

DS518
SSG-42 “Safety of Nuclear Fuel Reprocessing Facilities”,
SSG-43 “Safety of Nuclear Fuel Cycle Research and Development Facilities”
Step 3 – Approval of DPP by the Committees

COMMENTS						RESOLUTION			
No.	MS	Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1.	USA	1	General Title	The DPP for DS518 presented two proposed titles. DS518 is intended to integrate SSG-42 (on Safety of Nuclear Fuel Reprocessing facilities) and SSG-43 (on Safety of Nuclear Fuel Cycle Research and Development Facilities). In this regard, the following title is suggested: “Safety of Nuclear Fuel Reprocessing and R&D Fuel Cycle Facilities.”	Completeness and avoiding redundancy to develop a title covering SSG-42 and SSG-43.			Y	According to Section 2 of this DPP, the SSG-43 and SSG-43 will remain as separate publications.
2.	France	1	General Scope	Include for each SSG a specific part for the safety demonstration involving hazardous chemicals		Y			The provisions related to protection against toxic chemicals and other hazardous chemicals and the safety demonstration of this will be addressed along the documents, as necessary, in accordance with SSR-4.
3.	Japan	1	General	New section on “management and verification of safety” should be described as simple as	New safety guide concerning nuclear installations are	Y			

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				possible.	now being revised as draft DPP-DP 513. General description on management system should be addressed in proposed DS-513, Meanwhile, the recommendations in new SSG-42 and SSG-43 should be limited to facility specific ones.				
4.	USA	2	General	DS518 is intended as a revision of SSG-42 and SSG-43 (published in 2017). The main justification for such revision is to be in harmony with SSR-4 which also was published in 2017. In this context, DS518 may need to address aspects of coordination and harmonization between SSG-42/SSG-43 and SSR-4.	Coordination and harmonization between overlapping safety standards during development particularly those standards developed within the same timeframe.	Y			SSG-42 and SSG-43 refer to requirements of NS-R-5. So, the aspects of coordination and harmonization between SSG-42, SSG-43 and SSR-4 as presented in DS518 are valid and correct.
5.	Japan	2	Section 5 SCOPE New bullet	Add the following message; <ul style="list-style-type: none"> <u>New section on management and verification of safety, aligned with SSR-4 and the more relevant management safety guide GS-G-3.5;</u> 	To keep a consistency with the table of contents described in “7. OVERVIEW”, as	Y			

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					described in DPP-DS517.				
6.	Japan	3	Section 5 SCOPE Page4 2 nd bullet	<ul style="list-style-type: none"> Align with SSR-4 on descriptions of topics such as: main safety functions; safety classification; <u>human factors engineering</u>; design for ageing; classification and qualification of items important to safety; 	Completeness. Req. 27 “Human factors engineering” on SSR-4 is also introduced as a new requirement.	Y			
7.	Japan	4	Section 5 SCOPE P.4 5 th bullet	<ul style="list-style-type: none"> Influence of Human, Technology and Organization approach in GSR Part 2, <u>systematic systemic</u> approach to safety, leadership and safety culture. 	Correction. GSR Part 2 defined “systemic approach” for interactions between technical, human and organizational factors.	Y			
8.	Japan	5	Section 5 SCOPE Page4 2 nd bullet	<ul style="list-style-type: none"> Align with SSR-4 on descriptions of topics such as: main safety functions; safety classification; <u>human factors engineering</u>; design for ageing; classification and qualification of items important to safety; 	Completeness. Req. 27 “Human factors engineering” on SSR-4 is also introduced as a new requirement.	Y			

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9.	Japan	6	Section 5 SCOPE Page4 6 th bullet	<ul style="list-style-type: none"> Req.21 Design extension conditions, <u>Req.27 Human factors engineering</u>, Req. 28 Control over the transfer of radioactive material and other hazardous material; Req. 30 Qualification of items important to safety; Req. 39 Design of provisions for heat removal; Req. 71 Operational accident management programme; Req. 73 Feedback of operating experience and Req. 75 Interfaces between safety, nuclear security and the State system of accounting for, and control of, nuclear material; 	Ditto. (Completeness. Req. 27 “Human factors engineering” on SSR-4 is also introduced as a new requirement.)	Y			
10.	USA	3	Section 6	<p>The document listed in Section 6 20 IAEA safety standards which interface with the current standards; it is unclear how the structure of this document will be developed to accommodate such diversified multiple standard’s interfaces, and establish harmony with such standards.</p> <p>Recommend Section 6 of this document be provided in a Reference List.</p>	Clarity & Completeness to address multiple interfaces with the listed safety standards to ensure harmony in a succinct fashion.	Y			These are specific safety guides support the specific safety requirements SSR-4. List of documents in Section 6 will be list of references.

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11.	Pakistan/NUSSC	1	Section 7 Overview / 5. Design	<ul style="list-style-type: none"> • Specific requirements recommendations for design • Design requirements recommendations for protection against non-radiological hazards 	Editorial	Y	<ul style="list-style-type: none"> • Design for protection against non-radiological hazards 		For simplicity
12.	Pakistan/WASSC	1	Section 7 Overview / 5. Design	Radioactive Waste Management	Radioactive waste management is an essential element as per Req. 24: Design provisions for radioactive waste management of SSR-4. So it may be included as a separate content 'Radioactive Waste Management' during the design in proposed guides.	Y	Design for radioactive waste management		Consistency with relevant Requirement 24 of SSR-4
13.	Pakistan/NUSSC	2	Section 7 Overview / 5. Design	<ul style="list-style-type: none"> • Radioactive waste management • Emergency preparedness and response 	Radioactive waste management and Emergency preparedness and response are essential element as per Req. 24: Design provisions for radioactive waste management and Requirement 47: Design for emergency	Y	<ul style="list-style-type: none"> • Design for radioactive waste management • Design for emergency preparedness and response 		Consistency with relevant Requirements 24 and 47 of SSR-4

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					preparedness and response respectively of SSR-4. So these may be included as a separate content in proposed guides.				
14.	Pakistan/WASSC	3	Section 7 Overview / 8. Operation	Radioactive Waste Management Programme	Please provide separate content of 'Radioactive Waste Management Programme' instead of combining the two like 'Radiation protection programme and management of radioactive waste and effluents'.	Y	Management of radioactive waste and effluents		Consistency with relevant Requirement 68 of SSR-4