

## DS547 Regulatory Experience Feedback Management

COMMENTS BY REVIEWER					RESOLUTION			
Review Committee: NUSSC								
Comment No.	Comment ID.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1.	BR/1	3.2/1	Where regulatory body should assess its existing <b>integrated</b> management system to decide ....	The GSG Part 2 uses only the expression “management system”, instead to “integrated management system”	X			
2.	BR/2	3.22/3-4	a for example, when there are more than one authority with responsibility for safety <b>regulation and supervision</b> , when cooperation with regulatory bodies of other countries	In line with comment 7, the responsibility for safety lies with the operator of the nuclear or radioactive installation. The regulator is responsible for establishing requirements and assessing	X	.....with regulatory responsibilities for ensuring safety, when cooperation with regulatory bodies of other countries.....		
3.	BR/3	3.3/1	When the responsibility for safety <b>surveillance</b> is shared among more that one organization, the regulatory body should collaborate with these organizations while developing...	According to IAEA/SF-1, the responsibility for safety lies with the operator of the nuclear or radioactive installation. The regulator is responsible for establishing requirements and assessing safety	X	When regulatory responsibilities for ensuring safety are shared among.....		
4.	BR/4	1-4/line 6	.... on the root cause of the events. <b>In the regulatory body’s review of operational experience, it should be verified whether a regulatory process could prevent a specific event from occurring. In other words, whether the regulatory process</b>	It is necessary to verify whether an event can be avoided by some process should be created or improved to prevent or minimize the occurrence of similar events.			X	Para I-3 captures the prevention of recurrence of events and also delas with the improvement in regulatory processes and practices based on such analysis of operating experience.

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			<b>in place could find the cause before it triggers an event.</b>					
5.	BR/5	General	<p>General comment:</p> <p>This safety guide should be preceded by a guide on a regulatory effectiveness monitoring process, which would be the main source of findings for a regulatory experience feedback management program,</p>	<p>Some regulatory effectiveness verification tools are not mentioned in this guide, such as questionnaires/surveys and performance indicators and internal audits are mentioned only marginally. Additionally, the guide does not mention the use of regulator performance indicator as a source of feedback. It is suggested to read the article, published by the journal Nuclear Technology/ANS (vol. 208, 1562-1576 – October 2022), entitled “A Method for monitoring and evaluation the management of a Nuclear Regulatory Body Using a New Approach for Cross Cutting Indicators”, where performance indicators for regulatory functions are proposed. Additionally, this article addresses the impact of operation experience on regulatory effectiveness and deals with cross-cutting</p>				<p>The Agency will look into the suggested journal and explore the opportunity to develop guide/TECDOC on regulatory effectiveness monitoring process.</p>

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				areas that impact the regulator's effectiveness.				
6.	CAN/1	General	It is recommended that sections in this document reference the detailed information found in TECDOC 1899.	This will provide valuable guidance for organizations working to meet safety standard requirements.			X	As most of the recommendations are extracted from IAEA TECDOC-1899, to avoid too much of its referencing in the main part of the Safety Guide, it is referenced in the background section in para 1.5 to let Member States know about the availability of practical information on collecting and analyzing findings, implementing actions, and disseminating lessons learned in TECDOC-1899.
7.	CAN/2	General	Additional guidance should be developed or referenced for evaluating the effectiveness of actions developed in response to lessons learned.	This is different from the effectiveness of the feedback management process (Section 6 of this document).	X			Please see response to Comment No. 11
8.	CAN/3	1.6	"A proactive approach of the regulatory body to managing regulatory experience should contribute to enhancing their regulatory requirements and practices through the application of the lessons learned from their own experience and from the experience of regulatory bodies of other countries."	This text is not background and should be moved to section 2. <i>The Concept of Regulatory Experience.</i>	X			Para 2.3 will be replaced with this.

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9.	CAN/4	2.3	<del>“Regulatory bodies should make appropriate arrangements to identify lessons to be learned from regulatory experience, including regulatory experience in other States, as well as to disseminate these lessons to interested parties for their use”</del>	Paragraph 2.3 is redundant with paragraph 2.1, or at least the differences are so intricate that they are not clear to the reader. In addition, paragraph 2.3 excludes “ <i>international organizations and authorized parties</i> ”, both of which are included in paragraph 2.1. Recommend removing paragraph 2.3.	X			
10.	CAN/5	2.5, line 1	“The regulatory body should promote the concept of a learning organization <del>as a strategic objective</del> for continuously improving its performance. [...]”	This statement is too prescriptive. The concept of ‘learning organization’ should be incorporated into an organization; however, there are many ways to do this. It does not have to be a strategic objective; it could be in a vision statement or part of a quality assurance program. From an audit perspective, less prescriptive is better. Organizations are not required to create a ‘strategic objective’ to meet requirements.	X			
11.	CAN/6	2.7	<del>“Requirement 24 of IAEA Safety Standards Series No. SSR-2/2 (Rev. 1), Safety of Nuclear Power Plants: Commissioning and Operation [8] states that “The operating organization shall</del>	Paragraph 2.7 refers to operating nuclear facilities and operating experience and doesn’t clearly articulate a requirement for regulatory bodies to	X	This paragraph is used for referencing purpose (to introduce that the OPEX is covered in SSG50). We will summarize		

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			<p><del>establish an operating experience programme to learn from events at the plant.” Paragraph 5.27 of SSR 2/2 (Rev. 1) [8] states that “[the operating organization] shall obtain and evaluate available information on relevant operating experience at other nuclear installations to draw and incorporate lessons for its own operations, including its emergency 4 arrangements”. SSG-50 [3] provides recommendations for establishing, implementing, assessing and continuously improving an operating experience programme for nuclear installations.”</del></p>	<p>incorporate operating experience. Paragraph 2.8 is adequate to show the link between OpEx and RegEx. Also, is it possible to produce Figure 1.1 in Annex I in colour?</p>		<p>and move this as footnote.</p>		
12.	CAN/7	3.3, line 4	<p>“[...] This collaboration should <del>aim at ensuring that promote harmonization of</del> regulatory processes <del>are harmonized</del> across different organizations. [...]”</p>	<p>This document should not ‘ensure’ or require harmonization. We can promote and suggest harmonization, but different organizations may choose to do things different ways.</p>	X	<p>This collaboration <del>should</del> aims at promoting harmonization across different organizations.</p>		
13.	CAN/8	3.4	<p>Effectiveness review should be identified as a specific step in paragraph 3.4.</p>	<p>Based on experience, follow-up to ensure effectiveness is an area of weakness in many organizations.</p>			X	<p>The recommendations/guidance on effectiveness review of whole of the Regulatory experience feedback management process is covered in section 6. It is kept separate as it might be performed as per</p>

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14.	CAN/9	3.5	<del>“The process for managing regulatory experience feedback for safety should emphasize the importance of collecting and analysing findings and implementing improvement actions to enhance regulatory framework, functions and processes.”</del>	Paragraph 3.5 is redundant considering paragraph 3.4. Recommend including any subtle differences between the two paragraphs into paragraph 3.4.	X				Management system requirements.
15.	CAN/10	3.11	“In case a new safety significant issue is identified from the process for identifying regulatory findings, <u>immediate action should be taken to restore safe condition as soon as possible and report to management</u> , appropriate actions should be taken for further investigation, and this should be considered as a potential topic for further regulatory research and development.”	Safety significant findings should be acted upon immediately.	X				
16.	CAN/11	3.22 (c)	“Evaluating the impact of actions on the regulatory functions and processes, assessing their effectiveness and providing updates to senior management.”	Item (c) is the primary item for conducting an effectiveness review of actions implemented in response to lessons learned. There should be additional guidance in this area.	X	To review the effectiveness of actions implemented, the regulatory bodies should assess how well the actions have addressed the identified issues. This can be achieved by analyzing performance metrics, gathering feedback			

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						from the interested parties, and comparing results to baseline data.			
17.	CAN/12	3.24 and 3.26	<p>“3.24... to international knowledge and reporting networks.”</p> <p>“3.26... to other relevant organizations at the national and international level”</p>	<p>What are the “international knowledge and reporting networks” for Regulatory Experience? Does the IAEA have a plan to implement this requirement? Otherwise, how would a regulatory body develop a ‘mechanism’ to share international best practice? This should be actioned by the IAEA.</p>			X	<p>These are the requirements from IAEA GSR Part 1 (<a href="#">Rev. 1</a>) used here as verbatim for referencing purpose. Some of the international knowledge and reporting networks are given as examples in Table II-2. Further details could be found in the IAEA TECDOC-1899.</p>	
18.	CAN/13	5.6, line 5	<p>“[...] These criteria will determine the workload associated with further steps during the detailed assessment, <del>identification of lessons, and</del> development and implementation of the action plan <del>and the identification of lessons.</del>”</p>	Clarification of sequence.	X				
19.	FIN/1	1.6	<p>Please consider replacing the text with “This Safety Guide provides recommendations on how to meet Requirement 15 of GSR Part 1 (Rev. 1) [2] to regulatory bodies on establishing, implementing, assessing and continuously improving regulatory experience arrangements from their own experience and from the</p>	<p>Chapter 1.6. starts to talk about “regulatory experience feedback” without any previous explanation what this means. In addition, the proposed new text is in line with Chapter 1.4 (SSG-50), using the same kind of wording, which makes it</p>	X	<p>This Safety Guide provides recommendations for regulatory bodies on how to meet Requirement 15 of GSR Part 1 (Rev. 1) [2] on establishing, implementing, assessing and</p>			

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			experience of regulatory bodies of other countries.”	easier to understand. Or, use the same kind of wording as in GSR Part 1 in Chapter 1.3, or in Chapter 1.7.		continuously improving regulatory experience arrangements from their own experience and from the experience of regulatory bodies of other countries.”		
20.	FIN/2	1.8, 1.11	The scope of this Safety Guide covers regulatory experience_ <del>arrangements feedback- management</del> for all functions and processes of a regulatory body and for all types of facilities and activities that <u>may</u> give rise to radiation risks.	“Feedback management” is suggested to be replaced by “arrangements”, it is a broader term and in line with GSR Part 1 text. <b>Same comment is given through the whole document unless the meaning is only and specifically feedback (1.11., 3....).</b>			X	The purpose of this guide is to provide recommendations to manage the regulatory experience feedback. This is why this terminology is used for clear understanding. Although regulatory experience arrangements is a broader term but its use might lose the emphasis on the feedback process which is the primary objective here.
21.	FIN/3	2.4	The regulatory process reflects the knowledge and information resulting from operating and regulatory experiences for the effective management for safety, and new experiences ...	Please add knowledge and operating experience because they do have a role as well, and otherwise the sentence is a torso.	X			
22.	FIN/4	2.5	The regulatory body should promote the concept of a learning organization as a strategic objective for continuously improving its performance. These	Please add an appropriate reference to a safety standard in the first sentence.			X	The existing sentence in the draft safety guide is more comprehensive so we propose to keep it. In fact, we have received a

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			improvements can be achieved in e.g. new projects integrated management system and everyday work. <del>at various levels in the regulatory body such as:- -At the organizational level, through organizational improvement projects under the supervision of senior management;- -At the level of management system processes, under the supervision of the process owners;- -At the working level within a process, by those directly involved in daily activities.-</del>	<b>Please make the text more concise.</b>			comment to add some more guidance by adding one more level i.e. interaction of RB with external sources.
23.	FIN/5	3.1	Effective <del>management arrangements</del> of regulatory experience <del>feedback</del> involves appropriate arrangements for the collection and analysis of information and knowledge resulting from regulatory experience and for the implementation of lessons learned from that experience.	See Comment 2		X	Please see response to Comment No. 2
24.	FIN/6	3.2	The regulatory body should assess its <del>existing</del> integrated management system	Unnecessary	X		
25.	FIN/7	3.3	When the responsibility for safety is shared among more than one organization, the regulatory body should <del>collaborate with these organizations while developing</del>	Please make this more general (supports RB's independence)	X		When the responsibility for safety is shared among more than one organizations, the

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			and implementing the regulatory-experience feedback management process. This collaboration should aim at ensure that regulatory processes cover and are harmonized across different organizations.			regulatory body should establish effective cooperation to promote the harmonization of regulatory processes across those organizations.	
26.	FIN/8	3.6	Dossier or file?				Given the context of documenting here, “dossier” might be more appropriate as it conveys a sense of thoroughness and formality.
27.	FIN/9	3.7	<del>The first</del> An important element of managing regulatory experience feedback is collecting of regulatory experience findings from various sources utilizing appropriate tools and techniques for knowledge management in order to improve the regulatory process. The collection of regulatory experience findings should clarify how the relevant information is identified; collected, recorded and stored; and screened and categorized.	Collection may not necessarily be the first element; however, it is needed. The purpose of the rest of this chapter is unclear.		X	If we look at the detailed process as shown in attached figure 1 (logical framework), it includes the identification of sources for findings, after identification, the findings are collected and stored in some database or any other system at the RB, from where the designated team screen and categorize that collected finding. All this is the part of “Collecting of Findings” and if we skip some sub-steps here, it will lose its effectiveness.
28.	FIN/10	3.8	Regulatory experience findings should be identified as part of the	Unnecessary	X		

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			<del>management of regulatory-experience feedback-</del>				
29.	FIN/11	3.9	The sources that can be used for identification of findings include information from internal activities of the regulatory body, information from regulating facilities and activities, and information from external sources of regulatory experience. <u>The regulatory body should define the most relevant external sources who's lessons learnt to follow.</u> Further information on the sources of findings is provided in Annex II.	From our own experience these have been organizations who work in safety-critical and safety-relevant areas, also outside nuclear area, as in aviation industry, health care.	X		
30.	FIN/12	3.8-3.22	General comment: complete draft Guide	Please review these chapters to ensure logical approach and reduce repetition. Maybe some chapters could be combined.			X Please see attached figure, the concept of regularly experience feedback management is articulated in the same way. We hope, it is understandable. We will also include a schematic in the safety guide to make it understandable.
31.	FIN/13	3.27 & 3.29	General comment: Guide text could give more information of possible means to share the regulatory experiences with others by defining it's procedures.	The RB should consider/define what kind of lessons learnt of its regulatory experience will share with others, and how/by which means the RB does it, e.g. peer reviews, Conventions, IRRS.			X Para 3.27 provides guidance to make arrangements for dissemination of the lessons learned which provides flexibility to Member States to either develop procedure, program, plan, etc. as

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								deemed necessary by the Member State.
32.	FIN/14	3.21	<del>After approval of the actions</del> The action plan, the actions should be define the responsibilities for its implementation.	The action plan does not be approved before.			X	Para 3.18 (c) recommends assigning the responsibilities to the relevant personnel responsible for implementation. Here, we are focusing w.r.t the implementation purposes that the relevant actions should go to the relevant personnel already identified responsible to implement.
33.	FIN/15	4	Title: INTEGRATION OF THE REGULATORY EXPERIENCE FEEDBACK MANAGEMENT PROCESS INTO THE MANAGEMENT SYSTEM	Consistent terminology through the Guide	X			
34.	FIN/16	4.4	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.	Good; stresses the recognition of regulatory experience in policy level.	X			
35.	FIN/17	5.6	... a graded approach should be applied at two main phases: <u>when first the identification of regulatory experience identifying</u>	1) When an observer makes a finding, he/she should consider its safety relevancy,			X	The proposed wording alters the original intention of the text. Graded approach can be

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			<p><u>a finding and assessing it's possible consequences and the-when-screening and analysing the findings.</u></p>	<p>consequences etc and the finding should be treated with graded approach, plan and start corrective actions etc.</p> <p>2) While screening and analyzing (maybe a mass of) findings, possibly in more depth, looking for trends, and selecting actions.</p> <p>Please review graded approach Chapters 5.6-5.8 together for enhanced readability!</p>				<p>applied through the different stages of the process. However, careful application should be made upstream to ensure a balanced influx of findings for further analysis. Screening and analyzing are two separated stages that can be implemented by different staff. In any case, we take note of the comment and will make a review of this section to have a condense text and avoid repetitions as much as possible.</p>
36.	FIN/18	General Comment	<p>1. A lot of repetition, please condense the complete Guide text.</p> <p>2. Review of the text to be in logical order. Consistent terminology to be used.</p>		X			<p>Based upon the comment and feedback received from all the Review committees, the safety guide will be revised to avoid repetition and to ensure use of consistent terminologies such as 'findings', 'regulator experience feedback management' etc. The Agency has also a rigorous process in place to ensure for this purpose.</p>
37.	GER/1	2.5	<p>The regulatory body should promote the concept of a learning organization as a strategic</p>	<p>Learning potential outside organisation, both national</p>	X	<p>At the external level, by leveraging learning</p>		

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			<p>objective for continuously improving its performance. These improvements can be achieved at various levels in the regulatory body such as:</p> <ul style="list-style-type: none"> <li>– At the organizational level, through organizational improvement projects under the supervision of senior management;</li> <li>– At the level of management system processes, under the supervision of the process owners;</li> <li>– At the working level within a process, by those directly involved in daily activities.</li> </ul> <p><u>Further level could be involving in international activities, relevant workshops outside the organisation, national and international, etc.</u></p>	and international, should be mentioned here as well.		opportunities and best regulatory practices from national and international organizations and relevant activities		
38.	GER/2	2.6	<p>In order to implement Requirement 15 of GSR Part 1 (Rev. 1) [2], the regulatory body should distinguish the differences between operating experience and regulatory experience. The 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. The operating experience pertains to insights and</p>	We suggest to incorporate para. 2.8 into para. 2.6.	X			

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			<p>lessons to be learned from the operation of regulated facilities and activities, including events and other observations, such as potential problems relating to equipment and human performance, safety related concerns, situations that are likely to give rise to errors and need to be addressed to prevent undesired effects, procedural deficiencies and inconsistencies in documentation. The feedback from both the regulatory experience and operating experience contributes to enhancing the overall safety of facilities and activities. <u>The operating experience can also provide insights related to regulating the facilities and activities which may lead to improving the regulatory process. The link between regulatory experience and operating experience is explained in Annex I.</u></p>				
39.	GER/3	2.8	<p><del>The operating experience can also provide insights related to regulating the facilities and activities which may lead to improving the regulatory process. The link between regulatory experience and operating</del></p>	<p>It looks more logical and more comprehensive, if para. 2.8 is moved to the end of para. 2.6.</p>	X		

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			experience is explained in Annex I.				
40.	GER/4	3.3	When the responsibility for safety is shared among more than one organization, the regulatory body should collaborate with these organizations while developing and implementing the regulatory experience feedback management process. This collaboration should aim at ensuring that regulatory processes are harmonized across different organizations. The safety–security interface should also be addressed to ensure that regulatory requirements are applied consistently and effectively <u>and in an integrated manner so that security measures do not compromise safety and safety measures do not compromise security.</u>	Clarification; to be in line with SF-1.	X		
41.	GER/5	3.4 Second bullet	– Analysing findings and developing the action plan <u>to address the gaps and identify opportunities for improvement</u> (see paras 3.17–3.20);	Clarification	X		
42.	GER/6	3.8 Line 5	... Therefore, guidance and training should be provided to personnel on how to recognize and document potential findings, <u>internal and external</u> , that can be used to improve the regulatory functions and processes, and to ensure that relevant regulatory	Clarification	X		

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			experience is captured in a timely manner and can be used for improving regulatory effectiveness.					
43.	GER/7	Footnote 2	Regulatory experience findings, referred to as ‘findings’ throughout this publication, include information relating to issues, difficulties, inefficiencies, as well as good practices of the regulatory process <u>at the national and international level.</u>	Clarification	X			
44.	GER/8	3.16	In order to ensure effective screening and categorization of the findings, the regulatory body: Should <u>identify</u> <u>install mechanism of identifying</u> findings which involve more detailed analysis by defining and utilizing clear criteria to ensure verifiable and consistent implementation of the process for effectively managing the regulatory experience feedback.	Should identify findings, or should install mechanism of identifying such findings? Please clarify.			X	Identify here means to recognize and pinpoint specific finding for detailed analysis involves define and utilizing criteria/guidelines to determine which findings need further analysis.
45.	GER/9	3.18 Line 3	... (a) Involvement of suitably qualified personnel for conducting a multifaceted analysis. This analysis should comprise a comprehensive and thorough examination of the <u>national and international</u> findings from multiple perspectives such as technical, operational and organizational, should involve	Clarification			X	This is related to the detailed analysis of the screened-in findings. And the findings are screened-in based on their collection both from national and international level which is already made part of the earlier process as per comment 6 and 7.

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			experts from various disciplines and should take into consideration the impact of regulatory experience findings on regulatory functions and processes.				
46.	GER/10	Title for 4.1	INTEGRATION OF THE REGULATORY <u>Experience</u> FEEDBACK MANAGEMENT PROCESS INTO THE MANAGEMENT SYSTEM	Editorial	X		
47.	GER/11	4.2	Paragraph 1.5(b) of GSR Part 2 [10] states that “The management system also has to ensure the fostering of a strong safety culture, the regular assessment of safety performance and the application of lessons from experience”. Moreover, para. 4.9 of GSR Part 2 [10] states that: “The management system shall be applied to achieve goals safely, to enhance safety and to foster a strong safety culture by: (a) Bringing together in a coherent manner all the necessary elements for safely managing the organization and its activities;” <u>Further recommendations are available in DS513 “ Leadership, Management and Culture for Safety”.</u>	Reference to DS513 might be useful		X	It could be a good addition for referencing purpose but right now, it is still in draft and may get published with a different number.
48.	GER/12	5.3	<del>Furthermore, para. 4.39A of GSR Part 1 (Rev. 1) [2] states that “The regulatory body shall ensure, adopting a graded approach, that</del>	This quotation is related to operating experience and is misleading here. We suggest to delete.	X		

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			<del>authorized parties routinely evaluate operating experience and periodically perform comprehensive safety reviews of facilities.”</del>				
49.	GER/13	6.5	An appropriate governance should be established within the management system of the organization to monitor performance and effectiveness of the regulatory <u>experience</u> feedback management process and to embrace a culture of continuous improvement.	Editorial	X		
50.	GER/14	7.1	For effective management of regulatory experience feedback, the regulatory body should develop and implement appropriate training for the relevant personnel. <del>This training should be tailored to the organization’s specific characteristics and management system.</del> Recommendations on developing and maintaining adequate competences for the staff of the regulatory body are provided in GSG-12 [6].	Suggestion to delete, as redundant	X		
51.	GER/15	7.2	The regulatory body should train the personnel so that they can develop knowledge, skills and attitude to identify, analyse and use regulatory experience feedback. Necessary tools such as non-conformance reporting	We would like to suggest to move statements about training - A10, A11 and TABLE 2 - from Appendix into the main text, we think they are more suitable here.		X	Appendix is also considered the main part of the guide but with more details followed by the clear recommendations on training.

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			mechanisms, sharing of good practices and opportunities to raise concerns, empower employees to contribute towards the continuous improvement of the process. <del>The Appendix provides guidance on essential topics to be covered for training on regulatory experience.</del>				
52.	GER/16	7.2 A	<u>A.10. Suitable educational resources and training should be made available to familiarize the personnel of the regulatory body with the concept of regulatory experience management and to guide them in utilizing available tools, ensuring the effective management of regulatory experience.</u>	Please move from Appendix into the main text, as more suitable and reader-friendly here.			Please see response to Comment No. 15
53.	GER/17	7.2 B	<u>A.11. The education and training of the personnel of the regulatory body on regulatory experience should be tailored to fit the regulatory experience management process. The content of an education and training programme aimed at the effective management of regulatory experience should cover the eight topics presented in Table I 2. Regulatory bodies can use the guidance provided under these eight topics to develop their specific training programme as</u>	Please move from Appendix into the main text, as more suitable and reader-friendly here.			Please see response to Comment No. 15

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			<u>appropriate while meeting the purpose of each topic.</u>				
54.	GER/18	Table I.	<del>TABLE 2.</del> <u>TOPICS TO BE COVERED FOR TRAINING ON REGULATORY EXPERIENCE</u>	Please move from Appendix into the main text, as more suitable here.  Eight topics, presented in the Table, are very informative and gut structured, please consider the possibility to reformulate them into plain text as paras.			Please see response to Comment No. 15
55.	GER/19	A.7	Table 1 shows a checklist that <del>should</del> <u>could</u> be used for building tools to support personnel in deciding whether there are lessons to be learned to improve the regulatory process, including the identification of good practices.	Is "should" statement appropriate here? Please verify.	X		
56.	GER/20	A10 A11 TABLE 2.	<i>We would like to suggest to integrate paras A10, A11 as well as Table 2 into the main text of this Safety Guide (see our comments above)</i>				Please see response to Comment No. 15
57.	GER/21	I-2	Figure I-1 illustrates the linkage between regulatory experience and operating experience. As shown in the right-hand side of Fig. I-1, once an event has been identified, the operating organization <u>informs the regulatory body accordingly</u> and initiates action in a timely manner	Clarification. Regulatory body must be informed correspondingly during this process	X	.....once an event has been identified, the operating organization <u>informs the regulatory body as per national regulatory requirements</u> and initiates action.....	

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			for its screening and further analysis on the basis of the actual or potential consequences of the event for safety.				
58.	GER/22	I-5	The relevant lessons learned both from regulatory experience and from operating experience are shared and disseminated to national and international organizations and on a <i>need to know basis</i> .	How to understand “know basis” here? Can you please clarify?	X	The relevant lessons learned both from regulatory experience and from operating experience are shared and disseminated to national and international organizations considering general and targeted mechanisms and approaches to ensure effective dissemination of lessons learned.	The wording will be corrected and improved to avoid possible misinterpretation. The intention was to emphasize that the dissemination plan is target oriented to make it effective. As indicated regarding dissemination, the goal is not to conceal or limit dissemination. As an example, if a finding is applicable to the medical practice, the RB may still disseminate lessons learned worldwide through standard procedures, but in addition, it may decide to send an information notice specifically addressing this particular sector.
59.	GER/23	<del>ANNEX II</del> <u>Appendix II</u>	SOURCES OF REGULATORY FINDINGS	We find this information very valuable and useful. We would like to suggest to change this Annex to an Appendix and by that include it into the official part of this Safety Guide.	X		

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60.	GER/24	TABLE II-3	<del>NON-NUCLEAR</del> <u>FURTHER SOURCES OF REGULATORY EXPERIENCE</u>	Are “related to nuclear” meant here? What exactly international convention, treaties and agreements are referred to? Additional explanation will be helpful.	X	This table discusses sources from non-nuclear domain. The second row describing international conventions and treaties will be moved upward in Table II-2 (international sources of regulatory experience).		
61.	JPN/1	2.3.	Regulatory bodies should make appropriate arrangements to identify lessons <del>to be learned</del> <u>learned</u> from regulatory experience, including regulatory experience in other States, as well as to disseminate these lessons to interested parties for their use.	Appropriate wording. The same comments on para. 1.6. 3.2. and so on.			X	It will change the intended meanings. Lessons learned means we are ready to implement and disseminate the lessons. However, ‘to be learned’ means that the lessons are to be analysed and evaluated to extract the lessons to implement and disseminate.
62.	JPN/2	2.6.	In order to implement Requirement 15 of GSR Part 1 (Rev. 1) [2], the regulatory body should distinguish the differences between <u>regulatory experience</u> <del>operating experience</del> and <u>regulatory operating</u> experience.	To keep the same order used in the draft.	X			
63.	JPN/3	3.8.	The management of the regulatory body should promote positive <u>attitudes</u> <del>traits</del> in the personnel of	As with SSR-2/2 (Rev.1), it seems better to promote	X			

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			the regulatory body through training activities, coaching and mentoring, and providing appropriate tools for documenting and communicating potential findings.	"attitudes" rather than "traits".			
64.	JPN/4	3.12.	<b>Collecting, <del>recording</del> and storing information relating to findings</b>	If there are no difference between 'recording' and 'storing', 'recording' should be deleted.			X Each term “collecting (Gathering information), recording (Documenting information), and storing (Keeping information in a secure and accessible manner)” represents a distinct step in information management process.  Removing “recording” could imply that documentation step is unnecessary, which might lead to gaps in information management process. Therefore, it’s important to keep recording” to ensure that all findings are properly documented.
65.	JPN/5	3.18. (d)	The regulatory body should include the following arrangements for the analyses of findings and for developing the associated action plan:	Clarify how to evaluate “cost-benefit analysis”.			‘Cost-benefit analysis’ involves evaluating the value the identified action can add to the regulatory functions and processes enhancing the safety over

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			<p>.....</p> <p>(d) Review and approval of the action plan by the senior management of the regulatory body taking into account factors such as the safety implications of the identified actions; the outcomes of consultations; <u>a cost-benefit analysis</u>; <u>the impact on interested parties</u>; and follow-up actions.</p>	Clarify how to evaluate ‘the impact on interested parties’.			<p>the cost due to the consumption of time and resources (financial and technical) for the regulatory body.</p> <p>‘the impact on interested parties’ means to evaluate the potential interested parties (as defined in the 2022 IAEA Glossary) which will be affected and how the implementation of the actions will affect them in terms of regulatory burden.</p>
66.	JPN/6	5.7.	The regulatory body should apply a graded approach in assessing the regulatory experience findings, defining actions and the implementation of the actions taking into account factors such as safety implications, external consultations, <u>cost-benefit analysis</u> , impact on stakeholders, as well as when and how to do it.	Clarify how to evaluate ‘cost-benefit analysis’ in accordance with a graded approach.			As above
67.	JPN/7	6.6.	The regulatory body should periodically evaluate the degree of utilization and proper functioning of the arrangements to manage the regulatory experience feedback to explore possible improvements. Tools such as management reviews, self-reflections, self-assessments or independent	Independent ‘external’ review should be considered to effectively improve the feedback process.	X	....Tools such as management reviews, self-reflections, self-assessments or external assessments, including peer reviews and advisory missions, can be used	It does not harm, but pinpointing IRRS may not be of the likes of all (there are other peer review and advisory missions involving the regulators...)

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			assessments <u>including external review such as IRRS (Integrated Regulatory Review Service)</u> can be used to carry out these evaluations.	It seems better to add an example of external review such as IRRS.		to carry out these evaluations.	
68.	JPN/8	6.7. (d)	<p>The regulatory body should address the following elements that might impact the effectiveness of regulatory experience feedback management:</p> <p>.....</p> <p>(d) Fear of personal consequences: The regulatory body should foster a ‘no-blame’ 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.</p> <p><u>* 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.</u></p>	<p>The explanation of ‘no-blame’ is not clear.</p> <p>It seems better to add footnote for the ‘no-blame’ working environment.</p> <p>Proposed footnote was created with reference to the following TECDOC-1899 text.</p> <p>3.2.5. 3<sup>rd</sup> sentence: “If generating feedback from the use of regulatory processes is not encouraged throughout all levels of management through an open and <u>no-blame reporting environment</u>, then little will be gained as <u>staff will feel unable to speak up when they identify shortfalls and opportunities to improve the regulatory process.</u>”</p>	X		

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69.	JPN/9	(f)	<p>The regulatory body should address the following elements that might impact the effectiveness of regulatory experience feedback management:</p> <p>.....</p> <p>(f) Overly bureaucratic or unsuitable design: The regulatory body should design the management of regulatory experience feedback in such a way as to ensure that the workload associated with processing the findings is the minimum necessary to ensure transparency and traceability, while maintaining a reasonable <u>balance between cost and benefit in accordance with a graded approach.</u></p>	To keep a consistency with GSR Part 1 (Rev. 1) para. 4.3 for ‘balance between cost and benefit’ as ‘with the radiation risks associated with facilities and activities, in accordance with a graded approach’.	X	<p>The text will be modified as:</p> <p>.... to ensure transparency and traceability, commensurate with the radiation risks associated with facilities and activities, in accordance with a graded approach”.</p>			
70.	JPN/10	Appendix A.7.	Table 1 shows a checklist that should be used for building tools to support personnel in deciding whether there are lessons to be learned to improve the regulatory process, including the identification of good practices.	<p>Unclear how to use of the table 1.</p> <p>It shows only list to be checked but no description of the relationship among them. So it should be stated in Annex as examples.</p>	X				
71.	JPN/11	Appendix A.2	Managers at all levels of the regulatory body should instill positive <del>traits</del> <u>attitudes</u> in personnel through training and coaching, and by providing personnel with the appropriate	It seems better to replace “traits” with “attitudes”. (See comment to 3.8)	X				

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			guidance and tools to identify, document and submit potential findings.				
72.	JPN/12	ANNEX I I-1. & FIG. 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 <u>basically</u> different and this annex <u>mainly</u> describes the connections 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 <sup>5</sup> , while the 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>But note that there is a close relationship between operating experience feedback and regulatory experience feedback as shown in FIG. I-1.</u>	Clarify the relationship between operating experience feedback and regulatory experience feedback.  An operating organization's performance should be affected by the regulatory process, and the results of the analysis of operational experience resulting from performance degradation will provide input to the analysis of the existing regulatory process, and it is important to consider what to do based on the results. This might be regulatory experience feedback itself.  Para. I-1. seems to be showing a difference between them, but FIG. I-1 clearly says their relationship in the box 'Enhance regulatory process'.  Therefore, the close relationship between regulatory experience	X	The two concepts are different <b>but correlated</b> . This annex describes the connections and differences between them.	

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				feedback and operating experience feedback should be clearly stated in ANNEX I I-1 in accordance with FIG. I-1.			
73.	PK/1	3.1	See diagram at Annex-III Add the statement at the end of para 3.1	Refer to Section 3, the process for regulatory experience feedback management system is described in text. It is suggested to add <b>flow chart diagram</b> for better understanding of the overall process. Accordingly, Fig-4 of TECDOC-1899 may be utilized after modification.	X		The flowchart will be added in section 3 showing the process for managing the regulatory experience feedback.
74.	ROK/1	1.5/1	<del>Reference [4]</del> <a href="#">IAEA TECDOC Series No. IAEA-TECDOC-1899, Effective Management of Regulatory Experience for Safety [4]</a> provides practical guidance to regulatory bodies ...	Suggestion to ensure consistency in the citation style with other IAEA references, improving clarity and uniformity		X	This is as per format of Agency publications. There is different way of referencing the IAEA safety standards (SF, GSRs, SSRs, GSGs and SSGs) and IAEA informational publications (TECDOCs, Safety report series etc.)
75.	ROK/2	Paras 1.11, 3.4, 3.5, 3.7, 3.17, and 6.7 ...	<a href="#">the findings from regulatory experience</a>	Suggestoin to improve consistency by using uniform terms (e.g., "findings from regulatory experience") instead of using various terms (e.g., regulatory experience	X		Will be harmonized throughout the text

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				findings, regulatory findings, regulatory experience feedback findings, etc.).			
76.	ROK/3	Paras 3.4 and 3.5	<Insert> a schematic diagram of the process of regulatory experience feedback following the paragraph 3.4.	Suggestion to insert a schematic diagram of the process of regulatory experience feedback following the paragraph 3.4, similar to the SSG-50 Figure 1.  - A schematic diagram will provide visual clarity of the regulatory experience feedback process, similar to the approach in SSG-50, enhancing understanding of the flow from collection to dissemination.	X		A flowchart will be added in section 3 to demonstrate the overall process for managing regulatory experience feedback.
77.	ROK/4	3.17 /2-3	... to develop an action plan to address the gaps and identify opportunities for improvement, <a href="#">such as enhancing regulatory framework, functions and processes.</a>	Suggestion to provide a clearer description of the purpose of developing an action plan, emphasizing the enhancement of the regulatory framework and processes.	X	The text will be modified as: ..... to develop an action plan to address the gaps and identify opportunities for improving the regulatory framework.	
78.	ROK/5	Appendix TABLE 1 /26	There <del>are</del> <u>are no</u> available appropriate procedures ...	Correction of Typo	X		

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79.	SWN/1	2.7 and 2.8	Merge those para.	2.7 on its own is only information on operating experience. Together with 2.8 it makes sense	X			
80.	SWN/2	5.2 and 5.3	Merge those para	5.3 on its own is operating experience	X			
81.	SWN/3	6.7	Delete	This is common sense, not needed here			X	The factors are discussed here for emphasis purpose to ensure from the very beginning that management gives due consideration to these and take/set appropriate measures accordingly to make whole of regulatory experience feedback management more effective.
82.	UK/1	General – Graded Approach	Clearly communicate the expectation for a graded approach. Add a statement to paragraph 1.6, 1.7, 1.8, 1.9, 1.10 and/or 1.11 making it clear that regulators should use a graded approach to implement the guidance.	The guide does not introduce a graded approach until Chapter 5. Without clearly explanation, audiences could have a misleading perception that the scope should be implement in full.	X	.....processes of a regulatory body and for all types of facilities and activities that give rise to radiation risks <b>taking into account the application of graded approach.</b>		Application of graded approach will be added in para 1.8 (Scope)
83.	UK/2	General – resources	Consider including an expectation for regulatory bodies to provide adequate human and financial resources to deliver the graded approach.	Implementing this guidance may require regulatory bodies to invest resources. This will require planning and funding.	X	The information will be added as third bullet of para 5.5.		

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84.	UK/3	2.2 first sentence	..recommends regulatory body to take	Sentence does not scan as written.	X	Para 3.20 of IAEA Safety Standards Series No. GSG-12, Organization, Management and Staffing of the Regulatory Body for Safety [6] states that “Effective management for safety will take into account the knowledge and information resulting from both positive and negative experiences (e.g. good practices and bad practices)”. It includes a non-exhaustive list of examples of information and knowledge relevant for regulatory bodies, such as collective experience of the staff of the regulatory body, lessons learned from regulatory practices, feedback of experience from other authorities and national and		

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						international bodies, and operating experience in authorized facilities and activities in the State and in other States.		
85.	UK/4	3.12	<del>undertake the screening process-</del> 'review'	Screening is explained later in 3.15 so perhaps avoid referencing it here.			X	Yes, the recommendations on screening are provided in para 3.15 and 3.16 but here the emphasis is on "why we need to make the information available at this stage?" Review might be a good addition but mainly it is being done for the purpose of further screening the event.
86.	UK/5	3.24	Consider qualifying the "timeliness" aspect with the grading.  NB: this is a quote from GSR Part 1	Is there scope here to acknowledge there may be challenges to the timeliness of sharing information externally? i.e. legal process. This is inferred later in dissemination of lessons learned at 5.8			X	As this is a quote from published IAEA safety standards, we cannot change the statement here.
87.	UK/6	4.6	'...knowledge management captures, retains and keeps visible outcomes of the regulatory.....	Suggested addition	X			

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88.	UK/7	6.7	Add demotivation factors from A9 to these bullets.	Helpfully acknowledges some of the factors impacting lessons learning i.e. demotivation as a result of additional workload this initiative introduces. Useful to point to A.9 here.	X	<p>Following will be added in Para 6.7 (e) .....</p> <p>feedback by the personnel such providing feedback on findings, involving individuals in the feedback process, emphasizing their contributions to safety, organizing regular meetings to discuss improvements, and acknowledging these efforts in reports and newsletters.</p> <p>Following bullet will be added in A.9. Manage the additional workload on the individuals to promote active contribution towards the process of regulatory experience feedback management</p>		
89.	UK/8	1.5	“IAEA-TECDOC-1899 [4] provides practical guidance to regulatory bodies for...”	This para., is written differently to the proceeding and following paragraphs as it does not give the document name			X	It is as per format of the Agency publications. The informational publications are referred in the same way.

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				only referring to it as "Reference [4]".			
90.	UK/9	2.2	IAEA Safety Standards Series No. GSG-12, Organization, Management and Staffing of the Regulatory Body for Safety [6] recommends <b>the</b> regulatory body to take into account the knowledge and information resulting from operating and regulatory experiences for the effective management for safety.	Missing word "the" Alternatively, "...recommends <b>a</b> regulatory body to take into account the..." Or "...recommends regulatory <b>bodies</b> to take into account..."	X		
91.	UK/10	2.6	In order to implement Requirement 15 of GSR Part 1 (Rev. 1) [2], the regulatory body should distinguish the differences between operating experience and regulatory experience. <b>For the purposes of this document the</b> 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. <b>The</b> <del>o</del> Operating experience pertains to insights and lessons to be learned from the operation of regulated facilities and activities, including events and other observations, such as potential problems relating to equipment and human performance, safety related concerns, situations that are likely	Consider moving the definition of regulatory experience and operating experience to the beginning of the section to establish context (i.e., to 2.1).	X		

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			to give rise to errors and need to be addressed to prevent undesired effects, procedural deficiencies and inconsistencies in documentation. The feedback from both the regulatory experience and operating experience contributes to enhancing the overall safety of facilities and activities.				
92.	UK/11	Heading before 3.7	“Identification, recording, screening and categorization of findings from various sources”	This section is broader than just collection of findings. Suggest the heading makes that clearer.			X It is part of the Collection of Findings. We will insert one flowchart to explain the main processes and the subprocesses.
93.	UK/12	3.9	“Further information on the sources of findings is provided in Annex II. The Annex provides additional guidance for the regulatory bodies to assist the personnel in identifying potential findings.”	Not clear if the Appendix is different to the Annex. Suggest using the same word.			X In IAEA Safety Standards, appendixes are considered as main part of the safety guide, while annexes are used to give some additional information to Member States.
94.	UK/13	3.16	“(c) should identify where similar findings have been raised previously, and if so determine whether there are existing action plans to address the findings or a need for further analysis.”	Text currently misses an opportunity to consider findings more holistically, and whether similar findings have been identified from previous regulatory experience/operational experience. If so, it may be possible to rationalize the findings and avoid	X		

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				duplication of effort (e.g., where an action plan is already in place to address similar findings). Alternatively, there be a trend of similar findings which may warrant escalation (i.e., a higher categorization).				
95.	UK/14	3.22.	“(b) Monitoring the implementation of the action plan which includes tracking the implementation progress. <del>and.</del> ”	“And.” Is not needed (no other list has “and” between the penultimate and last points). Suggest it is deleted.	X			
96.	UK/15	3.24	Paragraph 3.5A of GSR Part 1 (Rev. 1) [2] states that: “Relevant information and lessons learned from regulatory experience shall be reported in a timely manner to international knowledge and reporting networks.”	Formatting different to para. 3.23 and 3.25 as quotation is not underneath and indented. There are other examples throughout (e.g., 4.1, 4.2, 6.1 etc.). Not clear why different formatting is used (e.g., sometimes the quote is bolded, and other times it isn’t)? Suggest adopting a consistent approach throughout the document.			X	As per Agency publications manual, if the quoted text goes beyond three lines, then it is to be referred in a different paragraph, if its less than it could be reflected in continuity as is referred here.  Likewise, IAEA Safety Standards manual call to reflect quotes as in the original document. If the text in the original document is bolded, the text should be quoted also in bold letters.
97.	UK/16	5	Graded approach – consider adding to an earlier section	This section provides important context for all the expectations in sections 3	X			

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				and 4. Earlier recognition of a graded approach (e.g., such as within the identification of regulatory experience findings and screening of the feedback from regulatory experience steps – which are explicitly identified in 5.6), with greater cross-referencing from previous sections would be helpful.			
98.	UK/17	7.1 or 7.2	“A graded approach to training may be appropriate”.	Suggest a graded approach is applicable to training too. Not all regulatory individuals/ teams will need in-depth training on screening, categorization and analysis of regulatory findings, development of action plans etc. However, an awareness of these elements may be appropriate. Therefore, training should be relevant to the individual’s role and contribution to the overall process.	X	For effective management of regulatory experience feedback, the regulatory body should develop and implement appropriate training for the relevant personnel taking into account the application of graded approach.	
99.	US/1	General Comment	The title of the safety guide should be: Operating and Regulatory Experience Feedback Management	Operating experience is an integral part of informing feedback that is useful. The text speaks to it but should be strengthened.			X While conceptually the comment is correct, detailed guidance/recommendations on operating experience feedback, including the operator and regulator

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								<p>processes, and the role of regulatory involving the criteria for reporting events to the regulatory body are addressed in IAEA SSG-50 for nuclear installations. This Safety Guide focuses on managing the regulatory experience feedback. Operating experience feedback is one of the inputs which can be used to identify and collect potential findings leading to actions (if any) upon detailed analysis/evaluation to enhance regulatory functions and processes. This link is covered in this safety guide.</p> <p>It is up to the regulatory bodies to decide if the management of operating and regulatory experience is conducted within a common setting as a single process or as separated processes.</p>
100.	US/2	General Comment	The safety guide should include operator/licensee events and ensure the regulator has	Self-explanatory			X	Please see above.

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			requirements for report on (non-emergency) operational anomalies related to safety and public knowledge (potential news events)				
101.	US/3	General Comment	The safety guide is strong on referencing requirements and how to perform the tasks but is weak on “why” there is a need to have a program until the Annexes. Include the annexes in the requirements section.	Annex information is considered by most member states as examples and not requirements or recommended practices. Figure I-1 is a very good example how the overall assessment fits into the feedback objectives.	X		
102.	US/4	General Comment	The document needs to include requirements for safety culture and the application of risks. This is applicable to the operators and should be explicit in section 6.7.	Safety Culture and <b>risk management</b> are important attributes of successful nuclear organizations.	X	Following will be added as 6.7 (f): <b>Safety Culture:</b> The regulatory body should promote a positive safety culture by integrating safety considerations into all aspects of regulatory experience feedback management. This includes encouraging open communication about safety issues and ensuring that safety is a core value within the organization.	X

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						<b>Risk Management:</b> The regulatory body should make take into account the risk management in managing the regulatory experience feedback.		
103.	US/5	General Comment	Need more examples are needed to base feedback on such as poorly written licensee applications, license amendments, exemptions and responses to inspection findings, violations and corrective actions.	The quality of operator/licensee submittals is an important factor for the regulator to evaluate. Is there a need for clearer regulation, guidance, and dialogue with the Operator/licensee prior to the submittal of a request?			X	The review of the licensee submittals (applications, amendments...) and the assessment of the quality of the submittals is part of the implementation of regulatory functions and processes. This safety guide focus on managing the feedback from the staff of the regulatory body conducting the review and assessment of the submittals regarding the quality of the regulatory processes. For instance, if the quality of the submissions is not appropriate this can be either because the operator did not do a good job or because the regulatory body has not provided appropriate guidance for the preparation of the submittals (i.e. content, structure, criteria...).

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								<p>Regulatory experience feedback focuses on the latter, i.e. on those aspects that the regulator has to improve of its processes (i.e. in this case improve available guidance)</p> <p>Any important feedback collected by the staff of regulatory bodies coming from the execution of the regulatory functions and processes (as well as from other sources of experience) should be captured as a potential finding for enhancing the regulatory effectiveness. This is already mentioned in the Safety Guide as a source of identifying and collecting the findings.</p>
104.	US/6	General Comment	Section 3.0 infers the feedback requires an action plan as if it were a special management decision. Collecting information and reporting of Operational and regulatory feedback should be a routine requirement and have a required reporting period and a report be issued.	Reporting of trends, findings and events should lead to both operator/licensee and Regulatory Body improvements and action plans to make changes.				This needs further clarification. The SG requires an action plan only if senior management agrees on taking actions. Otherwise, no special management decision. If as a result of the analysis of finding from regulatory experience senior management agrees to

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								take one or series of actions, the implementation of them should be properly planned.
105.	US/7	Section 6.7	Revise in a positive manner and add safety culture and assessing risks.	Self-explanatory.	X			<p>We can modify this by making the factors' heading look positive like:</p> <ul style="list-style-type: none"> <li>(a) Optimization of Resources</li> <li>(b) Continuous Improvement</li> <li>(c) Optimal Utilization</li> <li>(d) Team-oriented atmosphere</li> <li>(e) Supportive culture</li> <li>(f) Motivation and engagement</li> <li>(g) Safety culture</li> <li>(h) Risk Management</li> </ul> <p>But the information in its existing form looks good and directly targeting the issues</p>
106.	US/8	I-5	Disagree on the statement that information should be on a need-to-know bases.	Regulatory information needs to be transparent and available to the public unless it is security or safeguard sensitive information, or regulator approved licensee deemed proprietary information.	X	The relevant lessons learned both from regulatory experience and from operating experience are shared and disseminated to national and international organizations considering general		The wording will be corrected and improved to avoid possible misinterpretation. The intention was to emphasize that the dissemination plan is target oriented to make it effective. As indicated regarding dissemination,

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						and targeted mechanisms and approaches to ensure effective dissemination of lessons learned.		the goal is not to conceal or limit dissemination. As an example, if a finding is applicable to the medical practice, the RB may still disseminate lessons learned worldwide through standard procedures, but in addition, it may decide to send an information notice specifically addressing this particular sector.
107.	US/9	Section 5	<p>5. APPLICATION OF A GRADED APPROACH TO REGULATORY EXPERIENCE FEEDBACK MANAGEMENT</p> <p>5.1 The application of a graded approach underpins the effective and efficient performance of the regulatory framework of a country. Paragraph 4.3 of GSR Part 1 (Rev. 1) [2] states that “The performance of regulatory functions shall be commensurate with the radiation risks associated with facilities and activities, in accordance with a graded approach.”</p> <p>5.2 Paragraph 4.5 of GSR Part 1 (Rev. 1) [2] states that “The regulatory body shall allocate resources commensurate with the</p>	<p>The application of “graded approach” is overused and detracts from its purpose.</p> <p>Section 5 directs the use of a graded approach, but I believe it is a bit too scattered. Looking at how the NRC applies graded approach in the Generic Issues Program,”</p> <p>Determination of whether the proposed GI meets the criteria to proceed to Stage 3, Regulatory Office Implementation, using a graded approach based upon an assessment of safety and risk significance”</p>			X	<p>The statements are taken from IAEA Safety Standards and are to be added as verbatim here as per Agency style manual.</p> <p>in this SG graded approach is used as per the explanation in the IAEA glossary: “The use of a graded approach is intended to ensure that the necessary levels of analysis, documentation and actions are commensurate with, for example, the magnitudes of any radiological hazards and non-radiological hazards, the</p>

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			radiation risks associated with facilities and activities, <del>in accordance with a graded approach.</del> ”	Suggest the procedure focus (limit) the use of a graded approach during the assessment phase (highlighted in yellow below) Applying a graded approach in the other phase may not be necessary, would not provide much benefit, and result in missing items or not disseminating something that could be important.  Section 5.7 This section is the only section I would deem using a graded approach is practical.				nature and the particular characteristics of a facility, and the stage in the lifetime of a facility.”  We take note of the concern as commented and will review the text to make clear that graded approach is not used for other purposes.
108.	US/10	5.2	Paragraph 4.5 of GSR Part 1 (Rev. 1) [2] states that “The regulatory body shall allocate resources commensurate with the radiation risks associated with facilities and activities, <del>in accordance with a graded approach.</del> ”	Refer to reason in Comment No. 1			X	Please see response to Comment No. 8
109.	US/11	5.3	Furthermore, para. 4.39A of GSR Part 1 (Rev. 1) [2] states that “The regulatory body shall ensure, <del>adopting a graded approach,</del> that authorized parties routinely evaluate operating experience and periodically perform	Refer to reason in Comment No. 1			X	Please see response to Comment No. 8 The statement is copied from GSR Part 1. Here, ‘adopting a graded approach’ is important because it emphasizes that

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			comprehensive safety reviews of facilities.”				the regulatory body should tailor its oversight based on the potential risks and complexities of different facilities. Removing it might imply a one-size-fits-all approach, which could be less effective in ensuring safety.
110.	US/12	5.4	The regulatory body should <del>apply a graded approach while</del> developing and implementing the management of regulatory experience feedback in line with Requirement 16 of GSR Part 1 [2] and Requirement 7 of GSR Part 2 [10]. The regulatory body should take into account the criteria mentioned in para. 4.15 of GSR Part 2 [10] to identify and analyse the findings, define the actions and assign priority level or urgency to implement the actions originating from the management of regulatory experience feedback.	Refer to reason in Comment No. 1	X		
111.	US/13	5.6	There is <del>are one</del> key stages in the regulatory experience feedback management process where a graded approach should be applied: the assessment. During assessment the Regulator can use a graded approach to determine the extent of action required based	Refer to reason in Comment No. 1	X	As this aspect is covered in para 5.7. We propose to delete para 5.6 and move some of its part (The criteria will determine the workload associated	

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			upon the level of significance of the issue. <del>identification of regulatory experience findings and the screening of the feedback from regulatory experience. The regulatory body should develop criteria in accordance with a graded approach to determine what regulatory experience feedback should be considered potentially relevant for screening. These criteria will determine the workload associated with further steps during the detailed assessment, development and implementation of the action plan and the identification of lessons.</del>			with further steps during the detailed assessment, development and implementation of the action plan and the identification of lessons) to para 3.16 (a)	
112.	US/14	5.7	The regulatory body should apply a graded approach in assessing the regulatory experience findings, defining actions and the implementation of the actions taking into account factors such as safety implications, external consultations, cost-benefit analysis, impact on stakeholders, as well as when and how to do it.	Refer to reason in Comment No. 1	X		
113.	US/15	5.8	The regulatory body should <del>apply a graded approach in the dissemination of the lessons</del> learned from the regulatory experience feedback management process. The significance of the regulatory experience findings may have a different degree of	Refer to reason in Comment No. 1	X		

COMMENTS BY REVIEWER					RESOLUTION			
Review Committee: NUSSC								
			relevance, both inside and outside the organization of the regulatory body, nationally or internationally, depending on how the lessons learned will contribute to enhance the regulatory framework, functions and processes and, ultimately, to improve safety of the regulated facilities and activities.					
114.	US/16	6.1	<p>Requirement 19 of GSR Part 1 (Rev.1) [2] states that “The regulatory body shall establish, implement, assess and improve a management system that is aligned with its safety goals and contributes to their achievement.”</p> <p>Requirement 13 of GSR Part 2 [10] states that “The effectiveness of the management system shall be measured, assessed and improved to enhance safety performance, including minimizing the occurrence of problems relating to safety.” To implement these requirements, the regulatory body should continuously evaluate the management of regulatory experience feedback for its effectiveness into its assessments of licensee’s safety performance.</p>	<p>Based on NRC experience, the regulator needs to integrate known or available information into its assessments of licensee’s safety performance.</p> <p>In Section 6.1 mentions: “continuously evaluate the management of regulatory experience feedback for its effectiveness.”</p> <p>Suggest adding a little here, “continuously evaluate the management of regulatory experience feedback for its effectiveness into its assessments of licensee’s safety performance”</p>	X			

## DS547 Regulatory Experience Feedback Management

COMMENTS BY REVIEWER					RESOLUTION			
Review Committee: EPRcSC								
Comment No.	Comment ID.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1.	AUS/1	Annex II	Under 'Emergency preparedness and response' in Table II.1 add the text:  <b>Learnings identified from responses to incidents and emergencies.</b>	After Action Reviews following emergencies should be included as a source of regulatory experience. Learning from emergencies is mentioned only once in the document text, and learning from exercises isn't mentioned anywhere in the text. Emergencies have obviously been a great source of learning, take the IAEA International Conference on A Decade of Progress after Fukushima Daiichi: Building on the Lessons Learned to Further Strengthen Nuclear Safety held three years ago as an example	X			
2.	BR/1	2.3	.... should make appropriate arrangements, as for example, ... to identify ...	The text seems to be incomplete. For some MS it is important to say how to do it.	X	Para 2.3 is deleted		
3.	BR/2	3.2	... should assess its existing integrated management system to decide ...	The statement assumes that all MS have an integrated management system, which			X	IAEA GSR Part 1 and IAEA GSR Part 2 both requires management

COMMENTS BY REVIEWER					RESOLUTION			
Review Committee: EPRReSC								
				may not be true. What are the alternatives?				system for safety. The safety guide has to augment the established safety requirements.
4.	BR/3	3.3	... responsibility for safety is shared among more than one organization ...	The operator or license holder is responsible for ensuring safety. Please explain.	X	... regulatory responsibilities for ensuring safety is shared among more than one organization ...		
5.	BR/4	3.5	... emphasize the importance of collecting and analyzing findings and implementing improvement actions ...	In the case of a newly created or a small regulatory body that does not have this infrastructure (mechanisms and personnel). How should they do it?			X	The safety guide does not judge the among of resources needed to fulfil this or any other requirement of GSR Part 1 (Rev. 1) associated to regulatory responsibilities. Para 3.31 of SSG-50 for the management of operating experience states a similar provision for the management of operating experience: "The regulatory body should establish and maintain a system for the storage, retrieval and searching of operating experience. Effective searching of the system should be possible using an appropriate coding or keyword system."

COMMENTS BY REVIEWER					RESOLUTION			
Review Committee: EPReSC								
								Nevertheless, the safety guide (as well as TECDOC-1899) acknowledges that the mechanisms used by the regulatory body to discharge this responsibility should be adapted to the context of the regulatory body.
6.	BR/5	3.7	... utilizing appropriate tools and techniques for knowledge management ...	The statement assumes that all MS have the mastery over the mentioned tools and techniques. And if you don't have them on place? What are the alternatives?			X	As above The Government and or the Regulatory body shall provide for resourcing the regulatory body with the means necessary to discharge the responsibilities.
7.	BR/6	3.16	... which involve more detailed analysis ...	It should be mentioned which tools can be used to allow this detailed analysis	X	Para 3.16 will be modified as: ... which <del>involve</del> requires more detailed analysis ...		Para 3.16 will be modified as at the screening step, those findings are screened out which requires further detailed analysis.....
8.	BR/7	3.29	Implementing mechanisms to ...	It is of great value to mention which mechanisms.	X	To review the effectiveness of sharing and dissemination, the regulatory bodies should assess how well the sharing and dissemination has achieved the intended purpose.		

COMMENTS BY REVIEWER					RESOLUTION			
Review Committee: EPRReSC								
						This can be achieved, by analyzing performance metrics, gathering feedback from the target audience, and comparing results to baseline data.		
9.	BR/8	5.	Application of a graded approach ...	Items 5.1. to 5.9 are easily suitable. Perhaps they cannot be applied to regulators with a lack on staff and appropriate tools.				Applies the same as in previous comments
10.	BR/9	6.7 (a)	... a balance between the resources ...	Resources should be understood as personnel and tools?				Yes, personnel, tools, time, training along with financial resources
11.	BR/10	7.1	... training for the (involved) personnel.	The word relevant is unnecessary. The personnel is relevant.	X			
12.	BR/11	A.8	Include: Personnel with the necessary skills to motivate other employees must be identified by the staff. The personnel of the regulatory body ...		X	Following will be added under A.9: Identify personnel with the necessary skills to motivate and mentor other employes to raise regulatory findings.		
13.	CAN/1	General	Sections in this document should reference the detailed information found in TechDoc 1899.	This will provide valuable guidance for organizations working to meet safety standard requirements			X	As most of the recommendations are extracted from IAEA TECDOC-1899, to avoid too much of its referencing in the main part of the Safety Guide,

COMMENTS BY REVIEWER					RESOLUTION				
Review Committee: EPRReSC									
									it is referenced in the background section in para 1.5 to let Member States know about the availability of practical information on collecting and analyzing findings, implementing actions, and disseminating lessons learned in TECDOC-1899.
14.	CAN/2	General	Additional guidance should be developed or referenced for evaluating the effectiveness of actions developed in response to lessons learned	This is different than the effectiveness of the feedback management process (Section 6 of this document). Additional context is provided in Section 3.22 of these comments.	X				Please see response to Comment No. 7
15.	CAN/3	Section 2.3	Remove 2.3	Item 2.3 is redundant with item 2.1. or at least the differences are so intricate that they are not clear to the reader. In addition, 2.3 is incomplete.; 2.3 excludes “international organizations and authorized parties“ both are included in statement 2.1. Remove 2.3.	X				
16.	CAN/4	Section 2.5	<i>The regulatory body should promote the concept of a learning organization as a strategic objective for continuously improving its performance</i>	Statement is too prescriptive. The concept of “learning organization” should be incorporated into an organization however	X				

COMMENTS BY REVIEWER				RESOLUTION				
Review Committee: EPRReSC								
				there are many ways to do this. It doesn't have to be a strategic objective; could be in a vision statement or part of a quality assurance program. From an audit perspective less prescriptive is better; organizations are not required to create a "strategic objective" to meet requirements.				
17.	CAN/5	Section 3.3	"...This collaboration should aim at ensuring that regulatory processes are harmonized promote harmonization of regulatory processes across different organizations...".	This document shouldn't "ensure" or require harmonization. We can promote and suggest harmonization but different organizations may choose to do things different ways.	X	This collaboration should aim at promoting harmonization of regulatory processes across different organizations.		
18.	CAN/6	Section 3.11	<i>In case a new safety significant issue is identified from the process for identifying regulatory findings, appropriate actions should taken for further investigation and this should be considered as a potential topic for further regulatory research and development</i>	Statement should allude to "take immediate action to restore safe circumstances as soon as possible and report the action to management" be suggested in this section	X	In case a new safety significant issue is identified from the process for identifying regulatory findings, immediate action should be taken to restore safe circumstances as soon as possible and report the action to management. Additionally, this		

COMMENTS BY REVIEWER					RESOLUTION			
Review Committee: EPRReSC								
						issue should be further investigated and considered as a potential topic for regulatory research and development.”		
19.	CAN/7	Section 3.22 (c)	Provide additional guidance of item (c)	Item (c) is the primary item for conducting an effectiveness review of actions implemented in response lessons learned	X	.....assessing their effectiveness by analyzing performance metrics, gathering feedback from the target audience, and comparing results to baseline data, and providing updates.....		
20.	CAN/8	Table II	Add lessons learned from previous emergency activations at the plant or emergencies at any NPP for the national sources of regulator experience	Provide OPEX as case examples	X			Will be added in Table II-1

## DS547 Regulatory Experience Feedback Management

COMMENTS BY REVIEWER					RESOLUTION			
Review Committee: RASSC								
Comment No.	Comment ID.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1.	FR/1	2.4	<del>The regulatory process reflects the accumulated regulatory experience at a given time, and new experiences and context developments can lead to further changes.</del> Regulatory bodies should strive to continuously gain and manage regulatory experience from both internal and external sources [...]	Regulatory process are also governed by laws and regulations, which are influenced not only by regulatory experience but also by societal and political factors....	X	The existing regulatory process factors in the accumulated experience up to a given time, and new experiences and context developments can lead to further changes.		The intention of the original text is to indicate the continuous nature of the process of bringing in regulatory experience within the regulatory process. Of course, there are other factors as it is mentioned by the commenter.
2.	FR/2	2.4	[...]. Regulatory bodies should strive to continuously gain and manage regulatory experience from both internal and external sources to <del>have access to a wider range of information about situations they have experienced, as the analysis of these situations could lead to</del> <u>identify</u> improvement opportunities <u>in delivering their mandate</u> . Proactively seeking these opportunities by integrating regulatory experience feedback management into the daily work of regulatory bodies helps the regulatory body fulfil its mission and ensures that the national regulatory framework, functions	Simplification and clarification of the ultimate goal (to fulfil the regulatory mandate)	X			

COMMENTS BY REVIEWER					RESOLUTION			
Review Committee: RASSC								
			and processes remain effective and up to date.					
3.	FR/3	2.6	Relocate 2.6 before 2.3	Explaining the difference between regulatory and operating experience should take place earlier	X			
4.	FR/4	2.7	Transform 2.7 in a footnote related to current 2.6	DS547 is about regulatory experience, not operating experience	X			
5.	FR/5	3.2	<del>The regulatory body should assess its existing integrated management system to decide how whether, in its management system, the arrangements for managing regulatory experience should be established. This could be as a specific process to identify lessons to be learned from all the regulatory processes leading to regulatory experience or whether the arrangements should be embedded within the existing regulatory processes.</del>	The regulator, if regulating a large scope (various types of nuclear installations, different categories of nuclear activities...) may decide to implemented a combined approach.....	X			
6.	FR/6	3.3	<del>When the responsibility for safety is shared among more than one organization, the regulatory body should collaborate with these organizations while developing and implementing the regulatory experience feedback management process to ensure relevant regulatory experience is appropriately shared. This collaboration should aim at ensuring that regulatory processes</del>	The ultimate goal may not be harmonization as the legal framework may prevent it...	X	When the responsibility for safety is shared among more than one organization, the regulatory body should establish cooperation with these organizations to establish effective regulation considering the		Based on the input from other Member States, the para is changed as written in the next column

COMMENTS BY REVIEWER				RESOLUTION			
Review Committee: RASSC							
			<del>are harmonized across different organizations. The safety–security interface should also be addressed to ensure that regulatory requirements are applied consistently and effectively.</del>			responsibilities assigned to the different parties. . The safety–security interface should also be addressed to ensure that regulatory requirements are applied consistently and effectively.	
7.	FR/7	3.4	At the end of 3.4 add “ <u>taking into account a graded approach (see section 5)</u> ”	Make a link with section 5 which brings flexibility to the recommendations provided in 3.7 – 3.29	X		
8.	FR/8	3.5	The process for managing regulatory experience feedback for safety should emphasize the importance of collecting and analysing findings and, <u>when needed</u> , implementing improvement actions to enhance regulatory framework, functions and processes.	Improvement may not always be needed	X		
9.	FR/9	3.6	Delete 3.6	Excessive. The management system and associated records should be enough...	X	The regulatory body may complement the information recorded in management system by creating a separate retrievable dossier documenting the entire regulatory experience feedback management process. The dossier will help	For the purpose of record keeping and part of knowledge management, this recommendation is provided.

COMMENTS BY REVIEWER					RESOLUTION			
Review Committee: RASSC								
						retain information about the analysis performed and decisions taken for trending analysis and future consultation.		
10.	FR/10	3.7	The first element of managing regulatory experience feedback is the collection of regulatory experience findings <sup>2</sup> from various sources utilizing appropriate tools and techniques for knowledge management <del>in order to improve the regulatory process</del> . The collection of regulatory experience findings should clarify how the relevant information is identified; collected, recorded and stored; and screened and categorized.	Improving the regulatory processes is the outcome.	X			
11.	FR/11	3.11	In case a new safety significant issue is identified from the process for identifying regulatory findings, appropriate actions should be taken for further investigation <del>and this should be considered as a potential topic for further regulatory research and development</del> .	Superfluous.	X			
12.	FR/12	3.15	The regulatory body should make the necessary arrangements for screening and categorization of findings, including clearly defined roles and responsibilities of personnel and necessary	Too detailed			X	Added in response to comments to have more clarity on resources.

COMMENTS BY REVIEWER				RESOLUTION				
Review Committee: RASSC								
			resources, such as availability of suitably qualified personnel, financial resources, tools and equipment, thresholds for screening the findings and criteria for categorization of the findings.					
13.	FR/13	3.16	<p>In order to ensure effective screening and categorization of the findings, the regulatory body:</p> <p>(a) Should identify findings which <del>involve</del> <u>require</u> more detailed analysis <del>by defining and utilizing clear criteria to ensure verifiable and consistent implementation of the process for effectively managing the regulatory experience feedback to determine whether an action to improve regulatory action would be needed and what would be its priority level.</del></p> <p>(b) Should <del>document information relating to the process such as the name of the person conducting the screening and categorization, dates of screening and investigation, a file title (following a file naming convention that allows ease of reference) and</del> <u>record</u> a brief description of the finding along with the relevant justification explaining why the finding was screened-in or screened-out for future reference and record. In</p>	The purpose of screening and categorization should be made clearer. The way to do so may not be too much detailed...			X	The criteria would be helpful in identifying the findings that need to be evaluated in detail (giving priority is also embedded in this). Without criteria, it would be very challenging. We propose to keep it here, as it will assist Member States to compile the criteria in the very beginning while establishing the REGEX process.

COMMENTS BY REVIEWER				RESOLUTION			
Review Committee: RASSC							
			addition, for screened-in findings, the categorization of the finding should be included to <del>allow for ease</del> further analysis and <u>prioritization</u> .				
14.	FR/14	3.18 (c)	(c) Development of an action plan, which may result in actions ranging from minimal ( <u>or even no change</u> ) to substantive changes in the regulatory framework, functions or processes. <del>The action plan should define the roles and responsibilities of personnel for its implementation.</del>	An option may be not changing anything....  To detailed	X	Development of an action plan, if necessary, which may result in actions ranging from minimal to substantive changes in the regulatory framework, functions or processes. The action plan should identify the personnel responsible for implementation.	
15.	FR/15	3.20	Delete 3.20	This may depend on the action. If the action consistent in developing/updating a procedure of the management system, its dissemination will be by the management system itself. Para 3.27 and following are dealing with the topic of dissemination of lessons learned	X	The approved action plan should consider specific instructions for disseminating the lessons learned, when necessary.	We agree with the reason provided and proposed new sentence to provide such flexibility.
16.	FR/16	3.27	The regulatory body should make arrangements for dissemination of	Considering the variety of findings (from small issues			X Para 5.8 provides flexibility through

COMMENTS BY REVIEWER					RESOLUTION			
Review Committee: RASSC								
			the <u>significant</u> lessons learned from the regulatory experience feedback management process for their use by other regulatory bodies with the responsibility for safety and other relevant organizations, nationally or internationally. The lessons learned might <u>also</u> be useful for authorized parties, vendors, designers and supply chain organizations.	to big issues, and good practices), flexibility is needed...				application of graded approach in disseminating the lessons learned from REGEX process based upon the significance and relevance of the findings. Putting qualifier here might limit the dissemination to <b>significant</b> lessons learned, only even to the relevant parties which may not be of good value towards trust building and transparency.
17.	FR/17	3.29		Isn't it too detailed ?				Details are provided to make sure that every element essential to dissemination is captured here.
18.	FR/18	Chapter 5		Very nicely written and very important	X			
19.	FR/19	6.7	<del>The regulatory body should address</del> the following elements <del>that</del> might impact the effectiveness of regulatory experience feedback management:	Reformulation to offer flexibility considering the national context;	X	The regulatory body should address the following elements in the context of its organization .....		The proposed sentence provides the flexibility.
20.	FR/20	Appendix	Transform appendix into an annex	Example only	X	We will move table under A.7 to Annex.		Some Member States found this information useful to be put as main part of the safety guide. We propose to keep it as Appendix.
21.	SWE/1	General	In several paragraph the word personnel is used sometimes as	Organizational responsibility should lie at			X	Replacing "personnel" with "management" might

COMMENTS BY REVIEWER					RESOLUTION			
Review Committee: RASSC								
			opposite to senior management. However, in several places personnel should refer to management but not necessary senior management. Such an example is para 3.21. "After approval of the action plan, the actions should be assigned to the personnel responsible for its implementation." This should clearly reference management. Please change personnel to management. Please evaluate if personnel needs to be changes elsewhere.	different levels in management; tasks can be assigned to personnel.				not be appropriate. The term "personnel" refers to the individuals who will actually carry out the actions, while "management" typically refers to those who oversee and coordinate the work. Management could assign the actions for their implementation.
22.	SWE/2	1.7/L4-5	<i>"...to facilitate continuous improvement and enhanced regulatory effectiveness for ensuring safety of facilities and activities."</i>	It is stated "...so that they can enhance their regulatory effectiveness for ensuring safety of facilities and activities." The goal systematic learning could be enhanced.	X			
23.	SWE/3	ANNEX II Table II-1	The table could be complemented with issuance of regulations and guides	These activities are essential for authorization and inspections as such.	X	Table is updated to include issuance of regulations and guides.		

**TITLE:**  
**DS547 Regulatory Experience Feedback Management**

COMMENTS BY REVIEWER					RESOLUTION				
Review Committee: WASSC									
Comment No.	Comment ID.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection	
1.	IND/1	General comment	Although the document offers general guidance, the inclusion of case studies or examples of regulatory experience feedback improving safety practices would strengthen the content.	Suggested inclusion			X	The case studies and country examples are provided in the IAEA informational publications (TECDOCs, safety report series etc.). the case studies and country practices relating to regulatory experience feedback management can be found in IAEA TECDOC-1899.	
2.	IND/2	General comment	In the documents while addressing the complex processes like collecting, analysing, and disseminating regulatory feedback, visual aids (flowcharts, process maps) could simplify understanding. For instance, a flow diagram showing the step-by-step feedback management process could enhance clarity and provide a quick reference.	Suggested inclusion	X Flowchart describing the whole process will be added in section 3.				

3.	ROK/1	Page 1, Para 1.6/ Line 5	The following is suggested.  (before) ~~bodies of other countries  (after) ~~ bodies of other <b>Member States</b> .	o Based on the section 4 Objective of DPP DS547, it is suggested that the term of Member States is preferred.	X			
4.	ROK/2	Page 3, Para 2.4/ Line 5	The following is suggested.  (before) ~~~ could lead to improvement opportunities.  (after) ~~~ could lead to opportunities <b>for improving regulatory functions and processes</b> .	o Even though the similar phrase is found in the TECDOC-1899, it is suggested for better understanding that the sentence is modified.	X	.....could lead to opportunities for improving regulatory framework.		
5.	ROK/3	Page 4, Para 3.2/ Line 3	The following is suggested.  (before) ~~ learned from all the regulatory processes leading to ~~~  (after) ~~~ learned from all the regulatory <b>functions and</b> processes leading to ~~~	o Based on the section 4 Objective of DPP DS547, lessons could be learned from regulatory functions as well. So, it is suggested that the sentence is modified.	X			
6.	ROK/4	Page 27, Table II-1	The new item is added in the first column of Table II-1.  - <b>Communication with interested parties</b> The corresponding examples is added in the second column of Table II-1. - <b>Public hearings</b> - <b>Consultation with stakeholders, etc.</b>	o Based on the GSG-13, communication is one of the regulatory functions and processes. It could be a national source of regulatory experience. So, it is suggested that the new item is added.	X			