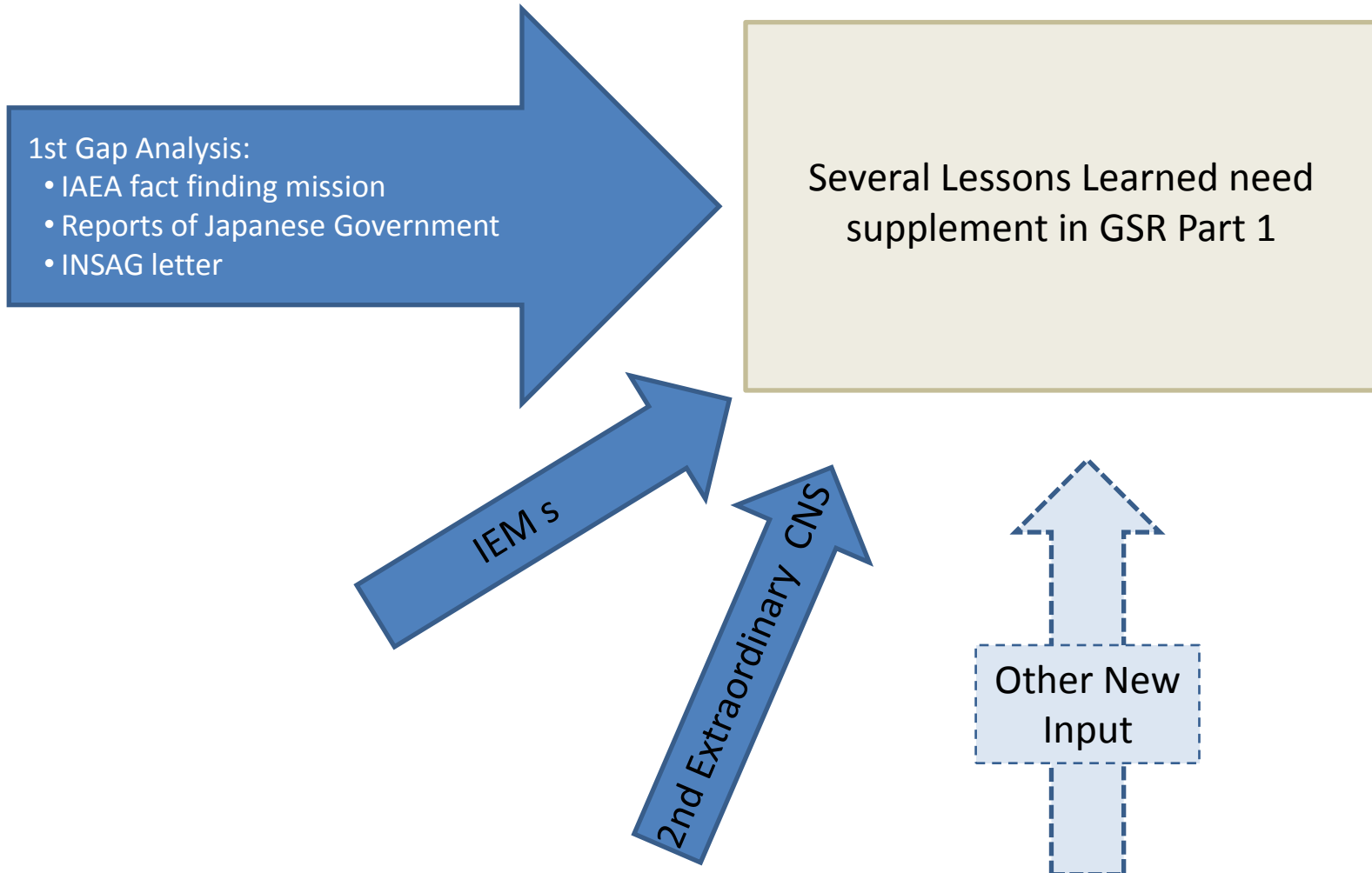


Result of Gap Analysis for GSR-Part1



Received Comments for GSR Part 1

- UAE 7 comments
- France 7 comments
- Germany 7 comments
- UK 18 comments
- ENISS 10 comments
- USA 9 comments
- Switzerland 2 comments
- Finland 8 comments
- EC 1 comment
- RASSC Chairman 4 comments

DS462 – Proposal for LL 2.1

LL	Current text	IAEA Proposal/ NUSC WG advise
2.1	Req. 4, 2.8 To be effectively independent, the regulatory body shall have sufficient authority and sufficient staffing and shall have access to sufficient financial resources for the proper discharge of its assigned responsibilities. The regulatory body shall be able to make independent regulatory judgements and decisions, free from any undue influences that might compromise safety, such as pressures associated with changing political circumstances or economic conditions, or pressures from government departments or from other organizations. Furthermore, the regulatory body shall be able to give independent advice to government departments and governmental bodies on matters relating to the safety of facilities and activities.	Req. 4, 2.8 To be effectively independent, the regulatory body shall have sufficient authority and sufficient staffing and shall have access to sufficient financial resources for the proper and timely discharge of its assigned responsibilities under all circumstances. The regulatory body shall be able to make independent regulatory judgements and regulatory decisions, under both operational states and accident conditions, free from any undue influences that might compromise safety, such as pressures associated with changing political circumstances or economic conditions, or pressures from government departments, authorised parties or from other organizations. Furthermore, the regulatory body shall be able to give independent advice to government departments and governmental bodies on matters relating to the safety of facilities and activities. <i>NUSC advise: break down for more clarity, insure changes are limited to those identified in Fukushima LL, delete 'under all circumstances'.</i>

DS462 – Proposal

Lessons Learned	Current text	IAEA Proposal/ NUSSC WG advise
Underlying theme of safety reports		Req. 5, new para 2.15 a 2.15a The prime responsibility for safety requires that the person or organization responsible for a facility or an activity must proactively search for, propose and implement <u>reasonable practicable</u> safety improvements regardless of whether the regulatory body uses its enforcement powers to require the improvements*. <i>*Ref. to letter of the Chairman of the International Nuclear Safety Group (INSAG) of 24 August 2012</i> <u><i>NUSSC: cancelled para to be relocated in the document</i></u>

Comments from: UAE, France, Germany, UK, Chairman of RASSC, ENISS, USA, Finland

DS462 – Proposal for LL 2.2

Lesson learned	Current text	IAEA Proposals
2.2	Req. 8, 2.23 The government shall specify and shall assign clear responsibilities for decision making in an emergency, and shall make provision for effective liaison between authorized parties and competent authorities and for an effective means of communication.	Req. 8, 2.23 The government shall specify and shall assign clear responsibilities for timely decision making in an emergency, and shall make provision for effective coordination and communication between authorized parties and response organizations*. <i>*Ref. to GS-R-2</i>

Comments from: UAE, UK

DS462 – Proposal

Lessons Learned	Current text	IAEA Proposal
Extr. CNS Meeting August 2012 and other (Reinforce the emergency response)		Req. 8, new para 2.24 a 2.24a The government shall ensure that adequate training, drills and exercises are carried out, involving all authorised parties and response organizations, including the decision makers, to ensure effective response to emergencies*. The drills and exercises should consider a full range of potential emergencies (e.g. events affecting several facilities on a single site and transboundary emergencies). <i>*Ref. to GS-R-2</i>

Comments from: UAE, France, UK, USA, Finland

DS462 – Proposal

Lessons Learned	Current text	IAEA Proposal
Extr. CNS Meeting August 2012 and other (Reinforce the emergency response)		Req. 8, new para 2.24 b 2.24b The government shall ensure that arrangements are in place to keep public informed throughout an emergency and that information is provided to the public before and during normal operation*. <i>*Ref. to GS-R-2</i>

Comments from: UAE, France, UK, USA, ENISS

DS462 – Proposal for LL A 5.1

Lessons Learned	Current text	IAEA Proposal
A 5.1		Req. 14, new para 3.2 a 3.2a The government shall ensure that adequate arrangements are in place to benefit from international cooperation and assistance in preparedness and response for a nuclear or radiological emergency*. <i>*Ref. to GS-R-2</i>

Comments from: Germany, UK, USA, ENISS

DS462 – Proposal for LL 4.1

Lessons Learned	Current text	IAEA Proposal
4.1	Req. 21 ,4.24 The regulatory body shall foster mutual understanding and respect on the part of authorized parties through frank, open and yet formal relationships, providing constructive liaison on safety related issues.	Req. 21, 4.24 4.24. The regulatory body shall foster mutual understanding and respect on the part of authorized parties through in-depth technical dialogue, frank, open and yet formal relationships, providing constructive liaison on safety related issues.

Comments from: UAE, Germany, ENISS, USA, Finland

DS462 – Proposal for LL 5.1

Lessons Learned	Current text	IAEA Proposal
5.1	Req. 26 , 4.43 The regulatory body shall assess all radiation risks associated with normal operation, anticipated operational occurrences and accident conditions, prior to operation of the facility or conduct of the activity, and periodically throughout the lifetime of the facility or the duration of the activity, to determine whether radiation risks are as low as reasonably achievable.	Req. 26 , 4.43 The regulatory body shall assess all radiation risks associated with normal operation, anticipated operational occurrences and emergency conditions, including low frequency extreme events, prior to operation of the facility or conduct of the activity, and periodically throughout the lifetime of the facility or the duration of the activity, to determine whether radiation risks are as low as reasonably achievable.

Comments from: France, Germany, Finland, USA, ENISS, Chairman of RASSC.

DS462 – Proposal

Lessons Learned	Current text	IAEA Proposal/ NUSC WG advise
Extr. CNS Meeting, ENSREG, other.		Req.26 new 4.48a 4.48a The Regulatory Body shall ensure that Periodic Safety Reviews (or equivalent) are performed at appropriate times by the authorised parties and that any reasonably practicable safety improvements identified in the findings are implemented. <i>NUSC WG comments: scope to be clarified (nuclear installations only?), frequency (10 years, maximum of 10 years for nuclear installations...?), in addition to addressing safety issues as they are discovered PSR are implemented. Explore possibility to move it to a different location (under Req 25 and 26). Mention RB shall review the PSR performed by licensee?</i>

Comments from: France, Germany, EC, UK, Switzerland, Finland, USA, ENISS.

DS462 – Proposal

Lessons Learned	Current text	IAEA Proposal
Extr. CNS Meeting, IAEA Mission on remediation, other.		Req.36, 4.66 new bullet (d-a) 4.66 (d-a) Public involvement in regulatory decision making should be encouraged, where appropriate, to enhance trust in the regulatory process.

Comments from: UAE, France, Germany, UK, Finland, USA, ENISS.

DS462 – Proposal for LL A6.2

Lessons Learned	Current text	IAEA Proposal
A 6.2	Req. 36, 4.68 The authorized party has an obligation to inform the public about the possible radiation risks associated with the operation of a facility or the conduct of an activity, and this obligation shall be specified in the regulations promulgated by the regulatory body, in the authorization or by other legal means.	Req.36, 4.68 4.68. The authorized party has an obligation to inform the public about the possible radiation risks (under both operational states and accident conditions) associated with the operation of a facility or the conduct of an activity and this obligation shall be specified in the regulations promulgated by the regulatory body, in the authorization or by other legal means.

Comments from: UK, Switzerland, Chairman of RASSC, ENISS.