SELF-ASSESSMENT OF WASSC 2014 – 2017 – Summary of Comments received  
Prepared by Geoff Williams (Chair)  
November 2017

<table>
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<tr>
<th>Section</th>
<th>Subject (derived from Terms of Reference)</th>
<th>Combined overview of comments received</th>
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<tr>
<td>1</td>
<td>Adequacy of the Committee’s review of:</td>
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|         | (a) Safety Standards for which it is the lead Committee | The committee performs a valuable function in reviewing the Safety Standards in advance of key stages, noting that the main effort is provided by the Secretariat in proposing and drafting the documents. Comments included:  
  - WASSC’s role is largely reactive responding to the Secretariat and it is primarily a revising body.  
  - The time-frame for dealing with the Standards is mostly adequate, but sometimes progress (outside of WASSC control) is.  
  - More extensive feedback is given by the WASSC Member States than for documents where the Committee is not the lead.  
  - Comments on the draft documents from WASSC members are mostly fruitful and often fully or partially accepted through a consensus approach.  
  - The demarcation of the competences and responsibilities between WASSC and RASSC is not always very clear or comprehensive.  
  - General rating between ‘Excellent’ and ‘Good’. |
|         | (b) Other Safety Standards for which it is designated a Review Committee | The adequacy of the Committee’s review of these standards is less important than for (a), recognising the need for consensus.  
  - MS representatives look to the reviews undertaken by their counterparts on other safety standards where WASSC is not the lead committee.  
  - Generally any feedback by the WASSC member is contributed through the MS representative on the lead committee, to ensure a consistent MS approach.  
  - Input at WASSC is to confirm the position taken by MS colleagues on the lead committee and if necessary discuss points specifically relating to WASSC topics.  
  - Allocated time for discussion in WASSC is mostly adequate, and should be considerably less than for (a).  
  - Noted that fewer MS give comments from a WASSC point-of-view on these draft documents.  
  - General rating between ‘Excellent’ and ‘Good’. |
| (c) | The treatment of safety–security interfaces in safety standards and nuclear security guidance for which it is designated a Review Committee | Common view that this area needs further consideration and development to increase the value of review of these documents by committees such as WASSC.  
- Unsure what value WASSC’s review of some of these documents adds because of our lack of knowledge of the subject matter.  
- Unclear to what extent NSGC values WASSC input.  
- Review by WASSC seen as often just a formality.  
- Security issues are becoming more important for WASSC in the future, especially in relation to storage and disposal facilities.  
- Concerns that the terminology used in the security guidance may not be consistent with that used in areas relevant to WASSC (e.g. on decommissioning, etc.).  
- Important for there to be an internal Agency review mechanism to ensure there are no contradictions or inconsistencies between nuclear safety and security requirements and guidance.  
- It was noted that there are quite a few interface topics between WASSC and NSGC (contrary to some other safety committees).  
- Rating ranged from ‘Poor’ to ‘Excellent’ (with more at the ‘Poor’ or ‘Fair’ end). |
| (d) | Other safety related publications within its area of expertise that it was requested to review (e.g. Safety Reports, TECDOCs) | It is important to ensure that such documents are consistent with the Safety Standards and Guides.  
- WASSC does not have any formal role in decisions as to what documents are produced by the Secretariat in this category but can make suggestions based on the scope of WASSC’s area of expertise.  
- It was noted that such lower-level documents are important in terms of the definition of good practice and learning from experience.  
- When WASSC has been asked to provide feedback on such draft documents, it was noted that there has been no follow-up at subsequent WASSC meetings and no review of the comments made. If a document is presented for WASSC feedback, it would be interesting to follow progress with the future development and what account is taken of WASSC comments.  
- It was noted that publication of TECDOCs is quite often delayed, sometimes up to several years after the original Technical Meetings.  
- Average rating of ‘Fair’. |
| (e) | Other relevant IAEA publications that it was requested to review (e.g. | It is important to ensure that such documents are consistent with the Safety Standards and Guides. |
| Nuclear Energy Series publications, Nuclear Security Series Technical Guidance publications | • The discussions are usually less extensive than those for Safety Standards.  
• Documents from the Nuclear Energy Series are rarely discussed within the WASSC meetings.  
• Again, follow-up on any WASSC feedback would be appreciated.  
• Average rating ‘Fair’. |
|---|---|
| (f) Strategy, priority and programme for the development of safety standards within its area of expertise | WASSC is coming to the end of a major programme of work to update the Safety Standards including guidance within its area of expertise. The revision of older Safety Standards is always part of the WASSC meetings and discussions in respect of the state of the art. First priorities are the Safety Fundamentals and Requirements, followed by the Safety Guides.  
• Suggest more time on future agendas to discuss this at WASSC meetings - query if the committee has had sufficient input on and transparency of the future strategy, priority and programme.  
• Discussions in WASSC on strategy and priorities are welcomed, for example, especially in the 2017 June meeting a discussion was raised in respect of developing some new standards in fields where guidance is lacking.  
• The Secretariat needs to respond to WASSC feedback on strategy and priorities.  
• The effectiveness and efficiency in developing and publishing of Safety Standards should be improved – quicker turn-around is requested.  
• Rating ‘Good’. |
| 2 | Effectiveness in achieving greater:  
(a) transparency;  
(b) consensus;  
(c) quality;  
(d) coherence;  
(e) consistency; and  
(f) participation of Member States | WASSC members felt it is quite difficult to make a judgment on these individual areas, although some specific comments were provided. General ratings were ‘Good” with the exception of that for ‘consistency’ which was ‘Fair’, and that for ‘consensus’ which rated as ‘Excellent’ (the importance of the role of the chair in achieving consensus was noted).  
• Transparency: The system used for addressing comments is helpful and the Secretariat reports on the process carried out. It is very important that the technical editing is completed before submission to CSS; otherwise there is a risk of loss of transparency.  
• All the material, including drafts, presentations and meeting agendas are publicly available on the WASSC website. As appropriate, the material is available before the beginning of a meeting, or directly after it. The comments on the Safety Standards drafts are made public with resolutions and the outcome is also discussed in the twice-yearly WASSC meetings. |
• As needed, WASSC members are communicated with by email from the Secretariat.
• Joint meetings with other committees enhance transparency.
• The use of WebEx to increase participation and hence transparency should be expanded and better communicated to MS prior to meetings.
• Consensus: This is clearly important and largely achieved. In the rare cases where it is not (e.g. as occurred at WASSC 43, albeit for non-WASSC led documents) it is important that the Chairman explains the route to resolution to WASSC members, as has been the case.
• In the few instances where attaining consensus proves difficult, resolution of issues should occur in small groups outside of the general WASSC meeting, and only the whole committee involved in the final discussion of the outcomes, for greater efficiency.
• Quality: Perception that WASSC and the other review committees have limited influence as they are effectively revising bodies. The Secretariat has a key role in ensuring quality through the drafting process, and it appears to be difficult to achieve very significant changes by the time a document reaches the later stages. A concern was expressed that the documents produced are very long and there is much repetition from other documents to ensure consistency. Greater clarity and transparency would be appreciated on how the Secretariat decides who to engage in the drafting of documents.
• Quality is the most important goal when it comes to the Safety Standards. The process of the development of the Safety Standards (SPSS Steps) is already a good tool for achieving high quality.
• Despite the rigorous SPESS steps, opportunities for improvement through discussions at WASSC meetings should always be adopted by the drafting officers.
• Coherence: The reports produced for WASSC of progress against the various elements of standards, guides, etc. indicate that there is certainly awareness of the need for coherence across the various subject areas. The NSS-OUI will be beneficial in this respect. Also welcomed was the move to greater integration of documents produced for the various types of nuclear installations (e.g. research reactors, nuclear power plants, etc.), in recognition of the commonalities of approaches.
• Documents which are directly related should continue to be discussed together.
or consecutively, to achieve a better overview of connected parts.

- **Consistency**: There appears to be good awareness of the need for consistency but the amount of repetition of elements of standards etc. in reports makes it difficult to ensure consistency. Again the NSS-OUI will be useful in identifying inconsistencies.

- **The importance of having some Committee members who have a really good overview of all the relevant IAEA documents was noted, and the way that such committee members can help improving the quality in respect of consistency is appreciated.**

- **Participation of Member States**: MS are willing to provide written comments but the effectiveness of the meetings in terms of active participation of the attendees in the discussions could be improved. The formality of the meetings may contribute to this. Perhaps consideration could be given to more informal, interactive sessions. More effective participation might be achieved if new members could be given some sort of “induction” about the work of the committees and the processes being operated.

- **An important question raised here is: what is the (expected) role of the MS representatives in the SS Committees? Balance between personal engagement/expertise vs. representation of national interests?** According to SPRESS, each MS representative is expected to present a ‘national’ position on IAEA safety standards, which should be based on appropriate consultation at the national level and coordination of the input of national interested parties. But how to balance the expectation that MS representatives are also expected to contribute ‘as experts’ (also relates to Q4/d ii with respect to participation in the consultancy meetings).

- **Not all of the MS are always able to participate in an active way. This is understandable, because not every MS has, for example, waste arising from nuclear power production or NORM residues and therefore a passive participation as observer is sufficient in some cases. MS are also encouraged to present their approaches to waste management and use of Safety Standards. Nevertheless, it would be very helpful, especially for the quality of the Safety Standards, if more members could participate in the WASSC discussions and provide comments on the drafts.**

| 3 | Effectiveness in collecting, exchanging and collating feedback on the application | During each 3-year term of WASSC, MS are asked to give information on the status of waste management and implementation of the Safety Standards in their country. This is |
and use of safety standards in Member States, and advising on the use of such feedback to improve the usefulness of the standards.

done regularly in the meetings and feedback from MS is regarded as a very important and useful part of the WASSC meetings. The Safety Standards are drafted to address and reflect the fundamental and practical issues on radiation and nuclear safety (and security); in general they do not address specific MS issues. The way the various MS implement the IAEA Safety Standards in their national legislative framework varies considerably from one country to another.

- As a result, the feedback from MS with respect to the application and use of the Safety Standards is possibly of higher interest for the Agency than for the individual MS representatives.
- Presentations at the meetings from MS on MS implementation do not always give a clear picture of the application and use of the safety standards. Nor do they provide much in the way of feedback to improve their usefulness. This area would benefit from further consideration to ensure there is an effective mechanism for gathering feedback and acting on it to improve standards (as for any quality management system) and thus demonstrate the value of their use. For example, there could be focused discussions as well as the more formal presentations.
- It was also noted that within the review process of Safety Standards and the later discussion, many MS give insight into the implementation, or the possible implementation, of the Safety Standards. Also often while reviewing a draft of a Safety Standard, comments from MS refer to rules and regulations in the state. This helps to improve the overview of how Safety Standards may be able to be implemented in national frameworks for safety.
- General rating between ‘Excellent’ and ‘Good’.

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<th>Effectiveness of interactions (including those by the Committee and those by the Chair) with:</th>
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<td>It was suggested that it would be useful to also consider interactions between IAEA and other international bodies such as the Nuclear Energy Agency, WHO, UNEP etc. and for possible co-sponsorship of relevant WASSC documents. The query was raised as to the mechanisms (such as the inter-agency committee on radiation safety?) by which this could be achieved. General ratings for all sub-categories were ‘Good’ with the exception of ‘Fair’ for (c) NSGC.</td>
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<p>| (a) Other Safety Standards Committees | WASSC has recently had useful joint meetings with RASSC and EPReSCL. Some MS would welcome a joint meeting with TRANSSC in future because of areas of joint interest such as Multi-Purpose Casks and the importance of transport in enabling disposal of wastes. |</p>
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<th>(b) The Commission on Safety Standards</th>
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<td>• The Chairman provides very useful feedback on CSS meetings and lessons for WASSC.</td>
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<td>• Members of the CSS are often participating in the WASSC meetings not just to present information, they also take part in the discussions and help to give an insight on the work done by the Commission.</td>
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<th>(c) The Nuclear Security Guidance Committee</th>
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<td>• The handling of the Security issues in WASSC appears more as a formalism than a constructive review.</td>
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<th>(d) The IAEA Secretariat, including:</th>
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<td>(i) Management;</td>
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<td>(ii) Scientific Secretary of the Committee; and</td>
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<td>(iii) Technical Officers responsible for development of publications.</td>
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<td>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.</td>
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<td>• Some MS expressed a wish to understand better how WASSC contributes to decisions within the Secretariat on the future work programme.</td>
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<td>• WASSC may also address other issues that the committee considers of particular relevance to its work, including any suggestions to the Secretariat for improving the Terms of Reference.</td>
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<td>• The email communications from the Scientific Secretary on upcoming events and timescales for comments on documents are very much appreciated, as this helps for more effective contribution to the work of WASSC.</td>
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<td>• Earlier completion of reports of the meetings would be appreciated, but it is understood there is a need to prioritise activities.</td>
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<td>• MS indicated they have limited direct interaction with the Technical Officers responsible for publications. Their presentations can sometimes leave little time for meaningful discussion although WASSC is aware that they appreciate our input. Sometimes there is overemphasis on the number of comments rather than the improvements achieved by implementing the comments or the emerging themes, which would better demonstrate the value added by committees like WASSC. It might be perceived that the committees are seen as hurdles to be crossed as a document proceeds through the production process.</td>
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<td>• The procedures concerning the nomination of consultants (to address specific issues) and the way how these consultancy meetings operate should be more transparent; thus, it is difficult to rate the effectiveness of such meetings. It is not clear, whether MS representatives of the SSCs can/do participate in such consultancy meetings; for instance, conflicts of interest may arise.</td>
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|   | **• Further discussion and comparative analysis of risk-assessment tools used in safety-case development and in decommissioning of facilities.**  
|   | **• Continue and enhance addressing the issue of ‘deterministic vs. probabilistic risk assessment approaches’ in safety assessments of waste and decommissioning facilities.**  
|   | **• Continue and enhance addressing current over-conservatism and discuss further the issue of uncertainties in safety assessment, particularly for clearance of materials, release of sites after decommissioning, and overall performance assessment.**  
|   | **• Enhance discussion of gap analysis and combining similar standards in order to enhance efficiency and minimise proliferation of multiple safety standards.**  
|   | **• Seek opportunities to collaborate with NEA/OECD in areas of mutual interest (e.g. those related to waste disposal and decommissioning), enhance early sharing of information, and evaluate possible minimisation of duplication of efforts (co-sponsored guides would be one means of doing this).** |