DS462

TABLE OF COMMENTS RESOLUTION

Comments from Argentina, Germany NUSSC, Germany WASSC, France, Finland, Poland, Japan NUSSC, Japan WASSC, USA, Switzerland, Canada, Ukraine, ENISS and WNA

Addenda to the IAEA Safety Requirements:

- GSR Part-1 on Governmental, Legal and Regulatory Framework for Safety
- NS-R-3 on Site Evaluation for Nuclear Installations
- SSR-2/1 on Safety of Nuclear Power plants: Design
- SSR-2/2 on Safety of Nuclear Power plants: Commissioning and Operation
- GSR Part 4 on Safety Assessment for Facilities and Activities

Status

STEP 7: first review by the Review Committees (NUSSC, RASSC, TRANSSC, WASSC) Information of NSGC

Addendum to SSR-2/2

Lessons Learned		Current Text	Proposal to	NUS	SSC	Proposed
Germany WASSC 1	1.3 Additional modification not initially proposed by the Secretariat	"The present publication reflects the safety principles of the Fundamental Safety Principles [1]. It has been harmonized with the IAEA Safety Standards Series publications No. GSR Part 2 on Leadership and Management for Safety [2], No. SSR- 2/1 on Safety of Nuclear Power Plants: Design [4], No. GSR Part 7 on Preparedness and Response for a Nuclear or Radiological Emergency [5], No. GSR Part 5 on Predisposal Management of Radioactive Waste [7], and No. GSR Part 6 on Decommissioning of Facilities [9]."	 Completion. See our related comments on Req. 19, Paras 5.8, 5.9 and 7.3 (with respect to SSR-2/1), Paras 5.7 and 5.8c (with respect to GSR Part 7), Para 5.18 (with respect to GSR Part 5), Req. 33, Paras 9.1 and 9.6 (with respect to GSR Part 6). 	x	As in the draft DS462 posted for comments, the cross- references will be updated	
Germany WASSC 2	3.2 (c) Additional modification not initially proposed by the Secretariat	"Operating functions, which include executive decision making and actions for the operation of a plant for all operational states and accident s conditions."	Editorial.	x		"Operating funct and actions for th and accident s co
Germany WASSC 9	5.18 Additional modification not initially proposed by the Secretariat	" The programme for the management of radioactive waste shall include the pretreatment, characterization, classification, processing (i.e. pretreatment, treatment, and conditioning), transport, storage and disposal of radioactive waste, as well as regular updating of the inventory of radioactive waste. Treatment Processing and storage of radioactive waste shall be strictly controlled in a manner consistent with the requirements for the predisposal management of radioactive waste [7]. Records shall be maintained for waste generation and waste classification, as well as for the processing, storage, treatment and disposal of waste."	Ensuring consistency with the General Safety Requirements No. GSR Part 5 "Predisposal Management of Radioactive Waste", see Paras 1.2, 1.4 and 1.12. According to the IAEA Safety Glossary (2007 Edition), the term 'processing' includes 'pretreatment', 'treatment' and 'conditioning'.		At this stagewe shouldnot openissues otherthan thefeedbackfromFukushima.But if theCommitteesand the CSSgive us themandate toincorporatethis change,we couldimplement	

ed Resolution for the Committees Meetings

nctions, which include executive decision making r the operation of a plant for all operational states conditions."

							it at the final stage when the draft will be submitted to the CSS			
43.1/ 43.2	Safet revie cons plant expe orga aspe	ews shall address, in equences of the cu t modification, equ rience, current sta nizational and mar cts. Safety reviews	carried out at regular intervals. Safety n an appropriate manner, the imulative effects of plant ageing and ipment requalification, operating ndards, technical developments, and nagement issues, as well as siting shall be aimed at ensuring a high level e operating lifetime of the plant.	Saf an pla tec <u>site</u>	quirement 4.44: ety reviews shall be carried appropriate manner, the c nt modification, equipmen hnical developments, and <u>e related</u> aspects. Safety re oughout the operating life	onsequences of the at requalification, of organizational and views shall be aime	e cumulative ef perating exper management i	fects ience, ssues	of plant ageing and , current standards, , as well as siting	NO CHANGE Requirement 4.44 Safety reviews sha reviews shall addr consequences of t plant modification experience, curren organizational and <u>related</u> aspects. Sa level of safety three
Argentina		4.44	Safety reviews shall be carried out at regular intervals. Safety reviews shall address, in an appropriate manner, the consequences of the cumulative effects plant ageing and plant modification, equipment requalification, operating experience, current standards, technical developments, and organizational and management issues, as well as siting site evaluation related aspects. Safety review shall be aimed at ensuring a high level or safety throughout the operating lifetime the plant.	l <u>e <mark>re-</mark> ws f</u>				×	"site related aspects" includes "re-evaluation" but could also include other aspects (e.g. changes in regulatory requirements).	
46.15	On the correct complete correct complete complet	operating organizat ective actions and r	ults of the systematic safety assessment, tion shall implement any necessary reasonably practicable modifications for able standards aiming at enhancing the This shall include the goal of further	On org pra the	quirement 4.47: the basis of the results of t ganization shall implement acticable modifications for o e safety of the plant. <u>This sh</u> nsequences of severe accid	any necessary corr compliance with ap nall include the goa	ective actions applicable stand	and re ards a	easonably himing at enhancing	Requirement 4.47 On the basis of the the operating orga corrective actions compliance with a safety of the plant reducing the likeli
Aigentina		4.47	reducing the likelihood and consequence of severe accidents on the plant or multi unit plants on the same site.						addresses multiple unit sites.	
Japan		4.47	On the basis of the results of the system safety assessment, the operating organiza shall implement any necessary correct actions and reasonably practic modifications for compliance with applic standards aiming at enhancing the safety o plant. This shall include the goal of and fur reducing the likelihood and consequence severe accidents.	ation ctive cable cable f the rther	The goal is ambiguous. Additional statement	X				

44:

shall be carried out at regular intervals. Safety ddress, in an appropriate manner, the of the cumulative effects of plant ageing and ion, equipment requalification, operating rrent standards, technical developments, and and management issues, as well as siting site . Safety reviews shall be aimed at ensuring a high hroughout the operating lifetime of the plant.

.47:

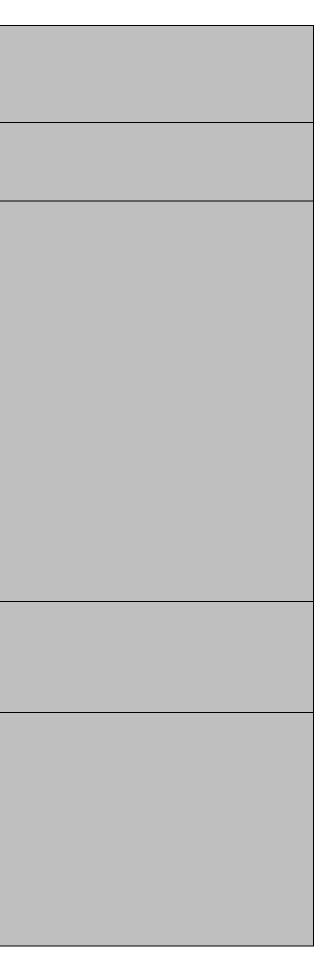
the results of the systematic safety assessment, organization shall implement any necessary ons and reasonably practicable modifications for h applicable standards aiming at enhancing the ant. <u>This shall include the goal of and further</u> celihood and consequences of severe accidents.

Comment	resolution table draft 1,						-
Canada	4.47 last sentence	This shall include the goal of further red the likelihood and consequences of extension conditions, including severe acci	design addresses reducing		X	DEC addressed in Footnote.	
ENISS	4.47 last sentence	This shall include the goal of further real the likelihood and consequences of accidents as far as reasonable practicable.			X	Not needed as sentence combined.	
WNA	4.47	On the basis of the results of the systematic, <u>risk informed</u> , safety assessment, the operating organization shall implement any necessary correct			X	"risk informed" addressed in para 4.46.	
44.1	communication system kept available and sha condition in such a ma	s, tools, equipment, documentation and ms to be used in an emergency shall be all be maintained in good operational anner that they are unlikely to be affected ole by, accident conditions.	Requirement 5.7: Facilities, instruments, tools, be used in an emergency, inc kept available and shall be m that they are unlikely to be a <u>The operating organization sl</u> <u>available in the emergency ce</u> <u>effective between the contro</u> <u>capabilities shall be tested pe</u>	luding for the acciden aintained in good ope ffected by, or made un hall ensure relevant sa entre and technical su of rooms and these cer	it management pr grational condition navailable by, acci afety parameter in pport centre and	ogramme, shall be in such a manner ident conditions. <u>oformation is</u> <u>communication is</u>	Requirement 5 Facilities, instr communicatio <u>those</u> for the a available and s in such a manr made unavaila organization sl information is support centre the control roo These capabilit
Poland 7	Addendum to SSR-2/2 Requirement 5.7	("that <u>The operating organization</u>	rial correction X t" was added).				

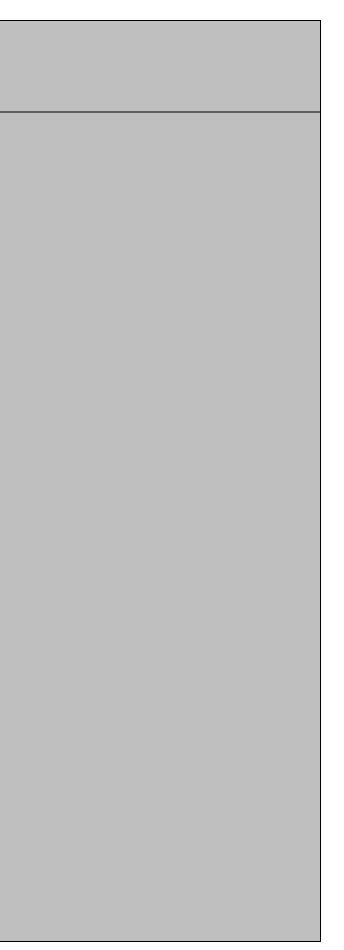
5.7:

struments, tools, equipment, documentation and tion systems to be used in an emergency, including e accident management programme, shall be kept d shall be maintained in good operational condition anner that they are unlikely to be affected by, or allable by, accident conditions. The operating a shall ensure <u>that</u> relevant safety parameter is available in the emergency centre and technical tre and that communication is effective between rooms and these centres in accident conditions. bilities shall be tested periodically.

Argentina	5.7	available in the emergencycentre and technical supportcentre and communication iseffective between the controlrooms and these centres inaccident conditions These capabilities and theireffectiveness shall be tested			×	"capabilities" includes	
		periodically.				"effectiveness"	
Japan	5.7	Facilities, instruments, tools, equipment, documentation and communication systems to be used in an emergency, including those for the accident management programme, shall be kept available and shall be maintained in good operational condition in such a manner that they are unlikely to be affected by, or made unavailable by, accident conditions The operating organization shall ensure relevant safety parameter information is available in the emergency response centre and technical support centre and communication is effective between the control rooms and these centres in accident conditions. These capabilities shall be tested periodically.	clarify. Editorial. Clarification for shared safety information in TSC and ERC.	X ("those")	X	Terminology consistency with GS-R-2.	
USA 1	5.7	"communication is effective between the control rooms and these centres in accident conditions."	Comment: What about offsite communications? They should be considered.		X	Communications, including off-site, is addressed in first sentence.	
USA 2	5.7	requirements for emergency support centre and technical centre.	Consistency. The modifications to 5.7 add reference to both an emergency support centre and a technical support centre. But in the revision of SSR-2/1, the requirement for an emergency centre was replaced by a requirement for a		X	Terminology consistency with GS-R-2.	



		i i	technical support centre. This nconsistency must pe resolved.				
Germany WASSC	5.7	"Facilities, instruments, tools, equipment, documentation and communication systems to be used in an emergency, including <u>those</u> for the accident management programme, shall be kept available and shall be maintained in good operational condition in such a manner that they are unlikely to be affected by, or made unavailable by, accident conditions. The operating organization shall ensure <u>that</u> relevant safety parameter information is available in the emergency centre, <u>the</u> <u>operational support centre</u> and <u>the</u> technical support centre, and <u>that</u> communication is effective between the control rooms and these centres in accident conditions. These capabilities shall be tested periodically."	1.)Editorial (missing words).2.)Ensuring consistency with Para 6.28 of GSR Part 7 (revision of GS-R-2; draft version DS457 dated 3 May 2013) which states"For facilities in category I, emergency response facilities separate from the control room and supplementary control room shall be provided so that: technical support can be given to the control room operating personnel in emergency conditions (technical support centre); operational control by the personnel personnel personnel personnel personnel personnel	X ("those", "that", "that")	X	Emergency centre terminology consistency with GS-R-2.	



-	Comment r	esolution ta	able draft 1, 7	June 2013						
					facility of					
					<u>maintai</u> (operat					
						centre);				
					-	on-site				
					emerge					
					respons					
					manage					
					(emerge					
					centre)	. These				
					emerge	ncy				
					respons	se facilities				
					shall op	erate as an				
					integrat	ted system				
					in supp	ort of the				
					control					
						tinterfering				
					in each					
					functio	ns"				
ľ	46.1/	Requireme	ent 5.8:			Requiremer	nt 5.8			Requirement 5.8
	21.2/		-	nt programme shall be establishe			lent management programr			5.8 An accident m
ī	21.2/			measures and guidelines that are			measures and guidelines the			that covers the p
l	46.17/	-	-	ith beyond design basis accidents programme shall be documented			nts <u>, including for spent fuel</u> cumented and periodically re	-		necessary for dea including for sper
	46.2			nd revised as necessary. It shall in			ite where several units are c		-	programme shall
		•	•	on of the available equipment —			er concurrent severe accide			revised as necess
			-	r as possible, but also conventior			zards. Resource in terms of			5.8a For a site wh
I				echnical and administrative meas ces of an accident. The accident	ures to		d external support shall be a include instructions for util			management pro accidents on mult
		-	•	ne shall also include organization	al		ipment as far as possible, bu			hazards. Resource
		-		ent management, communication		•	include alternative continge		•	personnel, equipr
		networks a	and training n	ecessary for the implementation	of the		<u>l air and mobile power to m</u>	-		available to cope
		programm	e.				This equipment shall be loc	ated and maintained so	<u>that it can withstand an</u>	5.8b It shall inclue
						accident.	include the technical and a	dministrative measures	to mitigate the	equipment — safe also conventional
1							tes of an accident, organizat		•	5.8c It shall includ
							tion networks.	U	0 /	alternative supply
							include training necessary f	•		mobile <u>electrical</u>
1							developing the accident mar			including any nec
						-	, adverse working condition of staff, as well as degraded			located and main will be readily acc
							iccount to ensure expected			5.8d It shall includ
										to mitigate the co
										arrangements for
										networks. 5.8e It shall inclue
										the programme.
L										

8

management programme shall be established preparatory measures and guidelines that are ealing with beyond design basis accidents<u>*</u>, ent fuel storage. The accident management all be documented and periodically reviewed and ssary.

where several units are co-located, the accident rogram<u>me</u> shall consider concurrent severe ultiple units due to, for example, external rce in terms of trained and experienced ipment, supplies and external support shall be be with the above.

ude instructions for utilization of the available afety related equipment as far as possible, but nal equipment.

ude alternative contingency measures such as oly of water, compressed air <u>or other gases</u> and al power <u>sources</u> to mitigate severe accidents, ecessary equipment. This equipment shall be intained so that it can withstand an accident and <u>accessible in postulated emergency conditions</u>. Inde the technical and administrative measures

consequences of an accident, organizational or accident management, communication

ude training necessary for the implementation of

Comment	resolution table unait 1,	7 June 2013					
							5.8f When develo and associated p conditions (e.g. e <u>temperatures</u> , la for operating sta equipment shall accident manage <u>New foo</u> <u>"Safety of Nu definition of severe than"</u> conditions' a <u>extension co</u> process of th <u>methodology</u> <u>related to th</u> <u>plants.</u> <u>For existing r</u> <u>than 'design</u> <u>considered in</u> <u>accordance v</u> <u>defined term</u> <u>directly appli</u> <u>nuclear powy</u> <u>IAEA Safety (than 'design</u>
France 16 Germany WASSC	5.8	 <u>5.8</u> An accident management programme shall be established that covers the preparatory measures and guidelines that are necessary for dealing with beyond design basis accidents, (including for spent fuel storage) or design extension conditions involving fuel melt. The accident management programme shall be documented and periodically reviewed and revised as necessary. <u>5.8c It shall include alternative contingency measures such as alternative supply of water,</u> "An accident management programme shall be established that covers the preparatory measures and guidelines that are necessary for dealing with beyond design basis 	 Clarification to cover both operating plants (where BDBA is relevant) and new plants (where DEC is relevant) Clarification 1.) With regard to design extension 	X ("altermative")	X	DEC addressed in Footnote.	accidents' ar defined term
		accidents extension conditions, including for spent fuel storage as long as it remains a part of the operational activities of the reactor"	conditions, see our related comment on Requirement 19. 2.)			addressed by hierarchy of General and Specific Safety Requirements.	

veloping the accident management programme d procedures, <u>accessibility</u>, adverse working g. elevated radiation levels, <u>elevated</u> lack of lighting <u>access to the plant from off-site</u>) staff, as well as degraded operating conditions for all be taken into account to ensure expected agement actions will be feasible<u>and reliable</u>.

<u>ootnote added on BDBA versus DEC:</u> <u>Nuclear Power Plants: Design" SSR-2/1 includes a</u> <u>of 'plant states' where accident conditions more</u> in 'design basis accidents' are: 'design extension i' and 'conditions practically eliminated'. 'Design conditions' are those considered in the design the facility in accordance with best estimate ogy. The associated requirements in SSR-2/1 these defined terms apply to the design of new

g nuclear power plants, conditions more severe gn basis accidents' were not necessarily d in the design process of the facility in e with best estimate methodology, hence the rm 'design extension conditions' cannot be oplied. The definition of 'plant states' for existing ower plants is in accordance with that given in the ry Glossary where accident conditions more severe gn basis accidents' are 'beyond design basis and the requirements of SSR-2/2 relate to these rms.

DS462 Addenda to GSR Part 1, NS-R-3, SSR-2/1, SSR-2/2 and GSR Part 4 – Comment resolution table draft 1, 7 June 2013

Comment resolu	ution table draft 1, i	7 June 2013		 			-
			The additional				
			statement with				
			respect to spent fuel				
			storage is essential				
			to be consistent with				
			the scope of GSR				
			Part 5 "Predisposal				
			Management of				
			Radioactive Waste"				
			(see Paras 1.12, 1.13				
			and 1.17) and SSG-15				
			"Storage of Spent				
			Fuel" (see Para 1.9).				
			SSG-15 covers spent				
			fuel storage facilities				
			that may be either				
			collocated with other				
			nuclear facilities				
			(such as a nuclear				
			power plant) or				
			located on their own				
			sites. However, SSG-				
			15 is not specifically				
			intended to cover				
			the storage of spent				
			fuel as long as it				
			remains a part of the				
			operational activities				
			•				
			of a nuclear power				
			plant.				
Switzerland	5.8	An accident management programme shall be	The accident		X	The accident	
		established that covers the preparatory measures	management			management	
		and guidelines that are necessary for dealing with	programme should not			programme is not	
		beyond design basis accidents, including all plant states and the spent fuel storage.	be restricted to full power operation.			restricted to	
		states and the spent rule storage.				addressing	
						accident only	
						from full power	
Finland	5.8	An accident management programme shall be	delete beyond design		X	operation. For existing	
imanu	5.0	established that covers the preparatory	basis, see new			plants, the	
		measures and guidelines that are necessary for	definition of plant			accident	
		dealing with design extension conditions,	states			management	
		including for spent fuel storage. The accident				should start for	
		management programme shall be documented				accidents that are	
		and periodically reviewed and revised as				beyond the DBA.	
		necessary.				This includes the	



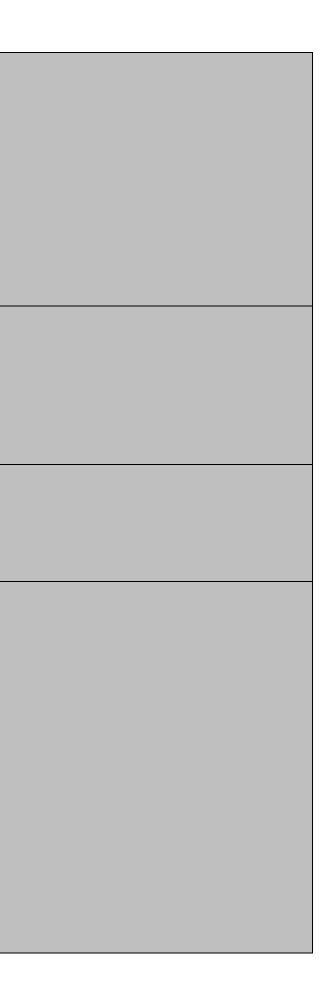
							DEC.	
Japan	5.8	An accident management programme <u>f</u> shall be established that covers the pre measures and guidelines that are neces dealing with beyond design basis ac <u>including as well as</u> for spent fuel stora accident management programme s documented and periodically review revised as necessary.	eparatory ssary for ccidents, age. The hall be	management		Х	Unclear of necessity for "NPPs" as complete document relates to NPPs.	
USA 7	5.8 and 5.9	Replace the term "severe accident" "beyond design basis accident" with "design extension conditions"		Consistency with the terminology change from SSR 2-1		X	DEC addressed in Footnote.	
Finland	Requirement 19	The operating organization shall establis accident management programme for th management of <u>design extension condit</u>	he	As a result of the comments above on 5.8, delete beyond design basis, see new definition of plant states		Х	As above (Finland 5.8)	
Japan	Requirement 19	The operating organization shall e accident management programme of design basis accidents <u>and shall</u> <u>available for using in emergency situal</u> This terminology of "beyond desig accidents" should be defined in a DEFI in SSR-2/2 clearly.	beyond <u>keep it</u> <u>tion.</u> m basis NITION	Add for an available use of accident management programme. Clarification of the terminology. Beyond design basis accident includes the beyond design extension conditions. The same terminology exists in paragraphs 5.8, 5.9 and 7.3.		x	"Availability" is inherent in "establish". Footnote related to BDBA/DEC added.	
Canada	Req. 19	Existing text in SSR-2/2 to be modified to: The operating organization shall establish an accident management programme for the management of beyond design basis accidents.	is need should achiev SSR-2. It need that no manag focus i	tency with SSR-2/1 led. All of SSR-2/2 be checked to e consistency with /1. ls to be recognized of all DECs will be ed under accident ement. But rather the s that they must be ed. Their		x	DEC addressed in Footnote.	



Comment resolut	tion table draft 1, 7				 			•
		The operating organization shall	-	ement needs to				
		establish an accident management	transiti	on effectively into				
		program for the management of	accider	nt management.				
		design extension conditions that	Dointa	to consider.				
		utilizes procedures and / or	Points	to consider.				
		guidelines and transitions operator						
		actions effectively to address event						
		progression.	· •	rating procedures,				
				ng EOPs and				
				ls do not map				
				y onto plant states.				
				tions between sets of				
			-	ures are based on				
				red plant condition,				
			not on	the perceived				
			freque	ncy of the accident.				
			2) The	SAMGs may not be				
			written	for beyond DECs				
			but the	y will be applied by				
			the ope	erating staff to the				
			best of	their ability. This				
			statem	ent implies that, for				
			an eart	hquake greater than				
			the DE	C level earthquake,				
			there a	re no procedures and				
			the ope	erator will do				
			nothing	g. Generally BDBA				
				en-ended set of				
			· -	nts) does apply to				
			SAMG					
Germany	Req. 19	"The operating organization shall estab	lish an	According to the new		Х	DEC addressed in	
WASSC 3		accident management programme for	the	definitions			Footnote.	
		management of beyond design basis		introduced by the				
		accidents extension conditions."		IAEA Safety				
				Requirements SSR-				
				2/1, the term 'design				
				extension conditions'				
				has superseded				
				'beyond design basis				
				accidents'. Design				
				extension conditions				



			could include severe accident conditions (see Section "Definitions" in SSR- 2/1). For the sake of consistency, we recommend to harmonize the terminology used in SSR-2/1 and SSR-2/2.				
Germany WASSC 11	7.3 Additional modification	"Procedures shall be developed for use in the event of anticipated operational occurrences and design basis accidents. Emergency operating procedures and guidance for managing beyond design basis accidents extension conditions shall also be developed"	See our related comment on Requirement 19.		x	DEC addressed in Footnote.	
Germany WASSC 6	5.8a	"For a site where several units are co-located, the accident management program <u>me</u> shall consider concurrent severe accidents on multiple units due to, for example, external hazards"	Editorial (uniform spelling throughout the document).	X			
Canada	5.8a	Existing text in SSR-2/2 to be modified to: For a site where several units are co-located, the accident management program shall consider concurrent severe accidents on multiple units (including design extension conditions) due to, for example, external hazards. Resource in terms of trained and experienced personnel, equipment, supplies and external support shall be available to cope with the above.	 This clause needs to consider a broader set of accidents such as: All units in no core melt conditions Some units in no core melt conditions and some units in severe accident conditions All units in severe accident conditions 		X	DEC addressed in Footnote.	



DS462 Addenda to GSR Part 1, NS-R-3, SSR-2/1, SSR-2/2 and GSR Part 4 –

Comment resolution	table draft 1	7 June 2012
comment resolution	table urait 1	, 7 June 2013

		1,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,					
ENISS	5.8a	For a site where several units are co-located, the accident management program shall consider concurrent severe accidents resulting from the same cause on multiple units due to, for example, external hazards. Resource in terms of trained and experienced personnel, equipment, supplies and external support shall be available to cope with the above.	that accidents occur due to the same initiating		X	 Wording related to "cause" may be restrictive (e.g. where causes on units are related are seismic, flooding, fire etc.), 	
Japan	5.8c	It shall include alternative contingency measures such as supply of water, compressed air and mobile power to mitigate severe accidents, including any necessary equipment. This equipment shall be located and maintained so that it can withstand an accident.		X			
Finland	5.8c	Replace "compressed air" by "compressed gas"		Х			
USA 3	5.8c	mobile <u>electrical</u> power <u>sources</u>		Х			
Canada	5.8c	Existing text in SSR-2/2 to be modified to: It shall include alternative contingency measures such as supply of water, compressed air and mobile power to mitigate design extension conditions (particularly to prevent severe accidents), including any necessary equipment. This equipment shall be located and maintained so that it can withstand an accident.	 This clause needs to consider a broader set of accidents such as: All units in no core melt conditions Some units in no core melt conditions and some units in severe accident conditions All units in severe accident conditions 		X	C DEC addressed in Footnote.	
Germany WASSC 7	5.8c	"It shall include alternative contingency measures such as supply of water, compressed air and mobile power to mitigate severe accidents, including any necessary equipment. This equipment shall be located and maintained so that it can withstand an accident and will be readily accessible in postulated emergency conditions."	 1.) Dispensable word. 2.) Ensuring consistency with Para 6.26 of GSR Part 7 (revision 	X			



Comment resolut	ion table draft 1, 7	June 2013			 	
			of GS-R-2; draft version DS457 dated 3 May 2013) which states			
			"For facilities in category I, alternative supplies as contingency measures, such as the supply of water, compressed air and mobile electrical power, including any necessary equipment, that are necessary for mitigating severe emergency conditions shall be located and maintained in such a			
			way that they can withstand and <u>will be</u> <u>readily accessible in</u> <u>postulated</u> <u>emergency</u> <u>conditions</u> ."			
ENISS	5.8c	It shall include alternative contingency measures such as supply of water, compressed air and mobile power to mitigate severe accidents, including any necessary equipment. This equipment shall be located and maintained so that it can withstand an <u>the</u> accident, <u>for which it is needed.</u>	that the equipment needs to withstand the postulated event, wherefore it is			
			5.8c is also better placed after 5.8d			
Finland	5.8f	Add accessibility: " <u>accessibility and</u> adverse working conditions"		X		
Argentina	5.8f	5.8f When developing the accident management programme and associated		X		



Comment	resolu	ion table draft 1, /	⁷ June 2013		-						•
USA 4 USA 5		5.8f	procedures, adverse working conditions elevated radiation levels, lack of lighting limitations for accessing the plant from outside) for operating staff, as well as degraded operating conditions for equip shall be taken into account to ensure expected accident management actions be feasible. (e.g. elevated radiation levels, elevate temperatures, lack of lighting) 5.8f When developing the accident management programme and associ procedures, adverse working condition (e.g. elevated radiation levels, lack of lighting) for operating staff, as well as	will ed tt The ated wor ons ass f acti	e additional rding is to have surance that an ion is not only ssible (i.e.,	X X					
			degraded operating conditions for equipment shall be taken into accour ensure expected accident manageme actions will be feasible and reliable.	nt to can ent imp son con	sible) but that it be blemented with ne level of hsistency (i.e., able).						
21.2	Arran oper in rel arrar comi actio inclu made respo	ating staff with app ation to beyond do gements and guid mencement of fuel ns necessary follow ding severe accide e, as part of the en	lent management shall provide the propriate systems and technical support esign basis accidents. These ance shall be available before the I loading and they shall address the wing beyond design basis accidents, nts. In addition, arrangements shall be nergency plan, to expand the emergency s, where necessary, to include the erm actions.	appropriat These arra loading <u>, be</u> beyond de shall be ma	ent 5.9 ents for accident ma e systems and techr ngements and guida <u>e tested in exercises</u> , sign basis accidents, ade, as part of the el ents, where necessa	nical supp ance shall , and they , including mergency	oort in rel l be availa y shall ado g severe a y plan, to	ation to beyond ble before the o dress the action accidents. In ado expand the eme	desi comr s neo dition ergen	ign basis accidents. nencement of fuel cessary following n, arrangements ncy response	Requirement 5.9 Arrangements for operating staff wit in relation to beyo arrangements and commencement of and then periodica they shall address design basis accide arrangements sha expand the emergo necessary, to inclu
Argentina		5.9	These arrangements and guidance sha available before the commencement of loading <u>, be tested in periodical exercises</u>	fuel			Х				
Finland		5.9	Replace twice "beyond design basis acci "design extension conditions"	dent" by	delete beyond de basis, see new de of plant states	-			X	DEC addressed in Footnote.	
Germany WASSC 8		5.9	"Arrangements for accident management provide the operating staff with appropri- systems and technical support in relation design basis accidents extension condition arrangements and guidance shall be avain before the commencement of fuel loading periodically tested in exercises, and they address the actions necessary following design basis accidents extension condition	riate n to beyond ons. These ilable ng, be v shall beyond	1.) With regard to de extension conditions see our related comment on Requirement 19.	-			X	DEC addressed in Footnote.	

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for accident management shall provide the with appropriate systems and technical support eyond design basis accidents. These and guidance shall be available before the at of fuel loading, be testedvalidated in exercises dically tested to ensure that they support, and ess the actions necessary following beyond cidents, including severe accidents. In addition, shall be made, as part of the emergency plan, to ergency response arrangements, where include the responsibility for long term actions.

-	connent i	Coolu	lion table draft 1, 7								
				including severe accidents"		2.) Consistency with Paras 5.7 and 5.8. Arrangements for accident management require periodic or regular testing.					
Ī	Finland		Definitions	There is no need to add definition of the states	plant	??					
	USA 7		5.8 and 5.9	Replace the term "severe accident" a "beyond design basis accident" with " extension conditions"		Consistency with the terminology change from SSR 2-1			X	DEC addressed in Footnote.	
	USA 6		5.9	5.9.Arrangements for accident manages shall provide the operating staff with appropriate systems and technical surelation to beyond design basis accides the arrangements and guidances available before the commencement loading, be validated through tested is exercises and then periodically tested ensure that they support and they should be before the actions necessary following beyo basis accidents, including severe account addition, arrangements shall be made of the emergency plan, to expand the emergency response arrangements, necessary, to include the responsibiliterm actions.	upport in lents. hall be of fuel n d, to all address nd design cidents. In e, as part e where	The revision emphasizes that the systems and technical support for beyond design basis accidents should be validated through initial exercises to ensure the systems and support achieve the intended result and that subsequent testing is done to ensure that capabilities are maintained.	X				
	(Proposal from Finland)	The o that coord invol cond	appropriate proceed dinating and coope ved. Periodic joint	tion shall be responsible for ensuring dures are in place for effectively erating with all firefighting services fire drills and exercises shall be e effectiveness of the fire response	procedures cooperating	nt 5.24: ing organization shall be res and competent staffing are g with all firefighting service inducted to assess the effect	e in place f es involved	or effectively co l. Periodic joint f	oordi fire o	nating and trills and exercises	Initial proposal Requirement 5. The operating o appropriate pro effectively coor services involve conducted to as capability.
	Argentina		5.24	The operating organization shall be resp ensuring that appropriate procedures <u>ar</u> <u>competent staffing</u> are in place for effect coordinating	<u>nd</u>		X				
	45.1	The oprog	ramme to report, o	tion shall establish and implement a collect, screen, analyse, trend, document a ting experience at the plant in a	collect, scre	nt 5.27: ing organization shall establ een, analyse, trend, docume ystematic way. It shall <u>seek</u>	ent and co	mmunicate ope	ratin	g experience at the	Initial proposal Requirement 5. The operating o

sal kept

5.24:

ng organization shall be responsible for ensuring that procedures and competent staffing are in place for pordinating and cooperating with all firefighting plved. Periodic joint fire drills and exercises shall be processed assess the effectiveness of the fire response

sal kept

5.27: g organization shall establish and implement a

systematic way. It shall obtain and evaluate information on relevant operating experience at other nuclear installations to draw lessons for its own operations. It shall also encourage the exchange of experience within national and international systems for the feedback of operating experience. Relevant lessons from other industries shall also be taken into consideration, as necessary.				operating experience at other nuclear installations to draw incorporate lessons for its own operations including emergency related arrangements. It shall also encourage the exchange of experience within national and international systems for the feedback of operating experience. Relevant lessons from other industries shall also be taken into consideration, as necessary.						
Argentina	5.27	The operating organization shall establis implement a programme to report, colle screen, analyse, trend, document and co operating experience at the plant in a sy way	ect <mark>and</mark> ommunicate				X	Not necessary to group "collect and screen"	consideration, as	
Germany WASSC 12	Section 9 Additional comment not initially proposed by the Secretariat	General note: The paras in this Section dealing with pr for decommissioning should be rearrang follow a logical order. Proposal for new paras: 9.1, 9.2, 9.5, 9.4, 9.3, 9.6.	ged to	For consistency. The statements in Paras 9.4, 9.3 and 9.6 should be placed at the end since they are in particular relevant for the transitional phase prior to the commencement of decommissioning (i.e. between the permanent shutdown of operations and approval of the final decommissioning plan).		We may implement this "editorial" change at the very end of the process if we have a mandate from the Committees and the CSS				
Germany WASSC 13	Req. 33 Additional comment not initially proposed by the Secretariat	"The operating organization shall prepar decommissioning plan and shall maintai throughout the lifetime of the plant, und otherwise approved by according to the requirements of the regulatory body, to demonstrate that decommissioning can accomplished safely and in such a way a the specified end state."	n it l ess be	Ensuring consistency with the General Safety Requirements No. GSR Part 6 "Decommissioning of Facilities" (revision of WS-R-5; draft version DS450 dated 14 March 2013). Requirement 10 of GSR Part 6 states "The licensee shall prepare a decommissioning plan and maintain it throughout the lifetime		We may implement this "editorial" change at the very end of the process if we have a mandate from the Committees and the CSS				

report, collect, screen, analyse, trend, document ate operating experience at the plant in a . It shall seek to obtain and evaluate information erating experience at other nuclear installations orate lessons for its own operations including ated arrangements. It shall also encourage the perience within national and international feedback of operating experience. Relevant ther industries shall also be taken into as necessary.

Germany 9.1 WASSC 14 Additional comment not initially proposed by the Secretariat	of the facility, according to the requirements of the regulatory body, in order to show that decommissioning can be accomplished safely to meet the defined end state."The current text in Requirement 33 is adopted from Para 5.1 of WS-R-5. Compared to this, Requirement 10 of GSR Part 6 establishes a more stringent approach.Ensuring consistency with Para 7.5 of GSR Part 6 which states" The initial plan shall be updated as necessary in the light of operational experience gained, lessons learned from the decommissioning of similar facilities, new or revised safety requirements, or technological developments relevant to the selected decommissioning, the initial decommissioning, the initial decommissioning plan shall be updated by the licensee as soon as possible"	It is not necessary and even not recommended to duplicate the GSRs in the SSRs.The GSR are applicable and are then complemented by the SSRs
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Germany	9.6	"The implications for safety of the activities in the	Ensuring consistency	It is not necessary					
WASSC 15		transitional phase prior to the commencement of	with Para 7.8 of GSR Part	and even not					
	Additional	decommissioning shall be assessed and shall be	6 which states	recommended to					
	comment not	managed so as to avoid undue hazards and to		duplicate the GSRs					
	initially	ensure safety. During this transitional phase,	" During the transition	in the SSRs.					
	proposed by	operational authorization shall remain in place	to decommissioning,						
	the Secretariat	unless the regulatory body has approved	operational						
		modifications of the authorization on the basis of a	authorization shall	The GSR are					
		reduction in the hazards associated with the plant."	remain in place unless	applicable and are					
			the regulatory body has	then					
			approved modifications	complemented by					
			of the authorization on	the SSRs					
			the basis of a reduction						
			in the hazards						
			associated with the						
			facility."						