NUSSC meeting
1-4 July 2014

Guidance on safety/security interfaces

Agenda item 6.2

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Guidance on how to address Safety/security interfaces

• First discussion with the Committees Chairs in March 2013, after the review of two drafts safety standards DS419 and DS420

• Discussion at the Coordination Committee in May and June 2013: establishment of an internal task force

• Several meeting of the task force between May and September 2013

• Discussion at NSGC in October 2013: establishment of an ad-hoc Group (4 NSGC members and 4 Chairs of the SSCs)
Guidance on how to address Safety/security interfaces

- Revised draft submitted to the Coordination Committee in January 2014
- Consultation of the Ad-Hoc Group in February 2014
- Last answer received on April 2, 2014
- Revised guidance issued on April 3, 214 for application
- Further consultation to enhance the guidance with more experience
Guidance on how to address Safety/security interfaces

Background:

• 80 % of safety standards and 80 % of Nuclear Security Series publication have an interface (results of the Interface Group consultation)

• “Any number of situations may give rise to safety-security interface issues, such as changes in facility or activity conditions, procedural changes, process changes or installations, etc.”; Statement from USA member of NSGC
Guidance on how to address Safety/security interfaces

Preparation of the DPP:

• Need to identify the nature and extent of the interfaces
• Cross consultation within the Department
• Annex with sample questions to help identifying these interfaces
• Consideration should be given to propose two Technical Officers in the DPP
• Identification of all the relevant Safety Standards or Security Series Publications, already published or being drafted, to be later taken into account and referenced.
Guidance on how to address Safety/security interfaces

Drafting stage:

Addressing interfaces

- The nature and extent of the possible interfaces should be described clearly.
- Relevant requirements or guidance (i.e. ‘shall’ or ‘should’ statements) may be provided to explicitly addresses what is specific to these interface aspects. As introduced above, such requirements or guidance should cover establishing management systems or procedures, and developing and implementing solutions for ensuring both safety and nuclear security.
- This may be complemented by examples of such issues, which could be identified from practical solutions that Member States have developed for dealing with such interfaces. However it should be stated clearly that these are only examples and that this does not provide an exhaustive list of possible interface issues.
- In cases where the extent of the interface is limited, it may be appropriate to describe interfaces in a generic manner.
Guidance on how to address Safety/security interfaces

Drafting stage:

**Not addressing safety in nuclear security drafts or vice-versa**
A Safety Standard should not include ‘shall’ or ‘should’ statements on nuclear security, nor should a Nuclear Security Series publication include ‘should’ statements on nuclear safety (note that there are no ‘shall’ statements in the Nuclear Security Series). Rather, the draft may include information to raise awareness about relevant aspects of nuclear security or nuclear safety, respectively. It should be made clear that the purpose of this information is not to provide guidance.

**Introducing cross-references**
Cross-references to existing publications covering the subject should be provided and introduced by indicating what the objective and scope of the publication is, with the reference provided in the standard format for references. Key aspects discussed in the referenced publication may be summarized. In the absence of existing detailed guidance publications on the subject, a cross-reference to the higher level publication should be included.
Guidance on how to address Safety/security interfaces

Drafting stage:

• Drafters should bear in mind that the users will need to implement all requirements and recommendations for both safety measures and security measures simultaneously for their particular facility, activity or practice. Therefore, it needs to be ensured that none of the requirements and recommendations for safety measures in a draft safety standards would compromise security, and that none of the recommendations and guidance for security measures in a draft Nuclear Security Series publications would compromise safety.

• Where there may be a contradiction between the recommendations for safety and security, there should be a clear statement that this is to be managed by implementing appropriate measures such that the protection of people, property, society and the environment is ensured. Examples of such measures should be provided as far as possible, reflecting actual practice in the Member States.

• The draft should also identify situations where synergies between safety and security measures are possible. This includes situation where an added benefit can be achieved with a better use of resources, or where one set of measures can benefit the other. In some cases there may be very few users for one particular activity.
Guidance on how to address Safety/security interfaces

Drafting stage:

- In many cases the challenge of dealing with interfaces is that the nuclear safety and nuclear security communities use different terminology and vocabularies, and sometimes different concepts, for dealing with similar topics. Therefore, as early as possible when a first draft is available, the Technical Officers should send the draft to other colleagues in the Department for their review, to ensure that the vocabulary in the text is understandable to both the nuclear safety and nuclear security communities and that terminology is used consistently across all publications in both Series. Every effort should be made to resolve any disagreements as early as possible, before submission of the first draft to the Coordination Committee for initial approval.
Guidance on how to address Safety/security interfaces

Next Step:

- Further comments on the guidance, based on experience feedback