

Revision of 7 closely interrelated Safety Guides: NS-G-2.2 to 2.6, NS-G-2.8 and NS-G-2.14 (DS497)
The Operating Organization for Nuclear Power Plants (revision of NS-G-2.4): DS497C
Status: STEP 12, Version from 15 December 2020

| COMMENTS BY REVIEWER | | | | | RESOLUTION | | | |
|--|-------------|---------------|--|--|------------|-----------------------------------|----------|-----------------------------------|
| Reviewer: Federal Ministry for the Environment, Nature Conservation and Nuclear Safety (BMU) (with comments of GRS) Country/Organization: Germany Pages: 2 Date: 19.03.2021 | | | | | | | | |
| Relevanz | Comment No. | Para/Line No. | Proposed new text | Reason | Accepted | Accepted, but modified as follows | Rejected | Reason for modification/rejection |
| 1 | 1. | 7.13 | <p>The operating organization should establish the necessary arrangements to ensure the safety of personnel and the safe operation of the nuclear power plant during situations in which a large number of personnel might be unavailable <u>due to external hazards affecting areas in which personnel live</u>, such as during an epidemic or a pandemic affecting areas in which personnel live. Such arrangements should include the following:</p> <p>(a) Retaining a minimum number of qualified personnel on the site to ensure safe operation of the plant;</p> <p>(b) Ensuring that a minimum number of qualified back-up personnel remain available off the site;</p> <p>(c) Adapting means of communication and transportation for personnel, arranging the deliv-</p> | <p>The paragraph has been updated with additional enhanced guidance addressing the COVID-19 pandemic situation only.</p> <p>It is understood that the operating organization should establish necessary arrangements to be resilient against different external hazards situation, like pandemic, but not only. Therefore we suggest more generic item (d), which is able to cope with different situations, such as prolonged autarky like flooding or disrupted infrastructure around the site as well as epidemic/pandemic.</p> | | | | |

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

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| | | | <p>ery of food and water to the site, and providing for beds and essential hygiene on the site;</p> <p>(d) Establishing additional measures to <u>ensure habitability and a work environment in accordance with ergonomic principles for reliable personnel actions.</u> prevent the spread of an infection on the site, in accordance with national and international guidance, e.g. cancellation of physical meetings, adapting controls at the entrance to the site, maintaining appropriate physical distance between individuals, and wearing a mask;</p> <p>(e) Enabling remote working for non-essential personnel, and maintaining regular contact with those personnel who are off the site, by phone or videoconference.</p> | <p>Item (e) is already covered by the generic item (c) in terms of “Adapting means of communication” which have to be adopted according to the situation.</p> | | | | |

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

Japan Comments on D497-C “The Operating Organization for NPPs (Revision of Safety Guide NS-G-2.4)”

| COMMENTS BY REVIEWER | | | | RESOLUTION | | | |
|--|---------------|--|---|------------|-----------------------------------|----------|-----------------------------------|
| Reviewer: Japan NUSSC Member Pages. 2 Country/Organization: Japan / Nuclear Regulation Authority (NRA) Date: 17 March, 2021 | | | | | | | |
| Comment No. | Para/Line No. | Proposed new text | Reason | Accepted | Accepted, but modified as follows | Rejected | Reason for modification/rejection |
| 1. | 5.24 | <p>The operating organization should develop and effectively utilize independent oversight. The purpose of the independent oversight is to verify that the utility has the full capability to perform in a manner which achieves the safety goals through appropriate staffing, processes, activities, actions and monitoring. The independent oversight personnel should be sufficiently independent from the line organization in order to be capable of providing objective oversight not hindered by line reporting relationships. The independent safety oversight should pay specific attention to verify that the plant management has taken measures in respect of changes in national regulations and international safety standards, operating experience, new operating practices and technologies, and implemented plant modifications as necessary. The independent safety oversight should have a direct</p> | <p>Japanese NUSSC members’ recognition of the discussion during the last NUSSC meeting is as follows.</p> <p>Finnish proposal to add a description on independent oversight was accepted by NUSSC members, meanwhile whether referring to the WANO document or not was remained as an action item to be resolved by the secretariat.</p> <p>But the underlined portion of para 5.24 of DS497C proposed for CSS endorsement remains as it was. Please clarify the underlined description.</p> <p>We would propose to have the reference to the WANO document, which is non-consensus</p> | | | | |

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| | | reporting line to the senior management of the operating organization. Suggestion to add: For further guidance on Independent Oversight, see reference [35] [35] WANO GL 2018-01, Guideline Independent Oversight (2018). | document among IAEA Member States, be described in the footnote, so that it does not belong to the identical category of the documents as IAEA Safety Guides publications. | | | | |