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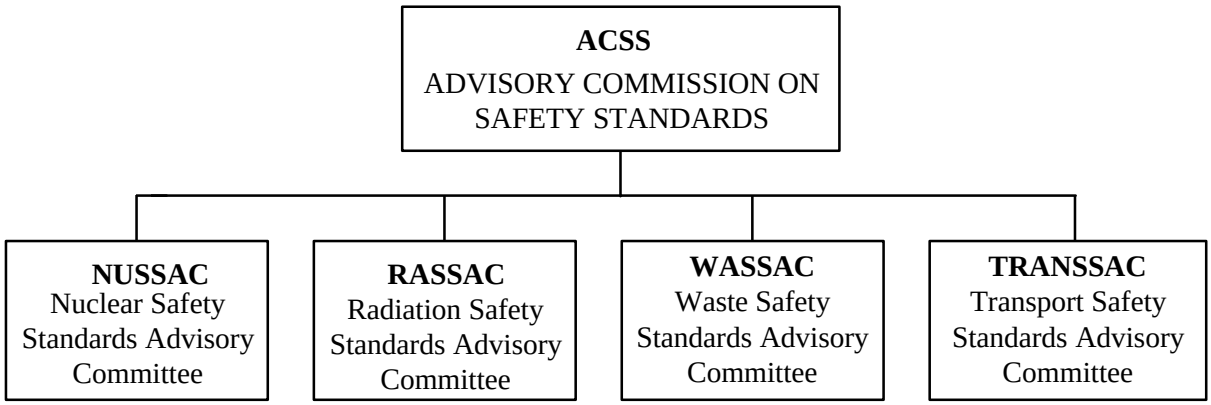
Advisory Commission on Safety Standards (ACSS)

Summary Report
1996-1999

1. Introduction

In August 1995, the Secretariat introduced a uniform preparation and review process for the development of Safety Standards (GOV/INF/772) covering topical areas of nuclear, radiation, radioactive waste and transport safety. The ACSS and four Advisory Committees were established in 1996, with the ACSS having a special overview role: to provide advice to the Director General on the Agency's Safety Standards (the terms of reference of ACSS are attached hereto as Annex I)



The ACSS and Advisory Committee members are appointed by the Director General. The appointment of ACSS members is for a four-year period whereas the Advisory Committee members are appointed for a three year period. The first term of the Advisory Committees expired at the end of 1998, the three year report of the Advisory Committees were submitted to the ACSS for review. The Advisory Committees have since been reconstituted for a second term covering period of 1999-2001.

The current term of ACSS expires at the end of 1999. ACSS has held six meetings to date; 18-20 March 1996, 2-3 December 1996, 2-3 June 1997, 2-4 June 1998, 31 May-2 June 1999 and 22-23 November 1999. This report presents a summary of the meeting reports of the ACSS for the period 1996-1999.

A summary of the advice provided by the ACSS on the process of development and review of the safety standards is provided in Section 2 of this report. The subsequent sections cover the advice provided on specific topics.

2. General

The meeting reports of the Advisory Committees (ACs) are sent to members of the ACSS and arrangements are made annually to bring together the Chairmen of the ACs in connection for the June meeting of ACSS. In the first meeting of the Chairs, a set of unified procedures for the development of Safety Standards was prepared and later approved by the ACSS (see Annex II). The unified procedure foresees the development of a Document Preparation Profile (DPP) for each safety standard. The DPPs require the approval of relevant ACs. The approval of the ACSS is required for DPPs of safety fundamentals and safety requirements.

In its first meeting, ACSS endorsed a plan, proposed by the Secretariat, to introduce two new

Series of publications replacing the Safety Series. This has provided for a clear separation of publications of regulatory nature (Safety Standards Series) and publications prepared for information exchange (the Safety Reports Series). The ACSS recommended that the categories of publications within the Safety Standards Series be changed to Fundamentals, Requirements, and Guides. In addition, the ACSS recommended that the publications within the Safety Standards Series be categorized as, General Safety, Nuclear Safety, Radiation Safety, Waste Safety and Transport Safety.

The practice of combining a selected number of published safety guides into one revised guide was considered by ACSS as generally appropriate for reducing the large number of guides in each area. It was noted, however, that combined titles should be considered carefully in order to avoid a distorted view of the guidance being provided.

In cases where there are changes to be made to published safety requirements (i.e. arising from the development of safety guides) the ACs are requested to record these changes and bring them to the attention of the ACSS for a decision on a possible early revision.

ACSS requested the secretariat to further improve the means of communicating with the ACSS and the AC members when submitting safety standards for comments. The following is a set of actions initiated by the secretariat for improving the flow of documents with the ACSS, ACs and the Member States:

- the action requested from the ACSS members and the date by which the action is to be completed will be clearly indicated on the cover of each document;
- each document is to be accompanied by a complete list of recipients;
- the secretariat should be able to confirm that the documents sent to the ACSS members have actually been received by them.
- the secretariat will keep track of the Member States comments on the individual documents.

2.1. Topics of Common Interest

The four items below are considered to be of particular interest to the four Advisory Committees and the Commission as such, and should be published within a 'general safety' category reflecting their applicability to all topical areas considered in the programme. The development of documents in these areas requires close co-ordination within the secretariat to ensure an appropriate level of participation by the four ACs.

> Common glossary: the need for a common glossary for safety standards has been highlighted on a number of occasions by the Chairmen of the ACs. A draft glossary was submitted for comments in the spring of 1998 to all members of the ACs and technical staff of the Secretariat involved in the development of safety standards. A revised draft of the glossary has been prepared on the basis of the comments received and was considered at the November 1999 meeting of the ACSS. The Commission agreed to the release of the draft for general use and approved the future plans for updating of the glossary.
>
> Governmental Organization: the secretariat, on the basis of recommendations of the ACs, prepared a list of documents to be developed under this topic. NUSSAC will take the lead for the development of a single safety requirements publication on the topic and four related safety guides for nuclear facilities, RASSAC will take the lead for the preparation of guides

dealing with industrial, medical, and other radiation sources. Strong participation by other Committees in the preparation of these documents was recommended.

Quality Assurance: At the request of the Commission the Secretariat prepared a report on the topic for discussion at the November meeting. The report was prepared in consultation with the Department of Nuclear Energy which has the responsibility for development of safety standards for quality assurance. Representative from the Department of Nuclear Energy were present during the discussion. The Secretariat pointed out that the development of safety standards on the topic will follow the established procedure (i.e. the approval process through the Advisory Committees and the Commission). The Commission discussed the topic, in the course of the discussion it was pointed out that having the responsibility for quality assurance with the Department of Nuclear Energy is inconsistent with the articles of Convention on Nuclear Safety which puts an obligation on the contracting parties to ensure an effective separation between regulatory and promotional activities. The Chairman will write to the Director General regarding this issue.

Emergency Preparedness: The secretariat, on the basis of recommendations of the Committees, has prepared the list of documents to be developed under this topic. RASSAC will take the lead for the development of documents.

Safety Fundamentals: The Commission approved the draft DPP for the preparation of common safety fundamentals at the November 1999 Meeting

2.2. Topics of Interest to More than One Committee

The topics presented in the following table are of interest to more than one Committee. The list has been prepared taking into account guidance sought by the ACs in their reports to the Commission. Contributions to the development of a topic is not exclusive to the committees listed in the last column.

Topic of Interest	**Leading Committee**	**Participating Committees**
Exemption levels	RASSAC	WASSAC/TRANSSAC
Very low level waste management (clearance levels)	WASSAC	RASSAC
Waste storage at reactor site	WASSAC	NUSSAC/RASSAC
Spent fuel storage and handling: interim storage	NUSSAC	WASSAC
Spent fuel storage and handling: disposal	WASSAC	-----
Decommissioning/dismantling	WASSAC	NUSSAC
Discharge control	RASSAC	WASSAC/NUSSAC
Environmental restoration	WASSAC	RASSAC

Note: RASSAC will take the lead for the preparation of documents on environmental monitoring and occupational protection.

2.3. Specific Topics of Interest

The ACSS has considered a number of topics at the request of ACs or the secretariat. The following paragraphs represent the views of the ACSS on these topics:

Very low level waste: The ACSS discussed the issue of management of materials containing very low level waste; the topic will be considered further by WASSAC. It was pointed out that consideration of the topic should be well balanced so as to demonstrate that all types of wastes (from very low level to high level waste) can be properly managed.

Illicit trafficking: A number of ACSS members expressed concern regarding the development of a safety guide on 'prevention, detection of and response to illicit trafficking in radioactive materials' (NS 61). At the time, the safety guide was with Member States for comments. One of the concerns expressed was that the topic was related to physical protection rather than radiation protection, and addressed actions by the receiving country and not the country of origin. The concerns expressed were taken into account in the development of the safety guide, which was subsequently endorsed by ACSS for publication.

Exclusion, exemption and clearance: The ACSS was informed of plans to prepare a safety guide on application of principles for exclusion, exemption and clearance from regulatory control (NS 33). As interest in this subject has been growing, the secretariat will proceed as rapidly as possible, consistent with an emerging consensus on criteria for regulation.

Radiation and the environment: A discussion paper on protection of the environment by WASSAC and RASSAC was presented to the ACSS. The advice provided by both committees was similar, namely that there is a recognition of the need to continue to evaluate the issues in this area, but caution should be exercised in developing guidance material, as an international consensus has yet to develop. The ACSS concurred with this view, recommending to proceed with caution and requesting to be informed of the future development of the topic.

Communication of nuclear, radiation, and waste safety: A draft report on the topic was presented to the ACSS, noting the possibility of preparing a safety guide or a safety report on the topic in the future. It was generally agreed that a report on how regulators should communicate with the public in case of emergency or incidents would be appropriate; however, discussions on how safe nuclear power or a given facility is must be avoided. The ACSS did not support the preparation of a safety guide or a safety report on the basis of the draft presented.

Developing safety culture: A report on safety culture dealing specifically with the development of a safety culture in an organization was presented to the ACSS. The ACSS recommended to expand the scope of the report to include considerations on the evaluation of safety culture within an organization. The revised draft of the report, which reflected the comments from the ACSS, was resubmitted to the Commission for approval. The report has now been published in the Safety Report Series.

3. Availability of Safety Standards

The secretariat was urged to arrange for free and electronic distribution of the safety standards to requesting experts in the Member States (particularly in developing Member States). The secretariat is exploring various options for free distribution of safety standards and will report back to the ACSS on the progress made.

4. Preparation of Safety Related Documents

ACSS expressed concern over the lack of either an external or an internal Agency-wide review of IAEA publications other than the safety standards before their introduction in the budget and the programme of the Agency. The ACSS decided to bring this matter to the attention of the Director General.

5. Endorsement of Safety Standards by the ACSS

The revised transport Regulations (Requirements) had gone through a review and approval process prior to the establishment of the ACSS and the four Advisory Committees. The Commission decided on a procedure leading to the endorsement of the transport regulations before their submission to the Board of Governors. The process was completed successfully and the regulations were submitted to the Board of Governors for approval at its September 1996 session.

ACSS has endorsed submission of six Safety Requirements to the Board of Governors for approval. Set forth below is the list of the Safety Requirements endorsed by the ACSS and their publication status:

- ST-1 Regulations for the Safe Transport of Radioactive Material (endorsed by ACSS June 1996, approved by the Board September 1996, published in 1996);
- WS-R-1 Near Surface Disposal of Radioactive Waste (Working ID NS 153, endorsed by ACSS June 1998, approved by the Board March 1999, published in 1999);
- WS-R-2 Predisposal Management of Radioactive waste including Decommissioning (Working ID NS 152, endorsed by ACSS June 1999, approved by the Board September 1999, in production);
- GS-R-1 Legal and Governmental Infrastructure for Nuclear, Radiation, Radioactive Waste and Transport Safety (Working ID NS 180, endorsed by ACSS June 1999, approved by the Board September 1999, in production);
- NS-R-2 Safety of Nuclear Power Plants: Operation (Working ID NS 179, endorsed by ACSS June 1999, approved by the Board September 1999, in production);
- NS-R-1 Safety of Nuclear Power Plants: Design (Working ID NS 118, endorsed by the ACSS for submission to the Board of Governors for approval November 1999, consideration by the Board is planned for March 2000).

The following is the list of Safety Guides endorsed by the ACSS for publication:

- WS-G-1.1 Safety Assessment for Near Surface Disposal (Working ID NS 166, endorsed by ACSS March 1998, published in 1999);
- RS-G-1.1 Occupational Radiation Protection (Working ID NS 69, endorsed by ACSS May 1998, published in 1999);
- RS-G-1.2 Assessment of Occupational Exposure due to Intakes of Radionuclides (Working ID NS

85, endorsed by ACSS May 1998, published in 1999);

- RS-G-1.3 Assessment of Occupational Exposure due to External Sources of Radiation (Working ID NS 12, endorsed by ACSS May 1998, published in 1999);
- NS-G-4.1 Commissioning of Research Reactors (Working ID NS 259, Endorsed by ACSS March 1998, publication has been delayed due to extensive technical editing, it will be resubmitted to the ACSS in the near future);
- NS-G-4.2 Maintenance, Periodic Testing and Inspection of Research Reactors (Working ID NS 260, endorsed by ACSS March 1998, publication has been delayed due to extensive technical editing, it will be resubmitted to the ACSS in the near future);
- NS-G-4.3 Operational Limits and Conditions for Research Reactors (Working ID NS 261, endorsed by ACSS March 1998, publication has been delayed due to extensive technical editing, it will be resubmitted to the ACSS in the near future);
- NS-G-4.4 Design, Safety Assessment and Operation of Storage Facilities for Spent Fuel from Research Reactors (Working ID NS 262, endorsed by ACSS May 1998, publication has been delayed due to extensive technical editing, it will be resubmitted to the ACSS in the near future);
- WS-G-2.1 Decommissioning of Nuclear Power Plants and Research Reactors (Working ID NS 257, endorsed by ACSS November 1998, published in 1999);
- WS-G-2.2 Decommissioning of Medical, Industrial and Research Facilities (Working ID NS 173, endorsed by ACSS May 1998, published in 1999);
- RS-G-1.5 Regulatory Control of Radioactive Discharges to the environment (Working ID NS 25, endorsed by ACSS April 1999, to be published in 2000);
- RS-G-1.4 Preventing, Detecting and Responding to Illicit Trafficking in Radioactive Materials (Working ID NS 61, endorsed by ACSS April 1999, publication has been delayed due to extensive technical editing, it will be resubmitted to the ACSS in the near future);
- ST-2 Advisory Material for the Regulations of the Safe Transport of Radioactive Material (Working ID NS 245, endorsed by ACSS November 1999, to be published in 2000);
- ST-3 Emergency Response Planning and Preparedness for Transport Accidents involving Radioactive Material (Working ID NS 246, endorsed by ACSS November 1999, to be published in 2000);
- NS-G-2.1 Fire Safety in the Operation of Nuclear Power Plants (Working ID NS 263, endorsed by ACSS November 1999, to be published in 2000);
- NS-G-1.1 Software for Computer Based Systems Important to Safety in Nuclear Power Plants (Working ID NS 264, endorsed by ACSS November 1999, to be published in 2000).

7. Programme Performance Assessment System (PPAS) for Safety Standards

The Scientific Secretary informed the ACSS of the results of a PPAS review of the IAEA safety standards programme. The PPAS report, prepared by consultants on 14-16 October 1996, contains 16 recommendations addressing resources, organizational aspects and procedures for development of safety standards as well as working procedures of the ACs and the ACSS. An action plan for the implementation of the recommendation was prepared by the secretariat and distributed to the members of the ACSS.

8. Overview of the PPAS: Peer Review of the IAEA Safety Programme

An overview of the results of the Peer Review of the IAEA Safety Programme, conducted in January 1997, was presented to the ACSS. The report, containing 74 recommendations, was used as an input in the preparation of the IAEA 1999-2000 Safety Programme. The ACSS members confirmed their view that the IAEA should record and review its follow-up to the recommendations. The secretariat prepared its response to each of the recommendations in the

process of preparing the 1999-2000 Programme. The secretariat's response to the recommendations were distributed to the members of ACSS. An overview of the PPAS performed in March 1999 was presented to the ACSS in November 1999.

9. Policy Issues

A number of policy issues related to safety standards have been raised by the members of ACSS, the ACs and the Secretariat, seeking the advice of ACSS. The issues below were discussed and recorded for future follow-up by the ACSS:

- Requirements for national responsibilities
- Quality assurance
- Collaboration with other international organizations
- Co-sponsorship of standards
- Revision of standards; how much, to what leve of detail and when
- Criteria for the long term
- The audience for the IAEA standards: regulatory bodies or operating organizations?
- Releases and long-term waste to be considered together?
- Other fuel cycle facilities (fuel fabrication, reprocessing)
- Mining and milling
- Potential exposures
- Exemption and exclusion
- Emergency preparedness
- Regulatory independence
- Standards: 'self standing' or 'reference to' related standards
- Decommissioning of non-reactor facilities
- Development of guidance for protection of the environment

10. Co-ordination with INSAG

In order to enhance co-ordination between ACSS and INSAG (International Nuclear Safety Advisory Group) it was decided to regularly exchange reports of meetings between the members of the two committees. ACSS will consider interface with INSAG in its future meetings (see Annex III Recommendation #10).

11. Peer Discussion Groups

Peer Discussion Groups were established as an IAEA activity in 1989, with the objective of promoting the sharing of experience through increased professional contacts between nuclear safety regulators. This involves meetings of regulators from three to four countries to discuss a pre-selected topic. The activity has proven to be an efficient mechanism for identification of commonly accepted good practices. Moreover, the results of the discussions are disseminated widely.

The secretariat started consultation with the ACSS in 1996, for the selection of topics for this activity. The ACSS recommended to expand the scope of peer discussion groups to cover topical

areas other than those related to nuclear safety and to present the results of the discussion to the meeting of senior regulators. Topics selected on the basis of ACSS recommendations in the period were:

- Decommissioning of nuclear facilities (1996-97);
- Regulation of life cycle management of nuclear installations (1997-98);
- Assessment of regulatory effectiveness (1999);
- Deregulation and its effect on safety (possibly for the year 2000).

12. Senior Regulators Meetings

The senior regulators meetings are held at the time of the IAEA General Conference. The Initiative started in 1983. In 1996 the secretariat started to consult with ACSS on selecting topics of interest to regulators. The following topics were suggested by the ACSS and have been used as a primary input for the preparation of the programme of the senior regulators meetings:

1996
- National approaches to spent fuel storage and disposal (including technological aspects of spent fuel elements;
- Safety of medical applications (diagnostic and therapeutic, including human factors).

1997
- Assessment of safety culture by regulatory authorities;
- Good regulatory practices in reporting of incidents, including public information policy;
- Maintaining, developing and retaining professional expertise in regulatory agencies;
- Licensing and design basis maintenance.

1998
- Future of regulatory practices (report prepared by CSNI);
- Safety Standards;
- Assessing regulatory effectiveness (2 presentations);
- Research facilities (2 presentations).

1999
- Regulatory effectiveness (IAEA, NEA/CNRA)
- Impact of deregulation and management changes to safety
- Contamination of transport containers
- Y2K.

13. Overview of the ACSS Activities and Main Recommendations for the Future

In its June 1999, meeting the Commission set up a sub-group charged with considering the mandate and terms of reference of the ACSS and advising the Commission on its future activities. The report of the sub-group was reviewed in the June 1999 meeting. The main recommendations of the sub-group are given here (the full text of the sub-group report is attached as Annex III):

- the Chair of ACSS should inform the DG on ACSS deliberations on the safety standards programme;
- a small 'bureau' should be set up to help plan and manage the work of the ACSS main meetings;
- ACSS should meet twice a year;
- all documents which require ACSS clearance should be cleared through the meetings of the ACSS and not by correspondence if members have raised a point of substance;
- ACSS should take a closer interest in the way the four Advisory Committees work and give guidance to these committees to enable them to function and report in a consistent way;
- ACSS should take a more strategic view on what standards are appropriate for the future, establish priorities and oversee the quality of the production process;
- ACSS should consider the process for handling comments made by the Member States on safety standards to ensure transparency in the process;
- the Agency should produce an annual report on the safety standards programme, covering both what has been achieved and what is planned, and should submit it to ACSS for comments;
- The Chair will raise with the Director General the issue of interfaces with other IAEA groups. The Chairs of such groups should meet to discuss mutual interests and possibly hold parts of their meetings jointly;
- The Agency is requested to make a presentation on the role and operation of the PPAS.

The Commission requested the Secretariat to prepare reports on the following topics for consideration at its meetings in the year 2000:

- the implementation of the recommendations of the sub-group;
- issues related to risk informed decision making in relation to safety standards;
- contacts and formal agreements between the Agency and other relevant international organizations;
- integrated structure for development of safety standards for fuel cycle facilities.

ANNEX I
Terms of Reference for Advisory Committees

Terms of Reference
Advisory Commission on Safety Standards (ACSS)

The Advisory Commission on Safety Standards (ACSS) is a standing body of senior government officials holding national responsibilities for establishing standards and other regulatory documents relevant to nuclear, radiation, waste and transport safety.

The ACSS has a special overview role with regard to the Agency's safety standards and provides advice to the Director General on the overall programme on regulatory aspects of safety.

Functions

The functions of the ACSS are:

- to provide guidance on the approach and strategy for establishing the Agency's safety standards, particularly in order to ensure coherence and consistency between them;

- to resolve outstanding issues referred to it by any advisory committee involved in the Agency's safety standards preparation and review process;

- to endorse, in accordance with the Agency safety standards preparation and review process, the texts of the Fundamentals and Requirements to be submitted to the Board of Governors for approval, and of the suitability of Guides to be issued under the responsibility of the Director General; and

- to provide general advice and guidance on safety standards issues, relevant regulatory issues and the Agency's safety standards activities and related programmes, including those for promoting the worldwide application of the standards.

Membership

- Member States will be requested to nominate senior officials who are active within national regulatory organizations and have recognized expertise in nuclear, radiation, waste and transport safety as candidates. In appointing the ACSS members, the Director General will ensure a balance of regional approaches and experience. A maximum of 15 members will be appointed by the Director General for a term of four years. The members may, when serving on the ACSS, be accompanied by assistants;

- Observers from specialized international organizations and relevant non-governmental bodies may be invited to attend ACSS meetings by the Director General;

- The Deputy Director General, Department of Nuclear Safety, or a designated substitute will participate in all ACSS meetings.

Working Methods

- A Chairman will be appointed by the Director General from among the ACSS members for a four-year term;

- A Scientific Secretary will be designated by the Deputy Director General, Department of Nuclear Safety, to serve the ACSS;

- Ordinarily, the ACSS will meet once a year for up to five working days. Extraordinary meetings may be called when required;

- The ACSS will submit an annual report on its work to the Director General;

- At the request of the ACSS, the Director General may establish working groups of experts to deal with specific tasks;

- Meetings will be conducted in English.

Resources

- The Secretariat will provide all resources necessary for ensuring the efficient work of the ACSS;

- All costs involved in the participation of each ACSS member, including travel and per diem expenses, will be borne by the Member State which nominated that member.

ANNEX II

UNIFIED PROCEDURE FOR THE PREPARATION AND REVIEW OF SAFETY STANDARDS SERIES PUBLICATIONS

These procedures apply to Safety Standards (Fundamentals, Requirements and Guides).

SAFETY REQUIREMENTS AND SAFETY GUIDES

1. Priorities in the development and revision of Safety Standards are set by the lead Advisory Committee (AC) and endorsed by the ACSS. The ACSS sets overall priority for development of safety standards, across the working areas of all four ACs.

2. A document preparation profile (DPP) is prepared by the Technical Officer (TO) in consultation with the AC Co-ordinator and the Section Head. After consultation with the chairman, the DPP is transmitted by the Co-ordinator to the AC having the lead for the preparation of the draft Safety Standards, and to other ACs[1] with an interest in the Safety Standard, for comment (for a response within two months of receipt). After incorporation of comments received DPP is sent to the Chairman of lead AC for approval.

3. If necessary, a revised DPP is prepared by the TO. The Co-ordinator, after consultation with the Chair of the lead AC, sends the revised DPP to the AC (or ACs) for information or, in the case of Standards falling in the category of General Safety, to all Committees and to ACSS.

4. The draft Safety Standard is prepared in accordance with the DPP. The TO, in consultation with the Co-ordinator and Section Head, decides when the draft is ready for submission to ACs for review.

5. The Co-ordinator transmits the draft Safety Standard to the lead AC, and to other ACs with an interest in the Safety Standard, for review. The review is conducted at the next meeting of the lead AC, which takes into account the transmitted views of the other interested ACs. The review should concentrate on whether the DPP has been fulfilled in developing the draft. Editorial comments and minor corrections, if any, should be passed to the TO for consideration outside the meeting. The AC decides:
   (a) Draft inadequate: return to step 4, with instructions for redrafting; or
   (b) Draft adequate but further consultation may be required to resolve outstanding issues. This may be done by consulting some or all members of the lead AC or the Chairmen of other ACs (the Chair of the lead AC decides on the appropriate next step); or
   (c) Draft adequate: proceed to the next stage.

[1] In practice, co-ordinators will communicate directly only with their own committee's, notices to other Committees will be sent through the relevant co-ordinator(s).

6. The TO transmits the agreed draft Safety Standard to Member States for comment (for a four month period). Outgoing correspondence is cleared by the Co-ordinator.

7. A revised draft Safety Standard is prepared by the TO, in consultation with the Co-ordinator and Section Head, in the light of comments received from Member States (this may require one or more CS or TC meetings). The revised draft Safety Standard is submitted to the Co-ordinator with a covering note indicating the more significant comments and how they were dealt with.

8. The Co-ordinator, after consultation with the lead AC Chairman, transmits the draft Safety Standard together with the covering note to Members of the AC for information and comment (by exception) within an appropriate period as agreed by the Chair of lead AC. After the end of the commenting period the AC Chairman considers the draft and the treatment of the comments and decides on the subsequent stage:
   (a) Draft inadequate: return to step 7, with instructions for redrafting; or
   (b) Too many outstanding issues: discuss the draft at the next AC meeting; or
   (c) Draft is adequate but further consultation may be required to resolve outstanding issues. This may be done by consulting some or all members of the lead AC or the Chairmen of the other ACs (the Chair of the lead AC decides on the appropriate next step); or
   (d) Draft adequate: proceed to the next stage.

   AC Chairman informs the Co-ordinator of his decision (within four weeks after the end of commenting period). When the decision is to proceed, the co-ordinator forwards the draft to the Scientific Secretary of the ACSS.

9. The Scientific Secretary to ACSS submits the draft Safety Standard together with the recommendation of the lead AC Chairman to the Chairman of ACSS and to Members of the ACSS for information and comment (by exception) within six weeks. After allowing for any exceptional comment from ACSS members to reach the Chair, the Chairman of ACSS considers the draft and treatment of comments and decides on the subsequent stage:
   (a) A major problem has not been addressed in preparation of the draft or has arisen since the draft was completed which needs discussion and resolution at the next ACSS meeting; or
   (b) Draft adequate but further consultation may be required to resolve outstanding issues. This may be done by consulting some or all members of the ACSS or the Chairmen of ACs; or
   (c) Draft adequate: endorsed by ACSS for transmission to the Board of Governors for approval (Fundamentals and Requirements) or the Director General (Safety Guides).

   The ACSS Chairman informs the Scientific Secretary of the decision (within four weeks of the deadline for receiving comments).

ANNEX III

1999-06-10

ADVISORY COMMISSION ON SAFETY STANDARDS
Sub-Group Report - May, 1999

Background

1. This sub-group of the Advisory Commission on Safety Standards was set up following the wish by the 1998 meeting to review the workings of the ACSS. Its objective was to consider the mandate and terms of reference of the ACSS and advise the June 1999 meeting on possible future activities.

2. The sub-group comprised the following:

Mr. L.G. Williams, UK (Chair)
Mr. R.M. Duncan, Canada
Mr. A.C. Lacoste, France
Mr. Y.K. Lim, Korea
Mr. A. Alonso, Spain
Mr. L.E. Holm, Sweden

3. The sub-group met on the morning of Monday, 31 May 1999. A number of topics were discussed and recommendations were made for the ACSS to consider. The following summarizes the topics discussed.

Mandate/Terms of Reference

4. The SG reviewed the Terms of Reference and concluded that they were sufficient and did not require amending. However, it was noted that the ACSS has a special role in relation to the overview of the Agency's safety standards and in particular to provide advice to the Director General on the overall programme on the regulatory aspects of safety. The SG felt that the ACSS was not currently carrying out its whole mandate, and it could and should do more, bearing in mind the importance Member States place on the IAEA's Safety Standards. It was felt that the Terms of Reference could be altered slightly to give the advisory role more prominence by making the fourth 'bullet' under Functions the first 'bullet'.

Recommendation 1

To make the provisions of general advice and guidance on safety standards issues, relevant regulatory issues and the Agency's safety standards activities and related programmes, the first 'bullet' under the ACSS functions.

5. The SG also felt that it was important for the ACSS to be seen to be taking an active role in advising the Director General on Safety Standards issues. It was felt that the quality and management of the Agency's Safety Standards were so important that there should be more direct contact between the ACSS and the Director General.

Recommendation 2

The Chairman of the ACSS should report directly to the Director General to inform him of the ACSS deliberations on the Safety Standards programme, within a reasonable time frame of the ACSS meeting.(not more than 3 months afterwards).

Management of the ACSS Business

6. The SG discussed the way ACSS managed its business. It was felt that the ACSS was not doing enough and that in concentrating on the clearance of Safety Standards documents it was only doing about one third of its mandate. It was also felt that more could be done to assist Members of ACSS with their important task. The idea of a 'bureau' or small sub-group, used by other Agencies, was discussed and it was agreed that the formation of such a bureau to help manage the work of ACSS would be a great advantage.

Recommendation 3

The ACSS should set up a small 'bureau' to help plan and manage the work of the ACSS main meetings.

7. The SG also looked at the workload of ACSS and concluded that it should hold two meetings per year. It was felt that the practice of cancelling meetings and allowing important Safety Standards to be cleared by correspondence was not good practice.

Recommendation 4

The ACSS should meet at least twice per year in order to carry out more fully its mandate.

Recommendation 5

All documents which require ACSS clearance should be cleared through meetings of the ACSS and not by correspondence.

Role of Advisory Committees

8. The subgroup was concerned that the workings of the Advisory Committees, NUSSAC, RASSAC, TRANSSAC and WASSAC was not transparent to Members of ACSS and more needed to be done to ensure consistency of approach in all Advisory Committees.

Recommendation 6

ACSS should take a closer interest in the way the four advisory committees work and give guidance to these committees to enable them to function and report in a more consistent way.

IAEA's Safety Standards Process

9. The SG felt that the ACSS did not take sufficient interest in the Agency's process for defining the Safety Standards programme or the process by which Safety Standards were produced. It was felt that the ACSS should play a more strategic role in overseeing the standards production process, given the importance Member States give to such standards. It was important for ACSS not to get 'bogged down' in detail but to look at the wider picture.

Recommendation 7

ACSS should take a more strategic view on what standards are appropriate for the future and the quality of the production process.

10. It was felt that on the strategic front there was much to do to improve quality and transparency of the Agency's safety standards process. Treatment of Member States'

comments to formal consultation on Safety Standards was not clear to the SG and it was felt that there was a need for transparency in this area.

Recommendation 8

ACSS should consider the process for handling comments made by Member States on Safety Standards to ensure transparency in the process.

11. Other areas the SG considered for strategic oversight in the future which could be considered by ACSS are:

- design of new reactor systems
- backfitting of existing plant in relation to new standards
- safety standards for safety culture
- organizational change impact on safety
- quality assurance
- fuel cycle safety standards
- long-term storage/retrievability of radioactive waste
- use of contractors in the nuclear industry

Functions of the Agency to support ACSS

12. The SG felt that much could be done by the Agency to help the ACSS function more effectively and help it deliver its mandate. It was felt that an annual report on the Agency's Safety Standards programme which both looks back at what has been achieved and looks forward to what is planned should be produced. The SG agreed that ACSS could usefully comment upon the integrated future programme such a report could describe.

Recommendation 9

The Agency should produce an annual report on the Safety Standards programme, both what has been achieved and what is planned and should submit it to ACSS for comment.

Interfaces with other IAEA organizations

13. The SG discussed the interfaces between ACSS and other parts of the Agency in the area of Safety Standards. There was a considerable discussion on the overlaps between INSAG and ACSS and it was felt that ACSS should follow up the Birkhofer initiative to see if INSAG and ACSS work can be better co-ordinated. This was considered to be important given the pressures on both the Agency staff and within Member States.

14. The SG felt that there was plenty of scope to co-ordinate with INSAG. In particular it was felt that INSAG could be seen as the group to identify and recommend issues on nuclear safety for the future and ACSS would then determine how such issues could be fitted into the overall strategy for nuclear safety standards.

Recommendation 10

> ACSS should meet with INSAG to discuss future plans to better co-ordinate work plans and avoid unnecessary duplication in relation to Safety Standards.

15. The SG considered the role of the Agency's PPAS programme. It was felt that there was a significant overlap between what PPAS does in relation to future programmes and that of ACSS. It was felt that there was a need for better co-ordination between ACSS and PPAS, again to avoid duplication and ensure a consistent approach on safety standards.

Recommendation 11

> At the November meeting of the ACSS the Agency should provide a presentation on the role and operation of the PPAS.

Interface with other Agencies

16. The SG noted that outside Agencies were involved with the development of Safety Standards and with the development of publications which had an impact of Safety Standards. It was felt that there was a need for ACSS to have a better appreciation of how the Agency handles the interface with such organizations to ensure consistency and limit duplication.

Recommendation 12

At the next meeting of ACSS the Agency should report on how it handles the interface with other Agencies which set standards or which produce information on technical issues related to such standards.

ACSS Members for the period 1996-1999

Beninson, D.	Argentina
Lokan, K.	Australia
Burns, P.	Australia
Bishop, A.	Canada
Huang, Q.	China, the People's Republic of
Lacoste, A-C.	France
Hennenhöfer, G.	Germany
Renneberg, W.	Germany
Sato, K.	Japan
Sumita, K.	Japan
Lim, Y.K.	Korea, Republic of
Misak, J.	Slovak Republic
Lipár, M.	Slovak Republic
Alonso, A.	Spain
Valentin, J.	Sweden
Holm, L-E.	Sweden
Prêtre, S.	Switzerland
Harbison, S.	United Kingdom
Williams, L.G.	United Kingdom
Taylor, J.M.	United States of America
Callan, L.J.	United States of America
Travers, W.D.	United States of America
Frescura, G.	OECD Nuclear Energy Agency
Valentin, J.	International Commission on Radiation Protection