Declaration of ENSREG

ENSREG and the European Commission have worked intensively to provide a response to the request of the European Council on 25 March 2011.

Notably, they have developed the scope and modalities for comprehensive risk and safety assessments of EU nuclear power plants. On 13 May 2011, ENSREG and the Commission have agreed the following:

1. In the light of the Fukushima accident, comprehensive risk and safety assessments undertaken by the operators under the supervision of the national regulatory authorities of nuclear power plants will start at the latest by 1 June 2011. These assessments will be based on the specifications in annex 1 largely prepared by WENRA and will cover extraordinary triggering events like earthquakes and flooding, and the consequences of any other initiating events potentially leading to multiple loss of safety functions requiring severe accident management. The methodology of these assessments is covered by annex 1. Human and organisational factors should be part of these assessments;

2. Risks due to security threats are not part of the mandate of ENSREG and the prevention and response to incidents due to malevolent or terrorists acts (including aircraft crashes) involve different competent authorities, hence it is proposed that the Council establishes a specific working group composed of Member States and associating the European Commission, within their respective competences, to deal with that issues. The mandate and modalities of work of this group would be defined through Council Conclusions[1].

3. Paragraphs 1 and 2 above contribute to a comprehensive risk and safety assessment.

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[1] See annex II

EN:S:REG
European Nuclear Safety Regulators Group

Annex I

EU "Stress tests" specifications

Introduction

Considering the accident at the Fukushima nuclear power plant in Japan, the European Council of March 24th and 25th declared that "the safety of all EU nuclear plants should be *reviewed, on the basis of a comprehensive and transparent risk assessment ("stress tests"); the European Nuclear Safety Regulatory Group (ENSREG) and the Commission are invited to develop as soon as possible the scope and modalities of these tests in a coordinated framework in the light of the lessons learned from the accident in Japan and with the full involvement of Member States, making full use of available expertise (notably from the Western European Nuclear Regulators Association); the assessments will be conducted by independent national authorities and through peer review; their outcome and any necessary subsequent measures that will be taken should be shared with the Commission and within ENSREG and should be made public; the European Council will assess initial findings by the end of 2011, on the basis of a report from the Commission*".

On the basis of the proposals made by WENRA at their plenary meeting on the 12-13 of May, the European Commission and ENSREG members decided to agree upon "an initial independent regulatory technical definition of a "stress test" and how it should be applied to nuclear facilities across Europe". This is the purpose of this document.

Definition of the "stress tests"

For now we define a "stress test" as a targeted reassessment of the safety margins of nuclear power plants in the light of the events which occurred at Fukushima: extreme natural events challenging the plant safety functions and leading to a severe accident.

This reassessment will consist:

- in an evaluation of the response of a nuclear power plant when facing a set of extreme situations envisaged under the following section "technical scope" and
- in a verification of the preventive and mitigative measures chosen following a defence-in-depth logic: initiating events, consequential loss of safety functions, severe accident management.

In these extreme situations, sequential loss of the lines of defence is assumed, in a deterministic approach, irrespective of the probability of this loss. In particular, it has to be kept in mind that loss of safety functions and severe accident situations can occur only when several design provisions have failed. In addition, measures to manage these situations will be supposed to be progressively defeated.

For a given plant, the reassessment will report on the response of the plant and on the effectiveness of the preventive measures, noting any potential weak point and cliff-edge effect, for each of the considered extreme situations. A cliff-edge effect could be, for instance, exceeding a point where significant flooding of plant area starts after water overtopping a protection dike or exhaustion of the capacity of the batteries in the event of a station blackout. This is to evaluate the robustness of the defence-in-depth approach, the adequacy of current accident management measures and to identify the potential for safety improvements, both technical and organisational (such as procedures, human resources, emergency response organisation or use of external resources).

By their nature, the stress tests will tend to focus on measures that could be taken after a postulated loss of the safety systems that are installed to provide protection against accidents considered in the design. Adequate performance of those systems has been assessed in connection with plant licensing. Assumptions concerning their performance are re-assessed in the stress tests and they should be shown as provisions in place. It is recognised that all measures taken to protect reactor core or spent fuel integrity or to protect the reactor containment integrity constitute an essential part of the defence-in-depth, as it is always better to prevent accidents from happening than to deal with the consequences of an occurred accident.

Process to perform the "stress tests" and their dissemination

The licensees have the prime responsibility for safety. Hence, it is up to the licensees to perform the reassessments, and to the regulatory bodies to independently review them.

The timeframe is as follows:

The national regulator will initiate the process at the latest on June 1 by sending requirements to the licensees.

	Progress report	Final report
Licensee report	August 15	October 31
National report	September 15	December 31

- The final national reports will be subjected to the peer review process described below.
- The European Commission, with the support of ENSREG, will present a progress report to the EU Council for the meeting scheduled on 9th December 2011 and a consolidated report to the to the EU Council for the meeting scheduled for June 2012.

Due to the timeframe of the stress test process, some of the engineering studies supporting the licensees' assessment may not be available for scenarios not included in the current design. In such cases engineering judgment is used.

During the regulatory reviews, interactions between European regulators will be necessary and could be managed through ENSREG. Regulatory reviews should be peer reviewed by other regulators. ENSREG will put at the disposal of all peer reviews the expertise necessary to ensure consistency of peer reviews across the EU and its neighbours.

Peer review process

In order to enhance credibility and accountability of the process the EU Council asked that the national reports should be subjected to a peer review process. The main purpose of the national reports will be to draw conclusions from the licensees' assessment using the agreed methodology. The peer teams will review the fourteen national reports of Member States that presently operate nuclear power plants and of those neighbouring countries that accept to be part of the process.

- **Team composition.** ENSREG and the Commission shall agree on team composition. The team should be kept to a working size of seven people, one of whom should act as a chairperson and a second one as rapporteur. Two members of each team will be permanent members with the task to ensure overall consistency. The Commission will be part of the team. Members of the team whose national facilities are under review will not be part of that specific review. The country subject to review has to agree on the team composition. The team may be extended to experts from third countries.
- **Methodology.** In order to guarantee the rigor and the objectivity of any peer review, the national regulator under review should give the peer review team access to all necessary information, subject to the required security clearance procedures, staff and facilities to enable the team, within the limited time available.
- **Timing.** Reviews should start immediately when final national reports become available. The peer reviews shall be completed by the end of April 2012.

Transparency

National regulatory authorities shall be guided by the "principles for openness and transparency" as adopted by ENSREG in February 2011. These principles shall also apply to the EU "stress tests".

The reports should be made available to the public in accordance with national legislation and international obligations, provided that this does not jeopardize other interests such as, inter alia, security, recognized in national legislation or international obligations.

The peer will review the conclusions of each national report and its compliance with the methodology agreed. Results of peer reviews will be made public.

Results of the reviews should be discussed both in national and European public seminars, to which other stakeholders (from non nuclear field, from non governmental organizations, etc) would be invited.

Full transparency but also an opportunity for public involvement will contribute to the EU "stress tests" being acknowledged by European citizens.

Technical scope of the "stress tests"

The existing safety analysis for nuclear power plants in European countries covers a large variety of situations. The technical scope of the stress tests has been defined considering the issues that have been highlighted by the events that occurred at Fukushima, including combination of initiating events and failures. The focus will be placed on the following issues:

a) Initiating events

- Earthquake
- Flooding

b) Consequence of loss of safety functions from any initiating event conceivable at the plant site

- Loss of electrical power, including station black out (SBO)
- Loss of the ultimate heat sink (UHS)
- Combination of both

c) Severe accident management issues

- Means to protect from and to manage loss of core cooling function
- Means to protect from and to manage loss of cooling function in the fuel storage pool
- Means to protect from and to manage loss of containment integrity

b) and c) are not limited to earthquake and tsunami as in Fukushima: flooding will be included regardless of its origin. Furthermore, bad weather conditions will be added.

Furthermore, the assessment of consequences of loss of safety functions is relevant also if the situation is provoked by indirect initiating events, for instance large disturbance from the electrical power grid impacting AC power distribution systems or forest fire, airplane crash.

The review of the severe accident management issues focuses on the licensee's provisions but it may also comprise relevant planned off-site support for maintaining the safety functions of the plant. Although the experience feedback from the Fukushima accident may include the emergency preparedness measures managed by the relevant off-site services for public protection (fire-fighters, police, health services....), this topic is out of the scope of these stress tests.

The next sections of this document set out:

- general information required from the licensees;
- issues to be considered by the licensees for each considered extreme situation.

General aspects

Format of the report

The licensee shall provide one document for each site, even if there are several units on the same site. Sites where all NPPs are definitively shutdown but where spent fuel storages are still in operation shall also be considered.

In a first part, the site characteristics shall be briefly described:

- location (sea, river);
- number of units;
- license holder

The main characteristics of each unit shall be reflected, in particular:

- reactor type;
- thermal power;
- date of first criticality;
- presence of spent fuel storage (or shared storage).

Safety significant differences between units shall be highlighted.
The scope and main results of Probabilistic Safety Assessments shall be provided.

In a second part, each extreme situation shall be assessed following the indications given below.

Hypothesis

For existing plants, the reassessments shall refer to the plant as it is currently built and operated on June 30, 2011. For plants under construction, the reassessments shall refer to the licensed design.

The approach should be essentially deterministic: when analysing an extreme scenario, a progressive approach shall be followed, in which protective measures are sequentially assumed to be defeated.

The plant conditions should represent the most unfavourable operational states that are permitted under plant technical specifications (limited conditions for operations). All operational states should be considered. For severe accident scenarios, consideration of non-classified equipment as well as realistic assessment is possible.

All reactors and spent fuel storages shall be supposed to be affected at the same time.

Possibility of degraded conditions of the site surrounding area shall be taken into account.

Consideration should be given to:

- automatic actions;
- operators actions specified in emergency operating procedures;
- any other planned measures of prevention, recovery and mitigation of accidents;

Information to be included

Three main aspects need to be reported:

- Provisions taken in the design basis of the plant and plant conformance to its design requirements;

– Robustness of the plant beyond its design basis. For this purpose, the robustness (available design margins, diversity, redundancy, structural protection, physical separation, etc) of the safety-relevant systems, structures and components and the effectiveness of the defence-in-depth concept have to be assessed. Regarding the robustness of the installations and measures, one focus of the review is on identification of a step change in the event sequence (cliff edge effect[1]) and, if necessary, consideration of measures for its avoidance.
– any potential for modifications likely to improve the considered level of defence-in-depth, in terms of improving the resistance of components or of strengthening the independence with other levels of defence.

In addition, the licensee may wish to describe protective measures aimed at avoiding the extreme scenarios that are envisaged in the stress tests in order to provide context for the stress tests. The analysis should be complemented, where necessary, by results of dedicated plant walk down.

To this aim, the licensee shall identify:

- the means to maintain the three fundamental safety functions (control of reactivity, fuel cooling, confinement of radioactivity) and support functions (power supply, cooling through ultimate heat sink), taking into account the probable damage done by the initiating event and any means not credited in the safety demonstration for plant licensing;
- possibility of mobile external means and the conditions of their use;
- any existing procedure to use means from one reactor to help another reactor;
- dependence of one reactor on the functions of other reactors on the same site.

As for severe accident management, the licensee shall identify, where relevant:

- the time before damage to the fuel becomes unavoidable. For PWR and BWR, if the core is in the reactor vessel, indicate time before water level reaches the top of the core, and time before fuel degradation (fast cladding oxidation with hydrogen production);
- if the fuel is in the spent fuel pool, the time before pool boiling, time up to when adequate shielding against radiation is maintained, time before water level reaches the top of the fuel elements, time before fuel degradation starts;

Supporting documentation

Documents referenced by the licensee shall be characterised either as:

- validated in the licensing process;
- not validated in the licensing process but gone through licensee's quality assurance program;
- not one of the above.

[1] Example: exhaustion of the capacity of the batteries in the event of a station blackout

Earthquake

I. Design basis

a) Earthquake against which the plant is designed :

- Level of the design basis earthquake (DBE) expressed in terms of peak ground acceleration (PGA) and reasons for the choice. Also indicate the DBE taken into account in the original licensing basis if different;
- Methodology to evaluate the DBE (return period, past events considered and reasons for choice, margins added...), validity of data in time;
- Conclusion on the adequacy of the design basis.

b) Provisions to protect the plant against the DBE

- Identification of the key structures, systems and components (SSCs) which are needed for achieving safe shutdown state and are supposed to remain available after the earthquake;
- Main operating provisions (including emergency operating procedure, mobile equipment...) to prevent reactor core or spent fuel damage after the earthquake;
- Were indirect effects of the earthquake taken into account, including:
    1. Failure of SSCs that are not designed to withstand the DBE and that, in loosing their integrity could cause a consequential damage of SSCs that need to remain available (e.g. leaks or ruptures of non seismic pipework on the site or in the buildings as sources of flooding and their potential consequences);
    2. Loss of external power supply;
    3. Situation outside the plant, including preventing or delaying access of personnel and equipment to the site.

c) Plant compliance with its current licensing basis:

- Licensee's general process to ensure compliance (e.g. , periodic maintenance, inspections, testing);
- Licensee' process to ensure that off-site mobile equipment/supplies considered in emergency procedures are available and remain fit for duty;
- Any known deviation, and consequences of these deviations in terms of safety; planning of remediation actions;
- Specific compliance check already initiated by the licensee following Fukushima NPP accident.

II. Evaluation of the margins

d) Based on available information (which could include seismic PSA, seismic margin assessment or other seismic engineering studies to support engineering judgement), give an evaluation of the range of earthquake severity above which loss of fundamental safety functions or severe damage to the fuel (in vessel or in fuel storage) becomes unavoidable.

- Indicate which are the weak points and specify any cliff edge effects according to earthquake severity.
- Indicate if any provisions can be envisaged to prevent these cliff edge effects or to increase robustness of the plant (modifications of hardware, modification of procedures, organisational provisions...).

e) Based on available information (which could include seismic PSA, seismic margin assessment or other seismic engineering studies to support engineering judgement), what is the range of earthquake severity the plant can withstand without losing confinement integrity.

f) Earthquake exceeding DBE and consequent flooding exceeding DBF

- Indicate whether, taking into account plant location and plant design, such situation can be physically possible. To this aim, identify in particular if severe damages to structures that are outside or inside the plant (such as dams, dikes, plant buildings and structures) could have an impact of plant safety.
- Indicate which are the weak points and failure modes leading to unsafe plant conditions and specify any cliff edge effects. Identify which buildings and equipment will be impacted.
- Indicate if any provisions can be envisaged to prevent these cliff edge effects or to increase robustness of the plant (modifications of hardware, modification of procedures, organisational provisions...)

Flooding

I. Design basis

a) Flooding against which the plant is designed :

- Level of the design basis flood (DBF) and reasons for choice. Also indicate the DBF
  taken into account in the original licensing basis if different;
- Methodology to evaluate the DBF (return period, past events considered and reasons for choice, margins added…). Sources of flooding (tsunami, tidal, storm surge, breaking of dam…), validity of data in time;
- Conclusion on the adequacy of the design basis.

b) Provisions to protect the plant against the DBF

- Identification of the key SSCs which are needed for achieving safe shutdown state and are supposed to remain available after the flooding, including:
  - Provisions to maintain the water intake function;
  - Provisions to maintain emergency electrical power supply;
- Identification of the main design provisions to protect the site against flooding (platform level, dike…) and the associated surveillance programme if any;
- Main operating provisions (including emergencyoperating procedure, mobile equipment, flood monitoring, alerting systems…) to warn of, then to mitigate the effects of the flooding, and the associated surveillance programme if any;
- Were other effects linked to the flooding itself or to the phenomena that originated the flooding (such as very bad weather conditions) taken into account, including:
  - Loss of external power supply;
  - Situation outside the plant, including preventing or delaying access of personnel and equipment to the site.

c) Plant compliance with its current licensing basis:

- Licensee's general process to ensure compliance (e.g., periodic maintenance, inspections, testing);
- Licensee's process to ensure that off-site mobile equipment/supplies considered in emergency procedures are available and remain fit for duty;
- Any known deviation and consequences of these deviations in terms of safety; planning of remediation actions;
- Specific compliance check already initiated by the licensee following Fukushima NPP accident.

II. Evaluation of the margins

d) Based on available information (including engineering studies to support engineering judgement), what is the level of flooding that the plant can withstand without severe damage to the fuel (core or fuel storage)?

- Depending on the time between warning and flooding, indicate whether additional protective measures can be envisaged/implemented.
- Indicate which are the weak points and specify any cliff edge effects. Identify which buildings and which equipment will be flooded first.
- Indicate if any provisions can be envisaged to prevent these cliff edge effects or to increase robustness of the plant (modifications of hardware, modification of procedures, organisational provisions…).

Loss of electrical power and loss of the ultimate heat sink

Electrical AC power sources are:

- o off-site power sources (electrical grid);
- o plant generator;
- o ordinary back-up generators (diesel generator, gas turbine...);
- o in some cases other diverse back-up sources.

Sequential loss of these sources has to be considered (see a) and b) below).

The ultimate heat sink (UHS) is a medium to which the residual heat from the reactor is transferred. In some cases, the plant has the primary UHS, such as the sea or a river, which is supplemented by an alternate UHS, for example a lake, a water table or the atmosphere. Sequential loss of these sinks has to be considered (see c) below).

a) Loss of off-site power (LOOP[2])

- Describe how this situation is taken into account in the design and describe which internal backup power sources are designed to cope with this situation.
- Indicate for how long the on-site power sources can operate without any external support.
- Specify which provisions are needed to prolong the time of on-site power supply (refueling of diesel generators...).
- Indicate any envisaged provisions to increase robustness of the plant (modifications of hardware, modification of procedures, organisational provisions...).

For clarity, systems such as steam driven pumps, systems with stored energy in gas tanks etc. are considered to function as long as they are not dependent of the electric power sources assumed to be lost and if they are designed to withstand the initiating event (e.g. earthquake)

b) Loss of off-site power and of on-site backup power sources (SBO) Two situations have to considered:

- • LOOP + Loss of the ordinary back-up source;
- • LOOP + Loss of the ordinary back-up sources + loss of any other diverse back- up sources.

For each of these situations:

- Provide information on the battery capacity and duration.
- Provide information on design provisions for these situations.
- Indicate for how long the site can withstand a SBO without any external support before severe damage to the fuel becomes unavoidable.
- Specify which (external) actions are foreseen to prevent fuel degradation:
    - o equipment already present on site, e.g. equipment from another reactor;

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[2] All offsite electric power supply to the site is lost. The offsite power should be assumed to be lost for several days. The site is isolated from delivery of heavy material for 72 hours by road, rail or waterways. Portable light equipment can arrive to the site from other locations after the first 24 hours.

- assuming that all reactors on the same site are equally damaged, equipment
- available off-site;
- near-by power stations (e.g. hydropower, gas turbine) that can be aligned to provide power via a dedicated direct connection;
- time necessary to have each of the above systems operating;
- availability of competent human resources to make the exceptional connections;
- identification of cliff edge effects and when they occur.

- Indicate if any provisions can be envisaged to prevent these cliff edge effects or to increase robustness of the plant (modifications of hardware, modification of procedures, organisational provisions...)

c) Loss of primary ultimate heat sink (UHS[3])

- Provide a description of design provisions to prevent the loss of the UHS (e.g. various water intakes for primary UHS at different locations, use of alternative UHS, ...)

Two situations have to be considered:

- Loss of primary ultimate heat sink (UHS), i.e. access to water from the river or the sea;
- Loss of primary ultimate heat sink (UHS) and the alternate UHS.

For each of these situations:

- Indicate for how long the site can withstand the situation without any external support before damage to the fuel becomes unavoidable:
  Provide information on design provisions for these situations.
- Specify which external actions are foreseen to prevent fuel degradation:
  - equipment already present on site, e.g. equipment from another reactor;
  - assuming that all reactors on the same site are equally damaged, equipment available off-site;
  - time necessary to have these systems operating;
  - availability of competent human resources;
  - identification of cliff edge effects and when they occur.
- Indicate if any provisions can be envisaged to prevent these cliff edge effects or to increase robustness of the plant (modifications of hardware, modification of procedures, organisational provisions...).

d) Loss of the primary UHS with SBO

- Indicate for how long the site can withstand a loss of "main" UHS + SBO without any external support before severe damage to the fuel becomes unavoidable
- Specify which external actions are foreseen to prevent fuel degradation:
  - equipment already present on site, e.g. equipment from another reactor;
  - assuming that all reactors on the same site are equally damaged,

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3 The connection with the primary ultimate heat sink for all safety and non safety functions is lost. The site is isolated from delivery of heavy material for 72 hours by road, rail or waterways. Portable light equipment can arrive to the site from other locations after the first 24 hours.

equipment available off site;
  - availability of human resources;
  - time necessary to have these systems operating;
  - identification of when the main cliff edge effects occur.
- Indicate if any provisions can be envisaged to prevent these cliff edge effects or to increase robustness of the plant (modifications of hardware, modification of procedures, organisational provisions…)

Severe accident management

This chapter deals mostly with mitigation issues. Even if the probability of the event is very low, the means to protect containment from loads that could threaten its integrity should be assessed. Severe accident management, as forming the last line of defense-in-depth for the operator, should be consistent with the measures used for preventing the core damage and with the overall safety approach of the plant.

a) Describe the accident management measures currently in place at the various stages of a scenario of loss of the core cooling function:

- before occurrence of fuel damage in the reactor pressure vessel/a number of pressure tubes;
  - last resorts to prevent fuel damage
  - elimination of possibility for fuel damage in high pressure
- after occurrence of fuel damage in the reactor pressure vessel/a number of pressure tubes;
- after failure of the reactor pressure vessel/a number of pressure tubes;

b) Describe the accident management measures and plant design features for protecting integrity of the containment function after occurrence of fuel damage

- prevention of H2 deflagration or H2 detonation (inerting, recombiners, or igniters), also taking into account venting processes;
- prevention of over-pressurization of the containment; if for the protection of the containment a release to the environment is needed, it should be assessed, whether this release needs to be filtered. In this case, availability of the means for estimation of the amount of radioactive material released into the environment should also be described;
- prevention of re-criticality
- prevention of basemat melt through
- need for and supply of electrical AC and DC power and compressed air to equipment used for protecting containment integrity

c) Describe the accident management measures currently in place to mitigate the consequences of loss of containment integrity.

d) Describe the accident management measures currently in place at the various stages of a scenario of loss of cooling function in the fuel storage (the following indications relate to a fuel pool):

- before/after losing adequate shielding against radiation;
- before/after occurrence of uncover of the top of fuel in the fuel pool
- before/after occurrence of fuel degradation (fast cladding oxidation with hydrogen production) in the fuel pool.

For a) b) c) and d), at each stage:

- identify any cliff edge effect and evaluate the time before it;
- assess the adequacy of the existing management measures, including the procedural guidance to cope with a severe accident, and evaluate the potential for additional measures. In particular, the licensee is asked to consider:
  - the suitability and availability of the required instrumentation;
  - the habitability and accessibility of the vital areas ot the plant (the control room, emergency response facilities, local control and sampling points, repair possibilities);
  - potential H_2 accumulations in other buildings than containment ;

The following aspects have to be addressed:

- Organisation of the licensee to manage the situation, including:
  - staffing, resources and shift management;
  - use of off-site technical support for accident and protection management (and contingencies if this becomes unavailable);
  - procedures, training and exercises;
- Possibility to use existing equipment;
- Provisions to use mobile devices (availability of such devices, time to bring them on site and put them in operation, accessibility to site);
- Provisions for and management of supplies (fuel for diesel generators, water...);
- Management of radioactive releases, provisions to limit them;
  Management of workers' doses, provisions to limit them;
- Communication and information systems (internal, external).
  Long-term post-accident activities.

The envisaged accident management measures shall be evaluated considering what the situation could be on a site:

- Extensive destruction of infrastructure around the plant including the communication
- facilities (making technical and personnel support from outside more difficult);
- Impairment of work performance (including impact on the accessibility and habitability of the main and secondary control rooms, and the plant emergency/crisis centre) due to high local dose rates, radioactive
- contamination and destruction of some facilities on site;
- Feasibility and effectiveness of accident management measures under the conditions of external hazards (earthquakes, floods);
- Unavailability of power supply;
- Potential failure of instrumentation;
- Potential effects from the other neighbouring plants at site.

The licensee shall identify which conditions would prevent staff from working in the main or secondary control room as well as in the plant emergency/crisis centre and what measures could avoid such conditions to occur.

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Annex II

The national nuclear safety authorities should remain associated with this process to facilitate an overall coherent response with respect to prevention, management and mitigation issues. They would share within ENSREG any recommendation that they believe will contribute to the overall response to the stress test exercise.

Progress on these issues should be included in the report to be made by the Commission to the December 2011 European Council.