

***{Development and Implementation of an Effective and Efficient Regulatory Experience Feedback Program for Regulatory Bodies for Safety (DS547)}***

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: United States		Page 1 of 2					
Country/Organization: Dept. of Energy/Dept. Homeland Security		Date: 05 May 23					
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1	Scope	DPP should include reference to the Nuclear Security Series and the interface with security.	While the title indicates the scope is limited to feedback for safety, the scope and other sections suggest it, “will cover management of regulatory experience in all functions and processes of a regulatory body for all facilities and activities that give rise to radiation risks.” This statement suggests an interface with security.	Accepted	Included following security series references in the DPP; i. IAEA Nuclear Security Series No. 7, 13, 19, 20 and 35-G ii. Complete list of references will be developed during the document drafting process		
2	Page 2, first paragraph	Further, requirement 4 para 2.8 (f) of GSR Part 1 (Rev. 1) necessitates <del>the regulatory body be able to promote cooperation and the to</del> exchange of regulatory related information and experience directly with regulatory bodies of other States and with international organizations as one means of	Restructuring sentence for clarity and consistency with the referenced requirement.		Accepted the proposed modification excluding the word “directly” to keep some flexibility in use of document by the member states		

		effectively independent from undue influences on its decision making. for effective independence in decision making.					
3	Page 2, Section 3	“During the third International Conference”	Editorial.	Accepted			
4	Page 4, Objective, Bullet 3	Establishing and maintaining means for receiving information from other regulatory bodies and international organizations, and authorized parties, as well as entities with whom regulators interface in particularly relevant ways, including law enforcement and emergency management bodies.	A lessons learned program implemented by a regulator to collect and assess information related to facilities and activities would benefit from the inclusion of lessons learned related to the interface between regulators and those with whom they interact on a regular basis and who might have particularly relevant insights. This may include law enforcement and emergency management authorities.			Rejected	Different regulators of member states have different responsibilities. In line with this Bullet-1 of Objective is meant to identify internal and external sources of regulatory experience in line with the mandate of the regulatory body according to applicable legal system

**Draft Safety Guide DPP DS547**  
**“Development and Implementation of an Effective and Efficient Regulatory Experience Feedback Program for Regulatory Bodies for Safety”**  
**(Version dated 27-10-2022)**  
**Status: STEP 3**

COMMENTS BY REVIEWER					RESOLUTION			
Reviewer: <b>Federal Ministry for the Environment, Nature Conservation, Nuclear Safety and Consumer Protection (BMUV)</b> (with comments of GRS) Country/Organization: <b>Germany</b>					Pages: 4 Date: 12.05.2023			
Relevanz	Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
3	1.	Page 3 Line 6	During <del>the</del> 66th General Conference, <del>the</del> Nuclear and Radiation Safety Resolution, GC(66)/RES/6 adopted on 30 September 2022, under item 26, requests the Secretariat to help Member States' regulatory bodies, upon request, to establish systematic regulatory experience feedback mechanisms.	Typo There is a number of typing mistakes all over the document.	Accepted			
2	2.	Page 4 6. PLACE IN ...	IAEA Safety Glossary: Terminology Used in Nuclear Safety, <del>Nuclear Security, and Radiation Protection and Emergency Preparedness and Response, 2018 Edition-2022 (interim) Edition, IAEA, Vienna (2022) (2018).</del> ..... INTERNATIONAL ATOMIC ENERGY AGENCY, Establishing the Safety Infrastructure of a Nuclear Power Programme, IAEA Safety <del>Standards Series Guide Series</del> No. SSG-16 ( <del>Rev.1</del> ), IAEA, Vienna ( <del>2011</del> ) ( <del>2020</del> ) ..... INTERNATIONAL ATOMIC ENERGY AGENCY, Use of a Graded Approach in the Application of the Safety	Please check, as there are new versions of these documents available.	Accepted			

Relevanz:  1 – Essentials  2 – Clarification  3 – Wording/Editorial

COMMENTS BY REVIEWER					RESOLUTION			
Reviewer: <b>Federal Ministry for the Environment, Nature Conservation, Nuclear Safety and Consumer Protection (BMUV)</b> (with comments of GRS) Country/Organization: <b>Germany</b>					Pages: 4 Date: 12.05.2023			
Relevanz	Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
			Requirements for Research Reactors, IAEA Safety Standards Series No. SSG-22 <u>(Rev.1)</u> , IAEA, Vienna (2012) <u>(2023)</u> . ..... INTERNATIONAL ATOMIC ENERGY AGENCY, <u>IRS Guidelines</u> , Joint IAEA <u>and OECD</u> /NEA International Reporting System for Operating Experience <u>(IRS)</u> , Services Series 19 <u>(Rev.1)</u> , IAEA, Vienna (2022) (March 2010).					
2	3.	Page 4 6. PLACE IN ...	<del>INTERNATIONAL ATOMIC ENERGY AGENCY, Safety of Nuclear Power Plants: Design, IAEA Safety Standards Series No. SSR 2/1 (Rev. 1), IAEA, Vienna (2016).</del>	SSR-2/1, Rev.1 does not address regulatory processes and may be deleted			Rejected	Design is one of the important aspect to be covered as experience feedback. This is an important reference
1	4.	Page 6 7. OVERVIEW  New Issue	<b>2. Process for Development and Implementation of Regulatory Experience</b> i. Identification and Collection ii. National Operating and Regulatory Experience iii. International Operating and Regulatory Experience iv. Records and Storage v. Screening	In order to enable <b>3. Analysis of Effectiveness of and Regulatory Experience</b> and to perform this analysis, feedback on the disseminated Lessons Learned needs to be collected. This is a precondition and			Rejected	This is covered under vii. Actions and outcome and subsection 5 is dedicated for lessons learned

Relevanz:  1 – Essentials  2 – Clarification  3 – Wording/Editorial

COMMENTS BY REVIEWER					RESOLUTION			
Reviewer: <b>Federal Ministry for the Environment, Nature Conservation, Nuclear Safety and Consumer Protection (BMUV)</b> (with comments of GRS) Country/Organization: <b>Germany</b>					Pages: 4 Date: 12.05.2023			
Relevanz	Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
			vi. Evaluation vii. Actions and Outcomes viii. Develop and Disseminate Lessons Learned <u>ix. Collection of Feedback on Lessons Learned</u>	hence should be considered as additional issue.  The feedback on lessons learned should be systematically collected, evaluated and shared among regulatory bodies.				
1	5.	Page 6 7. OVERVIEW  New Order	<b>5. Dissemination of the Lessons Learned</b> <del>i. Equipment</del> <del>ii. Human Performance</del> <del>iii. Management System</del> <del>iv. Changes to Regulatory Requirements</del> <u>i. Changes to Regulatory Requirements</u> <u>ii. Regulatory processes</u> <u>iii. Management System</u> <u>vi. Human performance</u>	The proposed order of the bullets reflects operating experience and its - mainly - technical issues.  However, we believe that the order of these bullets should be in line with topics, that have the highest impact on nuclear oversight in terms of the Regulatory Body's work.  For example, "Changes to Regulatory Requirements" have the highest impact on Regulatory Bodies and their work.  Changes to the management system affect the way Regulatory Bodies themselves work and		Accepted and equipment added at the end		

Relevanz: 1 – Essentials | 2 – Clarification | 3 – Wording/Editorial

COMMENTS BY REVIEWER					RESOLUTION			
Reviewer: <b>Federal Ministry for the Environment, Nature Conservation, Nuclear Safety and Consumer Protection (BMUV)</b> (with comments of GRS) Country/Organization: <b>Germany</b>					Pages: 4 Date: 12.05.2023			
Relevanz	Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
				<p>might be a direct result of changes to Regulatory Requirements too.</p> <p>The new proposed order of relevant topics might suit better for the Safety Guide on Regulatory Experience Feedback Program and will underline differences to Feedback Program on Operating Experience.</p> <p>Additionally, the point “equipment” is not that relevant for Regulatory Experience Feedback Program, we suggest not to include it.</p>				

Relevanz:  1 – Essentials  2 – Clarification  3 – Wording/Editorial

**Review of DS547 Development and Implementation of an Effective and Efficient Regulatory Experience Feedback Program for Regulatory Bodies for Safety, STEP 3**

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: Nuclear Safety Department Country/Organization: UAE/ Federal Authority for Nuclear Regulation (FANR) Date: 17 May 2023				Page.1 of. 1			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1	2./page 6	Add an additional section: iv. Nuclear Operators Regulatory Experience	This allows to also benefit from the nuclear industry regulatory experience (not only the regulators)			Rejected	Please see Under Section-6 “Operating Experience Feedback for Nuclear Installations, IAEA Safety Standards Series No. SSG-50, IAEA, Vienna (2018)”.
2	3. / page 6	3. Analysis, Effectiveness Review and Continuous Improvement of Regulatory Experience	The new text adds the continuous improvement to the process.		Modified as “Analysis of Effectiveness of Regulatory Experience”		

**Japan NUSSC comments on DPP-DS547, “Development and Implementation of an Effective and Efficient Regulatory Experience Feedback Program for Regulatory Bodies for Safety”**

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: Japan NUSSC member Country/Organization: Japan / NRA		Page 1 of 1 Date: 15 May 2023					
No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1.	4. Objective /1st bullet	<ul style="list-style-type: none"> <li>Identifying internal and external sources on regulatory experience, <u>including the feedback from operating experiences.</u></li> </ul>	The feedback from operating experiences by licensees are sometimes very useful for regulatory body.			Rejected	Operating experience feedback is covered by the safety standard No. SSG-50 (please see Section 6 of DPP)
2.	8. Production Schedule	The schedule should be modified in line with the actual year.		Accepted			

**Draft Safety Guide DPP DS547 “Development and Implementation of an Effective and Efficient Regulatory Experience Feedback Program for  
Regulatory Bodies for Safety”  
(Version dated 27-10-2022)  
Status: STEP 3**

COMMENTS BY REVIEWER					RESOLUTION			
Reviewer: <b>Federal Ministry for the Environment, Nature Conservation, Nuclear Safety and Consumer Protection (BMUV)</b> (with comments of GRS) Country/Organization: <b>Germany</b>					Page 1 of 1 Date: 17-04-2023			
Relevance	Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
3	1	6. Place in the overall structure second bullet point		There is an updated Glossary from 2022, please take this into account.	Accepted			
3	2	7. Overview section 3	3. Analysis of Effectiveness of and Regulatory Experience	Is something missing or too much in the headline? Please check.	Accepted			
1	3	8. Production Schedule		Please reconsider the schedule. First, it seems to be outdated (we are now (Q2/2023) in Step 3) and second, it seems very ambitious to draft a new guide within a quarter year.	Accepted Modified			

Relevance: 1 – Essentials 2 – Clarification 3 – Wording/Editorial

**DS 547: Development and Implementation of an Effective and Efficient Regulatory Experience Feedback Program for Regulatory Bodies for Safety**

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: TRANSSC Member/Experts (Naveed, A. Qavi, M, Amir)		Page 01 of 02					
Country/Organization: Pakistan/PNRA		Date:12-05-2023					
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1.	Section- 2 Para02/ Line-16/ Page-2 (add text)	While IAEA safety standards assist countries in developing programmes and processes within their regulatory frameworks <b>for harmonization</b>	By sharing experiences and lessons learned with regulatory counterparts from other countries can align their approaches, exchange best practices, and promote regulatory coherence. This harmonization reduces barriers to enhance regulatory effectiveness, and supports international cooperation on regulatory matters.			Rejected	The purpose is not harmonization here in this paragraph but it explains the context
2.	Section- 3 Para-2 Page-3 (Add in Justification)	It is a suggestion <b>to make a scale of reporting</b> (like INES) for regulatory OEF which may include violations of international practices, regulatory guides, regulations, ordinance etc. so that member states can share only those events which are credible and need attention. This will help to identify reportable events at the international level.				Rejected	The purpose of this standard is not to develop any scale but to take benefit from the existing systems to the extent practicable
3.	Section- 4 Para-1 Bullet-4 Page-4 (Add text)	Establishing processes for screening, and analyzing the information collected or Received <b>for early detection of risk.</b>				“and evaluating the effectiveness of corresponding activities” is added at the end of bullet	

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: TRANSSC Member/Experts (Naveed, A. Qavi, M, Amir)		Page 02 of 02					
Country/Organization: Pakistan/PNRA		Date:08-05-2023					
4.	Section 6 <b>PLACE IN THE OVERALL STRUCTURE....</b>	The IAEA Safety Glossary (2018) may be replaced with 2022 Edition	Latest edition of IAEA Safety Glossary 2022 is available. Please take this into consideration	Accepted			
5.	Section 7, <b>OUT LINE OF DPP</b>	Please modify the heading no. 3 "Analysis of Effectiveness of and Regulatory Experience..."	Heading is not clear	Accepted Deleted "and"			
6.	Section 8, <b>PRODUCTION SCHEDULE</b>	Reconsider the schedule, please,	At present we are at 2nd quarter of 2023.	Accepted			

**TITLE**  
**DPP DS547 Development and Implementation of an Effective and Efficient Regulatory Experience Feedback Program  
for Regulatory Bodies for Safety**

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: WASSC member Page 1 of 1 Country/Organization: Republic of Korea/Korea Institute of Nuclear Safety Date: May 12, 2023							
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1	p.1 / 36	o The following is suggested.  - of operating experience (IRS, FINAS, IRSRR... Similar mechanisms to ~~~  - of operating experience (e.g. IRS, FINAS, IRSRR, etc.). Similar mechanisms to ~~~	o I think that it is a typo.	Accepted			
2	p. 3 / 6	o The following is suggested.  - During 66 <sup>th</sup> General Conference, he Nuclear and Radiation Safety Resolution, - During 66 <sup>th</sup> General Conference, <del>he</del> Nuclear and Radiation Safety Resolution,	o I think that it is a typo.	Accepted 'the'			
3	p. 3 / last	o The following is suggested.  - for receiving information from other regulatory bodies and ~~~ - for receiving information from regulatory bodies of other Member States and ~~~	o Based on the IAEA GSR Part (Rev.1) para 3.4, it is clear than before.	Accepted			

4	p. 4 / 1	<p>o The following is suggested.</p> <ul style="list-style-type: none"> <li>- Establishing processes for screening, and analyzing the information ~~</li> <li>- Establishing processes for screening, analyzing <b>and implementing</b> the information ~~~</li> </ul>	<p>o Based on the proposed title, it is desirable to add it.</p>		<p>“and evaluating the effectiveness of corresponding activities” is added</p>		
5	p. 5 / 1	<p>o The following references would be added.</p> <ul style="list-style-type: none"> <li>- Disposal of Radioactive Waste, SSR-5 (2011)</li> <li>- Predisposal Management of Radioactive Waste, GSR-5 (2009)</li> <li>- Predisposal Management of Radioactive Waste from the Use of Radioactive Material in Medicine, Industry, Agriculture, Research and Education, SSG-45 (2019)</li> <li>- Regulations for the Safe Transport of Radioactive Material, SSR-6(Rev.1) (2018)</li> <li>- Radiation Protection and Safety in Medical Uses of Ionizing Radiation, SSG-46 (2018)</li> <li>- Decommissioning of Nuclear Power Plants, Research Reactors and other Nuclear Fuel Cycle Facilities, SSG-47 (2018)</li> <li>- Radiation Safety of X-ray generator and other Radiation Sources used for Inspection Purposes and for Non-medical Human Imaging, SSG-55 (2020)</li> <li>- Radiation Safety of Accelerator Based Radioisotope Production Facilities, SSG-59 (2020)</li> <li>- Establishing the infrastructure for Radiation Safety, SSG-44 (2018)</li> </ul>	<p>o The proposed Safety Guide will cover management of regulatory experience for all facilities and activities. Based on the IAEA Safety Glossary (2018 edition), the facilities and activities include the use of radiation sources, the transport of radioactive material, the decommissioning of facilities and facilities for radioactive waste management where radioactive waste is treated, conditioned, stored and disposed of. Thus, those references would be helpful to deal with those subjects.</p>	Accepted			

6	p. 6 / 7	<p>o In the provisional section 2, subsection is modified as follows;</p> <ul style="list-style-type: none"> <li>- ii. National Operating and Regulatory Experience</li> <li>- ii. National <del>Operating and</del> Regulatory Experience</li> </ul>	<p>o Based on the proposed title, the phrase of operating and is deleted. SSG-50 related to the operating experience has been published in 2018.</p>			Rejected	SSG-50 is in the reference documents. Useful ideas under the topic related to regulatory aspects will be included in the draft document under consideration
7	p. 6 / 8	<p>o In the provisional section 2, subsection is modified as follows;</p> <ul style="list-style-type: none"> <li>- iii. International Operating and Regulatory Experience</li> <li>- iii. International <del>Operating and</del> <b>Cooperation and Networks for</b> Regulatory Experience</li> </ul>	<p>o Based on the proposed title and the IAEA GSR Part (Rev.1) requirement 14 and 15, the phrase of operating and is deleted. And in order to clarify, the phrase of international cooperation and networks for is suggested.</p>		<p>“Cooperation and Networks for” already covered under ‘International’.</p> <p>Will be further addressed during drafting</p>		

**DS 547 – Development and Implementation of an Effective and Efficient Regulatory Experience Feedback Program for Regulatory Bodies for Safety**

**DPP – Step 3**

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: Bel V Country/Organization: Belgium Date:			Page.... of....				
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
	§ 7. Overview	For the title of Section 3, we propose “Analysis of Effectiveness of <del>and</del> Regulatory Experience”	It seems there is a typing error (word too much or missing word(s)?) in this title for Section 3.	Accepted			
	§ 7. Overview	We propose to add a Section “Integration of the Regulatory Experience Feedback Program in the Management System of the Regulatory Organization”	For IAEA SGs that are mainly addressed to Licensees, there is often a specific chapter on integration of the practices in the Licensee’s Management Program. Therefore, for this SG mainly addressed towards Safety Authorities and TSOs, it would also be logic to have a chapter on the integration of the regulatory experience feedback process in the Management System of the regulatory organisation. It is indeed important to integrate and articulate the REGEX-program with the already existing arrangements implemented in the framework of IMS and/or ISO-certification.	Accepted			

			All of this in view of fostering a continuous improvement approach/process.				
	§ 7. Overview	We propose to rearrange the § 5 which was on diffusion of LL on a communication § with broader scope.	<p>As indicated in § 3 on the justification of need for publication, it's highlighted that there is a need for a regulatory experience programme that is directed towards improving regulations as well as regulatory systems and processes. It's indicated as well in § 2, concerning existing diffusion tools "Also, the IAEA, in cooperation with other international organizations, has established mechanisms to foster the analysis and sharing of operating experience (IRS, FINAS, IRSRR... Similar mechanisms to facilitate the analysis and sharing of regulatory experience at regional or global level do not exist."</p> <p>Thus, it's expected for the guide to be focused on RB internal processing of OEF. Yet in § 7, with the structure proposed in 5. Dissemination of the Lessons Learned, it is not that clear. This one proposes the following:</p>		Will be considered during drafting of safety standard		

- i. Equipment
- ii. Human Performance
- iii. Management System
- iv. Changes to Regulatory Requirements

For equipment and human performance items, it is not clear if it is directed towards lessons learned from OEF or lessons learned from the RB process (use of tools and HP of the RB ?).

Maybe this § could be reworded as “communication” which could include then diffusions of lessons learned, good practices of communication from the RB on OEF (internally to the RB, to the operators, to the public...) and the evolution of regulation.

It could be the opportunity for the § to refer as well to existing and adequate communication channels (IRS, FINAS...).

In this context and referring to Annex II on experience feedback from IRRS missions, it is advisable to include in the Guide the arrangements and mechanism for collecting and sharing lessons learned

			from IRRS missions (including good practices) as it already exist for the OSART missions (OSMIR database).				
	§ 4 Objective	Clarification demand.	<p>In § 4, for the first bullet point:</p> <ul style="list-style-type: none"> <li>- Identifying internal and external sources on regulatory experience; → what is intended by internal source on regulatory experience, does it refers to the internal RB process?</li> </ul> <p>In our understanding, this bullet covers the “loopback” process implemented in the IMS/ISO practices. To be clarified/confirmed?</p>		Will be considered during drafting of safety standard		
	§ 1 Identification	<p>Proposed Title:</p> <p>Development and Implementation of an Effective and Efficient Regulatory Experience Feedback Program for Regulatory Bodies</p>	<p><i>“Proposed Title: Development and Implementation of an Effective and Efficient Regulatory Experience Feedback Program for Regulatory Bodies for Safety”</i></p> <p>Maybe <i>for safety</i> could be removed, it’s understandable that an effective and efficient feedback program could enhance the safety of</p>		Will be considered during drafting of safety standard		

			installation <i>in fine</i> , I'm not sure it's needed in the title.				
	§ 7. Overview		It could be interesting to add in the guide, a § on the definition of codes for OEF follow up at the RB level (dedicated to inspection or RB process).		Will be considered during drafting of safety standard		
	§ 7. Overview		In the § 6 on Application of a Graded Approach, it could be interesting to have a graded approach on the use of quantitative vs qualitative RB analysis for trends and follow-up.		Will be considered during drafting of safety standard		
	§ 7. Overview		We would add a § dedicated to inspection program (good practice for RB) and/or audit for EF (assessment). Maybe to be developed in § 3 <i>Analysis of Effectiveness of Regulatory Experience</i> .		Will be considered during drafting of safety standard		

**DS547 - Development and Implementation of an Effective and Efficient Regulatory Experience Feedback Program for Regulatory Bodies for Safety – Step 3 – NUSSC Comments**

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: Country/Organization:		UK/NUSSC		Page.1. of 1 Date: May 2023			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
UK1	Page 3, Objectives bullet points	Suggest adding a new bullet point stating: <ul style="list-style-type: none"> <li>Maximizing opportunities to learn from existing programs (such as IRS) to improve regulatory efficiency.</li> </ul>	To maximize efficiency by avoiding duplication of work of where current programs may hold relevant information.			Rejected	This aspect is covered under bullet#3 “international organizations” because IRS is not the only source
UK2	Page 3/4, Objectives 4 <sup>th</sup> bullet point	Please add: <ul style="list-style-type: none"> <li>Establishing processes for screening, and analyzing the information collected or received, <b>and evaluating the effectiveness of these activities.</b></li> </ul>	To provide a measure of feedback, to demonstrate its value and to promote continuous improvement of the process.		“and evaluating the effectiveness of <del>these</del> corresponding activities”.		
UK3	Section 5, Scope, last sentence	Please modify the last sentence as follows: ‘It might also be useful for operators <b>and particularly their internal regulator/audit functions,</b> vendors, design and supply chain organizations’.	To provide focus, by targeting the guidance at those areas of operator organizations that are most likely to benefit from it.	Accepted			

**DS547 - Development and Implementation of an Effective and Efficient Regulatory Experience Feedback Program for Regulatory Bodies for Safety**

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: Johan Enkvist, Aino Obenius Mowitz Page.... of.... Country/Organization: Sweden, Swedish Radiation Safety Authority (SSM) Date: 23 may 2023							
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1	1/4	“a <u>strong</u> safety culture”	Safety culture in itself needs a goal/value, by itself this is not clear.			Rejected	It says "promotion of safety culture" which will ultimately become strong
2	General 4 and 5: objective and scope	Suggestion/question: The interface to security (and safeguards) is not mentioned or clear within the DPP, suggest to integrate/clarify.	Since the plan is to establish such a high level Safety Guide, the opportunity to integrate security would be most valuable, but second at least to discuss or assess the interface to nuclear security. Even though security related information and experience sharing has other implication, e.g. the recently published AdSec/INSAG report No. 1 sets interfaces and interactions that should be recognized within a SG on Experience Feedback Program, e.g. as described on the		In section 6, nuclear security series documents are mentioned in order to include safety security interface		

			concept of <i>institutional strength in depth</i> (sec. 7.2 in report No. 1). Also, within NSS-7 (e.g. sec. 3.2.5) and probably other parts of security guidance would give support for the need to establish such a system for regulatory experience also within security, and they need to co-exist and be related to each other in order to reach the common goal.				
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**DPP DS547 Development and Implementation of an Effective and Efficient Regulatory Experience Feedback Program for Regulatory Bodies for Safety  
STEP 3**

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: M-L Järvinen, K. Hämäläinen.....Page.... of.... Country/Organization:STUK/Finland Date:11 <sup>th</sup> May 2023							
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1.	General	Please consider using term regulatory experience feedback management (or other terms used in TECDOC 1899) instead of the regulatory experience feedback program	Please consider the idea in TECDOC 1899 Objective second paragraph.  It is not the objective of this publication to encourage the regulatory bodies to create dedicated programmes or processes to manage regulatory experience. It is up to the regulatory bodies to use the information in this publication to assess their present arrangements and decide whether appropriate mechanisms are already in place or not to effectively identify lessons to be learned from regulatory experience and for sharing and disseminating the lessons learned.			Rejected	Since this is a safety standard, Objective is as outlined under Section 2 not exactly that of TECDOC 1989
2.	Objective	It is not the objective of this publication to encourage the regulatory bodies to create dedicated programmes or processes to manage regulatory experience. It is up to the	Please add from the TECDOC 1899 from the objective the paragraph.			Rejected	IAEA safety standards are not binding on the Member States rather set

		regulatory bodies to use the information in this publication to assess their present arrangements and decide whether appropriate mechanisms are already in place or not to effectively identify lessons to be learned from regulatory experience and for sharing and disseminating the lessons learned.					requirements and guidance on different subjects and encourage the member states to make use of them
3.	General	Observation!	Please, consider that this proposed safety guide will have effect on management system standards (GSG 12 and GSG 13 and GSR Part 2) and should be taken into account in those and they need to be consistent and coherent.		Accepted, please see all the references are in the DPP and will further be taken care during drafting		
4.	Objective	Suggestion as a new bullet: <ul style="list-style-type: none"> <li>Evaluating the efficiency of the Regulatory Experience Feedback Program;</li> </ul>	Because it is important to ensure that the procedures applied in regulatory experience feedback yield results and help all relevant parties to learn from such experience.		Bullet#3 is modified as “Establishing processes for screening, and analysing the information collected or received and evaluating the effectiveness of corresponding activities” ;		
5.	General	Suggestion!	Please, consider separating background		Will be separated in different		

			texts concerning OPEX and regulatory experience feedback into own chapters after introduction.		paragraphs during drafting of document		
6.	Page 6. Outline	Suggestion!	Please, consider using the same outline as in SSG 50 for Chapter 2.		SSG-50 was consulted during identification of contents and will further be elaborated during drafting of document		
7.	References	Please check the reference list.	for example INTERNATIONAL ATOMIC ENERGY AGENCY, Joint IAEA/NEA International Reporting System for Operating Experience Services Series 19 (March 2010). has been updated in 2022.	Accepted	Checked and updated		

**DS547, Development and Implementation of an Effective and Efficient Regulatory Experience Feedback Program for Regulatory Bodies for Safety  
(New publication) (Step 3)**

Reviewer: Republic of Korea Page.... of Country/Organization: Republic of Korea / Korea Institute of Nuclear Safety (KINS) Date: May 10, 2023				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1	General Comment		Support on the necessity of developing new safety guideline covers the OEF of the regulatory body. As there has been long discussion on this issue and TECDOC, which can be used as technical background, has been completed, it can be determined to proceed to further step for its development.				
2	(Page 6) 7. OVERVIEW  #2. Process for Development and Implementation of Regulatory Experience ~~ ii. National Operating and Regulatory Experience	7. OVERVIEW  #2. Process for Development and Implementation of Regulatory Experience ~~ ii. National Operating and Regulatory Experience <b>Nuclear Power Plants</b> <b>Other Radiation</b>	According to the ‘5. Scope’ in the document, all facilities and activities that give rise to radiation risks are covered. However, the classification of facilities is insufficient in the overview. For example, it will be better if the regulatory experiences of nuclear power plants and the other radiation facilities are stated separately. Therefore, it is judged that it will be		Accepted and will further be elaborated during drafting of document		

	iii. International Operating and Regulatory Experience ~~	<b>Facilities</b> iii. International Operating and Regulatory Experience <b>Nuclear Power Plants</b> <b>Other Radiation Facilities</b> ~~	better if the facility classification in the overview is more detailed.				
3	(Page 6) 7.OVERVIEW  <b>#5. Dissemination of the Lessons Learned</b>	7.OVERVIEW  <b>#5. Application of the Lessons Learned on Regulatory Aspects</b>	According to the proposal, four sections are indicated for dissemination of the lessons learned. It can be recognized as the items which should be driven or applied the operating experiences. And the dissemination process is already included in same paragraph, at 'Process for Development.....Experience , item viii'. Therefore, it may need different contents or title in #5. In that aspect, the suggestion which changes the title can be made if this paragraph aims to apply the OE to regulation fields or processes.  If the purpose of this paragraph is to exchange information with regulatory agencies or international			Rejected	Subsection 5 is modified as: i. Changes to Regulatory Requirements ii. Regulatory processes iii. Management System vi. Human performance V. Equipment

			organizations of other countries (which referred in SSG-50 3.28), it is necessary to reconsider and change the sections which describe the subject and method of information delivery according to the target organization.				
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