Report of the End of Term Self-Assessment of the International Atomic Energy Agency Radiation Safety Standards Committee

BACKGROUND
The Deputy Director General (DDG) requested that each Committee undertake a performance review (self-assessment) against its Terms of Reference. The results should be included in an annex in the end-of-term report. The self-assessment would be carried out independently for each Committee and outcomes would not be compared.

At the 42nd RASSC meeting this request to undertake a self-assessment of performance during the term, was discussed. Following that meeting and discussions between the Secretariat and the Chairman, it was decided that the self-assessment would be undertaken using a Survey Monkey Questionnaire. It was decided to use a version of the survey questionnaire template that was presented at the meeting and is being employed by the other committees.

On August 23rd the Secretariat issued an invitation to 72 RASSC members and observers to participate in the questionnaire based survey. Particular attention was drawn to the invitation to offer comments and recommendations under each set of questions.

The survey period closed on September 30th 2017.

In order to comply with the request from the DDG that the Secretariat should not be directly involved, the Secretariat engaged an external consultant to analyse and report on the survey results.

RESULTS

General Statistics
There was a 36% response rate with 26 of the 72 invitees participating. Questions 1, 2 and 4 were responded to by all participants, question 3 by 25, and question 5 by 14 participants. In total 71 comments were submitted with the majority being in response to question 1 (38 comments).

Specific Responses
The following sets out the data and comments arising from questions 1-4 and the comments submitted under question 5.

The results are presented in terms of the percentage of responses received that fall into each category (Very Good, Good etc). Also presented are the weighted average points scores for each question, where 1 is the maximum score and 4 the minimum.
Question 1: Rate the adequacy of the Committee’s review of:

(a) Safety standards for which RASSC is the lead Committee
(b) Other safety standards for which RASSC is designated a Review Committee
(c) The treatment of safety-security interfaces in safety standards and nuclear security guidance for which RASSC is designated a Review Committee
(d) Other safety related publications within its area of expertise that RASSC was requested to review (e.g. Safety Reports, TECDOCs)
(e) Other relevant IAEA publications that RASSC was requested to review (e.g. Nuclear Energy Series publications, Nuclear Security Series Technical Guidance publications)
(f) Strategy, priority and programme for the development of safety standards within RASSC's area of expertise

This question was answered by 26 recipients

Across all of the questions the satisfaction rating was high with the combined “Good” and “Very Good” responses ranging from 65% to 96% which is equivalent to between 17 and 25 of the 26 respondents. This is reflected in a weighted average ranking that ranges from 2.27 to 1.58.

Twelve responses were received in the Average category and 9 in the Below Average category. Below Average rankings were assigned in 4 of the 6 questions. The greatest number of Average or Below Average responses were in relation to question 1c and
represent the views of nine of the survey participants. In relation to question 1e, five responses were in the Average or Below category, while questions b and f received three comments in this range.

The comments submitted provide some insight into the highs and lows expressed in the data.

*Question 1a: Rate the adequacy of the Committee’s review of Safety standards for which RASSC is the lead Committee*

There were positive comments about the system of work or RASSC, and the value and necessity of its work in relation to the review of Safety Standards. Of particular note was the importance of work on Occupational exposure, Medical exposure, Non-Medical exposure, Natural Radiation sources, and control of consumer products, GSR Part 1, 3 and 7. It was noted that there remains a lack of clarity regarding the division of responsibilities between the different committees and asks for the leadership of the Chairs in this regard. One comment suggested that a narrow focus on safety levels may be inappropriate in a practical implementation context.

*Question 1b: Rate the adequacy of the Committee’s review of other safety standards for which RASSC is designated a Review Committee*

Comments received in relation to the Good and Very Good responses listed some areas of work that the respondents were satisfied with for example the IAEA Safety Standards Series and the Justification of practices. The three Average responses had only one comment associated with them. This comment pointed to a view that the interface between RASSC and the Nuclear Safety, Security and Emergency committees added little value.

*Question 1c: Rate the adequacy of the Committee’s review of the treatment of safety-security interfaces in safety standards and nuclear security guidance for which RASSC is designated a Review Committee*

This question received the lowest satisfaction rating. One comment notes the importance of the work of RASSC in relation to Nuclear Security and the need for guidance from the IAEA in order to achieve a global approach. The remaining comments express concern about the value of the RASSC input on Nuclear Security matters, and about the perception that Security and Safety are entirely separate. A lack of discussion of drafts is noted and there are comments on the competence of RASSC members to contribute on Nuclear Security matters. It is suggested that some lectures on security to bring members up to speed on the issues might add value.
Question 1d: Rate the adequacy of the Committee’s review of other safety related publications within its area of expertise that RASSC was requested to review (e.g. Safety Reports, TECDOCs)

Overall the feedback on this topic was positive. Only one respondent assigned a ranking below “Good”; a “Below Average” ranking was awarded with the associated comment cautioning on the risk of TecDocs assuming the status of Safety Standards in instances where no Safety Standard exists.

Question 1e: Rate the adequacy of the Committee’s review of other relevant IAEA publications that RASSC was requested to review (e.g. Nuclear Energy Series publications, Nuclear Security Series Technical Guidance publications)

Two respondents commented that there were few examples of this type of work for RASSC, while others noted it as an important function. One recommendation was that the workload of RASSC was already too high and therefore RASSC should be cautious about taking on additional work. The respondent also noted that the texts of Safety Standards should be shortened and duplications eliminated to improve efficiency.

Question 1f: Rate the adequacy of the Committee’s review of strategy, priority and programme for the development of safety standards within RASSC’s area of expertise

While only three of the rankings offered fall into the Average or Below Average category the associated comments offer a more broad range of suggestions. A couple of comments point to a view that the system of development of standards is overly lengthy and complex. There is a view expressed that the revision of the Safety Series was not effective and that there remains considerable overlap between the different areas (Nuclear Safety, Radiation Protection etc). One comment suggests that priorities put forward by the members were not advanced by the committee.
Question 2: In the development of safety standards, please rate the effectiveness of RASSC in achieving greater (a) Transparency, (b) Consensus, (c) Quality, (d) Coherence, (e) Consistency, and (f) Participation of Membership

This question was answered by 26 participants

Across the first five of the six elements of this question the rating was similar and largely positive, with between 24% and 27% of responses expressing the view that the effectiveness of RASSC is Very Good and 61% to 65% of responses in the Good category. About 10% of the responses assigned an Average or Below Average mark; this reflects the opinion of 2-3 respondents. There is a marked contrast in the view expressed regarding the last element of this question; a high satisfaction rating of Very Good was awarded by only one respondent, and combined with Good, the positive ratings were assigned by only 46% of respondents. A further 46% of respondents regarded the effectiveness of RASSC in relation to participation of membership as Average with 8% Below Average.

Looking at the 10 individual comments submitted it is possible to gain some insight into the views of the participants as follows: On transparency one respondent suggested that it would be helpful to receive feedback on why suggested changes are rejected. Another commented on the lengthy nature of the processes that are a feature of the work of RASSC but acknowledged that this is not unique to RASSC.

Six of the ten comments submitted, as might be expected from the data, relate to the participation of member states. The views expressed are that participation is very important and is currently not strong enough. Workload is sited as a problem for some participants and there is also a request for clarification on the role of the representative at the meetings viz-à-viz the member state consultation process. The view is also expressed
that the expertise of some members is not sufficiently broad and questions why the membership tends to be drawn from the regulatory community.

**Question 3:** Please rate the effectiveness of RASSC in collecting, exchanging and collating feedback on the application and use of safety standards in Member States, and advising on the use of such feedback to improve the usefulness of the standards.

![Graph showing the effectiveness of RASSC](image)

This question was answered by 25 participants.

The data shows that the majority (68%) of the participants express satisfaction with this aspect of the work of RASSC. However, there were 4 respondents (16%) who regard RASSC as ineffective in this regard. The comments submitted by these participants express concern in two specific aspects. The first relates to the process of standards development – the view is expressed that there should be opportunity for periodic input and feedback during the development of standards rather than waiting for the final product. Also there is a comment that the timeliness of posting of comments resolutions could be improved. The second refers to the need to improve the process of review of application of standards and feedback on points of learning, as the basis for practical advice and guidance of member states.

**Question 4:** Rate the Effectiveness of the interactions of RASSC (by the Committee and by the Chair) with:

- a. Other Safety Standards Committees (EPrESeC, NUSSC, TRANSSC, WASSC)
- b. The Commission on Safety Standards
c. The Nuclear Security Guidance Committee
d. The IAEA Secretariat, including
   (i) Management
   (ii) Scientific Secretary of the Committee
   (iii) Technical Officers responsible for development of publications

This question was answered by 26 participants.

Question 4 also elicited the highest levels of “Very Good” compared to the other questions and overall the satisfaction rating arising from each of the questions was high (Good or Very Good ranging from 80-95%), in all but question 4c. Two comments note that the assigned tasks are accomplished efficiently and that joint meetings with WASSC are excellent.

Question 4c relates to the interactions with the Nuclear Security Advisory Committee. The comment on this aspect calls for improvements in these interactions.

Question 4d(iii) regarding the interactions of RASSC with the Secretariat including Technical Officers responsible for development of publications, received an Average rating in 19% of responses. The associated comment suggests that firm timelines should be agreed for the stages of development of standards, and that the same Technical Officer should be involved from start to finish.

One comment was submitted and followed up by an email to the effect that the “Effectiveness” cannot be assessed through this questionnaire. The commentator suggested that RASSC is a forum, and effectiveness is determined by the performance of its members, which is variable and outside the control of the chair and the secretariat.
Question 5: Committees may also address other issues that they consider of particular relevance to their work, including any suggestions for improving the Terms of Reference, but they should address at least the points itemized above.

This invitation to comment received 14 responses.

The 14 comments can be grouped into four categories. The first three repeat comments made and highlighted above i.e. - 1. Comments in support of the statement in the question, and comments to the effect that RASSC does a very good job; 2. Comments to the effect that something needs to be done to increase member participation, and that consideration should be given to the breadth of experience of the members, reaching out beyond the regulatory community; 3. Comments on the transparency of priority setting, decision making and feedback from technical officers, the efficiency and consistency of the process of development of standards, and the view that the texts could be simplified.

The remaining comments refer to previously mentioned observations on the need for greater clarity on the role of each committee and how the different committees integrate. There are some suggestions for areas of work including a greater emphasis on safety issues, establishment of criteria for guidance for aircrew, dosimetry for the lens of the eye, and graded approach to regulation.

Conclusion and key points for consideration

Overall the review revealed a good degree of satisfaction with the work of the RASSC on the part of the membership. Across all of the questions that leant themselves to the calculation, the weighted average was 1.89, where 1 is the maximum score and 4 the minimum.

In terms of the adequacy of the committee’s review of safety standards and other roles, between 65 and 96% of the responses were in the Good or Very Good category. In relation to the Effectiveness of RASSC in terms of how it does its business, satisfaction ranged from 85-92% across all areas except that which dealt with member participation. The effectiveness of RASSC, in terms of engaging with members on the implementation and use of safety standards as a basis for developing practical advice, was judged by 64% of the respondents to be Effective and by 4% to be Very Effective. The effectiveness of the interaction by RASSC with other committees, the Secretariat and other support staff was deemed Good or Very Good by 65-95% of respondents.

The comments submitted provided insight into the thinking underlying the ratings and offer constructive suggestions for areas of improvement as follows:
• Encouraging greater participation by members with the work of RASSC
• Broadening the expertise of the membership beyond that of the regulatory community
• Clarification on the expectations on members
• Clarification on the separation of roles between RASSC and the other committees
• Greater transparency in decision making and priority setting
• Greater engagement on Nuclear Security matters
• Improving process efficiency and consistency
• More practical guidance and feedback on the challenges of implementation