

First Public Meeting on the EU stress test

2012-01-17

My name is Kühni. I'm here for Greenpeace Switzerland.

I have a question for Mr. Stritar.

First let me thank you for the insights into the conception of the stress test you provided this morning. In your presentation and some others, WENRA Reference Levels were repeatedly mentioned.

Before I come to my question I'd like to add some additional, **argumentative** details about these Reference Levels.

First, when the Reference Levels were presented in 2005, they were accompanied by the WENRA Policy Statement, **signed** by all the heads of the members' Nuclear Safety Authorities. This covers all the Nations that partake in the EU stress test today, with the exception of Ukraine. The WENRA Policy Statement **promises boastfully** and I quote "Hence we are committed, **by the year 2010** to improve and harmonize our nuclear regulatory system, using **as a minimum** the reference levels". Here we are **2012** and this is the first europe-wide harmonized safety test performed by **exactly these regulators!** Ukraine is excused.

Second, what everybody should know is that these Reference Levels are **specifically** and **exclusively** intended for **existing** nuclear power plants, **not** new

ones. This has been misrepresented in the past.

Let me quote from the WENRA web site: „The first task of the Reactor Harmonization Working Group was to develop safety reference levels (RLs) for **existing** nuclear power plants. “ Later it goes on “After the reference levels were published for the **existing** nuclear power plants, [Reactor Harmonization Working Group] initiated work with new reactors.”

This means that the Reference Levels do apply to **all** the old plants, regardless of age or date of licensing. To state it more clearly: the Reference Levels already include **all the leniency** towards old designs that **can** be justified.

This is very important, as the Reference Levels include important **minimal** Standards such as Issue E “Design Basis Envelope for Existing Reactors” and Issue G “Safety Classification of Structures, Systems and Components”.

So my logical question to you, Mr. Stritar, is:

Can you assure the Citizens, that the EU stress test **reviews will** “as a minimum” be subjected to the rules and obligations imposed by the WENRA Reference Levels, perhaps with the exception of the Ukraine, Yes or No?

And - perhaps foolishly - hoping for a Yes ;-) I'm asking the next question. What is the **accountability** on that? Can NGOs demand a follow up on **documented violations** of said Reference Levels if in the end they “escaped” the national Regulators and Reviewers?

Earlier Mr. Stritar suggested that the trust has been removed from the picture. If I understand correctly, public involvement, Openness and Transparency are the means adopted by the ENSREG to reinstall that trust, to a degree.

The peer review is the first opportunity to check safety outside the national regulator scope.

So I was very disappointed, when I learned that public suggestions are only welcome for **procedure** related issues, not for national reports and certainly not for plant specific reports.