

**Japan NUSSC Comments on DPP-DS510**

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: Country/Organization: Japan NUSSC Member		Page.... of. 3 Date: 17/10/2017					
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1.	general	<p><b>The same comment on DPP-DS509.</b></p> <p>Total ten (10) documents in DPP-DS509 and DPP-DS510 are planned to be intensively revised in this three years. The total amount of the corresponding works are supposed to be quite a heavy for the member states at the same time. So, these revises should be prioritized in accordance with some policies.</p> <p>Examples of the standards that are high priority for revision are as follows;</p> <ul style="list-style-type: none"> <li>- those standards which are equivalent to the standards for NPPs which are subject to the Vienna Declaration in 2015 are high priority (see attachment); <ul style="list-style-type: none"> <li>→ NS-G-4.2, SSG-10 and SSG-24</li> </ul> </li> <li>- those standards which are proposed to be combined in the Long Term Structure of the IAEA Safety Standards are also high priority; <ul style="list-style-type: none"> <li>→ combine NS-G-4.2 and SSG-10 (see comment No.2), NS-G-4.4 and DS-396(SSG-20) (see comment No.3)</li> </ul> </li> </ul>			<p align="center">X</p> <p>It is agreed that the standards with high priority include those in the long term structure and those equivalent to NPP standards subject to the Vienna declaration. See comments below regarding suggestions to combine guides</p>		
2.	General	<p>Suggested to combine NS-G-4.4 and DS-396(SSG-20) in accordance with item No.53 of the Long Term Structure of the IAEA Safety Standards which says that “Combine and supersede Safety Guide NS-G-4.4 and DS396(SSG-20)”. The contents of NS-G-4.4 may be included in specified chapter in an overall Safety Analysis Report for Research Reactors.</p> <p>The proposal in these DPPs does not address this future structure. If these two documents need to be revised separately, justification of the cancellation to combine two documents must be shown.</p>			<p align="center">X</p> <p>Justification will be added for these two documents to be revised separately.</p>		

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3.	General	<p>Proposed contents of contents of the new SSG-20 are different from the similar Guide for NPPs, which is being revised as DS449, and then suggested to coordinate with the structure of DS449.</p> <p>The identical contents of the new SSG-20 with DS449 will be beneficial and user-friendly for the states who operate RRs to install NPPs in future, because of being the same structure of SAR.</p>				X	SSG-20 is a specific safety guide for research reactors which covers safety assessment as well as preparation of the SAR. The content of the SAR is described in an appendix of SSG-20. It is not practical to have identical content as with the NPP guidance; however, consistency and coherence will be ensured during the development and drafting, and the structure will be aligned to the extent possible with DS449.

**FR comments – DS 509 and DS 510 – Evolution of various Safety guides related to research reactors**

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: G. Dandrieux		Page.1of.1					
Country/Organization: Ministry for an ecological and solidary transition – Department for nuclear security		Date: 2017-09-28					
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
<b>DS509</b>							
1 -		It is recommended to add a single paragraph referring to interfaces with nuclear security in each revised document, instead of trying to address the interfaces on very limited topics (such as training, interface with security organisations), which will not account for the global aspect of nuclear security				X	The revision is not intended to account for the global aspect of nuclear security, but the specific aspects of the interface between safety and security, per Req 90 in SSR-3.
2	NS-G-4.4, §6	<del>Physical Protection Procedures</del>	Nuclear security issues shall be referred to in an ad hoc chapter on the interfaces but the PP procedures shall not be summarized in a safety document. It is proposed to modify accordingly line 6 of table on NS-G-4-4 (page 17)			X	The PP procedures will not be summarized in this guide, but aspects of the interface between safety and security will be covered and aligned with security recommendations.
<b>DS 510</b>							
1	Revision of SSG-24 §3	<del>Security and Physical Protection Aspects</del>	See comment n°2 - DS509			X	See response above to comment #2

**TITLE: DS 510 DPP Revision of 2 interrelated Specific Safety Guides on Research Reactors as a set of publications**

COMMENTS BY REVIEWER				RESOLUTION			
Country/Organization: FRANCE		Date: 17/10/2017					
pages							
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1.	3	§ to be added at the beginning of chapter 3: <b>The development of the corresponding documents will be the opportunity to ensure overall consistency and hierarchy within standards related to both research reactors and power reactors, notably similar NPP standards will be considered to ensure consistency and evaluate the possibility to merge documents. IT-Platform would be a valuable tool in this context.</b>	This DPP is an important opportunity to reinforce consistency and balance between documents		X Added in first para in Sec 3:  In addition, guidance in similar NPP standards will be considered to ensure overall consistency		The possibility of merging documents was already considered and the DPP reflects the results.  It is agreed that the IT platform is a valuable tool which will be used but it is not necessary to reference this in the DPP.
2.	4	In the objective, add the goal to increase consistency with recommendations applicable to NPP when the recommendation is not facility dependent while recognizing specificities (e.g the fact that experiments are carried out and change according to the needs).	Increase consistency across Safety Standards dealing with nuclear installations			X	Section 4 is meant to describe the Objective of the revised guide itself, not the objective of the review process. This goal to increased consistency with NPP standards will be ensured during drafting of the documents.
3.	6	Add reference to guidance related to other types of installation but dealing with the same topics, more specifically NPPs	To ensure consistency across Safety Standards when technologies do not warrant different recommendations.			X	The list of references is not meant to be exhaustive – see Sec 6 para line 13 – this is not, and cannot be, regarded as an exclusive or exhaustive list.

**DS 510 DPP "Revision of 2 SSGs on RRs (SSG-20 and SSG-24)",**

**Version 01/ Step 3, 2017-07-31**

COMMENTS BY REVIEWER					RESOLUTION			
Reviewer: <b>Federal Ministry for the Environment, Nature Conservation, Building and Nuclear Safety (BMUB)</b> (with comments of GRS) Country/Organization: <b>Germany</b>								
					Pages 2 Date: 16.10.2017			
Relevanz	Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
2	1	Page 1 / line 23	These Guides were <u>all published before SSR-3 was released in the period 2006-2012 (except SSG-37 which was published in 2015)</u> and represent the international consensus on the safety of research reactors <u>at the respective date of publication.</u>	The important message should be made clearer. The Guides need a revision because they were published before SSR-3. Specifying the period 2006-2012 leads only to questions why SSG-37 is mentioned separately.	X			
1	2	Page 4 / line 21	The Guides covered by this DPP are facility-specific (i.e. research reactors <u>and subcritical assemblies</u> ), support the application of SSR-3 and interface with all General Safety Requirements and General Safety Guides.	As SSR-3 takes subcritical assemblies explicitly into account the definition of facility-specific should include subcritical assemblies as well.	X			
1	3	Page 6 / line 18	This Guide will cover safety in the utilization and modification of research reactors and provide recommendations and guidance mainly related to implementing Requirements 1, 5, 6, <del>16 - 29</del> <del>16, 17, 18, 19, 20, 21, 22</del> , 36, 41, 55, 66, 71, <del>77</del> , 83.	The modifications should also focus on Requirements 23 – 29 as they impose important constraints to the utilization and modification of research reac-	X			

Relevanz: 1 – Essentials 2 – Clarification 3 – Wording/Editorial

COMMENTS BY REVIEWER					RESOLUTION			
Reviewer: <b>Federal Ministry for the Environment, Nature Conservation, Building and Nuclear Safety (BMUB)</b> (with comments of GRS) Country/Organization: <b>Germany</b>					Pages 2 Date: 16.10.2017			
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			<u>88</u> and 89 of SSR-3.	tors. Requirements 77 and 88 should be added to the list in order to take into account lessons learned from the operation of research reactors during modifications.				
2	4	Page 6 Revision of SSG-20	<u>Annex III</u> <u>Items to be Considered in the Description of the Research Reactor</u>	Annex III of SSG-20 is missing	X			
2	5	Page 6 Revision of SSG-20	<u>Annex IV</u> <u>Typical Radiation Sources and Radiation Fields in a Research Reactor</u>	Annex IV of SSG-20 is missing	X			
2	6	Page 9 First table	<u>Annex IV</u> <u>Editorial</u>	Missing reference to Annex IV of SSG-20	X			

Relevanz:  1 – Essentials  2 – Clarification  3 – Wording/Editorial

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