY as in the other bullets.			**x**	Adding sponsoring organizations in the reference is the correct way of citing SF-1 according to the IAEA website (Fundamental Safety Principles | IAEA) and IAEA Style Manual.

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			~~LABOUR ORGANIZATION, INTERNATIONAL MARITIME ORGANIZATION, OECD NUCLEAR ENERGY AGENCY, PAN AMERICAN HEALTH ORGANIZATION, UNITED NATIONS ENVIRONMENT PROGRAMME, WORLD HEALTH ORGANIZATION,~~ Fundamental Safety Principles, IAEA Safety Standards Series No. SF-1, IAEA, Vienna (2006), https://doi.org/10.61092/iaea.hmxn-vw0a	Although the publication was kindly and jointly sponsored by the organizations named.				
9.	Germany (CSS, NUSSC)	Annex, Line 24	… (3) compilation of no site-specific data during the site selection stage and performing only the desktop study, …	Please specify whether "site-specific data" (without "no") or "non-site-specific data" are meant.		**x** Annex, Para. 3, "… (3) performing only the desktop study and not compiling site-specific data during the site selection stage…"		Sentence is modified in a slightly different manner.
10.	Germany (CSS, NUSSC)	Annex, Table A.1, Row "3"	**General Recommendations for the Siting Process**	Please delete in raw "6" and move to row "3".		**x**		To resolve this issue, title of Section 6 is changed as: "Application of Graded

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			… - New opportunities for siting, e.g. reduced land area, reduced emergency planning zone, siting in densely populated areas, etc. due to new and advanced reactor technologies will be included. - This section will be updated, according to new siting documents on advanced and small modular reactors as needed.	"Advanced reactors", at least if producing electricity, could still be considered "nuclear power plants" (although of a new type). Therefore, it might be better to incorporate these considerations in Section 3 "General Recommendations for the Siting Process". Alternatively, a new title for Section 6 could be considered, e.g. "Siting for Advanced Reactors and Nuclear Installations Other Than Nuclear Power Plants".		The new title of Section 6 is "Application of Graded Approach in Siting of Nuclear Installations"		Approach in Siting of Nuclear Installations". With this change, recommendations given in Section 6 will be applicable for the nuclear installations other than nuclear power plants, as described in Requirement 3 and paras 4.1–4.5 of SSR-1.
11.	Germany (CSS, NUSSC)	Annex, Table A.1, Row "4", 2nd bullet	**Classification of Siting Criteria** ... □□□Potential impacts of nuclear installations to the region (e.g. DS529, ~~2025~~)	What is implied by "2025" here? Please check.	**x**			Note: It was implied that DS529 will be published in 2025. Now, 2025 is removed.
12.	Germany (CSS, NUSSC)	Annex, Table A.1, Row "5", 2nd bullet	**Data Necessary at Different Stages of the Siting Process** … -The difference between on-site or site-specific studies to support the site selection for the preferred site from list of candidate sites will be clarified.	Please check whether it is really intended to make a distinction between "on-site studies" and "site-specific studies". Such a distinction might make sense for "data" (obtained at the site vs. off-site data applicable to the site) but seems to make little sense for "studies".		**x** Annex Table A.1, Section 5, Bullet 2: "Use of on-site or site-specific data to support the site selection for the preferred site from list of candidate sites		Sentence is modified in a slightly different manner.

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						will be clarified."		
13.	Germany (CSS, NUSSC)	Annex, Table A.1, Row "6", 1st bullet	**Siting for Nuclear Installations Other Than Nuclear Power Plants** ~~New opportunities for siting, e.g. reduced land area, reduced emergency planning zone, siting in densely populated areas, etc. due to new and advanced reactor technologies will be included.~~	Delete here and move to Row "3" "Advanced reactors", at least if producing electricity, could still be considered "nuclear power plants" (although of a new type). Therefore, it might be better to incorporate these considerations in Section 3 "General Recommendations for the Siting Process". Alternatively, a new title for Section 6 could be considered, e.g. "Siting for Advanced Reactors and Nuclear Installations Other Than Nuclear Power Plants".		**x** The new title of Section 6 is "Application of Graded Approach in Siting of Nuclear Installations"		To resolve this issue, title of Section 6 is changed as: "Application of Graded Approach in Siting of Nuclear Installations". With this change, recommendations given in Section 6 will be applicable for the nuclear installations other than nuclear power plants, as described in Requirement 3 and paras 4.1–4.5 of SSR-1.
14.	Germany (CSS, NUSSC)	Annex, Table A.1, Row "6", 2nd bullet	**Siting for Nuclear Installations Other Than Nuclear Power Plants** … - Review and reporting ~~of~~ by the owner/operator ~~the~~ of discretionary criteria for their ~~relationship with the~~ particular design or technology (and addition of new criteria if needed) will be included.	The original text is hard to understand. Does the proposed change convey the intended message? Otherwise please rephrase this bullet point.		**x** Annex Table A.1, Section 6, Bullet 2: "Review and reporting of the discretionary criteria for their relationship with the particular design or technology (and addition of new criteria if needed) by the		Sentence is modified in a slightly different manner.

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						owner/operator will be included."		
15.	Germany (CSS, NUSSC)	Annex, Table A.1, Row "6", 3rd bullet	**Siting for Nuclear Installations Other Than Nuclear Power Plants** … ~~This section will be updated, according to new siting documents on advanced and small modular reactors as needed.~~	Delete here and shift to row "3" "Advanced reactors" and "Small modular reactors", at least if producing electricity, could still be considered "nuclear power plants" (although of a new type). Therefore, it might be better to incorporate these considerations in Section 3 "General Recommendations for the Siting Process". Alternatively, a new title for Section 6 could be considered, e.g. "Siting for Advanced Reactors and Nuclear Installations Other Than Nuclear Power Plants".		**x** The new title of Section 6 is "Application of Graded Approach in Siting of Nuclear Installations"		To resolve this issue, title of Section 6 is changed as: "Application of Graded Approach in Siting of Nuclear Installations". With this change, recommendations given in Section 6 will be applicable for the nuclear installations other than nuclear power plants, as described in Requirement 3 and paras 4.1–4.5 of SSR-1.
16.	Germany (CSS, NUSSC)	Annex, Table A.1, Row "NEW Annex III"	**Examples of Criteria for the Siting Process for Advanced Reactors** New (in connection with Section ~~6~~3).	"Advanced reactors", at least if producing electricity, could still be considered "nuclear power plants" (although of a new type). Therefore, it might be better to link the new Annex III to Section 3 "General Recommendations for the Siting Process". Alternatively, a new title for Section 6 could be considered, e.g. "Siting for Advanced Reactors and Nuclear		**x** The new title of Section 6 is "Application of Graded Approach in Siting of Nuclear Installations". The title of Annex III is modified into		To resolve this issue, title of Section 6 is changed as: "Application of Graded Approach in Siting of Nuclear Installations". With this change, recommendations given in Section 6 will be applicable for the nuclear installations other than nuclear power plants, as described in Requirement 3 and paras 4.1–4.5 of SSR-1. Title of

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				Installations Other Than Nuclear Power Plants".		"Examples of Criteria for the Application of Graded Approach".		Annex III is modified as Examples of Criteria for the Application of Graded Approach", accordingly.
17.	India (NUSSC)	Page-4 New reference	Add: INTERNATIONAL ATOMIC ENERGY AGENCY, Managing Siting Activities For Nuclear Power Plants, NG-T-3.7 (Rev. 1), IAEA, Vienna (2022)	This guide of IAEA may be also an applicable reference document.	**x**			
18.	India (NUSSC)	Page-8 Table A.1/item 6	New opportunities for siting, e.g. reduced land area, reduced emergency planning zone, siting in densely populated areas, etc. due to new and advanced reactor technologies as well as related safety considerations will be included.	These developments also bring in challenges with regard to examination of feasibility of Emergency response during siting stage, due to reduced land area relative increase in radiation dose to public and possibility of radiation hot spots in public domain due to wake effects of plant structures, etc. can happen. All such aspects should also be examined and appropriately addressed in the guide.	**x**			
19.	India (NUSSC)	Page-8 Table A.1/item 7	Add New bullet: This section to be updated as necessary bringing out importance and specific attention to be given to Quality assurance of data collection, processing,	During siting process, generally related organizational structure would be minimal and unless specified otherwise, a specific management system for siting activities might not exist. Data		**x** Annex Table A.1, Section 7, Bullet 4: **"**Quality assurance of		Note: The first part of the 'proposed new text' provides an explanation for the need for the second part. Therefore, the second part of the proposed text

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			related modelling studies, etc. as well as competency of related personnel, taking cue from Sec. 3.3 of IAEA NG-T 3.7(R1).	collected and/or assessed in the earliest stages will affect decisions throughout the entire life cycle of the NPP. Low quality data or data that are not properly handled may have significant cost and schedule impacts.		data collections, processing, modelling etc. will be added (in compatibility with NG-T 3.7 (Rev.1)).”		was refined and included in the DPP.
20.	Ireland (EPReSC)	Section 2, Para 1	Poor planning and execution, and lack of information on the safety and environmental aspects and related safety standards…	Environmental Impact Assessments would be part of the application process.	**x**			
21.	Ireland (EPReSC)	Section 2, Para 3	In addition, results of the European Stress Tests for post-Fukushima improvements provided valuable lessons on the criteria used in site survey and site selection, particularly on issues related to the feasibility of the implementation of the site’s emergency plan and its potential response to flooding and tsunami events.	Might be useful to say to who these European Stress Tests were conducted by. Text in red reads better.	**x**			
22.	Ireland (EPReSC)	Section 2, Para 4	New reactor types and sizes, such as small modular reactors (SMRs) and microreactors, are being considered at an	Reads better.	**x**			

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			increasing pace by Member States, calling for adaptation to the current requirements and guidance..					
23.	Ireland (EPReSC)	Section 2, Para 4	…new reactor designs may introduce many new opportunities in the siting of nuclear installations, including reduced land area, the possibility of siting near densely populated areas..	Reads better.	**x**			
24.	Ireland (EPReSC)	Section 2, Para 4	…recent advances in remote sensing technologies may reduce the burden of fieldwork…	Reads better.	**x**			
25.	Ireland (EPReSC)	Section 3, Para 1	…the update of SSG-35 is planned to progress in parallel with that to ensure consistency between the two publications.	Reads better.	**x**			
26.	Ireland (EPReSC)	Section 3, Para 1	The update is also recommended by the IAEA's Nuclear Safety Standards Committee (NUSSC) and added to its medium-term plan as a priority…	Reads better.	**x**			

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27.	Ireland (EPReSC)	Section 3, Para 1	…the coal-to-nuclear initiative…	This should be clarified. The US have commenced such an initiative. https://www.energy.gov/ne/coal-nuclear-transitions	**x**			
28.	Ireland (EPReSC)	Section 4, Para 1	Recommendations will be provided for criteria and approaches for surveying for and selection of suitable sites for nuclear installations that comply with established safety requirements. This Safety Guide will also provide…	More definitive objectives.	**x**			
29.	Japan (NUSSC)	7. OVERVIEW	ANNEX III (new): Examples of Criteria for the Siting Process for ~~Nuclear Installations Other Than Nuclear Power Plants~~ Advanced Reactors	To keep a consistency with Table A.1. Existing gaps and possible revisions in each section, where the new annex is titled as "Examples of Criteria for the Siting Process for Advanced Reactors".		**x** The new title of Section 6 is "Application of Graded Approach in Siting of Nuclear Installations". The title of Annex III is modified into "Examples of Criteria for the Application of Graded Approach".		To resolve this issue, title of Section 6 is changed as: "Application of Graded Approach in Siting of Nuclear Installations". With this change, recommendations given in Section 6 will be applicable for the nuclear installations other than nuclear power plants, as described in Requirement 3 and paras 4.1–4.5 of SSR-1. Title of Annex III is modified as Examples of Criteria for the Application of Graded Approach", accordingly.

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30.	Republic of Korea (WASSC)	Page1/ Line 31	The followings are suggested. (before) ~~~ and human induced hazards (~~~ and SSG-79). (after) ~~~ radiological environmental impacts and human induced hazards (~~~ NS-G-3.2, GSG-10 and SSG-79).	o I think that SSG-35 is also related with the environment. So, these should be added.	**x**			
31.	Republic of Korea (WASSC)	Page 2/ Para 5/ Line 2	The followings are suggested. (before) ~~~ including government bodies, technical support organizations ~~~ (after) ~~~ including government, regulatory bodies, technical support organizations ~~~	o I think that the word of regulatory should be added in order to clarify the context.	**x**			
32.	Russian Federation (NSGC)	7. OVERVIEW	Exclude or rephrase the bullet 4b "Criteria relating to nuclear security".	It should be noted that nuclear security issues are out of scope of safety publications. Should this paragraph be included in the body of the document, it should not contain any nuclear security requirements.		**x** In Section 7 it is noted that Section 4b only refers to IAEA Nuclear Security Series and will not contain any nuclear security requirements.		Original version of SSG-35 does not include any recommendations related to nuclear security issues. There is only one paragraph in Section 4b (Para. 4.8), where the reader is referred to IAEA Nuclear Security Series. In the update, this paragraph will be updated without enlarging the scope; therefore, the

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								document does not or will not contain any nuclear security requirements. This is now indicated by * in Section 7, bullet 4b.
33.	South Africa (NUSSC)	Section 1, 1st sentence	Surveying and selecting a suitable site for a nuclear installation are crucial as these processes can significantly affect its safety, cost, and public acceptance throughout its lifetime.	The sentence reads better.	**x**			
34.	South Africa (NUSSC)	Section 1, 3rd sentence	If the site-related design parameters are changed during the operational stage, the installation may require re-evaluation and upgrades, which could lead to extended shutdown periods and considerable delays.	The sentence is easier to follow.	**x**			
35.	USA (NUSSC)	Section 2 (Background), Para.1	Poor planning and execution, and lack of information on the safety aspects and related safety standards during the site survey and site selection phase could lead to faulty decision making and cause major delays~~, either at the construction stage~~	Poor planning and lack of information on safety standards can have impacts in all subsequent phases, not just construction and operation. For example, significant impacts could arise first in the site evaluation.	**x**			

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			~~or at the operational stage~~ in subsequent phases of the nuclear installation project.					
36.	USA (NUSSC)	Section 7 (Overview) and Table A.1 (Existing gaps and possible revisions in each section)	Comment: The proposal is to add the new material focused on advanced and small modular reactors into Chapter 6 and (new) ANNEX III. However, Chapter 6 and ANNEX III are identified in DDP Section 7 as addressing "Nuclear Installations *Other Than Nuclear Power Plants*". This is confusing since the application of many if not most advanced reactors and SMRs will be for nuclear power plants. Additionally, the title for ANNEX III in Table A.1 is materially different than that given in DPP Section 7.	Conflating site survey and site selection topics for SMRs and advanced reactors with installations other than nuclear power plants is not appropriate. Reconsideration of how site survey and site selection topics for SMRs and advanced reactors are organized within the revised SSG is needed.		**x** The new title of Section 6 is "Application of Graded Approach in Siting of Nuclear Installations". The title of Annex III is modified into "Examples of Criteria for the Application of Graded Approach".		To resolve this issue, title of Section 6 is changed as: "Application of Graded Approach in Siting of Nuclear Installations". With this change, recommendations given in Section 6 will be applicable for the nuclear installations other than nuclear power plants, as described in Requirement 3 and paras 4.1–4.5 of SSR-1. Title of Annex III is modified as Examples of Criteria for the Application of Graded Approach", accordingly.
37.	USA (NUSSC)	Section 2 (background), Section 3 (Justification), and Section 5 (Scope)	Comment: DPP sections 2, 3, and 5 do not envision addressing site survey and selection issues related to transportable reactors. This may be somewhat of a stretch goal, but it would be	There is a growing interest in transportable microreactors for various applications. However, the site survey and selection process for the application of transportable reactors will likely be significantly different (in scope and duration) than			**x**	Since discussions on transportable reactors are still at an early stage, it would be more appropriate to discuss them during the drafting phase, in connection with the drafting of DS557 (update

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			beneficial to include this topic. It would be appropriate to address this topic in a separate ANNEX for now.	that for fixed nuclear installations.				of SSR-1), and consider them to the extent possible at that time, rather than making specific references in the DPP or incorporating an Annex at this stage.