

Form for Comments
DS 513 - Leadership, Management and Culture for Safety

COMMENTS The comments are listed according to their order of appearance in the text				RESOLUTION			
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
Finland	General	Two different terms are used for the persons working in the organization: personnel and staff. Please check the document and use only one term. Personnel is preferable because it is used in the Safety Culture Framework.	Please harmonize the terminology in the safety guide: personnel or staff.	x			As term staff was used much more frequently throughout the document, it is preferred
Japan	General	The description of “manager level” should be reviewed for whole document, as the most of the “managers” are connected with “at all levels”, while some of them are connected with “within the organization” (Paras. 6.7 and 7.10) and some of them are used without any specification (Paras. 7.12, 8.7, 8.15 etc.).		x			Managers at all levels is dominant term now; in case of GSR Part 2 quote we do not change terms. I case that paragraph starts with “managers at all levels” we do not repeat at all levels in the same paragraph
Cuba NSGC	General	Much has been discussed regarding "technological" safety culture and Nuclear Security Culture. Although there are disparate criteria, both seek to prevent harm to people and the environment caused by the undesirable effects of radiation. In this regard, the title of the standard should take into				x	IAEA uses safety culture term (not technological) and security culture. Safety culture and security culture interface is mentioned in 8.8 and 8.15

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		<p>account both concepts as part of a single safety culture: "technological and nuclear security culture."</p> <p>In point 3 itself, the systemic approach is mentioned, where safety issues must be analyzed as a system, thus reinforcing the idea that security culture must be led and managed as a whole.</p>					
Saudi Arabia	General	<p>Please consider the following proposals regarding the 'parallel' use of 'safety culture' and 'culture for safety':</p> <p>1- If 'culture for safety' and 'safety culture' are used with the same meaning, then a footnote should be included at the first appearance of 'culture for safety', to read as follows: <i>"For the purpose of this Safety Guide, 'culture for safety' and 'safety culture' are used with the same meaning."</i></p> <p>2- If 'culture for safety' and 'safety culture' are used with different meanings, differences need to be clarified and</p>	<p>Safety culture is an important part of the leadership and management for safety. Therefore, it deserves clear recommendations, with unambiguous terminology.</p> <p>It is recognized that:</p> <ul style="list-style-type: none"> - 'culture for safety' and 'safety culture' have been used in 'parallel' in IAEA safety standards, e.g. GSR Part 2, Requirement 12. - Only 'safety culture' is defined in the IAEA Nuclear Safety and Security Glossary, which 			x	<p>This proposal was rejected after IAEA internal discussion (TO consulted it with Safety Standards and Security Guidance Development Section)</p>

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		justified, e.g. by using a footnote.	<p>might suggest that ‘culture for safety’ has the same meaning as ‘safety culture’ and, hence, does not need a specific definition.</p> <p>However, in the following IAEA document: https://www.iaea.org/sites/default/files/culture_for_safety_leaflet.pdf the situation is different because ‘safety culture’ is specified as one variable amongst others (e.g. technology, management system, strategy), while ‘culture for safety’ is considered as something inherent in all aspects of the organization, i.e. technology, management system, strategy and safety-system.</p> <p>The present comment is supported by para. 1.5 of DS513, as ‘culture for safety’ does</p>				

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			<p>not exist in the IAEA Nuclear Safety and Security Glossary.</p> <p>It is expected that due consideration of the issue of ‘culture for safety’ versus ‘safety culture’, in this Safety Guide, will facilitate addressing it in the next revision of GSR Part 2 and other concerned IAEA safety standards.</p>				
Saudi Arabia	General	Except in the quotations, please consider using either ‘competence’ as singular noun or ‘competencies’, as appropriate. Some proposals are given e.g. for paragraphs, 6.4, 6.7 and 6.12.	<p>‘Competence’ is a noncount noun that does not have a plural. This word, in its ‘plural form’, is used several times in DS513.</p> <p>Competence is defined as the ability to do a particular activity to a prescribed standard and is dependent on the employee’s knowledge and skills.</p> <p>Competencies are the personal attributes or</p>			x	This proposal was rejected after IAEA internal discussion (TO consulted it with Safety Standards and Security Guidance Development Section)

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			<p>behaviours of an employee which result in effective or superior performance in a job.</p> <p>It is recognized that ‘competences’ (in plural) is used in IAEA safety standards, in particular in GSR Part 2. It is expected that properly addressing the issue in DS513 will facilitate addressing it in the next revision of GSR Part 2 and other concerned IAEA safety standards (e.g. IAEA GSG-16).</p>				
Japan	Contents Appendix	APPENDIX ANNEX SAFETY CULTURE FRAMEWORK	<p>Each topic on “Safety Culture Traits” and “attribute” should be expressed with “should” statement, if this table would be treated as “appendix”, and, if not, this table should be ANNEX, that is, current descriptions in this table provide only explanation of each topic of safety culture and do not provide</p>		x		<p>The introductory paragraph to safety culture framework was moved to 8.1 and term “should” replaced the term “may”.</p> <p>Also, there is a paragraph 8.16 explaining application of graded approach.</p> <p>Nevertheless, the wording of appendix was not changed it stays in statement shape.</p> <p>Similarly, previous safety culture traits</p>

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			<p>any recommendation for fostering safety culture.</p> <p>Remember the message of SPESS-C, which states “Annexes and footnotes to the main text are used to provide practical examples or additional information or explanation.” in 7th line from the top on page10 of SPESS-C. This table is just that.</p> <p>However, in order to be treated as an “APPENDIX”, the attached document is proposed as a reference, in which the messages proposed in the table are changed to recommendations with the appropriate “should” statement.</p> <p><u>New text of safety culture framework was proposed</u></p>				<p>were used as follows: safety is a clearly recognized value, leadership for safety is clear, accountability for safety is clear, safety is integrated into all activities, safety is learning driven / see pages 9-10 of GS-G-3.1</p>

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Saudi Arabia	Appendix	<p>Please consider changing the ‘Appendix’ to an ‘Annex’.</p> <p>If the proposal is accepted, paragraph A.1 should be slightly modified to read as follows:</p> <p>A.1 This appendix <i>annex</i> presents a safety culture framework, which attempts to enhance the alignment of different safety culture models used in different States. This safety culture framework describes the traits and attributes that are present in organizations with a strong safety culture. A graded approach should <i>needs</i> to be used in the application of this framework, taking into account the type of facility or activity and the associated radiation risks.</p> <p>This appendix <i>annex</i> is based upon the work previously done; A Harmonized Safety Culture Model was published as IAEA Working Document in 2020, (see <i>harmonization_05_05_2020-final_002.pdf (iaea.org).</i>)</p>	<p>Consistency with SPESS C:</p> <p>Section 3 of SPESS C specifies the differences between an appendix and an annex as follows:</p> <p>“An appendix is considered to form an integral part of the standard or guidance. Therefore, material in an appendix has the same status as the main text and the IAEA assumes authorship of it.</p> <p>Annexes and footnotes to the main text are used to provide practical examples or additional information or explanation. Annexes and footnotes are not an integral part of safety standards or nuclear security guidance publications, and should not contain requirements, recommendations or</p>			x	See above

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			<p>guidance. Annex material published by the IAEA is not necessarily issued under its authorship; material that is under other authorship may be generalized as necessary and presented in annexes.”</p> <p>Since the document proposed as the main basis for the Appendix, which is an integral part of the Safety Guide, “is not an official IAEA publication” and that “[T]he views expressed herein do not necessarily reflect those of the IAEA or its Member States”, “[T]his document should not be quoted or cited as an official publication.”</p> <p>An additional reason to consider an Annex rather than an Appendix is the used formulation: Except paragraph A.1, no paragraph contains a ‘should’ recommendation, i.e. all the ‘safety culture</p>				

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			<p>traits’ and ‘safety culture attributes’ are formulated as statements/observations..</p> <p>For the reasons above, it is proposed to rather consider an ‘Annex’ instead of ‘Appendix’, with the following structural modifications:</p> <ul style="list-style-type: none"> - Modify the text of paragraph 1.11 as proposed in comment No. 7; - Change the title from ‘Appendix’ to ‘Annex’; - Modify paragraph A.1 as proposed; <p>Move the list of references before the Annex and remove reference [8], which should be placed after the Annex and specific to it.</p>				

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Germany NUSSC	Appendix general	<p>All of the German comments in Step 8 related to the Appendix have been rejected on the reasoning “Appendix uses the wording which was harmonized and agreed by involved parties. Modifications of the text is done only in limited cases when the terminology of the original text is not consistent with terminology used in this guide.”</p> <p>As the appendix of an IAEA Safety Guide is to be seen as an integral part of the Safety Guide and has the same status as the body text, we would still like you to review our comments to Appendix from Step 8 individually, if possible. If it is not possible to introduce changes to “Safety Culture Framework”, which is the subject of the current Appendix, it might be better to include it as an Annex instead.</p> <p>To avoid all the misunderstandings, our basis for this comment is GSR Part 2, Chapter “Interpretation of the text”, namely: <i>“Material for which there is no appropriate place in the body text (e.g. material that is subsidiary to or separate from the body text, is included in support of statements in the body text, or describes methods of calculation, procedures or limits and conditions) may be presented in appendices or annexes. An appendix, if included, is considered to form an integral part of</i></p>				x	See above

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		<i>the safety standard. Material in an appendix has the same status as the body text, and the IAEA assumes authorship of it."</i>					
Ireland EPreSC	A.1	This safety culture framework describes the traits and attributes that ought to be present in organizations with a strong safety culture.	The Framework is a guidance for what <i>should</i> be in place.		x		Term should is used
Ireland EPreSC	A.1	Communication Opportunities	CO should correspond to two words like the examples for IR, QA, LR, etc.			x	COmmunication is the base for the abbreviation CO
Brazil	Para 1	This Safety Guide considers that leadership, management, and culture for safety are interrelated concepts that support each other to achieve an effective implementation of each of the mentioned concepts. These three elements are manifested, for example, in how operational safety decisions are made based not only on technical procedures but also on behaviors and organizational values	The introduction mentions the interdependence of the concepts but lacks practical examples that would help organizations concretely apply the systemic approach.			x	Explained in 3.3 in similar words

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Ireland EPRéSC	1.4	The footnote should be removed and placed instead in the Reference section.	For consistency of locating reference materials.			x	It cannot be used in reference part because it is a revision of the same document
Cuba NSGC	1.9	1.9. All recommendations in this Safety Guide are of general application; however, is needed the use of an approach graded for the application of recommendations specific to different facilities and activities	Section 1.9 refers to the need for "good judgment" and the use of a graded approach to implementing specific recommendations. The term "good judgment" is not specified in the standard and is highly ambiguous. We suggest removing it and leaving only the graded approach.			x	The word good is not used in the text ... Quote: nevertheless, judgement and the use of a graded approach are needed for the application of specific recommendations to different facilities and activities.
Finland	1.10	Requirements on the management system of the regulatory body are established in IAEA Safety Standards Series No. GSR Part 1 (Rev. 1), Governmental, Legal and Regulatory Framework for Safety [4]. <u>Guidance on the organization of the regulatory body is given in GSG-12 and on the functions of the regulatory body in GSG-13.</u>	Please add the related safety guides to the text and reference list: GSG-12 and GSG-12 or delete the para. see comment 1.14.			x	No need to add the mentioned safety guides, they support GSR Part 1 not Part 2

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Finland	1.11	Further requirements for the management system of organizations and for safety culture are established in IAEA Safety Standards Series No. GSR Part 3, <u>Radiation Protection and Safety of Radiation Sources: International Basic Safety Standards</u> [5].	Please update correct name of the GSR Part 3. or delete the para. see comment 1.14	x			
China RASSC	Para 1.11/Line 2	Change “No. GSR Part 3, Governmental, Legal and Regulatory Framework for Safety ” into “No. GSR Part 3, <u>Radiation Protection and Safety of Radiation Sources: International Basic Safety Standards</u> ”	It is a wrong citation.	x			
Japan RASSC	SCOPE 1.11.	Further requirements for the management system of organizations and for safety culture are established in IAEA Safety Standards Series No. GSR Part 3, <u>Radiation Protection and Safety of Radiation Sources: International Basic Safety Standards</u> Governmental, Legal and Regulatory Framework for Safety [5].	Editorial. If [5] refers to GSR Part 3, it should be corrected to the proper name.	x			
WNA	1.11	IAEA Safety Standards Series No. GSR Part 3 Radiation Protection and Safety of Radiation Sources	There is a mistake in the current text: IAEA Safety Standards Series No. GSR Part 3, <u>Governmental, Legal and</u>	x			

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			Regulatory Framework for Safety				
Finland		delete the para. see comment 1.14	delete the para. see comment 1.14			x	GSG 3.5 directly supports GSR Part 2
Finland		delete the para. see comment 1.14	delete the para. see comment 1.14			x	
Finland	1.14	Requirements on the management system for facilities and activities nuclear installations are provided in all the IAEA Safety Standards Series General Requirements Documents and Specific Requirements Documents. Recommendations on the management system features for specific topics are presented in the related underlying Safety Guides.	<p>There are management system requirements in all the Requirements level Safety Standards and specific recommendations related to those requirements in the related Safety guides.</p> <p>Only some examples of the related requirements and safety guides should not be presented.</p>			x	The most relevant are mentioned

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Ireland EPRéSC	1.17	The Appendix presents a safety culture framework, containing the traits and attributes that ought to be present in organizations with a strong safety culture.	The Framework is a guidance for what <i>should</i> be in place.	x			The term should was used
Brazil	Para 2	Senior management has the overall responsibility for safety within the organization and shall ensure that the necessary arrangements are in place to ensure safety. Safety responsibilities should also be clearly defined at all levels, with appropriate oversight, communication, and accountability according to each role.	The current focus is on top management, but without extending responsibility throughout the hierarchy, implementation gaps may arise			x	The whole Requirement of GSR Part 2 is about senior management. The engagement of other staff is described in other parts of DS513
WNA	2.3	The arrangements for achieving the fundamental safety objective should take into account any interfaces between safety, security and safeguardability (i.e. the 3S approach) with the basic objective that safety is not compromised by security and or safeguards and vice versa	The current text should be extended to the safeguardability , i.e the aptitude of the architecture to ease the operations related to the safeguards. This corresponds to the implementation of the 3S approach.	x			

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Saudi Arabia	2.5/2 and 3.7/ 1 and 2	[...] management and safety culture commensurate to with the risks of the facility or activity [...]	Although ‘commensurate to’ is correct, IAEA safety standards use more frequently ‘commensurate with’, e.g. in SF-1, para. 3.24.	x			
Germany NUSSC	2.6	Owners who have the legal right to possess and use facility or the organization conducting activity Registrants and licensees should take active oversight of safety performance, challenge the senior management on safety matters, and ensure that safety has the overriding priority in decision-making.	The ownership of an NPP is complex, it would even be reasonable to see taxpayers			x	Owner is not the same as tax payer. Owners have significant impact on organizations. Owner is not a licensee or registrant in many cases.
Germany NUSSC	2.7 New issue	<u>It should be impermissible to delegate responsibilities. Duties may be delegated, but only if the delegation recipients have the required qualification and expertise.</u>	The inadmissibility of delegating responsibilities is important and should be mentioned in Section 2.			x	No need to add what not to do
Brazil	Para 3.1–3.6	The organization should adopt methods to evaluate leadership for safety, using both qualitative and quantitative indicators such as participation in safety dialogues, handling of events, and staff perception surveys.	Leadership expectations are well described but the document lacks guidance on how to measure the effectiveness of those behaviors.			x	Some explanation is in chapter 9, 9.14 and further

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Japan RASSC	Section3 3.4.	Senior management should apply a long term view when formulating and aligning policies, goals, strategies, plans and objectives, and should also actively promote that a high level of safety performance is an essential part of the overall performance and is necessary to sustain a high level of the <u>organization's</u> organization's overall performance.	Editorial. Three other locations (i.e., 6.2.(b), 6.7.(e), 7.11.) should be similarly modified.	x			
ENISS	3.5	“Managers at all levels should seek the active involvement and support of all individuals within the organization...”	In order to reach effective, organised and practicable implementation, the second all should be deleted. Expecting that the active involvement and support of <u>all</u> individuals in the organisation is sought by managers at <u>all</u> levels is highly likely to be over interpreted.	x			
Ireland EPReSC	4.3	(a) Establish a work environment ... (b) Cultivate a work environment ... (c) Ensure that managers ...	Reads better.	x			

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ENISS	4.5	<p>“Senior management should ensure that management systems of suppliers are appropriate to the scope of their activities consistent with the organization’s overall management system and meet the relevant regulatory requirements.”</p>	<p>The original wording is likely interpreted too strictly, implying that suppliers’ management systems should be actively aligned with that of the organization’s. Suppliers, e.g. suppliers of serially produced industrial standard items, operate independently and <u>design their own systems based on their context</u> and regulatory obligations. Licence holder assesses and approves them as they are or doesn’t approve. Major nuclear specific requirements and alignments are not required. The revised wording introduces flexibility while maintaining the intent of ensuring that suppliers have appropriate systems in place that support compliance and collaboration.</p>		x		

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Saudi Arabia	4.6 (i)	(i) It should include a commitment to the highest safety performance by all individuals. including suppliers.	Clarity. It is not clear how the suppliers can commit to the highest safety performance within the organization safety policy.	x			
Saudi Arabia	4.17	In the communications with interested parties, clear and unambiguous language should be used.	Editorial/ clarity. Add a comma after 'parties'.	x			
WNA	4.17	A foot note could be added indicating <i>"Appropriate means as, for example, a representation of the "Safety architecture" defined as being the set of provisions (active and passive systems, inherent characteristics, procedures) that are set up by the designer to:</i> <ul style="list-style-type: none"> ▪ <i>ensure the achievement of tasks allocated to the process in satisfactory conditions of safety, i.e. maintaining significant parameters within allowable operational limits;</i> ▪ <i>prevent the degradation of the facility, i.e. exceeding of operational limits;</i> 	<i>"Appropriate means"</i> is quite generic, I feel the notion of "safety architecture" can be useful as a basis for the communication			x	Not applicable to all facilities and activities

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		<ul style="list-style-type: none"> restore and keep the facility in a safe shutdown condition for the short and long term, in case of failure. <p>Note that analogous notions can be considered for security and safeguards."</p>					
	Para 5	<p>Managers at all levels should ensure that their staff are empowered to raise safety concerns in a safe environment (i.e. without fear of retaliation, sometimes referred to as 'no-blame culture'). Even while promoting a no-blame reporting culture, proportional accountability must be applied in cases of deliberate misconduct or gross negligence to maintain fairness and organizational trust. Additionally, managers should: (a) Ensure that staff are aware of the means available for raising safety concerns and actively encourage staff to raise safety concerns. (b) Ensure that any concerns raised are addressed in a timely manner and provide feedback on the progress of resolving the issue.</p>	<p>While a safe environment for reporting is essential it must be balanced with proportional accountability to avoid permissiveness and ensure just culture.</p>			x	<p>Relevant to 3.12 This paragraph is about raising safety concerns not about judgement of deliberate misconduct etc</p>

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Finland	5.6	(d) Ensure that decisions having implications to safety are documented and traceable	<p>There are changes in the organizations throughout the plant life-cycle from design to decommissioning and therefore decisions shall be documented and traceable for possible re-engineering and analysis.</p> <p>N.B. 5.7 speaks on “If conflicts between the elements of the management system are identified they should be solved by using a structured, transparent, documented and well communicated decision making approach</p> <p>N.B. there is text on 5.9 on changes applying GA, but fundamental decisions on safety (design, Construction, Operation..) should be noted.</p>	x			Added to 3.7

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WNA	5.7	Compliant with the 3S approach, potential impacts of security / safeguardability measures on safety and potential impacts of safety measures on security / safeguardability shall be identified and shall be resolved without compromising safety, security of safeguardability	Need to extend the objective of the 3S implementation			x	Safeguards are mentioned in 2.3 and this is enough
WNA	5.7	Current text : <i>If conflicts between the elements of the management system are identified they should be solved by using a structured, transparent, documented and well communicated decision making approach. Senior.</i> Add a foot note : The availability of a safety / security / safeguardability architecture can be useful to meet this objective.	Outline the interest for having an exhaustive representation of the installation's architecture			x	Not relevant to all facilities and activities
WNA	5.9	Current text: <i>These provisions should ensure that all changes (i.e. technical modifications, documentation changes and organizational changes), are methodically identified, analysed, and controlled.</i> Add a foot note : The availability of a safety / security / safeguardability architecture can be useful to meet this objective.	As above : outline the interest for having an exhaustive representation of the installation's architecture			x	Not relevant to all facilities and activities

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Germany NUSSC	5.9 Line 5	These provisions should ensure that all changes (i.e. technical modifications, documentation changes and organizational changes), are methodically identified, analysed, and controlled. <u>Possible alternatives should be evaluated as far as practicable.</u> For each change, the impact on the objectives of the organization, including those relating to safety, health, the environment, security and quality, should be considered within the context of applying a graded approach.	Possible alternatives for changes or modifications should be considered and evaluated as well, please add.				
Germany NUSSC	5.13	Senior management should establish criteria for the evaluation of technical modifications and organizational changes based on a graded approach. <u>The objectives intended by the technical modifications and organizational changes should be specified and documented.</u> If the evaluation of a significant change is conducted by an independent external organization, then the methodology, team structure and respective competences (including training) should be specified and agreed by the organization whose management system is being evaluated.	The objectives are an essential part of a systematic and comprehensible procedure for the evaluation of changes/modifications and should be mentioned.		x		Documented added to second paragraph of 5.9. 5.13 speaks about evaluation of changes.

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Saudi Arabia	5.13/4	[...] then the methodology, team structure and respective competences <i>competencies</i> (including training) should be specified.	Clarity - editorial See comment 16 above.			x	This proposal was rejected after IAEA internal discussion (TO consulted it with Safety Standards and Security Guidance Development Section)
WNA	5.17	If justified , senior management should ensure that changes are communicated to interested parties, in order that they all know and understand the objectives of the changes.	Current text: <i>"If necessary"</i> Rather : "if justified"	x			
China	5.19	It is suggested to add following description: The organization should set up safety review bodies such as safety committees to review important safety matters, and follow up the implementation of the review resolutions, also conduct risk analysis and independent review as necessary.	5.19. Paragraph 4.14 of GSR Part 2 [2] states: "Arrangements shall be established in the management system for an independent review to be made before decisions significant for safety are made. The requirements on the independent nature of the review and on the necessary competences of the reviewers shall be specified in the management system." As digital data tools and cyber-security are becoming increasingly important in nuclear safety management and security management, it is recommended to add content on digital data tools and cyber-security.			x	GSR Part 2 is selfexplanatory, Not relevant to all facilities and activities

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WNA	5.20	<p>Current text: <i>Senior management should ensure that the documentation of the management system is appropriate to the organization and to its facilities and activities, and is flexible enough to accommodate changes.</i></p> <p>Add a foot note: Cf. the comments addressing the interest for the representation of the safety / security / safeguardability architecture</p>	As above : outline the interest for having an exhaustive representation of the installation's architecture			x	Not relevant to all facilities and activities
Germany NUSSC	5.20	<p>Requirement 8 of GSR Part 2 [2] states that "The management system shall be documented. The documentation of the management system shall be controlled, usable, readable, clearly identified and readily available at the point of use."</p> <p>Senior management should ensure that the documentation of the management system is appropriate to the organization and to its facilities and activities, and is flexible enough to accommodate changes. <u>This also implies that the use of outdated versions of documentation should be avoided.</u></p>	As one of the most common mistakes to be avoided is the use of non-valid documentation, it should be explicitly recommended. Either here or in another para of the chapter.			x	It is included in 5.27

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Russian Federation NSGC	5.22	Exclude paragraph.	The paragraph provides requirements for nuclear security (information security). Nuclear security considerations are concern of Nuclear Security Series and are out of scope of this document.	x			
Russian Federation NSGC	5.25 (f)	Exclude paragraph.	The paragraph provides requirements for nuclear security. Nuclear security considerations are concern of Nuclear Security Series and are out of scope of this document.	x			
Brazil	Para 6	Senior management shall be responsible for establishing, applying, sustaining and continuously improving a management system to ensure safety. Senior management should foster long term commitment and engagement of all individuals through participation and consultation. Participation may include involvement in thematic workshops, improvement groups, or lesson-learned panels.	Participation and consultation are mentioned but not specified. Practical examples would help organizations apply the recommendation more effectively.			x	4.1 Too specific, text provides more flexibility

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China RASSC	Para 6.1/Line 1-3	Display “Senior management shall determine the competences and resources necessary to carry out the activities of the organization safely and shall provide them. ” in bold.	Be consistent with the context, display the Requirements in bold.	x			
Germany WASSC	6.4	Core competences should be built up by means of engagement with relevant industry and branch experts, professional associations, research centres, and universities on national and international levels taking into account a graded approach.	Core competencies should also be a required prerequisite for less complex facilities.			x	First sentence says Senior management should ensure that the organization develops and retains fundamental core competences. Second sentence relates to organizations which can help with competences build up and here is graded approach relevant.
ENISS	6.4	” ... Core competences should be built up by engaging with relevant industry and branch experts, and utilising professional associations, research centres, and universities at national and international levels, applying a graded approach.”	The original wording is likely to be interpreted too rigidly, suggesting that all listed external parties - including both national and international universities, research centres, and professional associations at both national and international levels – are expected to be			x	Taking into account a graded approach is in the end of sentence

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			involved in the development of core competences. The proposed text introduces flexibility by clarifying that such engagement should be utilised as appropriate, depending on the context and needs of the organisation.				
Saudi Arabia	6.5/5 and 7	If external competences <i>competencies</i> and resources are used, the organization should have sufficient knowledge to undertake the following: (a) Identify the specific needs for external competences <i>competencies</i> and resources;	Editorial. See related comments above.			x	This proposal was rejected after IAEA internal discussion (TO consulted it with Safety Standards and Security Guidance Development Section)
Saudi Arabia	6.7/1	To support the achievement and development of collective and individual competences <i>competencies</i> , [...]	Editorial.			x	This proposal was rejected after IAEA internal discussion (TO consulted it with Safety Standards and Security Guidance Development Section)
Saudi Arabia	6.8/2	Managers at all levels should ensure the timely specification and acquisition of the competences-competencies necessary (e.g. for specific tasks) [...]	Editorial.			x	This proposal was rejected after IAEA internal discussion (TO consulted it with Safety Standards and Security Guidance Development Section)

COMMENTS				RESOLUTION			
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Saudi Arabia	6.12/ 1	Managers at all levels should contribute to the development of staff competences <i>competencies</i> and [...]	Editorial			x	This proposal was rejected after IAEA internal discussion (TO consulted it with Safety Standards and Security Guidance Development Section)
China	6.14	(c) Establish management system processes to ensure the preservation, <i>use</i> , <i>innovation</i> and <i>inheritance</i> of organizational knowledge.	The knowledge management is not only preservation, but also use, innovation and passing on about knowledge.			x	The text is selfexplanatory
Saudi Arabia	7.6 (d)	The resources and competences <i>competencies</i> needed within the organization to implement the process;	Editorial.			x	This proposal was rejected after IAEA internal discussion (TO consulted it with Safety Standards and Security Guidance Development Section)
Saudi Arabia	7.12/3	Clearly, specified lines of communication should be established.	Editorial/ clarity. Please add a comma after 'clearly'.			x	Not correct
Saudi Arabia	7.14	Footnote 12 does not appear as a footnote but as part of the text.	Editorial.			x	This is a part of GSR Part 2 quote

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Russian Federation NSGC	7.15 (h)	Exclude paragraph.	The paragraph provides requirements for nuclear security (information security). Nuclear security considerations are concern of Nuclear Security Series and are out of scope of this document.			x	No, this is also related to safety and quality as well
ENISS	7.18	The organization should apply a graded approach to the management of the supply chain. As such, the different elements of the procurement process (e.g. qualification, selection, evaluation, oversight of supplier's performance) and activities conducted during procurement should be implemented in a way and at a level of detail that are proportionate with the safety significance of the item, product or service being supplied. Where appropriate, the organization may accept the supplier and its established management system as-is, without imposing nuclear-specific requirements, provided that the product and supplier performance meet the safety expectations.	Addition of 7.18 is welcomed. However, it may still be interpreted in a way that leads to the routine imposition of nuclear-specific requirements on suppliers' management systems, even when not necessary. This can discourage capable industrial suppliers from participating in the nuclear sector. The proposed addition clarifies that, where justified, high-quality mass-produced products and their suppliers may be accepted without additional nuclear-specific tailoring, provided that the license holder assesses and accepts them. (ref. IAEA-			x	This paragraph describes graded approach and is relevant to all facilities and activities. Tecdoc refers to nuclear power plants only

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			TECDOC-2034 App. VIII.)				
Brazil	Para 8	The processes and plans resulting from the strategy for interaction with interested parties should include: (a) Appropriate means of communicating routinely and effectively; (b) Means for timely and effective communication in changed or unanticipated situations; (c) Means of dissemination of safetyrelated information; (d) Means for considering the concerns of interested parties. Communication strategies may include regular public meetings, accessible report dissemination, and direct feedback channels with the community.	Concrete communication examples enhance external confidence and reduce reputational risk.			x	Related to 4.17 Provided examples are not relevant to all facilities and activities
Germany WASSC	8.7	[...] (b) Maintaining a presence in the workplace, such as performing walk-downs of the facility and making observations of tasks where staff can be coached on the desired behaviours and attitudes and where staff can express any safety concern or idea for improvement	This should be quite clear but it was also highlighted in other Safety Standards.			x	Covered already in 3.12

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		<u>without having to fear negative personal consequences.:</u>					
WNA	8.10	Current text: <i>The management system should include tools and processes for reporting and resolving safety concerns. These.</i> Add a foot note: Cf comments addressing the interest for the representation of the safety architecture	As above : outline the interest for having an exhaustive representation of the installation's architecture			x	Not relevant to all facilities and activities
ENISS	9.4	“Staff assigned to manage processes should periodically conduct self-assessments of processes and their effectiveness. These self-assessments should involve all organizational units and individuals that significantly contribute to the process.”	The use of the word “all” may lead to overly broad interpretations, implying that every contributing individual must be involved in each self-assessment. This could be impractical and needlessly burdensome. Removing “all” introduces necessary flexibility, allowing the organization to determine appropriate involvement based on the scope and nature of the process being assessed.	x			

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Germany WASSC	9.8	Senior management should ensure that appropriate training is provided to all staff on reporting non-conformances and proposing and approving corrective actions. This training should reinforce that staff are enabled and encouraged to freely raise concerns <u>without having to fear negative personal consequences.</u>	See comment 2.			x	Covered already in 3.12
Germany WASSC	9.11	Non-conformances and their direct and root causes <u>as well as contributing factors</u> should be analysed for trends to identify recurring events, generic issues and weaknesses. Mitigation actions should be taken as appropriate.	Clarification	x			
Germany WASSC	9.13	The results of corrective actions should be monitored at planned intervals to ascertain whether they are effective. Corrective actions implemented to prevent recurrence should be reviewed for effectiveness in eliminating the root cause <u>and contributing factors.</u>	Clarification			x	Corrective actions to prevent recurrence address root causes usually
ENISS	9.13	The results of corrective actions should be monitored at planned intervals to ascertain whether they are effective. Where appropriate , corrective actions implemented to prevent recurrence should be reviewed for effectiveness in eliminating the root cause. Individuals who are responsible for implementing a corrective action	All corrective actions should not require an effectiveness review. The original wording may be interpreted as requiring a root cause effectiveness review for all corrective actions, regardless of their significance or complexity. Introducing	x			

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		should be provided with the necessary authority and resources.	“where appropriate” or “By implementing graded approach” would clearly allow organizations to apply proportional effort based on the nature and impact of the issue being addressed.				
Germany WASSC	9.16	A graded approach should be applied to the conduct of these assessments: for example, for a less complex facility or activity with a low radiation risk, the assessments of leadership for safety and of safety culture may be less formal .	Clarification	x			
Germany NUSSC	9.16	A graded approach should be applied to the conduct of these assessments: for example, for a less complex facility or activity with a low radiation risk, the assessments of leadership for safety and of safety culture may be informal .	Please define the term “informal” regarding the assessment of leadership for safety and of safety culture. If possible, give a more concrete example. This recommendation otherwise leaves room for misinterpretation e.g. that there is no need for documentation of the assessment.		x		See the line above
Germany NUSSC	9.17	Paragraph 6.9 of GSR part 2 [2] states: “Senior management shall ensure that self-assessment of leadership for safety and of safety culture includes assessment at all organizational levels and for all functions in the organization.	Please delete “when relevant”. Independent assessments should always be conducted by people with sufficient expertise and experience. No other para on self-assessment and	x			

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		<p>Senior management shall ensure that such self-assessment makes use of recognized experts in the assessment of leadership and of safety culture.”</p> <p>Senior management should ensure that both self-assessments and, when relevant, independent assessments are managed by individuals and groups with sufficient expertise and experience in assessing leadership for safety and safety culture, including in the use of appropriate methods.</p>	independent assessment has this restriction.				
Saudi Arabia	9.19 (b) and 9.19 (c)	<p>Please consider merging bullet (b) and (c) to read as follows:</p> <p>(b) The resources necessary for an effective assessment, including resources for planning, implementation, <i>addressing issues discovered during the assessment</i> and reporting, are provided.</p>	<p>Clarity and conciseness of the recommendations.</p> <p>Bullet (c) can be covered in bullet (b).</p>			x	c) is follow up after assessment is conducted; it is better to leave it separate
Brazil	Para 10	<p>The application of a graded approach should be reflected in the resources devoted to the development and implementation of the management system. This may include adjustments such as: the extent and level of documentation, the planning and assessment methods, and the level of formality of control processes. For instance, the degree of formalization and</p>	<p>The graded approach is central, and practical examples help less complex organizations implement it appropriately.</p>			x	Probably 5.19? The text says the same maybe different words are used

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		document control may be adjusted according to the risk level associated with each process.					
Brazil	Para 11	Managers at all levels should contribute to the analysis of training needs, the development, review and approval of training programmes, the delivery of selected parts of the training and the evaluation of training effectiveness. Managers at all levels should ensure that appropriate periodic retraining or requalification is provided, to ensure that individuals remain capable of performing their assigned tasks. Training effectiveness should be evaluated through practical performance, procedural compliance, and incident analysis.	While training is addressed, effectiveness is not. Evaluation is essential for continuous competence assurance.	x			Probably 6.3 Effectiveness is in a text
Brazil	Para 12	If external competences and resources are used, the organization should have sufficient knowledge to undertake the following: (a) Identify the specific needs for external competences and resources; (b) Specify the objective, scope, requirements and relevant qualification for activities conducted by external organizations or individuals; (c) Monitor activities conducted by external organizations or individuals; (d) Understand, evaluate and use the outcomes of activities	Retaining internal capacity ensures proper supervision and understanding of outsourced safetyrelated services.				Probably 6.5 Reflected in 6.4 and 6.5

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		conducted by external organizations or individuals. The organization must retain enough internal expertise to act as an informed customer, even when outsourcing expertise.					
Brazil	Para 13	Senior management should analyze and plan for the organization's future competence needs. This should include consideration of the following: (a) The future needs related to the organization's strategy, goals, plans and objectives; (b) Any planned refurbishments of a facility, major change in the technologies or equipment supporting the activities, or organizational changes; (c) Predicted future demographic and economic conditions; (d) Foreseeable staff fluctuation and retirement; (e) Future changes to regulatory requirements that could affect the organization. Competence planning should also consider the introduction of new technologies and changes in regulatory requirements.	Competence planning should reflect technological and regulatory evolution for proactive workforce development.			x	Probably 6.11 Covered by b/ and e/

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Brazil	Para 14	The following approach should be used to develop the processes of an organization: (a) Identifying the processes necessary for the organization; (b) Creating a logical structure of the processes specifying the sequence of and the interactions between the processes; (c) Developing a process description, including inputs, outputs and records; (d) Addressing regulatory requirements and relevant codes and standards; (e) Identifying the resources needed for each process; (f) Identifying the indicators to measure and assess the effective implementation of each process. Additionally, processes should incorporate lessons learned from past events and national or international best practices	Embedding continuous learning and benchmarking into processes increases organizational resilience	x			Probably 7.5
Brazil	Para 15	The organization shall make arrangements to ensure that suppliers of items, products and services important to safety adhere to safety requirements and meet the organization's expectations of safe conduct in their delivery. Mechanisms for promoting a safety culture within the supply chain, such as recognition of good practices or collaborative audits should also be considered.	The current focus is on compliance; adding positive reinforcement supports supplier engagement in safety.			x	Probably 7.14 This is a quote from GSR Part 2

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Brazil	Para 16	Managers at all levels should promote safe working practices and conditions and discourage unsafe practices and behaviours. Various methods (e.g. training, team activities, rewards, staff promotion) should be used to create and support a working environment where safety conscious behaviour is recognized, encouraged and valued. The use of institutional recognition programs, such as awards or internal campaigns, may reinforce behaviours aligned with the safety culture.	Visible reinforcement helps institutionalize and promote safetyaligned behaviors.			x	Probably 8.5 Too detailed, not relevant for all facilities and activities
Brazil	Para 17	The management system should include tools and processes for reporting and resolving safety concerns. These should not be only major concerns but also minor concerns, precursors or adverse trends as they might become major later. Individuals should be encouraged to report concerns in a timely manner. Managers at all levels should implement and clearly explain the measures that support an individual's rights and responsibilities to raise safety concerns to increase openness and decrease fear of raising concerns, thereby building a trusting and continually learning organization. Reporting mechanisms should include anonymous channels and formal protection against retaliation	Trust in reporting systems depends on guaranteeing psychological and procedural safety for whistleblowers	x			Probably 8.10 Addressed in appendix under RC.1

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Brazil	Para 18	The organization should develop its capacity to learn not only from failures but also from positive achievements and success. Recognizing and analyzing good practices should also be part of the organizational learning cycle. The organization should employ a variety of approaches to stimulate learning and improve safety and the overall performance of the organization.	Focusing only on failures may limit learning. Highlighting success supports balanced safety culture growth.		x		Probably 8.12 Text already covers learning from positive achievements and successes
Brazil	Para 20	A thorough assessment of both leadership and safety culture should be performed periodically in order to monitor and evaluate trends and changes. The assessments of leadership for safety and of safety culture should be conducted together. Leadership and safety culture assessments should consider the impacts of strategic decisions on employees' safety perceptions.	Strategic decisions (e.g., budget cuts, restructuring) may strongly influence organizational safety culture and should be monitored			x	Probably 9.14 Covered in 9.15 sufficiently
Japan TRANSSC	REFERENC ES	[6] INTERNATIONAL ATOMIC ENERGY AGENCY, Regulations for the Safe Transport of Radioactive Material, IAEA Safety Standards Series No. SSR – 6 (Rev.1), IAEA, Vienna (2018).		x			
China RASSC	Pages after 27	The page numbering is incorrect after page 27; the numbering restarts from 0 twice.	Editorial issue.				Yes, it is the template weakness and I do not know how to do it

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