3rd Meeting of EPREsC

29 November 2016 - 1 December 2016

Agenda item 4.1

NST004 – DEVELOPING A NATIONAL FRAMEWORK FOR MANAGING THE RESPONSE TO NUCLEAR SECURITY EVENTS

For clearance for submission to DDG-NS for publication

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EPReSC2 Discussion on draft NST004

- Draft at step 11 of SPESS process
- Presented for clearance for submission to DDG
- Intense discussion
- Relevant inconsistencies with GSR Part 7 identified in the draft by Committee members

Conclusion:
DRAFT NOT CLEARED BY EPReSC
EPReSC2 Discussion on draft NST004 (Cont.)

• Rational for not to clear the draft (EPReSC-2 minutes)

“Type 1 and 2 security events defined in the draft NST004 are emergencies that would require a state to activate its emergency response organization. GSR Part 7 addresses the preparedness and response to emergencies and should be implemented for these emergencies without creating parallel organizations as suggested in the document.”
First steps towards a solution

• EPReSC2 minutes:
(Chair): “The document is not cleared by EPReSC. We are very interested to work together with the authors to improve this document, make it compatible with GSR Part 7, and ensure that Member States implement a single, comprehensive response to emergencies.”

• Situation (not clearing a document at the last stage) wasn’t clearly addressed in SPESS guides

• Recent establishment of EPReSc may be one contributing factor: the Committee discussed the draft for the first time

• Bounding condition: It was about making changes to the text, not to develop a new one

• IEC and NSNS started to define common grounds to revise the existing draft.

• NSOC-Safety Standards and Security Guidance Development Section was kept aware of the issue and provided advice on the process to be followed
• Common grounds set by NSNS/IEC for draft revision
  – The document **is about nuclear security events**…
  – ……but it has strong **overlap with EPR because some of those events are actually emergencies**
  – Pertaining to EPR topics, GSR Part 7 requirements should be adhered to, which clearly state that an unique framework for response to emergencies, **irrespective of their origin**, should be put in place.
  – The arrangements to respond to emergencies like the defined in the draft should allow **for proper consideration of specific features and activities associated to security events**
Summary of changes included in the draft

• Inclusion of a specific paragraph (1.7) in the background section referring specifically to the case when a security event represents an emergency. With specific reference to:
  – The need for integrating the response in the framework defined for emergency response
  – The need to allow for adequate consideration of the features and activities associated to security events

• Modification of the definition of security events to address that some of them represent nuclear or radiological emergencies and some of them may escalate to emergencies

• Modifications made to include references to an unified structure for response in all the paragraphs (not few) were the doubt might arise (with the previous text) regarding the integration of the security response in the broader emergency response framework. However, no detailed guidance on emergency response framework for those events has been included, since the document is about security events and not about EPR
Summary of changes included in the draft (Cont.)

• Particular care was put in keeping and clarifying the consideration to specific security aspects which should be properly taken into account in the response to this kind of events

• Some paragraphs (i.e. 2.2) with misleading text were totally rewritten

• In many paragraphs, wording was modified to avoid ambiguous text that could lead to confusion regarding the scope of the document and interface with EPR

• Definitions of nuclear or radiological emergency was included, directly from GSR Part 7

• Many editorial changes to improve text clarity and consistency
Conclusions:

• Previous draft had inconsistencies with GSR Part 7 requirements

• Situation (draft not cleared in step 11) was not foreseen in SPESS guides. Ad hoc process put in place by the Secretariat

• Intense dialogue and cooperation between NSNS and IEC. Common grounds set to revise the draft

• Amended text developed to properly address EPR concerns while keeping important aspects for security
Recommendation to EPReSC:

To clear the new NST004 draft for submission to DDG for approval
Thank you!