

Predisposal Management of Radioactive Waste from Reactors (DS448)

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: FRANCE/MEDDE		2013-04-17					
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
	General comments	Integration of security aspects in safety documents and vice versa should follow the agreed proposal made during second meeting of NSGC. It should consist in including brief references to where interfaces may exist and provide cross-references in the appropriate serie.	This will prevent making incomplete or inappropriate recommendations.				
1	4.2 p 14	Proposal to delete	We do not see why this subparagraph that balances safety and costs is included into this paragraph on integrated approach to safety	x	Propose to replace 4.2-4.4 with “4.2 For a new facility, the site selection and design should take physical protection into account as early as possible and also address the interface between physical protection, safety and nuclear material accountancy and control to avoid any conflicts		Consistent with NSS 13

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					and to ensure that all three elements support each other.” “4.3 The operator should assess and manage the interfaces between nuclear security, safety and nuclear material accountancy and control activities in a manner to ensure that they do not adversely affect each other and that, to the degree possible, they are mutually supportive.”		
2	4.3 p 14	Proposal to delete	<p>Already covered by 4.1 and does not add any value to it.</p> <p>On the contrary it gives a narrow perspective that would be counter productive as regard consideration of safety/security interfaces.</p> <p>4.1 might be developed a bit more on principles of managing security/safety interfaces.</p>		See response above		
3	4.4 p14	Proposal to delete	Included in 4.1. Moreover reciprocity should have been		See response above		

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			mentioned				
4	4.6 p15	Proposal to delete	<p>We do not understand why the public should be unduly exposed by access and monitoring.</p> <p>Nor do we see any example when access should unduly expose workers</p>	x			
5	7.34	Replace (g) with “Malevolent action”			<p>7.34 (f) modified: “...sabotage, and other malicious acts etc.” 7.34 (g) deleted</p>		Per discussion w NSGC:

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Reviewer: Adrian Freer		Page 1 of 3					
Country/Organization: ONR, UK		Date: 16 April 2013					
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1	1.9	Add new paragraph 1.10 stating “The Safety Guide does not provide recommendations on the nuclear security of nuclear material, nuclear facilities or radioactive material. Recommendations and guidance on nuclear security at nuclear facilities and for radioactive material are provided in NSS No.13, No. 14 and other publications in the IAEA Nuclear Security Series”. Add details of NSS No.13/14 in Reference section	To make clear that references to nuclear security in this Guide are confined to those where it has an interface with safety	x			
1	2.3, 3.18, 4.1, 4.5, 4.14, 4.17, and 4.20	Insert “nuclear” before “security”	Correct IAEA terminology	x			
2	3.23, 2 nd sentence	Delete “and security”	It is not the place of a Safety Standard to set requirements relating to nuclear security	x			
3	3.25(h)	Delete	The responsibilities of an operating organisation in relation to nuclear security go far wider than conducting “assessments” (which in any case is not a defined nuclear security term)	x			

4	3.30	Delete “security”	That “special considerations” may be required to achieve high security standards is meaningless	x			
5	Section 4 Box	Insert appropriate reference as to origin of Requirement 5	Consistency with other boxes	x			
6	4.1, 4.5 4.14, 4.17, 4.20 and 4.24	Insert “nuclear” before the references to “security”	IAEA terminology	x	Not in 4.24		
7	4.2, line 2	Delete “and security”	Risk management is applied in the nuclear security area. Requirements are not “balanced” against operational needs and costs.		Propose to replace 4.2-4.4 with “4.2 For a new facility, the site selection and design should take physical protection into account as early as possible and also address the interface between physical protection, safety and nuclear material accountancy and control to avoid any conflicts and to ensure that all three elements support each other.” “4.3 The operator should assess and		Response to France comments (Consistent with NSS 13)

					manage the interfaces between nuclear security, safety and nuclear material accountancy and control activities in a manner to ensure that they do not adversely affect each other and that, to the degree possible, they are mutually supportive.”		
8	4.3	Delete “In addition” and the word “should” in line 3	Unnecessary words		See response above		
9	4.4	Add at end “Similarly, the implications of all safety systems and arrangements should be assessed and it should be ensured that no nuclear security function is compromised on account of such systems and arrangements.	Nuclear security is equally as important as safety.		See response above		
10	7.6(n)	Delete	This aspect has already been well addressed in paragraphs 4.1-4.6. (In any case the correct term is “nuclear security”, not “security”.	x			
11	7.34(g)	Delete	By itself, the failure of the physical protection system (or more correctly “nuclear security system”) will not result in any radiological		See response to France comment 4		

			consequences and its inclusion is therefore not relevant to a discussion on beyond design basis accidents				
12	4.3 and 7.58(d)	Amend "physical protection" to "nuclear security"	Correct IAEA terminology	x	Changes proposed to 4.3 in response to Comment 8		