

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

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1 Finland	Generic comment	<p>Consider integrating security aspects more systematically throughout the text. Some suggestions below:</p> <p>-Title: “Leadership, Management and Culture for Safety and Security DS513 and NSTXXX” (and other respective changes, such as the attribute “Nuclear Security Implementing Guide”)</p> <p>- Section 1. Introduction: Background, Objective, Scope, Structure: Modify to include security references and other content corresponding to the safety content.</p> <p>-Section 2. Responsibility... Add “and security” to the heading of the section.</p> <p>2.1 Add a sentence at the end of the para: “Nuclear security shares the same fundamental objective.”</p>	<p>It would be better to manage safety and security under the same leadership, in the same integrated management system, and, to the appropriate extent, by the same or similar processes. (This idea is already included in the draft, e.g. in 5.1). It would be good to have an organizational culture that takes safety and security into account in a balanced, risk-informed manner. Overall risk management should take into account risks associated with malicious acts/unlawful or other [intentional] unauthorized activities.</p> <p>The objective is the same. Means to achieve it are different, due to the measures needed to</p>			x	<p>DS513 was not drafted as common guide for safety and security. Discussion was held in committees many times and conclusion was that relevant publications in NSS should be revised together with DS513. This is not happening..</p>

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		<p>2.3 Modify: ...”international codes and standards for safety and security...” (For example the ISO/IEC 27 000 series and ISO/IEC 31 000 are applicable, as well as Code of Conduct for Safety and Security of Radioactive Sources.)</p> <p>2.4 Modify: “The arrangements for achieving the fundamental safety and security objective should take into account any interfaces between safety and security with the basic objective that safety and security are considered in a balanced, risk informed approach is not compromised by security and vice versa.</p> <p>2.5 Modify: “...the fundamental safety and security objective...”</p> <p>2.6 Add two sub-paras: “(e) Integration of management of risks associated with unlawful and other unauthorized [intentional] activities, including external and insider risks, into the overall risk management process.”</p>	<p>combat an active adversary.</p>				

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		<p>“(f) The effect of the individual’s activities, acts, and omissions to the safety and security and risks associated with specific facilities and/or activities.”</p> <p>Section 3. Add “and security” to the heading. Add relevant quotes from the NSS or A/CPPNM.</p> <p>3.1. Modify: “The organizational approach to safety and security should encompass the commitment to the planning, ...”</p> <p>3.3. Add, at the end: “These interactions and this systemic approach should cover also nuclear security.”</p> <p>3.11. Modify: “Managers at all levels should engage in frequent formal and informal communication with staff to remain aware of any concerns by staff in relation to safety. Managers should also be present regularly in the workplace to consistently observe, coach and mentor staff to encourage a focus on safety. Managers should use various communication tools and monitor their effectiveness of ways of</p>				

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		<p>communication to engage individuals in enhancing safety performance. The same objectives apply to security.”</p> <p>Section 4. Add “and security” to the heading. Add relevant references/quotes from the NSS or A/CPPNM.</p> <p>4.2..Add: (c) ...safety and security objectives.”</p> <p>4.6 Add, at the end: “The organization should decide whether to have separate politics or whether to combine safety and security into one policy.”</p> <p>4.7, 4.8, 4.11, 4.12. Add: “safety and security”.</p> <p>4.10 Add: “The organization’s goals, strategies, plans and objectives should be developed, implemented and aligned in such a manner that their collective impact on safety and security is understood and managed and safety and security are not compromised by other priorities.”</p>				

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		<p>4.13 Add, at the end: “The same principles apply to nuclear security.</p> <p>4.17 Add, at the end: “In the communication on security matters, principles of confidentiality, integrity, and availability are applied, in a risk-informed manner.”</p> <p>Section 5. Management...the management system Add “and security” to the heading and where “safety” is mentioned; for references, add relevant higher-level security reference from the NSS or A/CPPNM.</p> <p>5.24 Modify: “Using a graded approach, including information security requirements, senior management should decide on the level of control...”</p> <p>Section 6 Add “and security” to the heading and where “safety” is mentioned (apart from direct quotes), add relevant higher-level security reference from the NSS or A/CPPNM.</p>				

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		<p>6.6 Consider adding a bullet: “(e) Knowledge of nuclear security methodologies and situational awareness [to maintain an effective nuclear security system].”</p> <p>Section 7 Add “and security” to the heading and where “safety” is mentioned (apart from direct quotes), add relevant higher-level security reference from the NSS or A/CPPNM.</p> <p>7.11 Consider adding: “...based on a graded approach and have information security integrated into them.”</p> <p>Section 8. Add “and security” to the heading and where “safety” is mentioned (apart from direct quotes), add relevant higher-level security reference from the NSS or A/CPPNM.</p> <p>8.8. Consider adding a bullet: “(x) Understanding of how safety and security culture can support the insider threat mitigation programme.”</p> <p>8.8. (i) amend (i) to:</p>				

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		<p>Understand the integration of security, safeguards and radiation and nuclear safety in the organisation's culture for safety.</p> <p>Para 8.16 Amend: Managers should establish means for communicating and underlining the integrated safety culture where security, safeguards, radiation, and nuclear safety are interacting as elements of the overall safety. Managers should establish means for cooperation to ensure that the needs of the different elements of overall safety are balanced.</p> <p>Section 9 Add "and security" to where "safety" is mentioned (apart from direct quotes), add relevant higher-level security reference from the NSS or A/CPPNM.</p>					
2 Finland	General comment	The involvement, inclusion, participation of the personnel to the creation and maintenance of culture for safety could be emphasised more throughout the text.				x	Chapter 8 Culture for Safety addresses that in sufficient way (senior managers, managers at all levels, individuals are mentioned in many paragraphs)

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3 Finland	General	The organization should ensure that there is a strong internal independent oversight of nuclear safety that is outside the executive line management chain for operating the plant and that has independent reporting lines to the chief operating officer or chief executive officer.	Independent nuclear safety oversight function is not referred to in this Guide. References, e.g., INSAG-27 item 29; No. SSG-72 items 5.24-5.26; WANO GL 2018-01.			x	This proposal is too specific, mainly applicable to nuclear power plants. DS513 is applicable to all facilities and activities including regulatory bodies. This proposal can be reflected in potential revision of GS-G-3.5 dedicated to nuclear installations only.
4 Finland	General	Consider defining (e.g. in footnotes) the key concepts: Leadership, Management, Culture, Graded approach.		x			It is already defined - leadership and management on page no. 3. Other terms are defined in IAEA Nuclear Safety and Security Glossary (see 1.9)
5 Saudi Arabia	General	Please consider the following proposals regarding the ‘parallel’ use of ‘safety culture’ and ‘culture for safety’: 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>	Safety culture is an important part of the leadership and management for safety. Therefore, it deserves clear recommendations, with unambiguous terminology. It is recognized that: - ‘culture for safety’ and ‘safety culture’ have been used in	x			

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		<p>2- If ‘culture for safety’ and ‘safety culture’ are used with different meanings, differences need to be clarified and justified, e.g. by using a footnote.</p>	<p>‘parallel’ in IAEA safety standards, e.g. GSR Part 2, Requirement 12.</p> <p>- Only ‘safety culture’ is defined in the IAEA Nuclear Safety and Security Glossary, which 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</p>				

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			<p>system, strategy and safety-system.</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>				
6 Saudi Arabia	General	<p>Except in the quotations, please consider using either ‘competence’ as singular noun or ‘competencies’, as appropriate. Some proposals are given for paragraphs 4.19, 6.4, 6.6, 6.7 and 6.11.</p>	<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 behaviours of an</p>	x			<p>Check was done in Oxford and Maria Webster Dictionaries; they both say that competence and competency are synonyms; all proposals in next chapters will be considered individually</p>

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			<p>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>				
India	General Section 3, 4 and 8	<p>The guidance on the following aspects are not covered in DS-513. These aspects were included in DPP (<i>Version 31 December2019</i>):</p> <p>:</p> <ul style="list-style-type: none"> ○ To take account of new and emerging practices and technologies ○ The application of defence in depth and strength in depth in the area of management, leadership and culture for safety <p>Relationship between Safety Culture and Human Technology and Organization (HTO) concepts</p>	<p>Scope and completeness:</p> <p>These aspects should be covered in draft text of DS-513, as these are identified during the DPP (<i>Version 31 December2019</i>)</p> <p>These are relevant aspects, on which guidance will be useful to the member states.</p> <p>If these aspects are being covered in other IAEA publications, this may be included in Para 1.3 on Scope as ‘excluded’ aspects</p>			x	<p>Ad/ To take account of new and emerging practices and technologies</p> <p>Draft text reflected new practices in all areas – leadership, management and culture for safety; regarding technologies – it is technologically neutral</p> <p>Ad/ The application of defence in depth and strength in depth in the area of management, leadership and culture for safety</p>

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							DS513 is safety guide which brings recommendations how to apply GSR Part 2 requirements. GSR part 2 does not include any specific requirements related to defence in depth and strength in depth Ad/ Relationship between Safety Culture and Human Technology and Organization (HTO) concepts Safety guide is a set of recommendations which must be specific and clear. Relations are most visible in safety culture model – traits and attributes which covers many human and organizational factors
Pakistan	General	Information may be included in DS-513 regarding developing/ maintaining QA from 50-C/SG-Q.	IAEA Safety Series No. 50-C/SG-Q (1996) provided detailed requirements on quality assurance for NPPs/nuclear installations for different stages. IAEA GSR Part-2 defines overarching requirements of Integrated Management System for ensuring safety and subsequently its			x	This safety guide is not on quality system, it is on leadership, management and culture for safety. It is a set of recommendation how to apply GSR part 2 in all facilities and activities. There are other publications (not safety standards) describing much more details, like IAEA TECDOC 1910 Quality Assurance and

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			<p>guidance document (DS-513) provides guidance regarding these overarching requirements instead of going into details of QA (like in 50-C/SG-Q) for different stages.</p> <p>Most of the industry (manufacturers, design organizations, etc.) are still using 50-C/SG-Q guidance due to its step by step user friendly details to establish/maintain QA.</p> <p>QA is still an important ingredient of integrated management system as per IAEA GSR Part-2 and most of the guidance provided in 50-C/SG-Q is still valid and could be utilized by nuclear industry.</p> <p>It is suggested to either include information regarding developing/maintaining QA from 50-C/SG-Q into DS-513 or develop another document to describe step by step</p>				Quality Control in Nuclear Facilities and Activities.

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			guidance for establishing/maintaining QA system that will complement implementation of IAEA GSR Part-2.				
Pakistan	General	It is suggested to include elaborative examples such as contents of management system, etc. for facilities and activities with low radiation risk as an Appendix.	In different sections of the draft, it is mentioned that for facilities or activities with low radiation risk, the level of details may be adjusted accordingly. Therefore, examples may be provided.			x	As it was explained during committees meeting, it is difficult to bring such examples in safety standard dedicated to all facilities and activities <ul style="list-style-type: none"> - NPP operators, - Fuel cycle facilities, - Hospital, - Veterinary clinic - NDT companies, - Oil industry - Research centre - University - Airport with security X-rays - A regulatory body
UK NUSSC Comment not included in step 7	The Title	“Leadership, Management System and Culture for Safety”	To clearly identify the main umbrella topics that contribute towards safety			x	The title was approved in DPP. Moreover management of safety does not include only management system

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Canada	1.1 and Appendix A.1	<p><u>“The Appendix-IAEA document titled <i>“A Harmonized Safety Culture Model”</i> presents a safety culture framework <u>which attempts to enhance the alignment of different safety culture models used in different States. This safety culture framework describes, containing</u> the traits and attributes that are present in organizations with a strong safety culture. <u>A graded approach should be used in the application of this framework, taking into account the type of facility or activity and the associated radiation risks”</u>”</u></p>	<p>Propose to expand Section 1.1. to include the opening paragraph of Appendix A.1 then remove the appendix altogether.</p> <p>The proposed appendix is a direct cut and paste from another IAEA document titled “A Harmonized Safety Culture Model” last revised May 2020. (link: harmonization_05_05_20-20-final_002.pdf).</p> <p>It is not recommended to copy another IAEA document verbatim for several reasons, with the key reason is an expectation that the other document will undergo revision at point point in time which would make Appendix A.1. outdated.</p> <p>Another rationale is that the original document is formatted in a more user friendly format than what</p>			x	<p>A Harmonized Safety Culture Model is published only as a working document. In fact, it was developed to be included in DS513 later. Authors wanted to publish it asap therefore form of working document was chosen. DS513 brings this model into safety guide as planned before.</p>

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			is proposed in the revision to DS513.				
Finland	Introduction, 1.2.	[...] “the interactions between people, technology and organization are duly considered.”	Elaborate “the interactions” and clarify the meaning of “duly consideration”. “Systemic” is not listed as a term in the IAEA Glossary, 2018 edition.			x	This is self explanatory
Russian Federation	1.3	This Safety Guide considers that leadership, management, and culture for safety are interrelated concepts that support each other to achieve an effective implementation each of the mentioned concepts .	It is not clear from the text effective implementation of meant.	x			
Germany	1.4	This Safety Guide revises, expands and supersedes IAEA Safety Standards Series No. GS-G-3.1, Application of the Management System for Facilities and Activities.	Please state clearly that this Safety Guide is not only a very high-level description compared to the document that it supersedes and that there is no additional documentation where the topics will be covered. This should be mentioned for traceability. In case if additional / other Safety Guides are jet			x	“Supersedes” is standard IAEA formula for the revision of previous document. This means practically that previous version is no more understood as valid although available on IAEA website. If any other document substitutes the previous one it would be mentioned in the text. But it is not the case.

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			available, please list them and integrate them into the text.				
Germany	1.6	This Safety Guide should assist to operating organizations, Regulatory Bodies and other government organizations in the application.....	Please put in line with GSR Part 2: its para. 1.12 is mentioning other government organizations as well.	x			
UK	Para 1.6	Comment as above against the Explanatory Note, change to ‘This Safety Guide should assist to operating organizations and regulatory bodies in the application of the requirements...’	Editorial	x			
Germany	1.6 Line 2	It will also be of interest to other organizations involved in ensuring safety, such as technical support organizations (TSOs) , technical service providers and the supply chain.	TSOs should be included explicitly in the list. It is not obvious that they are addressed as technical service providers.	x			
Saudi Arabia	1.6/1	This Safety Guide should assist to operating organizations and regulatory bodies in the [...]	Editorial.	x			

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Iran	1.7	The scope of this Safety Guide is ... and to regulatory bodies as far as is appropriate.		x			
Germany	1.7	The scope of this Safety Guide is the same as for GSR Part 2 [2]. Specifically, it applies to all facilities and activities that give rise to radiation risks (see para. 1.11 of GSR Part 2 [2]) and to regulatory bodies as far as appropriate, and to other government organizations (see para. 1.12 of GSR Part 2 [2]). Furthermore, the scope includes is valid to the entire lifetime of facilities and the duration of activities, for all operational states and for accident conditions, and in a nuclear or radiological emergency (see para. 1.13 of GSR Part 2 [2]).	1. For consistency please mention all three subpointsreferences. 2. The formulation related to Para 1.12 of GSR Part 2 should be similar to it. 3. Clarification.	x			
Saudi Arabia	1.7/3	[...] Specifically, it applies to all facilities and activities that give rise to radiation risks (see para. 1.11 of GSR Part 2 [2]) and to regulatory bodies' functions and activities.	Clarity. The Guide applies to the functions and activities of regulatory bodies.		x		

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Saudi Arabia	1.7/3 and 4	Furthermore, the <i>Safety Guide applies to scope includes registrants and licensees throughout the lifetime of facilities and the duration of activities, with their organizationa the entire lifetime of facilities and the duration of activities,</i> for all operational states and for accident conditions, and in a nuclear or radiological emergency (see para. 1.13 of GSR Part 2 [2]).	Clarity. The sentence does not correctly reflect para. 1.13 of GSR Part 2; the scope concerns more specifically the registrants and the licensees.			x	The main purpose of the paragraphs is to say when it is applied and not by whom.
UK	Para 1.8	Should be a semi-colon in 'are generally applicable; nevertheless...'	Grammar	x			
Germany	1.8	All the recommendations in this Safety Guide are generally applicable: nevertheless, engineering judgement and the use of a graded approach are needed for the application of specific recommendations to different facilities and activities	What type of judgement is meant here? Please clarify.			x	Judgement must be generic; it is self explanatory
Japan	1.8.	All the recommendations in this Safety Guide are generally applicable: nevertheless, judgement and the use of a graded approach are needed for the application of specific recommendations to different facilities and activities. Relevant	As a general safety guide, make clear the relationship between relevant safety standards from the viewpoint of applying a graded			x	Safety guides proposed to be referenced do not explain how to apply GSR Part 2 but how to apply SSR-1, SSR-2/1, SSR-2/2, SSR-3, SSR-4 etc.

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		<p><u>safety guides regarding management system were shown in the table [xx] in Annex.</u></p>	<p>approach to management system.</p> <p>There are examples of application of management systems of the operation of NPPs and other facilities and activities in the existing safety guides. The table[xx] in attachment -1 is an example.</p> <p>Suggested to add a table clearly explaining the relationships between these systems and management system.</p>				
Saudi Arabia	1.9	Please consider reformulating this sentence by due consideration of comment No. 1.	‘Culture for safety’ is not defined in the IAEA Nuclear Safety and Security Glossary.	x			1.10 added
Saudi Arabia	1.11	<p>Please consider modifying paragraph 1.11 (as justified in comment No. 40) to read:</p> <p>The Appendix <i>Annex</i> presents a safety culture framework, containing the traits and attributes</p>	<p>Consistency with SPESS C.</p> <p>See comment No. 40.</p>			x	Safety culture model is a part of DS513 and it substitutes original 5 characteristics model. Therefore is included as appendix.

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		that are present in organizations with a strong safety culture.					
27							
Finland	2. Responsibility for safety (2.1)	The Owner(s) and Board of Directors 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.	Consider adding reference to Owner(s) and Board of Directors. Senior management is affected by the Owners Board of Directors, as they define priorities, set expectations and affect decision-making, which may affect safety. The role of the “Board” is mentioned in IAEA INSAG-27, item 30); it could be referred here.	x			New paragraph 2.7 created

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Slovakia	2 Responsible for Safety	I propose to address the issue of adequate resources and funding in section 2	Section 2 do not cover para 2.2.e in GSR Part 2 for adequate resources and funding			x	We do not need to repeat everything from GSR Part 2
UK NUSSC Comment not included in step 7	New para 2.2 before current para 2.2	“Senior management are ultimately responsible and accountable for safety and for ensuring achievement of the fundamental safety objective.”	To show a clear line of responsibility and accountability for safety over the whole organization.	x			
Germany	2.3	Senior management should ensure that they are aware of national regulatory requirements as they apply to the facilities and activities under their control. Additionally senior management should consider the need to apply relevant international codes and standards for safety and understand the related benefit.	Clarification	x			
Saudi Arabia	2.3/1	Senior management should ensure that they are aware of regulatory requirements as they these apply to the facilities and activities under their control.	Clarity. ‘they’ is used two ties (for senior management and for the regulatory requirements); the proposal is to avoid confusion and improve the clarity of the text.		x		

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UK	Para 2.4	'...when radiation risk is only a one of the...'	Editorial	x			
UK	2 / 2.4	Could safeguards be added to this section?	The industry would benefit from raising the profile of safeguards in parallel to safety and security.			x	Would be great it is not logical in this paragraph
Russian Federation	2.4	<p>2.4 The arrangements for achieving the fundamental safety objective should take into account any interfaces between safety and security with the basic objective that safety is not compromised by security and vice versa.</p> <p>2.5 Similarly, when radiation risk is only one of the risks to be managed at the facility or activity, interfaces should be taken into account to protect people and the environment from all risks.</p>	<p>Improving the quality of text perception.</p> <p>It is recommended to list all than radiation.</p>			x	No need to divide into 2 paragraphs. This paragraphs says that all potential risks should be considered in context (safety, security, fire, man made external hazards, etc.)

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Germany	2.4	The arrangements for achieving the fundamental safety objective should take into account any interfaces between safety and security with the basic objective that safety is not compromised by security and vice versa. Similarly, when radiation risk is only a one of the risks to be managed at the facility or activity, <i>interfaces</i> should be taken into account to protect people and the environment from all risks.	What exact interfaces are meant in the second sentence? Please clarify, as the statement is not clear.	x			Interface in second sentence has the same meaning as in the first sentence. The sentence was modified to be better understandable. Interface by dictionary: “the place at which independent and often unrelated systems meet and act on or communicate with each other”
Germany	2.4 A new issue	Senior management should evaluate the needed resources and funding for the adequate long-term management and disposal of radioactive waste and decommissioning of the facility.	The current text of this Safety Guide does not refer to requirement 2.2 (e) from GSR Part 2, please add.			x	We do not need to repeat everything from GSR Part 2
Saudi Arabia	2.4/3	Similarly, when radiation risk is only a one of the risks to be managed at the facility or activity, [...]	Editorial.	x			
Finland	The 2.2 - 2.6	General comment: The 2.2-2.6 seems to be on a generic level. Would be beneficial to include more practical examples linked directly to the GSR-Part 2 paragraphs 2.1 and 2.2.	The text could be developed to give more practical guidance to implement GSR Part 2 2.1 and 2.2.			x	Yes, text is generic. All GSR Parts 1- 7 and SSR publications contain some text on responsibilities. A lot of effort was done to develop the text of chapter 2 and finally it stayed generic as it is.

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UK	Para 2.5	'specific trainings and'	Editorial	x			
Germany	2.5	In order to achieve the fundamental safety objective , senior management should ensure that specific trainings and coaching for personnel at all levels (including suppliers) is provided and should as well install the mechanism of reliable check that suppliers personnel is trained appropriately for the understanding of the following:	Management cannot ensure that training is provided for personnel of suppliers. We suggest a rewording.			x	“Should ensure” does not mean that top management does it personally themselves. This formula formula is used in the whole document
Germany	2.5 A new issue	It should not be permissible to delegate responsibilities. Duties may be delegated, but only if the delegation recipients have the required qualification and expertise. And no duties should be delegated that are directly associated with exercising responsibilities of personnel such as the radiation protection commissioner, plant security commissioner, or nuclear safety commissioner.	The inadmissibility of delegating responsibilities is important and should be mentioned in Section 2 (“Responsibility for Safety”). In addition, it should be mentioned that the delegation of duties is permissible considering certain conditions.			x	Safety guide says what should be done NOT what should not be done. The proposal is too specific (how many Member States have safety commissioner? – as example
Saudi Arabia	2.5/2	In order to achieve the fundamental safety objective, senior management should ensure that specific trainings and coaching for personnel at all levels (including suppliers) is are provided [...]	Editorial.				

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Finland	2.6.	“2.6. Senior management should declare expectations regarding leadership, management and safety culture commensurate to the risks of the facility or activity and communicate them throughout the organization.”	Suggestion to substitute the word “commensurate”. Consider an expression, which is easier to understand for non-native English speakers, such as “proportionate”.	x			Commensurate replaced by proportionate in the whole text
27							
17							
44							
Finland	3. Leadership for safety	Consider replacing “Managers at all levels” with “Leaders” (for example) in items 3.5, 3.6, 3.7, 3.11, 3.12	This Guide limits the concept of leaders to “managers at all levels”, instead of every influential individual in the organization. Managers have formal responsibilities and hierarchical power, but everyone can act as a leader, for example, by serving as a role model, influencing and directing others by mentoring and providing peer-guidance.			x	This draft text is not limited to managers at all levels; there are five categories: 1/ senior management 2/ managers at all levels 3/ staff (all people) 4/teams 5/ individuals IAEA has a concept that everyone can be a leader for safety

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UK	Para 3.1	In the indented paragraph it should have 'behaviours' in plural, ie, 'shared goals, values and behaviours'.	Editorial	x			
UK	3 / 3.1	I suggest that better linkage to the content be sought.	Pull out the specific item that reinforces the recommendation being made.			x	I do not understand the comment
Pakistan	3.1	The organizational approach should encompass the commitment to the establishment, implementation, assessment and continual improvement of programmes for leadership and culture for safety.	Leadership and culture for safety is integrated in all activities. Separate programme may not be required for this. Management system is such as to promote leadership and culture for safety.			x	Programmes is OK
Iran	3.2	To Add "by leading by example": Managers at all levels should demonstrate and act as role models and leading by example in the promulgation of these values and expectations.	Paying attention to the consistency of senior management's behaviors with values promoted by them and expectations of the leaders.			x	Role model has the same meaning as leading by example

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Finland	3.2.	“3.2. Managers at all levels should demonstrate and act as role models in the promulgation promotion of these values and expectations.”	The word “promulgation” is not very familiar to non-native English speakers, could you consider changing to “promotion”.	x			
Canada	3.3	“Paragraph 5.2(f) of GSR Part 2 [2] states: “Senior managers and all other managers shall advocate and support... (f) The means by which the organization seeks to enhance safety and to foster and sustain a strong safety culture, and using a systemic approach (i.e. an approach relating to the system as a whole in which the interactions between technical, human and organizational factors are duly considered).”	Incomplete use of wording from GSR Part 2 can change the intent or meaning. DS 513 should not change the intent of the parent document.			x	Quote rules enable to use dots ... to shorten text length; recommendation is related to systemic approach
Germany	3.2 Line 4	... Managers at all levels should demonstrate and act as role models in the promulgation dissemination of these values and expectations.	Clarification: as promulgation is part of an official act, we suggest a rewording.		x		Promulgation replaced by promotion
Germany	3.3	Paragraph 5.2(f) of GSR Part 2 [2] states: “Senior managers and all other managers shall advocate and support... [t]he means by which the organization seeks to enhance safety and to foster and sustain a strong safety culture, and using a systemic approach (i.e. an approach relating to	The quotation is incomplete – it remains open why senior managers and all other managers should advocate and support using a systemic approach. The quotation lacks the purpose for using a systemic approach: namely, to enhance safety and to			x	Quote rules enable to use dots to shorten text length; recommendation is related to systemic approach

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
		the system as a whole in which the interactions between technical, human and organizational factors are duly considered).”	foster and sustain a strong safety culture.				
Finland	3.3	Simplify: These interactions should be taken into account in the organization's decision making process, utilizing relevant expertise and diverse perspectives. The systemic.....staff.	Text could benefit from simplification.			x	The draft text is better.
Germany	3.3 Line 7	... This systemic approach should be applied, if relevant, by interdisciplinary teams that include members with diverse perspectives and expertise from different levels of management and staff. The systemic approach should eventually be applied to contributors external to the organization whose activities impact directly the organization's safety culture.	The guideline should also consider external organizations (e.g. suppliers for maintenance activities in the facility) that have a relevant impact on the safety culture. Please add.		X This systemic approach should be applied, if relevant, by interdisciplinary teams that include members with diverse perspectives and expertise from different levels of management and staff and from different organizations if needed.		

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
UK NUSSC Comment not included in step 7	Para 3.3(b)	“Acknowledging that safety encompasses interactions between people, technology and the organization and acting accordingly; ”	To demonstrate /indicate that leadership need to perform activities that help ensure safety.			x	The original 3.3 was erased based on comments of committees
UK NUSSC Comment not included in step 7	Para 3.3 new bullet e)	“e) Communicating and endorsing the importance of establishing and following the management system to give due priority to safety. ”	Highlights the importance of the MS as a key tool to proportionately manage and control activities that have a impact on safety.			x	The original 3.3 was erased based on comments of committees
Germany	3.4 A New issue	Managers at all levels should promote a questioning attitude to identify possible risks before proceeding any activity.	Promoting a questioning attitude should belong to one of the principles to ensure the safety culture. Please add.			x	Already in 3.12, 8.7 and appendix safety culture traits and attributes
Pakistan	3.4	The traits and attributes of policies, goals, strategies, plans and objectives as well as interrelationship among with some examples/case studies.	To better understand the means for conforming the safety requirements set-forth in IAEA GSR Part 2			x	Text is explanatory
Pakistan	3.4	The traits and attributes of policies, goals, strategies, plans and objectives as well as interrelationship among with some examples/case studies.	To better understand the means for conforming the safety requirements set-forth in IAEA GSR Part 2				

COMMENTS				RESOLUTION			
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UK NUSSC Comment not included in step 7	Paras 3.4 and 3.5	<p>Add guidance on how senior management shall demonstrate leadership for safety by:</p> <p>(b) Acknowledging that safety encompasses interactions between people, technology and the organization</p> <p>(c) Establishing behavioural expectations and fostering a strong safety culture</p> <p>(d) Establishing the acceptance of personal accountability in relation to safety on the part of all individuals in the organization and establishing that decisions taken at all levels take account of the priorities and accountabilities for safety.</p> <p>For example guidance for (c) could be:</p> <p>"It is recommended that senior management establish a set of values which provide guiding principles on how people should behave within the organisation. These values should be accompanied by a behavioural framework which establishes the behavioural expectations of all</p>	<p>Nowhere, in paras 3.4 or 3.5, does there appear to be any recommendations as to how a senior manager should address these requirements from GSR Part 2</p>			x	<p>Current text was modified during step 7 with many compromises</p>

COMMENTS				RESOLUTION			
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		individuals in the organisation. Senior management should ensure that the behavioural framework includes safety behaviours....."					
UK NUSSC Comment not included in step 7	New para 3.5 before current para 3.5	“The organization’s expectations for leadership should also encompass a commitment to having an adequate management system and giving clear and firm support for the management system’s role in prioritizing safety.”	To demonstrate that leadership is also required to establish and maintain its MS as one of its key tools to prioritize safety in its activities.			x	Several relevant recommendations are in chapters 4 and 5
Finland	3.5	Modify: This framework... Appendix. Appendix provides an example of such a framework.	There might be other frameworks, so this should be given as an example.			x	No such words in 3.5, confusing
India	Page No. 4 Clause 3.5	Additional sentence as given may be included in last : The communication methods to obtain feedback may include use of questionnaires, meetings, drop boxes etc.	Examples proposed to be included for clarity.			x	Draft text is explanatory enough
UK NUSSC Comment not included in step 7	Para 3.6	Include full quote from GSR part 2 “leadership for safety, management for safety, an integrated management system and a systemic	In the context of the document, the abridged paragraph sounds misleading, giving the impression leadership for safety & a systematic			x	Quotes were considered in step 7, some of them were erased

COMMENTS				RESOLUTION			
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		<p>approach (i.e. an approach relating to the system as a whole in which the interactions between technical, human and organizational factors are duly considered) are essential to the specification and application of adequate safety measures and the fostering of a strong safety culture.”</p>	<p>approach are the two essential topics for adequate safety measures. Other topics include management for safety & the integrated MS (see GSR Part 2, para 1.2).</p>				
Japan	3.6.	<p>Managers at all levels should be role models in terms of personal accountability by ensuring their actions demonstrate their words, ensuring safety is evidently the overriding priority in all work, holding themselves accountable for actions and decisions and taking personal ownership of the results of their decisions and actions. [xx]</p> <p><u>Footnote</u> [xx] While ‘responsibility’ (see Section 2 of this Safety Guide) is more related to managers completing specific tasks, ‘accountability’ highlights how a person takes personal ownership and feels a moral obligation to achieving the results of a specific task.</p>	<p>Adding the explanation of “accountability” as a footnote is desirable for users.</p> <p>The explanation of accountability was included in the footnote in the Step 7 draft guide, but it was deleted due to comments from other Member States. As a result, the explanation of accountability is no longer included in the Step 8 draft guides. Restore of the footnote is desirable.</p>			x	Unfortunately, the consensus was not found so footnote was erased.

COMMENTS				RESOLUTION			
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UK NUSSC Comment not included in step 7	Para 3.7	More guidance should be provided on the GSR Part 2 requirements that “Managers at all levels in the organization...shall ensure that their leadership includes...development of individual and institutional values and expectations for safety throughout the organization by means of their decisions, statements and actions”.	The proposed guidance (‘Senior management should demonstrate and act as role models in the promulgation of these values and expectations’) does not add materially to the GSR Part 2 requirement			x	Current text was modified during step 7 with many compromises
Germany	3.7	Managers at all levels should make decisions in an integrated, risk informed manner , follow a riskinformed decision making process commensurate to the risks of the facility or activity.	There is no such a requirement in GSR Part 2 to follow a risk-informed decision making process. As term is officially used not in all national regulators, we suggest a rewording.		x Managers at all levels should follow a risk-based decision making process proportionate to the risks of the facility or activity.		
Pakistan	3.7	The methodology of determining risk parameters including qualitative and quantitative criteria (with examples/case studies) may be included/ mentioned and its relationship with policies, goals, strategies, plans and objectives for risk-informed decision making.	To better understand the means for conforming the safety requirements set-forth in IAEA GSR Part 2			x	Text is explanatory enough

COMMENTS				RESOLUTION			
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Finland	3.8	Clarify, add example: Managers at all levels should implement actions e.g. pre-job briefings, checklists etc. to help ensure that all individuals make safety conscious choices so that actions are determined to be safe before proceeding.	Without examples the paragraph does not give much support for implementation.			x	Examples are not relevant for some facilities and regulatory bodies, so generic text is more appropriate
Finland	3.9.	“3.9. Managers at all levels should be personally involved in relevant training and coaching when needed to ensure the understanding...”	“When needed” is unnecessary.			x	When needed was consensus of step 7
Germany	3.9	Managers at all levels should be personally involved actively participate in relevant training and coaching when as needed to ensure understanding of and to reinforce personal accountability for safety by all members of the organization. all members of the organization understand and take personal responsibility for safety.	Clarification.			x	Draft text is better
UK NUSSC Comment not included in step 7	Paras 3.10 to 3.17	These paras should contain more detailed guidance on how managers ensure that their leadership includes: 1. Setting goals for safety that are consistent with the organisation's policy for safety.	There is limited guidance to support these requirements in GSR Part 2			x	Current text was modified during step 7 with many compromises

COMMENTS				RESOLUTION			
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		<p>2. Actively seeking information on safety performance</p> <p>3. Demonstrating commitment to improving safety performance</p>					
UK	Para 3.10	'...set an example to staff'.	Editorial	x			
Germany	3.11 Line 4	... Managers should use various appropriate communication tools to engage individuals from all levels of the organization in enhancing safety performance and monitor their effectiveness to engage individuals in enhancing safety performance.	The communication tools should be chosen according to the stakeholder's need. For this reason, we recommend referring to "appropriate communication tools"			x	Draft text is better
Germany	3.12	Managers at all levels should ensure that 'safe' (i.e. retaliation-free) means to raise safety concerns are available to staff all the individuals within the organization (sometimes referred to as a 'blame-free culture') and to ensure that an open safety culture (without groupism, etc.) is applied. Additionally, managers should: (a) Ensure that staff all the individuals within the organization are aware of the means available for raising concerns and actively encourage staff to raise safety concerns.	We recommend using "all individuals within the organization" instead of "staff", similar to the previous paras. External parties (e.g. suppliers or subcontractors) shall be able to raise concerns regarding safety. The second suggestion leads to the inclusion of an open safety culture and its artefacts.			x	The term staff is used in many places of document; draft text is explanatory

COMMENTS				RESOLUTION			
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Germany	3.12 (c)	Respond with urgency to any concern that indicates a serious severe safety issue.	Serious is every situation, term “severe” is more appropriate here.			x	Accordingly dictionary: serious and severe are synonyms
Iran	3.12	To add one another element: (g) means and methods/mechanisms for raising concerns shall be added and documented in management system documents.	It is in line with commitment of senior management to safety and to increase the safety of raising concerns and to defend and encourage workers to express their concerns without fear.			x	Already in recommendation 8.11
Canada	3.12	“Managers at all levels should ensure that their staff are empowered to ‘safe’ (i.e. retaliation-free) means to raise safety concerns in a consequence-free environment are available to staff (sometimes referred to as a ‘blame-free culture’). Additionally, managers should:”	It is recommended to remove content in parentheses by simplifying the sentence itself. This change provides clarity to the message.	x			
Finland	3.12.	Modify: “Managers at all levels should ensure that ‘safe’ (i.e. retaliation-free) means to raise safety <u>and security</u> concerns are available to staff (sometimes referred to as a ‘blame-free culture’). Additionally, managers should:...” 3.12 (a), (c), (e): modify “ <u>safety and security</u> ”	Same as 1. Rather than questioning [the justification of] safety and security themselves, perhaps question the associated claims?			x	

COMMENTS				RESOLUTION			
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		3.12 (d): “questioning attitude to <u>decisions and choices affecting safety and security, ...</u> ”					
India	Page No. 5 Clause 3.12	(a) Ensure that staff are aware of the means available for raising concerns and actively encourage staff to raise safety concerns.	<p>This aspect is already covered in point no. (e) as given below:</p> <p>(e) Provide recognition, as appropriate, of individuals who have raised safety concerns to reinforce and encourage such behaviour. Safety conscious behaviours should be recognized and taken into account within individual and collective performance evaluations.</p>			x	The draft text is good
Japan	3.12. (b)	<p>Managers at all levels should ensure that ‘safe’ (i.e. retaliation-free) means to raise safety concerns are available to staff (sometimes referred to as a ‘blame-free culture’). Additionally, managers should:</p> <p>(a) . . .</p> <p>(b) Ensure that any concerns raised are addressed in a timely manner and provide feedback on how the issue was resolved. <u>If it takes time to</u></p>	<p>The progress of addressing the issue should be also provided for issue that takes time to address.</p>			X	<p>Ensure that any concerns raised are addressed in a timely manner and</p>

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
		<u>address these concerns, its progress should be provided.</u>			provide feedback on resolution progress.		
Russian Federation	3.12. (a)	Ensure that staff are aware of the channels for voluntary and responsible informing the management on safety concerns and actively encourage staff to raise safety concerns.	This proposal follows from the Requirement 12: Fostering a culture for safety, Chapter 5 Culture for Safety (General Safety Requirements No. GSR Part 2 «Leadership and Management for Safety»).		X Managers at all levels should ensure that their staff are empowered to raise safety concerns in consequence-free environment		
Russian Federation	3.12. (g)	Support an atmosphere of trust, openness and respect in the team.	This proposal follows from the Requirement 12: Fostering a culture for safety, Chapter 5 Culture for Safety (General Safety Requirements No. GSR Part 2 «Leadership and Management for Safety»).			x	Already in recommendation 8.10 and 8.11
UK NUSSC Comment not included in step 7	Para 3.15	Managers should also frequently be present in the workplace to consistently observe and coach staff to encourage a focus on safety.	The use of the word ‘coach’ rather than ‘mentor’ is consistent with other sections of the document, e.g. para 8.9(b)	x			

COMMENTS				RESOLUTION			
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UK NUSSC Comment not included in step 7	Para 3.16	Managers at all levels should ensure that 'safe' (i.e. retaliation-free) means to raise safety concerns are available to staff (sometimes referred to as a 'just culture').	Shouldn't we be guiding organisations to develop a 'just culture' rather than a 'blame-free culture'?		x		The term just culture is not applied in all facilities and activities
44 42 86							
UK	Para 4.2	'coordinate parts of the management system'.	Editorial	x			
Russia	4.2 (c)	Integration of all processes in the management system to meet safety objectives.	All processes in organization should be included into the management system.			x	The paragraph speaks about situation when senior management assigns staff members to coordinate parts of management system; so wording "various" fits to coordination role
Germany	4.2 New issue	(d) Promoting continuous improvement of the management system and learning from best practices of the sector	This paragraph defines three goals for the staff members who should coordinate the management system. One important part of the management system is the continuous improvement and learning. This fact		X (a) To establish a work environment that supports effective implementation of the management		Learning reflected in 3.12 (f); 8.11-8.14, 9.1

COMMENTS				RESOLUTION			
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			should be included in the goals.		system and its continuous improvement;		
Germany	4.2 A New issue	Senior management should ensure that the organization's overall management system meets the relevant regulatory requirements.	Please incorporate new para, which establishes the requirements for the downstream organizations (supplier). There should be a statement establishing the requirement with regard to the upstream organizations (Regulator).			x	In 5.4 (a)
Brazil	4.3(a) line 1	To establish a work environment and adequate resources that supports effective....	Incorporation of an effective MS also depends on "adequate resources".			x	Resources are in chapter 6 in comprehensive way
Canada	4.3	Senior management should take actions to implement the following: (a) To establish a work environment that supports effective implementation of the management system; (b) To cultivate a work environment in which all applicable elements of the management system are implemented in daily work; (c) To ensure that managers and individuals assigned to coordinate	The current wording is incomplete as it raises the question 'what must be implemented to meet items (a) to (c)?'. Clarify what must be implemented to establish.., cultivate.., and ensure....			x	It is a choice of each organization how to implement it

COMMENTS				RESOLUTION			
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		work on the management system are given the authority to raise issues relating to the management system with senior management.					
Iran	4.3	should communicate timely	In order to have the benefit of the issue practically, the result shall be shared early and timely.			x	Proposal is not clear, communication is not addressed in 4.3
Canada	4.4	“If any parts of the management system are developed or updated by an external organization, senior management should shall ensure that those parts are consistent with the organization’s overall management system. The responsibilities and authority for those parts should shall remain with senior management.”	Since senior management retains accountability for the management system per paragraph 4.2, these statements ought to be “shall” statements as well. Paragraph 4.2 cannot be fulfilled if paragraph 4.4 is left as should statements.		X		1.1. If any parts of the management system are developed or updated by an external organization, senior management should ensure that those parts are consistent with the organization’s overall management system. The responsibilities and authority for

COMMENTS				RESOLUTION			
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					those parts remains with senior management.		
Russia	4.5 (and 2.24.6 4.20, 5.9, 5.19, 5.24, 7.10, 9.2 and others concerning the graded approach references)	4.5. Senior management should ensure that management system of suppliers is consistent with the organization's overall management system and meet relevant regulatory requirements taking into account graded approach.	Evidently from the safety point of view that the requirements for management system of suppliers should be depended on facilities themselves and type of elements supplied.			x	Graded approach related to management of supply chain is in 7.18
Canada	4.5	“Senior management should ensure that management systems of suppliers is consistent with the organization's overall management system and meet <u>the</u> relevant <u>standards and</u> regulatory requirements”	It is recommended to remove “consistent with the organization's overall management system” as supplier management systems may be different than those established by nuclear facilities and still meet the applicable regulations and standards.		X Senior management should ensure that management systems of suppliers are consistent with the organization's overall management system and meet the relevant standards and		Management systems can be different but must be consistent in the whole supply chain (consistent does not mean same)

COMMENTS				RESOLUTION			
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					regulatory requirements.		
Brazil	4.5 line 2and meet relevant regulatory requirements...	All the regulatory requirements should be met.		X Senior management should ensure that management systems of suppliers are consistent with the organization's overall management system and meet the relevant standards and regulatory requirements		
Saudi Arabia	4.5	Senior management should ensure that <i>the</i> management system of suppliers is consistent with the organization's overall management system and <i>meets</i> relevant regulatory requirements.	Editorial	X Senior management should ensure that management systems			

COMMENTS				RESOLUTION			
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				of suppliers are consistent with the organization's overall management system and meet the relevant standards and regulatory requirements			
Canada	4.6	Add item (j) and reorder as needed: <u>(j) It should include a commitment to adhere to the management system by all staff.</u>	Using/adhering to the management system by all employees (including managers at all levels) is important to fostering a strong safety culture.		X (e) modified		

COMMENTS				RESOLUTION			
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Brazil	4.6 (h) line 2	to effectively meet the safety requirements, through a management system.	Important to highlight that the safety requirements should be implemented via a MS.			x	The draft text is good
Germany	4.6 (g)	It should promote a strong and open safety culture.	The aspect of an open safety culture should be included			x	Speaking about safety culture we use strong or healthy; openness is understood as attribute of respectful work environment
Germany	4.6 (h)	It should include a commitment of senior management to provide	Clarification that here the senior management is addressed.		x		Safety policy is declared by senior management, see introductory part of 4.6; therefore management is erased from (h)
Germany	4.6 New issue (j)	It should promote a blame-free culture	This statement establishes the requirements or the safety policy. The safety policy should ensure a blame-free culture to reach the final goal, please add.			x	Blame free culture is a part of strong safety culture (g) see appendix raising concerns

COMMENTS				RESOLUTION			
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							Not all traits and attributes of strong safety culture must be reflected in safety policy
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	It is not commitment done by suppliers but by senior management towards suppliers. Senior management must ensure arrangements accordingly (contracts etc.)
Germany	4.7	In the application of a graded approach, the safety policy may be customized to reflect the level of risk of the facility or activity, for example based on whether it is required to be authorized by registration or licensing (see paras 3.8 and 3.9 of IAEA Safety Standards Series No. GSR Part 3, Radiation Protection and Safety of Radiation Sources: International Basic Safety Standards [6]). Where applicable, the safety policy should be available in multiple languages.	Addition to highlight the need for multi-language documents, for facilities where different languages are in use.			x	Too specific, no need

COMMENTS				RESOLUTION			
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UK	Para 4.8	Stating that managers at ALL levels should be consulted does not seem to be realistic or achievable. Agree that feedback and input from a good representative population at different levels is required, but stating ALL levels seems overly-prescriptive.	Minor	x			
Iran	4.7	Instead of "...to reflect the level of risk of the facility or activity..." To say: "...to reflect the level of complexity and risk associated with the facility or activity "	This is more compatible with the rest of the document.	x			
Finland	4.12	Senior managers should ensure that all individuals within the organization understand the goals, strategies, plans and objectives relevant to their responsibilities , set by...	Individuals should understand these aspects from the point of view of their own roles and responsibilities. It is unreasonable and inexpedient to expect everyone to understand business strategies set by senior management.			x	Relevant is already there
Pakistan	4.13	Please modify the text at mentioned location: The frequency and methodology for such reviews should be clearly defined and communicated to all relevant personnel involved staff within the organization to ensure that they understand the process(es)....	Revised goals, strategies and plans should be communicated to all relevant staff rather than their frequency and methodology for such reviews		X The frequency and methodology for such reviews should be clearly defined and communicated to all relevant staff within the		

COMMENTS				RESOLUTION			
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					organization. Any resulting actions...		
Finland	4.15, 4.18, 4.19	Modify “interested parties” to “stakeholder” or equivalent.	For relevance.			x	<p>From IAEA Glossary:</p> <p>The term [stakeholder] is used in the same broad sense as interested party and the same provisos are necessary. ! The term stakeholder has disputed usage, and it is misleading and too all-encompassing for clear use. In view of the potential for misunderstanding and misrepresentation, use of the term is discouraged in favour of interested</p>

COMMENTS				RESOLUTION			
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							party.
Saudi Arabia	4.15/2	Requirement 5 of GSR Part 2 [2] states that “Senior management shall ensure that appropriate interaction with interested parties takes place.”	Editorial – incorrect quotation. Quotations need to be correctly done.	x			
Germany	4.16 (a)	Decide on the topics that are to be communicated to interested parties on a regular basis, occasionally and in case of emergencies and the most appropriated communication means.	Senior manager should decide which topics are to be communicated and how exactly (press conference, written communication etc.), please add.			x	Appropriate means are in quote of GSR Part 2, 4.17
Brazil	4.17 2 line 1 after (d)	Communication with interested parties should be performed via formal channel(s) and based on honesty,	Important to established a formal channel(s) to dialogue with the interested parties.			x	It is a decision of organization to use formal or other channels
Germany	4.17	Paragraph 4.7 of GSR Part 2 [2] states: ...	Typo	x			

COMMENTS				RESOLUTION			
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Germany	4.17 New issue	(e) Appropriate resources for the execution	According to GSR Part 2, senior management shall provide adequate resources. This includes the implementation of the communication strategy, please add.			x	It is in 4.16 already
Germany	4.17 Line 13	In the communications with interested parties clear and unambiguous language should be used, if possible, in the same language as the interested party. Communication with interested parties should be performed based on honesty, openness, trust and fairness (see also IAEA Safety Standards Series No. GSG-6, Communication and Consultation with Interested Parties by the Regulatory Body [X]).	If possible, a single language should be agreed upon. This might be is the right place to add a reference to GSG-6. This Safety Guide is included in the reference list as Ref. [4] (mistakenly together with TS-G-1.4), but nowhere cited in the text of DS513. Please check.			x	Same language.. no need; all references which are not used in the text of DS513 were erased based on comments of MS
UK	Para 4.17 (d)	Missing full stop at the end of the sentence.	Editorial	x			
Saudi Arabia	4.17/1	Paragraph 4.7 of GSR Part 2 [2] states:	Editorial.	x			

COMMENTS				RESOLUTION			
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Saudi Arabia	4.17 (c)/2	Appropriate means of dissemination to interested parties of necessary information relevant to safety; 22	Editorial – incorrect quotation.	x			
Saudi Arabia	4.17 (d)/2	Appropriate means of considering in decision making processes the concerns and expectations of interested parties in relation to safety.”	Editorial – incorrect quotation.	x			
Saudi Arabia	4.19/2	Senior management should ensure that the staff designated to interact with interested parties have the appropriate competences <i>competence</i> [...]	Editorial. ‘competence’ is a noncount noun that does not have a plural (see general comment No. 2 above). In the context of para. 4.19, ‘competencies’ can be another alternative to ‘competences’.	x			
86							
35							
121							

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
UK	Para 5.1	“The management system should be a single, integrated framework for overall management of the organization, including management of all relevant processes”	Minor	x			
Germany	5.1 Line 4	... The management system should be a single framework for overall management of the organization, including management of all relevant processes. An effective management system supports the achievement of high levels of performance, including ensuring and continuously improving safety and promoting and continuously improving the continual improvement of safety culture.	The continual improvement does not only apply to safety culture but also to safety itself. Also promoting the safety culture is an essential objective of the management system.		X		
					The management system should be a single framework for overall management of the organization, including management of all relevant processes. An effective management system supports the achievement of high level of safe and efficient performance and promotes the continual improvement of safety culture.		

COMMENTS				RESOLUTION			
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Germany	5.3	If an external project management organization is used to manage large projects (e.g. the development of a new facility or the major refurbishment of an existing facility), the project management team and related staff should be aligned with the safety goals of the organization and the project management should be consistent (in harmony) with the operating organization's management system. These requirements could already be part of the original call of tenders.	This section highlights the management for safety. It should be mentioned that external project management teams should also align with the safety goals, not only with the management system (they should share the same safety culture). It should be indicated as well that these issues are to be addressed at a very early stage.		X If an external project management organization is used to manage large projects (e.g. the development of a new facility or the major refurbishment of an existing facility), the project management system should be consistent with the operating organization's management system.		
Saudi Arabia	5.3/3	[...] the project management should be consistent (in harmony) with the operating organization's management system.	Clarity. The word 'consistent' is well known and widely used; adding '(in harmony)' might be confusing.	x			

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
Finland	5.3	Add: The management system shall have documented procedures for project leadership, management, and progress assessment. There shall be a set of instructions for drawing up the project plan as well as the risk management, resource, and quality plan for the project.	It is important that project management procedures are also instructed in the management system.			x	Too specific and detailed recommendation
Finland	5.3	...the project management should be consistent (in harmony) with the safety objectives and principles of the operating organisation's management system	Operating organization management system may be much larger than the contractors one and not all the parts need to be consistent or in harmony.			x	Consistent means that all or relevant parts are reflecting each other
Germany	5.4	(b) Consider national and international recommendations on management systems, other relevant safety related codes and standards, and best practices of the sector;	One of the aims of the management system is the continuous improvement. For this reason, the feedback of best practices in the sector should be considered for the establishment	x			
UK	Para 5.4 (b)	Add hyphen in "...safety-related ..." for consistency (as 3.13).	Editorial		x		Text changed based on comments of other MS

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
India	Page No. 9 Clause 5.4	Additional point to be included in Clause as given below : (d)Take inputs from all stakeholders so that the management system meets all requirements that ensure safety and is user friendly.	The intent of the comments is covered in Para 3.5 of Draft DS-513: However, the suggested inclusion is required for management system to be 'inclusive' and 'participative'.			x	It is covered by (a) and (b)
Russian Federation	5.5	Senior management should ensure that the management system clearly describes the accountability and the division of duties, responsibilities, authorities and the working relationships between all organizational units participating in the organization's activities including external organizations.	This proposal follows from the para. 4.11, Requirement 6: Integration of the management system (General Safety Requirements No. GSR Part 2 «Leadership and Management for Safety»).	x			Deleted as no added value of recommendation (the same as requirement)
UK	Para 5.7 (b)	Add semi-colon at the end of sentence.	Editorial	x			
Iran	5.8	To add a sentence after "If conflicts between the elements of the management system are identified they should be solved by a structured, transparent and well communicated decision making approach." The conflict and approach to resolve it and origin of decision and the logic	Proposal is in line with the documentation of management systems contains. This is one element of learning from experiences and one element to avoid reoccurrence of similar conflicts.		X ...elements of the management system are identified they should be solved by a structured, transparent, documented and		

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
		behind it and... should be well documented in management system.			well communicated decision making approach.		
Germany	5.8	Paragraph 4.10 of GSR Part 2 [2] states that “Arrangements shall be made in the management system for the resolution of conflicts arising in decision making processes. Potential impacts of security measures on safety and potential impacts of safety measures on security shall be identified and shall be resolved without compromising safety or security.” If conflicts between the elements of the management system are identified they should be solved by a structured, transparent and well documented and communicated decision making approach. ...	The decision-making approach on conflicts should be well documented as well. Please add.	x			
Germany	5.9	Considering the graded approach, for a less complex facility or activity with a low radiation risk, the management system may be simpler and less formal, but should still integrate all the necessary elements. The comprehensiveness of documentation may be limited to those tasks with a higher risk and to processes that are related to meeting regulatory requirements.	The documentation itself shouldn't be limited, but the comprehensiveness.	x			

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
UK NUSSC Comment not included in step 7	Para 5.9	“... If conflicts between the elements of the management system are identified they should be solved by a structured, transparent and well communicated decision making approach which gives due priority to safety . Senior management should encourage the involvement of individuals by active participation in decision making at all levels.”	To align with the organization’s objectives of performing its activities safely.			x	The paragraph speaks about, among others, impact of safety on security and visa versa. So it is not possible to prioritize safety in this paragraph.
Finland	5.10	Add: For each change, the risks and 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.	Not only the expected impact but also possible negative impacts (risks) should be considered.			x	Impact covers both positive and negative
UK NUSSC Comment not included in step 7	Para 5.10	Documentation text should include ‘... and to describe and provide instruction on how control measures (captured in processes, procedures and supporting guidance) are applied by the organization to conduct its activities safely ’.	The guidance in the DS513 feels like a retrograde step for the elements of the MS as it does not always state why the activities is important for safety (not just to meet regulatory requirements).			x	<i>Not clear what recommendation is affected</i>

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
Germany	5.10 line 5	These provisions should ensure that all changes (i.e. technical modifications, documentation changes, and organizational and management system changes), are methodically identified, analysed, and controlled. Possible alternatives should be evaluated as far as practicable. 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.	GSR Part 2 requests provisions for changes. This Safety Guide refers to technical modification however, there should be also provisions for the changes of the organization management system. Possible alternatives for changes or modifications might be considered and evaluated as well, please add.			x	<i>Paragraph mentions example technical modifications, documentation changes and organizational changes – these all area under umbrella of management system.</i>
Germany	5.12 A New issue	Senior management should ensure that individuals with the appropriate training and knowledge in the field of applicability of the change are appointed to approve changes.	Para. 5.12 mentions the individuals authorized to approve changes. These individuals should be appointed due to the training and knowledge therefore, we recommend adding a new para.	x			Involved in 5.12 (newly 5.11)
UK	Para 5.13	“then the methodology, team structure and respective competences (including training) should be specified by the parent organization ”	Minor	x			

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
Russian Federation	5.13	Senior management should establish criteria for the evaluation of technical modifications and organizational changes based on a graded approach. 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 integrated into the management system of the mentioned independent external organization	Improving the quality of text perception			x	The original text is better. Basically it should be specified within the organization not outside.
Germany	5.13	Senior management should establish criteria for the evaluation of technical modifications and organizational changes based on a graded approach. The improvement objectives intended by the technical modifications and organizational changes should be specified and documented. 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. The final approval of the change should remain by the organization.	1) The improvement objectives are an essential part of a systematic and comprehensible procedure for the evaluation of changes/modifications and should be mentioned. 2) This para states the requirements for the evaluation of changes by independent external organizations. We recommend highlighting that the approval of the change should be done by the organization.			x	Not all changes are done because of improvement. As e example – technical modification is planned because of some current spare parts are no more available, manufacturers no more exist, etc.

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
Saudi Arabia	5.13/4	[...] then the methodology, team structure and respective competences competencies (including training) should be specified.	Clarity - editorial See comment 16 above.	x			
Finland	5.14.	Modify: Senior management should consider the safety aspects <u>and risks</u> of organizational changes and ensure that there is no adverse impact. This includes any transitional arrangements as well as the final changes, which should be designed to enhance safety.	It is important to understand that this is specifically about the potential risks that organizational change could cause.			x	Adverse impact means risk.
Finland	Para 5.17	Senior management should ensure that changes are communicated to the personnel and if necessary to other interested parties in order that they all know and understand the objectives of the changes.	. In particular, own personnel should be involved in the design, implementation, etc. of changes to facilitate commitment.	x			New separated para to communication to staff created
UK	Para 5.18	Add full stop at the end of sentence.	Editorial	x			

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
UK	Para 5.19	Misalignment of indentation of the first item (a) in the second list “The effort devoted...”.	Editorial	x			
Finland	5.18.b)	Add one paragraph about documentation of changes, e.g.: The organization should ensure applying the graded approach that the management system include proper requirements for documenting the change management activities and results, e.g. the justification for the change, safety or risk assessments, decisions etc. that may be of importance during later life cycle phases.	Especially concerning changes important to safety, it is important to document the reasons for the changes and the safety evaluations related to ensure proper traceability. The information may be important later during the life cycle of the facility.		x		Added to 5.8 (newly 5.7)
Germany	5.19 Line 13	The application of a graded approach should be reflected in the resources devoted to the development and application implementation of the management system in different facilities and activities.	Clarification: The word application is used twice in the same sentence. We recommend using “implementation of the management system”	x			
Germany	5.19 Line 21 New issue	This may include the following: ... (d) The level of monitoring requested to ensure the effectiveness of the management system	The list includes requirements for the application of the graded approach on the development and application of the management system, monitoring is required.		x		(b) was modified

COMMENTS				RESOLUTION			
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India	Page No.11 Clause 5.19 Point (c)	The number of personnel engaged in the development and application of the management system and their level of qualification-training and training-qualification. qualification.	The term qualification used in this Para is related to operation and maintenance of facility or activity and not 'Academic' qualification. Hence, the training has to come first.			x	the draft text is better
Belarus	5.20	Quality manuals or quality assurance programs, operating procedures, guidelines, working instructions or similar documents may be considered as the equivalent of management system documentation	According to the article 201 (note 3) of «Quality Assurance for Safety in Nuclear Power Plants and other Nuclear Installations: Code and Safety Guides Q1-Q14», in some Member States, the quality assurance program is referred to as a quality assurance system or quality system.	x			
Germany	5.20 Line 4	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. The graded approach should be applied to the scope and level of detail of the documentation in dependence of the complexity of the facility and the	This para explains how the graded approach can be implemented and focus on less complex facility or activity. However, the approach for the scope and documentation should be graded, not only applicable for less complex facility or activity.			x	The draft text is good

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
		activity. For a less complex....					
Russian Federation	5.20	It is desirable to add provisions with explanations and some examples of the last sentence of para. 5.20 “Quality manuals, operating procedures, guidelines, working instructions or similar documents may be considered as the equivalent of management system documentation”.	It is not clear in the text what “the equivalent of the management system documentation” means. Does it mean that the management system documentation includes these documents as well, or 2. If such documents are not (may not) considered as the equivalent of management system documentation what the documentation system (subsystem) of such documents is. It is desirable to have some explanations and examples.		x		It means that there is a documentation but not under umbrella of management system (which is not implemented as a whole). This is applicable for less complex facilities as explained in the previous sentence like hospitals, etc. The paragraph was divided to improve clarity
Russian Federation	5.21	2.7 Senior management should ensure that information security requirements are established and implemented	Improving the quality of text perception by transferring of paragraph 5.21 to the chapter 2 where recommendations for the responsibility for safety are established			x	This is related to security of information and belongs here. This is not related to nuclear security.

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
UK	Para 5.24	Add semi-colon at the end of (f) and (h).	Editorial	x			
India	Page No.12 Clause 5.24	The existing order of point (d) and (e) should be interchanged for maintaining proper sequence	Comment is editorial in nature but having logical sequences is also important. Safety assessment provides guidance to prepare procedures and instructions and these should come first.			x	This list of examples with no priority or sequence
Germany	5.24 (f)	(f) Nuclear security and physical protection related documents (g) Data file specifications and computer codes; (h) Records (i) Contracts with suppliers. For nuclear security and physical protection related documents usually a higher-level security clearance is required. Senior management must ensure that access to these documents is adequately restricted.	Skip bullet point (f) from the list and add to par. 5.24 the following text – we made a suggestion - after enumeration, before para 5.25, as information about nuclear security issues is usually strictly confidential.			x	There is a formula “different level of control” and it covers the proposal
Russian Federation	5.24	(j) event investigation reports	Improving the quality of text.			x	Under records

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
UK NUSSC Comment not included in step 7	Para 5.25	<p>Docs - Not sure what the implication is with last two sentences. Appears giving implicit permission to have undocumented processes with understanding its importance to safety.</p> <p>Suggest change to “Some of the management system processes and arrangements may be undertaken on a less formal basis, provided that the organization can demonstrate that these practices and arrangements are applied consistently and that achievement of the fundamental safety objective is assured”</p>	<p>The criteria seems misplaced, i.e. to have a less formal approach (towards documentation) solely based on if the activity can be applied consistently, not on its importance to safety.</p>	x			
Germany	5.26	<p>Senior management should also ensure that a graded approach is applied to the document control process for the management system in respect of the following:</p> <p>(a) Preparation, review, approval, and issue of documents;</p> <p>(b) Distribution and availability of specific documents at the necessary locations;</p> <p>(c) Revision of documents.</p> <p>(d) Withdrawal of outdated documents.</p>	<p>Document life cycle is not closed without addressing withdrawal.</p>	x			

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
UK NUSSC Comment not included in step 7	Para 5.26 to 5.35	<p>Docs - Overall, the guidance on documentation seems to lack strong, clear explanations about why certain types of documents are needed and how to control/ manage them</p> <p>Suggest change to “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 with due consideration of the importance to safety”.</p>	<p>The guidance in the DS513 feels like a retrograde step for the elements of the MS as it does not always state why the activities are important for safety..</p>			x	No need to repeat safety everywhere
Finland	Para 5.28	<p>Add: The document control process should include provisions for a periodic review of documents that comprise the management system, taking into account the current status of the facility or activity. Documents should be updated as necessary, and then are required to be reviewed and approved in the same way as the initial documents. <u>Changes shall be traceable.</u> (see para. 4.18 of GSR Part 2 [2]).</p>	<p>It is important to be able to reliably trace all changes, even after a long period of time.</p>	x			

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
UK	Para 5.28	Indent does not align with other paragraphs.	Editorial	x			
Germany	5.28	The document control process should include provisions for a periodic review of documents that comprise the management system, taking into account the current status of the facility or activity. Documents should be updated as necessary, and then are required to be reviewed and approved in the same way as the initial documents (see para. 4.18 of GSR Part 2 [2]). This process should include controlled removal of outdated documentation from circulation.	Please add statement for prevention of outdated documentation staying in circulation			x	This paragraph is dedicated to update of documents only
Germany	5.28 A New issue	The document management system should ensure that the last valid reviewed documentation is identifiable and accessible. The use of outdated versions should be avoided.	One of the most common mistakes to be avoided is the use of non-valid documentation. This case occurs when outdated documentation is used. For this reason, we recommend adding a new para saying that the misuse of old revisions should be avoided.			x	This is already in GSR Part 2

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
Germany	5.29	(c) They are made available in human readable form and stored in a safe and secure environment to prevent from damage and loss with controlled access and in appropriate storage media with a clearly specified retention time in accordance with locally applicable regulations.	Ensuring availability in human readable form. "Readable" is not well defined, e.g. computer readable, binary, etc.			x	The draft text is good and generic enough
UK	Para 5.29 (c)	This contains a number of aspects that would be better listed as individual numbered bullets: "They are made available and stored in a safe and secure environment to prevent from damage and loss with controlled access and in appropriate storage media with a clearly specified retention time".	editorial	x			
India	Page No.13 Clause 5.29	Additional point to be included as given below at (d):They are weeded out after approval of authority as per approved procedure which should include frequency and method of disposal.	Suggested inclusion is required for appropriate disposal of the records that are no more required to be retained.	x			
Germany	5.30	The transfer of information from one type of media to another should include procedures for the control and verification that the information has been transferred as specified. Safety and security aspect for the transmission of documented information should be considered.	The information transfer from media to media should consider safety and security aspects independently if it has been specified or not: it can be forgotten, please add this statement.			x	The draft text is sufficient

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
121							
50							
171							
Germany	Section 6 First sentence	6.1. Requirement 9 of GSR Part 2 [2] states that “Senior management shall....	Numbering of para is missing, please insert			x	Not missing because it is only a quote not recommendation
UK	Para 6.1 (c)	Add semi-colon at the end of (c).	Editorial	x			
Brazil	6.1 to 6.13	“knowledge” appears 14 times in the text, there is no mention to a Knowledge Management System (KMS).	There should be mentions to KMS as many others IAEA documents.			x	It is under 6.13 (c) management system processes to ensure the preservation.... Not all facilities and activities implement knowledge management as know in some IAEA documents
India	Page No.13 Clause 6.1(a)	The effective, efficient, and timely provision of resources throughout the duration of an activity or lifetime of a facility and during an emergency— planning, preparedness and response.	Resource are required during planning, preparedness phase also to manage emergency effectively.			x	Planning and preparedness is understood under first part of sentence – it is normal operation

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
Germany	6.3 Line 2	... Core competences should be built up by means of engagement with relevant industry and branch experts, professional associations, research centres, and universities on a national and international level with due consideration of the graded approach.	It should be made clear that this recommendation is not valid for all kinds of activities.	x			
Brazil	6.3 line 4	Core competences should be built upnational and international level, supported by a competence gap analysis.	Competence gap analysis is a powerful tool to design an organization.			x	This detail is not needed here
Saudi Arabia	6.3/ 3 and 4	[...] on a national and international levels.	Editorial.	x			
Germany	6.4	If external competences and resources are used, the organization should have sufficient knowledge to undertake the following: ... (d) Understand, evaluate and use the outcomes of activities conducted by external organizations or individuals, which includes among others products delivered and services rendered by manufacturers.	The term "outcomes of activities" is rather general, we suggest adding the most common examples.			x	Draft text is good

COMMENTS				RESOLUTION			
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Finland	6.4 (b)	b) Specify the objective, scope and relevant requirements and qualifications for activities conducted by external organizations or individuals;		x			
UK	Para 6.4 (a)	Swap colon for semi-colon at the end of (a).	Editorial	x			
Saudi Arabia	6.4/5	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			
Brazil	6.6 (c)	A knowledge of regulatory requirements and nuclear legislation;	Sometimes the competences of an organization are established by Law or Decree.	x			

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
Saudi Arabia	6.6/ 1 and 2	To support the achievement and development of collective and individual competences <i>competencies</i> , managers within the organization should consider the needed competences <i>competence</i> in the following areas: [...]	Editorial.	x			
UK	Para 6.6 (d)	Add semi-colon at the end of (d).	Editorial	x			
UK	Para 6.6 (f)	“Needed skills” is a random and generic item in this list of specific competencies. Should/could it be more specific?	Minor	x			
Germany	6.6 (f)	Needed Required skills.	Editorial clarification.		x		deleted

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
Saudi Arabia	6.6 (f)	Please consider removing 'Needed skills' and ending the list of areas to be considered at bullet (e).	Clarity. 'Needed skills' cannot be considered an area at the same level as the knowledge and understanding described in bullets (a) to (e).	x			
Pakistan	6.6(f)	Needed Skills: Although some attributes of IAEA competency framework are included in document such as communication, teamwork, planning, achieving results, leading, analytical thinking, knowledge sharing and learning, judgment/decision making, change management and commitment to continuous process improvement, however; rest of attributes of competency (core and functional) may be included such as organizing, supervising, technical/scientific credibility, partnership building, client orientation, persuasion and influencing and resilience.	Technical Traits and competencies similar to IAEA Competency Framework may bring effectiveness in the work practices			x	Too detailed
Saudi Arabia	6.7/2	Managers at all levels should ensure the timely specification and acquisition of the competences <i>competencies</i> necessary (e.g. for specific tasks) and should make provisions for the	Editorial.	x			

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
		timely delivery of training and qualification.					
Germany	6.9	The organization should apply a graded approach to the different elements of the training programme (e.g. analysis of training needs, development , review and approval of the training programme, evaluation of its effectiveness, documentation) ensuring that an appropriate level of detail is employed.	Training documentation for later review needs to be part of the considerations	x			
Germany	6.10 New bullet e)	Senior management should analyse and plan for the organization’s future competence needs. This should include consideration of the following: ... (e) Foreseeable personnel changes (e.g. retirements, succession planning and expected personnel fluctuations)	The future competence needs are dependent on such things as retirements and personnel fluctuations, which should be considered.	x			
Saudi Arabia	6.11/ 1 and 2	Managers at all levels should contribute to the development of staff competences-competencies and should pay special attention to positions that are critical-important to safety.	Editorial – Terminology.	x			

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
Germany	6.13 New issue	(0a) Identify the organizations knowledge strengths and weaknesses; (a) Identify the organization's information and knowledge needs, for example as they	This para states the approach to manage knowledge and information. It is crucial that the organization knows where their strengths and weaknesses are. The strengths should be maintained, and the weaknesses improved. The text focusses on the weaknesses (knowledge needs) but the organization should not forget the strengths and work on them, otherwise they will develop into weaknesses.			x	Too detailed, under (c)
Finland	6.14	To manage knowledge and information, senior management should undertake the following, as applicable	Information and knowledge management being such wide concepts, it is vital to be able to focus on the essentials.	x			
171							
24							
195							

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
UK NUSSC Comment not included in step 7	Para 7.1 to 7.10	<p>Processes & activities - Please revert to some of the more specific , directional language and intent as in the original GS-G.3.1.</p> <p>For example add:</p> <p>“A specific management process should provide a vehicle for establishing priorities. This process should also integrate all review and oversight activities by management, to ensure that there is a structured approach to decision making that meets the needs of the business plan.” (after para 7.7)</p> <p>“The organization should determine the processes that implement the vision, goals, strategy, policies and objectives of the organization.” (as part of para 7.3)</p>	<p>The guidance in the DS513 feels like a retrograde step for the elements of the MS as it does not always state, why process management is important to safety (e.g. to deliver the importance of the process owner, examples of key processes or process implementation. Reads more as a list of things to do, not supported by why it must be done or nuanced things to consider.</p>			x	<p>This part of guide provides recommendations to GSR Part 2 requirements</p> <p>Processes and activities shall be developed and shall be effectively managed to achieve the organization’s goals without compromising safety.”</p> <p>Provided examples are not applicable in all facilities and activities (especially of those of low complexity and low radiation risks)</p>
Saudi Arabia	7.1/6	<p>[...] This should be based on the nature of the organization’s activities, the associated radiation risks (including <i>risks during</i> emergencies) and the regulatory requirements that apply.</p>	<p>Clarity.</p> <p>‘emergencies’ are not risks by themselves.</p>	x			

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
Saudi Arabia	7.2	Managers at all levels should advocate and support a common understanding of <i>what a process is</i> , management of processes, which processes should be established <i>and managed</i> , and how these processes interrelate.	Clarity.			x	Draft text is better
Brazil	7.3	The processes of the organization should be identified by senior management based on regulatory requirements and comprehensive review of the activities being conducted in the organization, and in consultation with the relevant organizational units and staff.	Some processes are required by the regulatory body.			x	Draft text is better
Finland	7.4 (e)	The associated information and knowledge management needs	More understandable and precise	x			Comments is to 7.6
Brazil	7.5 (f)	Identifying the controls, including hold points, and indicators to measure.....	It is not always possible to check an a process only by indicators.			x	Indicators can include other controls

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
Brazil	7.5 (g)	Introduce a new item (g): Identifying the records to be generated	Procedures shall established the necessary records in order to enable later review or audits	x			Included in c)
Germany	7.6 (a)	The risks and chances associated to the process	A process can develop risks and chances for this reason, not only the risks should be mentioned.			x	We want to identify risks
Brazil	7.6 (c)	The associated regulatory and statutory requirements;	The procedures have to take into account other requirements besides the regulatory ones	x			
Saudi Arabia	7.6 (d)	The resources and competences competencies needed within the organization to implement the process;	Editorial.	x			
UK	Para 7.6 (d)	Swap colon for semi-colon at the end of (d).	Editorial	x			

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
UK	Para 7.7 (a)	Remove unnecessary spaces.	Editorial				
Germany	7.7	For each process, the following should be performed, as appropriate: (a) Address Assignment of the responsibility to manage the process;	What is meant by “addressing” the responsibility? Maybe “Assignment” or “Allocation” are better here.			x	Addressing is OK
Canada	7.7	Add: <u>(e) Completing rollouts to enable effective implementation of processes.</u>	Rollouts of new processes to all affected individuals is a key element to enable organizations to successfully implement new or revised processes.			x	Difficult to understand
Saudi Arabia	7.7 (a)	Addressing the responsibility to manage the process;	Editorial.	x			
Belarus	7.7 (add new clauses)	E) specifying the relation between outputs of processes as inputs of others	To create the clear and transparent correlation between processes			x	This is already in 7.5 b)

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
Belarus	7.7 (add new clauses)	F) specifying the order of non-conformities management	The operation organization may have some existing orders on the non-conformity management (depending on causes, sources and responsibilities). We suggest to add the proposed clause to except the uncertainty by non-conformity management.			x	Not relevant to 7.7
Finland	Para 7.9	Add: <u>Within the organization, special attention must be paid to the cross-cutting processes of different functions so that they receive the attention they deserve.</u>	It has been particularly problematic that the organisation does not sufficiently recognise cross-cutting processes and their functionality.				Paragraph 7.9 is dedicated to interactions between processes inside the organization and external ones
Saudi Arabia	7.9/1	Paragraph 4.29 of GSR Part 2 [2] states:	Editorial.	x			

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
Germany	7.9 Line 11 New issue	(0a) Risks and chances from the process than can impact the organization; (a) Agreement on the outputs from the organization that will serve as inputs to the outsourced process and the outputs from the outsourced process that will serve as inputs to the organization;	This para defines the requirements for the management of interactions between processes conducted by the organization and processes conducted by external service providers. One of the points should be the associated risks and chances due to the interactions. For this reason, we recommend adding it.			x	Draft text is better
Russian Federation	7.10 (Section 2 and others as applicable)	Managers within the organization should ensure that all relevant staff are aware that the final and/or primary responsibility for safety remains with the organization itself, even when suppliers are used for the supply of safety related items, products and services.	It is not clear what “the final responsibility for safety” means. It is necessary to add explanations.	x			Used “prime” as SF1
Russian Federation	7.14	(d) Where necessary, demonstrating to the regulatory body that items, products and services meet safety requirements.	Improving the quality of text. Meeting the safety requirements should be constantly demonstrated to the regulatory body.	x			

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
Finland	General comment for 7.13.-7.17.	It is vital that the requirements or their implementation recommendations do not hinder or prevent the application of processes aimed at higher utilization of appropriate mass-produced high-quality industrial standard products for safety significant use. In these cases, the license holder assesses and on that basis accepts the product and the supplier, including its established manufacturing processes, as they are without any nuclear specific tailoring.				x	Covered by graded approach in 7.18
UK	Para 7.15	Delete space after performance: "...of supplier's performance . These ...".	Editorial	x			
UK	Para 7.15	Lines (e), (f) and (g) need semi-colons and item (h) needs a full stop.	Editorial	x			
Germany	7.15 Line 8	These processes should be communicated to potential suppliers and should include the following: (b) A description of the qualification, evaluation and selection process of	Relevant approval criteria should not be communicated with the supplier, to prevent bad faith reporting		x		This is necessary for transparency and fair relations with suppliers, criteria kept and approval erased

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
		suppliers, including relevant approval criteria and how the results are administrated and communicated;					
Germany	7.15 Line 17 New issues	(i) A description of the impact of the products and/or services to safety (identification of ITNS) (j) A description of evaluation criteria and possible derived counter measures	This para defines the requirements to processes for the supply chain development and oversight. As this Safety Guide is oriented to organizations in the nuclear sector, we recommend adding the description how to assess Items Important to Nuclear Safety (ITNS). Additionally, the list includes the evaluation of suppliers. This evaluation may result in the implementation of countermeasures or the blocking of the supplier in the extreme case. The criteria for the assessment should belong to the proces		x		Partially accepted (safety added to a))
Pakistan	7.15	Please add the text at mentioned location: These processes should be communicated to potential suppliers and should include the following:	For sustainability of supply chain of equipment		x		Added generic commercial which covers this proposal in more generic way

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
		Description of requirement regarding after sales services by the supplier					
Germany	after 7.17	7.18. The organization should apply a graded approach to the management of the supply chain. ...	The last paragraph in Section 7 does not have a paragraph number, please add	x			
UK NUSSC Comment not included in step 7	Para 7.20	<p>Supply Chain -The paragraph could include guidance on counterfeit, fraudulent & suspect items (CFSI) as well as more guidance on procurement activities as per GS-G.3.1.</p> <p>For example add “Senior management should establish relationships with suppliers so as to promote and facilitate communication, with the aim of improving the effectiveness and efficiency of processes on both sides.”</p>				x	There is only recommendation 7.15 g) but not details. It is questionable if CFSI is applicable in hospitals and similar facilities as well in regulatory body

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
Saudi Arabia	Para. after para. 7.17	<p>Please consider numbering the paragraph after paragraph 7.17 as paragraph 7.18 to read:</p> <p>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 is are commensurate with the safety significance of the item, product or service being supplied.</p>	<p>Clarity and consistency.</p> <p>In the context of application of a graded approach, both the way and the level of details should be commensurate with the safety significance of the item.</p>	x			

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
195							
31							
226							
Germany	Section 8	<p><i>Revision of Section 8 recommended (removal of duplications). Section 8 has many duplications with Section 3, compare e.g. 8.7 (b) with 3.11. Another example is the treatment of safety concerns, which is addressed in paras 3.12 and 8.11/8.12.</i></p> <p><i>We would like to suggest to focus this Section on aspects not dealt with in other Sections of the safety guide, explaining this in an appropriate introduction, e.g.:</i></p> <p><i>"Many recommendations in the previous Sections, especially Section 3, help to foster a strong safety culture. In addition, the following recommendations apply."</i></p>			x		Preference is to interconnect paragraphs with similar topics (but saying different recommendations). Through references
UK	Para 8.2	Add colon after 'including' as follows, "...including: awareness..." to match the text in GSR Part 2.	Editorial		x		

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
Finland	8.2	Senior management should establish, apply and support direct and open communication and heedful interaction.	A strong safety culture is built through interaction. Communication alone is not enough.			x	Communication contains interaction
Brazil	8.3 line 2	...so that they motivate the individuals to act.....	A policy or plan can motivate, but can not ensure motivation			x	Draft text is good.. they help to ensure
Germany	8.5	Managers at all levels should promote safe working practices and conditions and discourage unsafe practices and behaviours. Various methods (e.g. training, reflections, group discussions, rewards, staff promotion) should be used to create and support a working environment where safety conscious behaviour is recognized, encouraged and valued.	The examples only encompass methods addressing the individual level despite culture as a social phenomenon. Therefore, the notion of reflections and group discussions add group-based methods.		x		Idea accepted, different words were used
Iran	8.7	In order to have the completed paragraph, it is suggested to add following items: (d) Record and report documentations of periodic communications or other observations. (e) Present the documentations to the staff as feedback for promotion of strong safety culture	This helps managers to understand the effects of staffs' attitudinal and professional changes on the organization safety culture. In addition, staff and experts can find how effective their performance has been.			x	Not all communication is documented and reported

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
Germany	8.7 New issues	Managers should promote a strong safety culture in a visible and ongoing manner. Actions may include the following: ... (e) Serving as an example with their own actions (d) If possible, establish an anonymous reporting tool for safety concerns	This para states the actions to be performed by managers to promote a strong safety culture. The main action for managers is to be an example. They can't promote anything that they don't follow. Addition of an anonymous system, to increase participation without fear of repercussion, will be useful as well.			x	Addressed in different paragraphs already
Saudi Arabia	8.8 (i)	Understand the interface of safety and security culture <i>between safety culture and security culture.</i>	Clarity. The proposed modification is consistent with the related text in paragraph 8.16.	x			
UK	Para 8.8 (f)	Add semi-colon at the end of (f).	Editorial	x			
Germany	8.9	Managers at all levels should know and understand the organization's safety culture framework (see para. 3.1 3.4 and the Appendix), ...	Please check the paragraph number which is referred to.	x			Reference to chapter 3 deleted, reference to appendix kept

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
Russian Federation	8.10	Blame-free culture, trust, openness and respect in the workplace should be clearly demonstrated by the actions of managers.	This proposal follows from the Requirement 12: Fostering a culture for safety, Chapter 5 Culture for Safety (General Safety Requirements No. GSR Part 2 «Leadership and Management for Safety»).			x	Addressed already in other paragraph
Germany	8.11 Line 6	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. This process should include dedicated information sharing routes, when a safety concern from one site or one organization could be applicable to others. Individuals should be encouraged to report concerns in a timely manner. Managers at all levels should ...	Sharing of information and checking of applicability of concerns to other sites within one organization should happen already on the stage of concerns, not only from “lessons learned”			x	Addressed sufficiently here and in 3.12
Finland	8.13	“8.13. The organization should develop its capacity to learn not only from failures but also from success (see also para. 6.8 of GSR Part 2 [2]). The organization should employ a variety of approaches to stimulate learning and improve safety and the overall performance of the organization.”	The Guide does not provide guidance on success - what does “success” mean in this context? In addition to events that are labelled “successes” (or “failures”), organizations should also learn from normal work – the way in which they achieve	x			Positive achievements added

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
			uneventful, safe status. This can be very insightful, but it not necessarily considered “success” because it is not extraordinary.				
Iran	8.13	To add the end of the paragraph: “In addition to intra-organizational subject, learning from failures and successes of other organizations will also play effective role to enhance safety culture.”	From text of paragraph 8.13, this subject is not understood explicitly. If the mentioned subject is not understood from paragraph, it recommends to consider that here.			x	The text is self-explanatory
Saudi Arabia	8.15/ 3 and 4	[...] which should be avoided on both an individual and organizational level <i>individual and organizational levels.</i>	Clarity.	x			
Russian Federation	8.16	Managers should establish means for communicating about concerns or issues in relation to the interface of safety culture with security culture . Opportunities for complementary support should be identified. Cooperation and teamwork to ensure that the needs of both safety and security are met should be supported and encouraged.	Improving the quality of text in which there is no definition of security culture.				Term security culture is used in GSR Part 2, security culture is also addressed in IAEA Gloassary

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
Saudi Arabia	8.16/2	[...] Opportunities for complementary <i>mutual</i> support should be identified. [...]	Clarity. The proposed wording, i.e. ‘mutual’, assumes that safety culture supports security culture and vice versa. If the support is meant to be from the managers, then ‘additional support’ would be simpler and less confusing than ‘complementary support’.	x			
Germany	8.17	In application of a graded approach to a less complex facility or activity with a low radiation risk, expectations concerning safety culture may be communicated primarily by informal means . safety conscious decisions and actions can be credited as fostering of strong safety culture	This paragraph contains the correct message that it is possible to downgrade. However, this does not have to lead to focus on informal communication only. Therefore, we suggest to add the addition of the word “primarily” to clarify that there might be other options. In addition, the content of the last sentence is not exclusively true for low-risk activities and, therefore, expendable.	x			

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
Pakistan	8.17 (c)	Communicating clear expectations regarding personal accountability, teamwork, questioning attitudes, human performance tools including error reduction tools and safety focused decision making in meetings at all levels.	Human performance and error reduction tools, applications of relevant tools related expectations may be communicated to reinforce safety culture			x	The paragraph is dedicted to graded approach, not clear what is addressed by comment
226							
19							
245							
Canada	9.2	“...For a less complex facility or activity with a low radiation risk, the management system review <u>assessment</u> and process assessment methodologies may be simpler and less formal.”	Management system review is historically a formal process in the nuclear industry. Assessment is a better term that suggests flexibility on the methodology. This proposal avoids a term that has historical impact in the nuclear industry.	x			

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
Germany	9.2 (a)	To identify strengths, weaknesses, opportunities and threats (i.e. SWOT analysis) Add reference	Regarding SWOT-analysis give reference please to other IAEA documents and e-learning courses, e.g., IAEA Nuclear Energy Series NG-T-3.16 about Strategic Planning and the related elearning course that treats SWOT- and PESTLE analysis as well as risk assessment issues			x	There is no intention to refer to specific document
Germany	9.3 Footnote	(b) Persons conducting independent assessments do should not participate directly in the work being assessed.	Changed from “do not” to “should not” for emphasis			x	Footnote is taken from Glossary
Belarus	9.3 (note 2)	They can be conducted by or on behalf of the organization itself for internal purposes, by overhead organization as a NAPIO , by interested parties such as customers and regulators (or	In some Member states there is the overhead organization of the operating organization as a NAPIO. For example, in the Republic of Belarus the Belarusian NPP is included in the state			x	Footnote is taken from Glossary

COMMENTS				RESOLUTION			
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		by other persons on their behalf), or by external independent organizations.	production association of electricity «Belenergo». SPA «Belenergo» provides the managing services to the Belarusian NPP and support on the different issues, including quality management, nuclear safety etc.				

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
Belarus	9.3 (note 2, clauses (b)0	Persons conducting independent assessments do not participate directly in the work being assessed. In independent assessments as an auditors can participate the persons with technical and operation background on the closely-relating duties or processes.	The effectiveness of the audit, and as a consequence the improvement of the management system, can be increased through the participation of not only specialists from the quality department, but also technical specialists in			x	Footnote is taken from Glossary

COMMENTS				RESOLUTION			
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			<p>related processes. For example, participation of engineer on the technical diagnostic responsible for the detection of equipment rejection by audit of department of incoming control will allow to assess the cooperation between departments on consideration of the equipment rejection by the further incoming control by the same equipment.</p>				

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
Brazil	9.3 line 5	Senior management should ensure both self-assessments and independent assessments 2 of the management system, and their results should be disclosed throughout the organization.	The results of the assessments of MS should be disclosed to all.			x	Addressed in 9.21
Germany	9.4	Staff assigned to manage processes should periodically conduct selfassessments of processes and their effectiveness. These self-assessments should involve all organizational units and individuals that significantly contribute to the process. Processes and their effectiveness should be evaluated from independent individuals to the process	The independent assessment of processes and their effectiveness should be conducted to ensure the continuous improvement, please add this statement.			x	This paragraph focuses on self-assessment only independent assessment is cover by independent assessment of management system
India	Page No.23 Clause 9.5	Key safety performance indicators should be established for management to easily and quickly assess the overall safety status of the organization.	Suggested additional sentence may be included in the last para for better assessment of safety.			x	9.5 is dedicated to management system review/assessment and not to overall safety assessment
Saudi Arabia	9.5/6	Please consider removing ‘See content of a review in para 9.2.’, which seems to be a forgotten note.	Editorial.	x			

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
Germany	9.5 Line 6	See content aims of a review in para 9.2.	Para 9.2 defines the aims of the review, not the content. If the content shall be recommended, additions are necessary.		x		Sentence deleted
Germany	9.7	Senior management should ensure that responsibilities for the management of non-conformances are allocated in the management system. Senior management should also ensure that individuals who implement management system processes are aware of their duty to identify and report non-conformances and to propose corrective actions. Senior management should ensure that all levels of the staff can report nonconformances	All individuals should be able to report nonconformances. For this reason, we suggest adding this requirement	x			
Germany	9.8	Senior management should ensure that appropriate training is provided for every employee for reporting nonconformances and proposing corrective actions.	Addition for clarification	x			
Canada	9.8	“Senior management should ensure that appropriate training is provided on reporting non-conformances and proposing corrective actions. <u>This training should reinforce that staff are enabled and encouraged to freely raise concerns.</u> ”	Training for reporting non-conformances should reinforce the importance of the process and the expectation that staff raise any potential non-conformances without fear of reprisal.	x			

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
UK	Para 9.9	Bulleted list should use semi-colons rather than full stops for consistency.	Editorial	x			
Finland	9.9.	Add: <u>(f) near misses that could have led to safety issues</u>	Also near misses should be identified and reported as type of event, due to that they may communicate deficiencies concerning e.g. instructions.			x	Under paragraph 8.11
UK	Para 9.11	“...generic issues and weaknesses and address these to mitigate against a more significant effect”.	Minor	x			
Canada	9.11	“Non-conformances and their direct and route <u>root</u> causes should...”	Incorrect word which changes meaning	x			
Slovakia	9.11 / 1,2,3	9.11. Non-conformances, their direct causes and root causes of the events should be analysed for trends to identify recurring events, their common causes, generic issues and weaknesses before they generate a significant effect.	The incorrect term " route causes " is used in the text. The correct term is "root causes". Root causes are not determined for every non-conformity.	x			

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
Germany	9.11	Non-conformances and their direct and route root causes should be analysed periodically for trends to identify recurring events, possible applicability to other products and/or services, generic issues and weaknesses before they generate a significant effect.	Added periodically, as the analysis should not be a onetime action. Additionally, nonconformances can be identified in one product or activity but can be related to similar products. For this reason, we recommend that the analyses cover also the assessment to similar products and/or activities.			x	Under generic issues
Germany	9.11A New issue	The corrective actions derived by the non-conformance analyses should be approved by trained and experienced individuals	Non-conformance can lead to the implementation of corrective actions. We recommend stating the corrective action should be approved by trained and experienced individuals (similar to the changes)	x			Added to 9.8
Canada	9.13	“The results of corrective actions should be monitored at regular planned intervals to ascertain whether they are effective...”	Monitoring at regular intervals (at a precise time) may not be an effective process. As part of the corrective action process, the organization should plan when monitoring needs to occur as part of the action plan. This ensures the effectiveness review is linked to the event.	x			

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
Finland	9.16.	9.16. A graded approach should be applied: 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 . less extensive .	The word “informal” is problematic here: it sends a wrong message. Safety culture assessment should be systematic and formal, not necessarily extensive but there should be a process, management commitment, it should follow procedures, it should be communicated, it should result in corrective actions and their effectiveness should be monitored. In a less complex facility with low radiation risk, safety culture assessment can be less extensive according to graded approach.			x	This paragraph addresses hospitals and similar facilities (industrial use of sources of ionizing radiation). Less extensive is not self-explanatory. Less formal means that there is no specific process for it.
Germany	9.16	A graded approach should be applied: 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 primarily qualitative .	“Informal” is not a clearly defined term. If it means to use qualitative instead of quantitative methods or to use a limited set of methods (see 9.18), then it should be stated more explicitly.			x	Does not address the idea of paragraph

COMMENTS				RESOLUTION			
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UK	Para 9.17	Delete 'both' in: "...ensure that both self-assessments...".	editorial	x			
Germany	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. Senior management shall ensure that such self-assessment makes use of recognized experts in the assessment of leadership and of safety culture." 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.	Why should leadership be excluded from independent assessment? Please delete "when relevant".			x	See para 9.14 safety culture and leadership for safety assessment should be conducted together
Saudi Arabia	9.18/ 1	Multiple methods should be used in the assessment of leadership <i>for safety</i> and <i>of</i> safety culture. [...]	Editorial. Consistency with paragraph 6.9 of GSR Part 2 and paragraph 9.16 of this Draft Safety Guide.	x			

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
Saudi Arabia	9.19 (a)	They are actively involved and encourage all individuals to participate in the assessments of leadership <i>for safety</i> and <i>of</i> safety culture;	Editorial. Consistency with paragraph 6.9 of GSR Part 2 and paragraph 9.16 of this Draft Safety Guide.	x			
Saudi Arabia	9.19 (b) and 9.19 (c)	Please consider merging bullet (b) and (c) to read as follows: (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.	Clarity and conciseness of the recommendations. Bullet (c) can be covered in bullet (b).			x	c/ comes after b/, so separation is good
Finland	9.20.	Add: Senior management should clearly demonstrate that they take ownership of the findings and support cross-functional actions that impact all relevant organizational units and functions <i>including, if necessary, outsourced processes.</i>	Also safety critical outsourced processes should be in the scope of both assessment and development activities.	x			
Saudi Arabia	9.21/ 2	Paragraph 6.11 of GSR Part 2 [2] states that (citation omitted) “The results of self-assessments and independent assessments of leadership for safety and of safety	Editorial.	x			

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
		culture [4] shall be communicated at all levels in the organization.”					
245							
30							
275							
Japan	Appendix SAFETY CULTURE FRAMEW ORK	Each topic on “Safety Culture Traits” should be expressed with “should” statement if this table would be treated as “appendix”, which is part of main body of IAEA Safety Guide in accordance GSR Part 2. If this table is treated to be annex, which explain definition of those terms inherent to specific Safety Guide, “should” is not necessary.				x	Appendix uses the wording which was harmonized and agreed by involved parties. Modifications of text is done only in limited cases when the terminology of original text is not consistent with terminology used in this guide.
Saudi Arabia	Appendix	Please consider changing the ‘Appendix’ to an ‘Annex’. If the proposal is accepted, paragraph A.1 should be slightly modified to read as follows: 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	Consistency with SPESS C: Section 3 of SPESS C specifies the differences between an appendix and an annex as follows: “An appendix is considered to form an			x	Safety culture framework is an integral part of the text. Presented safety culture framework replaces safety culture attributes in para.2.36 in GS-G-3.1

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
		<p>States. This safety culture framework describes the traits and attributes that are present in organizations with a strong safety culture. A graded approach should needs 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 annex is based upon the work previously done; A Harmonized Safety Culture Model was published as IAEA Working Document in 2020, (see harmonization_05_05_2020-final_002.pdf (iaea.org).)</p>	<p>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 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</p>				

COMMENTS The comments are listed according to their order of appearance in the text				RESOLUTION			
			<p>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 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</p>				

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
			<p>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>				
Finland	APPENDIX X	IF the published appendix would be revisited, we would comment following:				x	Appendix uses the wording which was harmonized and agreed by involved parties. Modifications of text is done only in limited cases when the terminology of original text is not consistent with terminology used in this guide.

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
Finland	Appendix, Safety Culture Framework	QA.1 Recognition of unique risks: Individuals understand the unique risks associated with facilities and activities. They understand that the technologies and the whole socio-technical system may be complex and might fail in unforeseen ways with significant consequence	Add “and whole socio-technical system”. It is not just technology which is complex – it is the whole socio-technical system (consisting of technological, human, organizational and interorganizational factors) that is complex and can fail in unexpected ways.			x	Appendix uses the wording which was harmonized and agreed by involved parties. Modifications of text is done only in limited cases when the terminology of original text is not consistent with terminology used in this guide.
Finland	A.1, LR.7	The impact of the change on safety is assessed before, during and after the change, to ensure that the development goals are achieved and to mitigate the risks identified in the assessments.	The purpose of the evaluations is to produce added value, i.e. to ensure safety and the achievement of goals, which also requires the mitigation of identified risks.			x	Appendix uses the wording which was harmonized and agreed by involved parties. Modifications of text is done only in limited cases when the terminology of original text is not consistent with terminology used in this guide.
Finland	Appendix, Safety culture framework LR. Leader Responsibility	LR. 4 – LR. 7	These are rather responsibilities for managers, not specifically for leaders (if informal, non-manager leaders are also considered leaders). Consider rewording “leaders” to “managers”.			x	Appendix uses the wording which was harmonized and agreed by involved parties. Modifications of text is done only in limited cases when the terminology of original text is not consistent with terminology used in this guide.

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
Finland	Appendix Safety Culture Framework , DM. Decision Making	DM.1 Systematic approach	Throughout the Guide the systemic approach is mentioned many times, here another term is used, “systematic approach”: Consider clarifying the difference to avoid confusion. Neither “systemic” or “systematic” is defined in IAEA Safety Glossary, 2018 edition.			x	Appendix uses the wording which was harmonized and agreed by involved parties. Modifications of text is done only in limited cases when the terminology of original text is not consistent with terminology used in this guide.
Finland	Appendix Safety Culture Framework , CL. Continuous Learning	CL.4 Leadership development: Competent safety leaders are developed through the nuclear leadership training and succession management processes.	Formulated as such, CL.4 Leadership development may refer to general leadership (“competent leaders”), not specifically with leadership for safety or nuclear leadership (cf. WANO PL 2019-01). Consider clarification and sharpening the safety and nuclear specific aspects of leadership in comparison to general leadership. In addition, the possibility to gain competence by being mentored by an experienced informal leader, without formal management title, is			x	Appendix uses the wording which was harmonized and agreed by involved parties. Modifications of text is done only in limited cases when the terminology of original text is not consistent with terminology used in this guide.

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
			missing here. Competency is assumed as being developed only by formal training or succession management.				
Germany	Appendix IR New issue	IR.4 Training Individuals are aware of trainings regarding safety procedures and commit to completing the relevant training before starting a task	Added clause to personal training resolution			x	Appendix uses the wording which was harmonized and agreed by involved parties. Modifications of text is done only in limited cases when the terminology of original text is not consistent with terminology used in this guide.
Germany	Appendix IR New issue	IR 4 Accountability Individuals understand and accept the importance of being held accountable for their actions related to safety. They are expected to not only meet safety standards but also actively identify, report and correct unsafe conditions or behaviors	Accountability should be included as part of individual responsibility			x	Appendix uses the wording which was harmonized and agreed by involved parties. Modifications of text is done only in limited cases when the terminology of original text is not consistent with terminology used in this guide.
Germany	Appendix CO	CO3 Reasons for decisions: Leaders from top management ensure that the reasons for technical and administrative decisions are communicated to the appropriate individuals in a timely manner.	Section 3 provides a description of Leadership and management. Based on this description, leadership is provided to any individual with capabilities and competences to give direction. Manager is a			x	Appendix uses the wording which was harmonized and agreed by involved parties. Modifications of text is done only in limited cases when the terminology of original text is not consistent

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
			<p>formal, authorized function. Based on this definition, managers should be leaders but not every leader should be a manager</p> <p>This section may not use the term leadership accordingly</p>				with terminology used in this guide.
Germany	Appendix CO New issue	<p>CO.5 Availability</p> <p>Communication should be available also at a later point in time and in different modes. A repository of relevant communications should be established and maintained</p>	<p>Please add clause to availability of communications</p>			x	<p>Appendix uses the wording which was harmonized and agreed by involved parties. Modifications of text is done only in limited cases when the terminology of original text is not consistent with terminology used in this guide.</p>
Germany	Appendix LR	<p>LR.1 ... Leaders from top management establish and promote organizational priorities that place safety above competing goals. Leaders from top management take a long term approach.....</p> <p>LR.4 ... Leaders from all management levels ensure that personnel, equipment, procedures,.....</p> <p>LR.6 ... Leaders from all management levels ensure that rewards and sanctions ...</p> <p>LR.7 ... Leaders from all management levels use a systematic process for communicating and implementing</p>	<p>Section 3 provides a description of Leadership and management. Based on this description, leadership is provided to any individual with capabilities and competences to give direction. Manager is a formal, authorized function. Based on this definition, managers should be leaders but not every leader should be a manager</p> <p>This section may not use the term leadership accordingly.</p>			x	<p>Appendix uses the wording which was harmonized and agreed by involved parties. Modifications of text is done only in limited cases when the terminology of original text is not consistent with terminology used in this guide.</p>

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
		change... LR.8 ... Leaders from top management ensure that authorities, roles and responsibilities are clearly defined and understood. Leaders from all management level ensure that authorities, roles and responsibilities are clearly understood.					
Germany	Appendix DM.1	DM.1 Systematic Systemic approach: Individuals use a consistent, Organizations provide a guideline for a systemic systematic approach to evaluate relevant factors, including risk, when making decisions. Using a systematic systemic approach, high quality information is collected from all relevant sources. All appropriate individuals have to be trained to apply this approach.	The organization should provide the systemic approach and the individuals should be trained in it			x	Appendix uses the wording which was harmonized and agreed by involved parties. Modifications of text is done only in limited cases when the terminology of original text is not consistent with terminology used in this guide.
Germany	Appendix DM.4	DM.4 Resilience: Prudent decision making is always used, but in anticipation of unforeseen situations when no procedure or plan applies, organizations develop the ability to adapt should include degrees of freedom in their systemic approach in order to adapt.	Clarification			x	Appendix uses the wording which was harmonized and agreed by involved parties. Modifications of text is done only in limited cases when the terminology of original text is not consistent with terminology used in this guide.

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
Germany	Appendix WP	WP.1 Work management: There is a systematic systemic approach of selecting, scheduling, coordinating and completing work activities, in which safety is emphasized. The identification and management of relevant factors, including safety, are taken into consideration in the work process.	To our understanding an approach is systemic, not systematic.			x	Appendix uses the wording which was harmonized and agreed by involved parties. Modifications of text is done only in limited cases when the terminology of original text is not consistent with terminology used in this guide.
UK	26 / Appendix	Safety Culture Framework – this is a great document.	It would benefit from being more graphical if possible.	x			
Slovakia	References	The reviewed document refers to document “INTERNATIONAL ATOMIC ENERGY AGENCY, A Harmonized Safety Culture Model, IAEA Working Document, Vienna (2020)” as the reference [8]. On the other hand, this reference document states the following: “This is not an official IAEA publication. The views expressed herein do not necessarily reflect those of the IAEA or its Member States. This document should not be quoted or cited as an official publication.”	Failure to comply with a requirement in a reference document.	x			Yes, using reference to working document is not typical; it is an exception.
USA	REFEREN CES	No new text is suggested.	Observation: Many of the references that are included are not actually referenced in the body of the document. Thus, it is unclear of the purpose of the references or how the reader will benefit from	x			All these references removed as they are not used in body text

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
		<p>[4] INTERNATIONAL ATOMIC ENERGY AGENCY, The Management System for the Safe Transport of Radioactive Material, IAEA Safety Standards Series No. TS-G-1.4, IAEA, Vienna 2008</p> <p>[xx] INTERNATIONAL ATOMIC ENERGY AGENCY, Communication and Consultation with Interested Parties by the Regulatory Body, IAEA Safety Standards Series No. GSG-6, IAEA, Vienna 2017.</p>	<p>them with respect to the purpose of DS513. The IAEA reviewers should consider how best to address this issue to the benefit of the reader.</p> <p>It is noted that the current reference [4] appears to include two references, and as a minimum, they should be separated. As well, perhaps the second reference (as shown in bold text in the column to the left) may not have a purpose in DS513. The IAEA reviewers should assess this reference and determine the proper outcome.</p> <p>Additionally, it is noted that TS-G-1.4 is currently being reviewed for potential update. The IAEA reviewers should determine the most current version of TS-G-1.4 to use/reference in DS513.</p>				

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
Saudi Arabia	References	<p>Please consider separating Ref. [4] into references and ensure that both are appropriately called by the text. If necessary, please renumber the references and ensure the consistency of the numbering with reference numbering in the text <u>for all the references.</u></p> <p>INTERNATIONAL ATOMIC ENERGY AGENCY, The Management System for the Safe Transport of Radioactive Material, IAEA Safety Standards Series No. TS-G-1.4, IAEA, Vienna 2008.</p> <p>INTERNATIONAL ATOMIC ENERGY AGENCY, Communication and Consultation with Interested Parties by the Regulatory Body, IAEA Safety Standards Series No. GSG-6, IAEA, Vienna 2017.</p>	<p>Consistency of reference numbering in the list of references and their numbering in the text.</p> <p>Ref. [4] includes two IAEA safety standards (IAEA TS-G-1.4 and IAEA GSG-6) and none of them contains the quoted text in footnote 2. <u>The quoted text is in fact taken from the IAEA Nuclear Safety and Security Glossary, which is referenced as Ref. [5] and not Ref. [4].</u></p> <p>Also, note that IAEA GSG-16 and IAEA SSR-6 are included in the list of references as Ref. [3] and Ref. [7] respectively, but they are not called in the text.</p>	x			All references not used in body text were removed
Finland	p.37	<p>One of the authors shall be “Mäkelä”, not “Maekelae”</p>	<p>Name of the author not correctly written</p>	x			

COMMENTS				RESOLUTION			
The comments are listed according to their order of appearance in the text							
UK	Page 27	Blank landscape page – is this intentional?	Editorial	x			The problem with template
UK	Page 30	Page numbering re-set to 0 for Appendix – is this intentional?	Editorial	x			The problem with template
UK	Page 36	Page numbering re-set to 0 for References – is this intentional?	Editorial	x			The problem with template
275							
24							
299							