



MINUTES OF THE MEETING OF NUCLEAR TRANSPARENCY WATCH – WORKING GROUP ON EMERGENCY PREPAREDNESS AND RESPONSE

June 9 & 10 2014

Conference Center Albert Borschette-CCAB (EC premises), room 3 B (3rd floor) –

36, rue Froissart, B-1040 Brussels

LIST OF PARTICIPANTS

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¹ Only on June 9 2014

Agenda

Monday, June 9 2014

13:30 – 14:00	Registration of the participants
14:00 – 14:30	Welcome address by the organisers and the representative of the EC DG Energy Mr Bart Castermans
14:30 – 15:00	Methodology of information collection on EP&R- <i>Nadja Železnik, REC Slovenia</i>
15:00 – 16:00	Report by individual countries on the progress on information collection on EP&R
16:00 – 16:30	Discussion on information collection on EP&R
16:30 – 17:00	Coffee break
17:00 – 18:00	Report on Round Table on NPP Cattenom <i>Andrej Klemenc (REC)</i>

Tuesday, June 10

9:00 – 9:20	Report on preparatory activities on EP&R RT in Bulgaria <i>Albena Simeonova (FEA) or Boris Sandov (Zelenite)</i>
9:20 – 9:40	Report on preparatory activities on EP&R RT in France <i>Yves Lheureux (ANCCLI)</i>
9:40 – 10:00	Report on preparatory activities on EP&R RT in Czech Republic <i>Jan Haverkamp (Greenpeace)</i>
10:00 – 11:00	Information on plans of NTW activities in 2015 and discussion <i>Michele Rivasi – president of NTW</i>
11:00 – 11:20	Coffee Break
11:20 – 11:40	Report on preparatory activities on EP&R RT in Slovenia <i>Nadja Železnik (REC Slovenia)</i>
11:40 – 12:00	Report on preparatory activities on EP&R RT in Ukraine <i>Zoriana Mischuk (Mama 86)</i>
12:00 – 12:20	Report on preparatory activities on EP&R RT in Poland <i>Jerzy Niczyporuk and Marcin Harembski</i>
12:20 – 13:00	General discussion on EP&R Round Tables
13:00 – 14:00	Lunch
14:00 – 15:00	Bilateral meeting on cross-border EP&R round tables

² Only on June 10 2014

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INTRODUCTION TO THE MEETING

After welcome of the chair of the EP&R WG Ms Železnik and technical announcements of Mr Klemenc the participants were address by the representative of the EC DG Energy **Mr Bart Castermans** who presented himself as an expert on nuclear waste policy that is not familiar in details with the issues of EP&R and EC policy in the field. He emphasised the commitment of the EC to strengthen the safety of nuclear reactors and improve EP&R provisions in the EU. EC DG Energy also welcomes and will maintain its support to endeavours of the civil society for providing more transparency on nuclear issues.

Ms Železnik thanked to the EC DG Energy for its support of NTW EP&R, explained roots and mission of the NTW and its WG EP&R. She pointed out that within NTW there are different, even opposing views on the role of nuclear energy in energy supply therefore NTW should not be regarded as an anti-nuclear network but at very first as a network that strives for more transparency and inclusion of civil society and the public also by promoting and using Aarhus, Espoo and Kyiv conventions and other tools for open and transparent dialogue among all stakeholders in processes related to nuclear fuel cycle.

After brief presentation round of all participants **Ms Železnik** asked Mr Castermans on the actual status of ENCO study and the position of EC DG Energy to the study and its results.

Mr Castermans explained that ENCO study is in procedure of assessment and evaluation by the EC yet it is not yet clear when the EC will make its final statement.

Mr Boutin recalled the case of EP&R exercise in French NPP Cattenom that in his opinion demonstrated that French government does not know how to deal with EP&R in practice and expressed his concerns about the effects of EC policies and measures for actual improvements in the field.

As the president of NTW **Ms Rivasi** emphasised that NTW it is also about making EU institutions to work for the people and create an European identity since it is evident that nuclear safety issues cannot be solved at national level and without inclusive approach and expertise available also for those does not have direct benefits from the activities of nuclear industry.

Mr Harembski emphasised importance of civil monitoring of nuclear developments also in EU member states which plan to introduce domestic nuclear energy generation or build new nuclear facilities (or upgrade existing ones). He warned from policies of nuclear industry to invest in countries with relatively short experience with modern civil society participation and weaker institutional

capacities for fair assessment of nuclear risks and alternatives to nuclear energy which is a case of Poland.

In the opinion of **Ms Mischuk** by providing strong commitment to nuclear safety and inclusive governance in nuclear field the EU is not only playing the role of “shining example” but is also influencing more transparent and democratic decision making in countries that are like Ukraine aspiring for more democratic rule and better nuclear safety in general.

METHODOLOGY OF INFORMATION COLLECTION ON EP&R

Ms Železnik recalled the methodology on assessment of nuclear EP&R provisions in individual countries and their practical implementation and relevance as developed after WG EP&R inception seminar in Paris in February this year. She stressed the importance of “checking the reality” of EP&R provisions that have been identified by ENCO study only to a level that “they exists on paper”. She also stressed the necessity to identify those stakeholders that actually play crucial role in emergencies like medical doctors, teachers, fireman etc. She expressed her concerns on the state of the art of the EP&R in practices since even nuclear regulatory bodies admits that many provisions that are administratively at place would in practice functioning poorly due to for example lack of calibrated instruments or the people that could use them appropriately or because those instruments might not be stored in a way to be easily put in function in a case of emergency. There are many nuclear emergency drills in Europe but a few evidences that lessons from those drills have been learned and turned into improved provisions and actions. There are also evidences of the problems of provision of in time, coherent and easy to understand information to the people in case of major nuclear accident as well as evidences of not enough efficient and coordinated cross border cooperation in case of an emergency between regulatory and decision making bodies. The later has been recently also recognised by HERCA. The task of NTW WG EP&R is however not only to register at full scope those evidences and make them visible within the countries and on the EU level but also to identify and propose both conceptual and practical solutions to improve EP&R in practice in terms of “total quality management”.

Mr Heriard Dubreuil pointed out that WG agreed to go beyond ENCO study top desk work approach and “check the reality” yet it is also important to check if a conventional approach to emergencies can work out in case of nuclear emergency at all. He asked if we can after lessons from Fukushima accident still firmly believe that people would in case of emergency stay where they are, wait for information and instructions from authorities and then act according to those instructions. In his opinion it is much more probable that the people will try to use modern communication technologies and search for different information sources where one can with large probability expect that information provided by (foreign) sources that are alternative to the official bodies would be more trustful. People will not simply stay and wait to authorities to deliver iodine pills, provide shelter or evacuate them but will actively search for information and make their own choices and decisions. The real challenge for NTW is to identify social networks, credible sources of information and structures of trust that are needed for social action in case of an nuclear accident that is as social phenomenon by its nature a chaotic event.

Mr Boiley made a point by stressing the importance of the activities of the WG and its members not to focus only on preparedness activities but to address post emergency issues based on the experiences gained from Fukushima accident that showed how can interference of natural catastrophe, inadequate nuclear safety technical solutions and poor safety culture leads to a disaster in a technological advanced society.

Ms Železnik pointed out that Fukushima accident also provided evidence for “artificial” nature of division of emergency and post emergency since emergency lasted for 8 months therefore EP&R should be also adapted for recovery phase where challenges are different.

In the opinion of **Mr Haverkamp** there is not a single member state where everything is even broadly in compliance with very abstract EU EP&R requirements. It should be also acknowledged that conclusion of ENCO study that technical differences can be objectivised but are causing confusion in public confidence is a value judgment. The problem is that this is not evident to the authors that should rather than attempt to calm down the public and “regain the credibility” by “harmonisation” explain those differences because this is exactly where the problems lay at very first. Public confidence is a result of the good work that has not been done yet regarding EP&R in the EU and beyond. ENCO study has its merits but is by its approach technocratic therefore WG should not lose too much time with it. WG primary task is rather to give good evidence for many examples of non-functioning or malfunctioning provisions that will challenge ENCO study approach and can provoke EC to go beyond ENCO study approach.

Mr Boiley agreed with Mr. Haverkamp about the ENCO study problems. ENCO is very technical and technocratic. We should not have only technical approach. Authorities have the tools but population will not trust the authorities and this will be a problem. The view of a naive citizen who would be affected by an accident is the ground of our work. In case of emergency first concern of parents is »are my kids safe at school«. At each school there is a need of measurement instruments, means of communication with the parents... Nuclear safety should become an issue of a society and not exclusively of the state. Yet new French national EP&R master plan is not changing the paradigm and is not taking into consideration lessons from Fukushima. CLIs should at least try to change that during the design and approval of local EP&R plans that is scheduled for Autumn this year.

Mr Heriard Dubreuil emphasised the importance of the way how to re-build confidence during and after emergency in situation of plurality of information sources and options to act from individual perspective. The real emergency problem is the danger of contamination and not only at very first that problems related to »fear communication«. Long term contamination need to be addressed since it cannot be removed from the environment in general. So people will have to learn how to deal and live with radioactivity.

Ms Rivasi agreed that confidence can be only gained on plurality and not on monopoly of information. A state cannot provide effective and efficient solutions to citizens but can and should provide support to civil society to address and solve nuclear preparedness, emergencies and post emergencies issues from various perspectives and by plurality of solutions.

Ms Deront asked whether each country is free to choose its own national investigation approach as long this is in line with agreed methodology.

Ms Železnik confirmed that the approach depends very much on each country respectively each organisation involved. Nevertheless besides common methodology and questionnaire, two ways approach of in field investigation (by search of published sources, interviews and questionnaire etc) and multi-stakeholder round tables should be followed.

INFORMATION COLLECTION ON EP&R

Mr Haverkamp pointed out that questionnaires yields quite general answers but it should be also searching for concrete examples of good practices and problems that are addressed by legislation.

Ms Železnik stated that in Slovenia and most probably also in many other countries responsible people are aware of the problems but are not willing to speak in public on that and/or has have not been addressed by ENCO study. In the opinion of Mr Haverkamp EP&R round tables should bring evidence for that.

Mr Klemenc stated that this evidence might lose its credibility if rather authoritarian communication culture of state authorities on nuclear issues will be challenged by anti-nuclear design of round tables. NTW should next to be well equipped with expertise on weak safety of nuclear reactors and lack of adequate of EP&R provisions and tools also equipped with “naïve” expectations and beliefs that dialogue with the other side makes sense and can lead toward improvements even if the final objective is out of reach of NTW mission. He recalled on fairly tail of H.C. Andersen where innocence of child’s look is a precondition to bring the evidence that the emperor is naked. If the same would be stated by a radical anti-royalists this would have lead to a civil war. If NTW round tables will be designed as “invitation to its own funeral” to a nuclear industry than they will fail to provide practical evidence of inadequate information, poor safety culture and EP&R malfunctioning. In order to change culture of communication and decision making one should invite “the other side” already in design and preparation of a round table and not only to an already designed round table. Only in this manner one can avoid social construction of “the Other” within a critical discourse on nuclear energy. The question however remains what to do when the authorities and nuclear industry is either non-responding or is using its power to undermine any conclusions by investing in “expertise based supported doubt production industry”.

Mr Heriard Duberuil emphasised the importance of the plurality of the round tables where no one should be put in a corner. The strength of the round table on EP&R on Cattenom organised in Schengen on May 17 2014 was that it was organised completely independently by money out of the pockets of considered citizens and provided good independent expertise on the safety design of NPP Cattenom. However the meeting has lacked plurality.

Mr Boutin recalled his experience as an observer on Cattenom EP&R exercise under the cover of a status of an elected local official. He was completely ignored by authorities who neglected him to play any role but to obey and follow the orders. In France EP&R drills looks military drills alike and they do not tolerate anybody who has different statement on nuclear energy. By starting the dialogue with CLIs and ANCLLI French authorities are first learning how to approach nuclear issues in a more civil and civilised manner. What happened at round table in Schengen was just a natural

reaction to the way of communication and decision making of French authorities when they are faced with brave, critical and knowledgeable people in the field of nuclear safety.

Mr Heriard Dubreuil noticed that NTW EP&R round tables should not be organised only as a reaction on public policies but as an attempt to change it to make proposals and enable discussions that put things forward through dialogue, using tools provided by Aarhus and Espoo conventions as well as national “right to know” and “right to be listen to” legal provisions.

Ms Rivasi reminded the participants that the goal of NTW EP&R round tables should be to provide upstream information to know what should be done in case of a nuclear emergency prior to an emergency event. The problem is that in many contexts one has to deal with a “military system” and by simply being good tampered and naïve one can indeed only provide democratic legitimisation of undemocratic practices. We should insist to get clear answers on concrete questions like where and how the people will be evacuated or what the authorities are planning to do if the people will start “wild evacuation”. In approaching the officials one should avoid to send them only the questionnaire or send them questionnaire first but should rather approach them by informal interview and first afterwards send the questionnaire. Then one would be able to compare what the officials are really concerned and what they really think with what they suppose they should be concerned and think of in order to stay on their positions and develop their carriers. In this manner one should take the power of information away from the authorities that are operating in a military mode.

Mr Haverkamp warned from the danger that NTW EP&R will be marginalised within overall nuclear national and EU debates or even used to put lipstick of democracy to an authoritarian face. If there would not be people who are in principle against nuclear energy some very important questions will not be addressed at all. As for round tables on EP&R in France now it is the ANCLLI's turn and they should also invited Greens of Fichtelgebirge and Greenpeace Luxemburg to be active already by designing the agenda and list of speakers for the round table in France and to take part as guests on the event. In many cases the problem is not that one might intend to clamp down the nuclear industry and state authorities or kick them in corner but that both the industry and the authorities are in the corner soon after factual debate on safety and EP&R starts. The danger of the conventional RT is that one or the other side is afraid to be in a kicking corner. Round tables are good to pick up hot issues however for factual discussion is better that they are followed by the work in small groups. We should therefore think to change the set-up of the agenda and the structure of our round tables. In his experience from discussion on reactor ageing critical experts can work perfectly well in small groups without Greenpeace branding. The other possibility is to take part on RT organised by the authorities and make »wild participation« backed up by credible anti-nuclear brands like Greenpeace. The third option is to have anti-nuclear round tables that will provoke feedback from authorities. Also here one solution does not fit to all situations.

ROUND TABLE ON NPP CATTENOM AND THE FUTURE DESIGN OF NTW EP&R ROUND TABLES

Mr. Klemenc presented in brief the round table on EP&R of NPP Cattenom that was organised in Schengen on May 17 2014 by the Greens of Fichtelgebirge and “Cattenom non-merci!” civil initiative from Germany. In the opinion of Mr Klemenc the round table provided very valuable and substantialised information of safety deficiencies of the NPP Cattenom and on terrorist threats to

NPP in general yet it failed to bring together relevant authorities from neighbouring countries – with an important exception of radiation protection authorities from Luxemburg as well - and CLI Cattenom and ANCLLI although all have been invited by the organisers. Authorities from German federal states of Rheinland Pfalz and Saarland however provided written answers on NTW WG EP&R questionnaire. Round table also failed to provide more detailed information on EP&R provisions at NPP Cattenom since this was not in the main focus. Main messages from the round table are very straight and clear: NPP Cattenom needs to be immediately shut down till main safety deficiencies will not be solved, no NPP can withstand crash with a supersonic military airplane or with very large commercial airplane; emergency personal need to very fluent in English in order not to lose time with translation by coordinating cross-border activities in a case of an emergency. At the end of his presentation Mr Klemenc raised question on fruitfulness of straight anti-nuclear approach in organising round tables for participation of NPP operators and authorities and proposed reflectively “naïve” and good tampered approach that should focus at very first on EP&R issues. He also proposed to organise round tables in two parts where one part is dedicated to nuclear safety issues since it is clear that those issues cannot be put under the table when discussing emergency situations in NPPs.

Mr Niczyporuk proposed two aspects to be added to the agenda of the round tables: working on awareness on the consequences of radiation doses to the population in terms of birth defects, future generation mutations and infertility. Real data on this matter from Hiroshima, Nagasaki, and Chernobyl are needed. People should be also well informed that there is no real liability, insurance and compensation in case radioactive catastrophe.

Mr Boilley proposed to have a bottom up approach and start questioning from a perspective of ordinary people. It can be expected that in a case of emergency 90% of the population will flee and the question is to give them a possibility to do that in best possible way - measurement instruments in neighbouring villages etc. Some knowledgeable people need to be trained to use instruments that need to be placed in early.

Mr Sandov suggested that more moderation and more professional should be engaged.

Ms Simionova expressed her disappointment on what she has heard on the nature of nuclear discussion in Western Europe since she was convinced that the state of the art of the discussion is like that only in new member states and in Eastern Europe. She emphasised very unstable political situation in most of the Balkan countries where political change after election can completely change the nature and dynamics of discussion on nuclear issues – one day the critical voices are welcome yet the other are in best case ignored. EU should strive for implementation of that will not change by each new government.

Mr Heriard Dubreuil reminded that EU gives us tools to put pressures on governments like directives on wastes. National plan for managing wastes are however outside the scope of EP&R. There will be soon also legal tools regarding reactor ageing.

Mr Demet mentioned dual paradox of the situation in France where there is gap between national and regional EP&R plans while on the other side the state does not take into consideration cross-border EP&R. Local politicians are reluctant to deal with evacuation plans. In his opinion crises exercise should be defined at EU level.

Mr Lheureux emphasised that also according to the experience from EP&R exercises in France people will take their own decisions which is not enough taken into consideration by the national plan.

Ms Mischuk recommended to avoid »us« against »them« discourse since at least in Ukraine the government is not speaking with one voice but different ministries and governmental organisations are critical to the other therefore one can find weaknesses and deficiencies and profit out of them. Also NGOs are not speaking with one voice and it is important to include NGOs who dealing with social issues since they are indeed grass-root.

Mr Glorieux emphasised the importance of the situation of NPPs that are situated close to national borders where the different counties have different EP&R procedures that will complicate the situation and put people in doubts and anger. Collaboration on EP&R harmonisation needs to be in his opinion strengthened but it is also important to eliminate huge difference between »paper« and »reality« and take into consideration important “banalities” like the situation in Belgium where fire brigades only have one good set of tyres that is switched from one vehicle to the other when the vehicle is driven to technical inspection.

Mr Heriard Dubreuil presented his impression on the conclusions from Round Table on Cattenom. Based on the conclusions one can conclude that the round table addressed several purposes such as the nuclear safety of the Cattenom NPP on the one hand and EP&R provisions in this context on the other hand. Several experts have participated and notably a representative of the HERCA group of Radiation Protection Authorities. Since the organisers did not succeed in bringing a plurality of stakeholders (for parties were reluctant to participate in this meeting) in the meeting, the discussions was not as informative as they might have been. This first experience of EP&R RT should draw the attention of the organisers of future EP&R RT to dedicate more attention to the creation of conditions for the different parties to come into the same room for an equitable dialogue. This should in particular result in involving the several parties during the preparation stage rather than inviting them when the framework is already settled. He also suggests the preparation of guidelines for future organisers of RT that would notably be based on previous experience of Aarhus Convention & Nuclear RT (2008-2013).

Mr Haverkamp underlined importance of focusing on one NPP – like it was case on the round table in Schengen where also trans-boundary issues has been highlighted by Mr Majerus – when organising round tables and avoid speaking about general EP&R plans. As for participation from France on the round table in Schengen he pointed out that the organisers invested a lot of efforts to assure participation of NPP operator, authorities and CLI Cattenom however without success. He was especially surprised of the rejection of CLI Cattenom to participate on the discussion based on argumentation that the event is too antinuclear. German authorities have at least answered the questionnaire. “Cattenom - non merci!” initiative should be applauded for its efforts and it was good that the Luxemburg radiation protection authorities took part on the event. Round table on Cattenom was a very good event with a lot of relevant conclusions and NTW can learn a lot out of the event. It is important that everybody except that there are different views on the table. One should also take into consideration that in Germany exists only confrontation platforms on nuclear issues therefore it would be good if ANCLII would take part on next round tables to provide an example of co-operative platform. Only in this way NTW can overcome differences in national policy style and

platforms and avoid dominance of national identity politics and discourses when discussing nuclear issues internationally. NTW should use round table to make local people more aware on Aarhus and Espoo convention which are by none of the state authorities in any country considered as they should be. Not only France has a problem with implementation of Aarhus convention but also Germany where it is believed that everything is perfectly set already by their legal order.

Mr Demet explained the reasons why ANCLII has not taken part on round table on Cattenom. He pointed out that ANCLII has not obstructed the event but would have needed more time to prepare for it in order that its internal democratic rules would have been respected. He also stressed that there are 4 cross-border CLIs which are very different but each CLIs is independent from ANCLII therefore ANCLII cannot give them orders what to do. At present ANCLII is focused on the issue of national EP&R plan and its transposition into local plans where ANCLII has difficulties with the authorities to present and explain guidelines and take into consideration the proposals of CLIs. ANCLII has capacities to accept opposing views and to deal with them and has managed to have a report that was co-subscribed by the French nuclear authorities as well as by ANCLII and Greenpeace.

As the president of ANCLII and CLI Gravelinne Mr Delalonde emphasised the importance of NTW for creation of political culture where opposing opinion can be freely expressed and participants accept to listen each other although they disagree. He pledged to attract in NTW more organisations and individuals that have not principal anti-nuclear statements in order to demonstrate that NTW is not an anti-nuclear organisation.

Mr Haverkamp proposed to ANCLII to organise new round table on EP&R of NPP Cattenom II in partnership with French authorities and with participation of the organiser of the first round table.

Mr Demet explained that ANCLII set up cross-border WG on emergencies and already began to set up new round table on Cattenom that will include also nuclear safety authorities, however it is still too early to define exact time of the new round table.

Mr Boutin stressed the importance of NTW to avoid being pro or anti-nuclear advocates and reminded on aggressiveness and arrogance of nuclear industry that are in his opinion provoking aggressive answers of those who are critical to nuclear energy. The aggression comes from the system and anti-nuclear people just reflect it. It is not possible to have a non-partisan debate unless fair access to all relevant information and transparency are assured. In many cases authorities are getting ignorant or even aggressive even when people are only addressing them questions they would need to answer by law. The state and nuclear industry should stop to attack protests against their own ignorance and “nuclear omerta” and start to provide information and answers. Until this will not happen we will always have on our round tables people that will at very first express their anti-nuclear statements because this is the only place they can speak in public about their fears and frustrations.

Tuesday, June 10 2014

LESSONS FROM FUKUSHIMA

Mr Boilley recalled the fact that nuclear disaster in Fukushima Daiichi NPP in March 2011 was not the result of a natural catastrophe as it was claimed by the NPP operator TEPCO but a man caused disaster as confirmed by 3 independent reports (set by government, parliament and a private foundation). 90% of the workers escaped from Daiichi NPP on the 4th days. In the sheltering zone, most people fled and nobody wanted to come in the emergency zone where there were helpless old and sick people left behind. In some hospitals in Fukushima medical doctors and nurses were missing because some escaped from fallout zone.

Writing EP&R plans is not enough: there should be some people to execute it. The right to retract in case of a nuclear emergency is a very serious issue that should be addressed.

After Fukushima in Japan the trust in existing nuclear safety authorities have been lost completely. New nuclear regulation agency have drawn new EP&R plans that defined evacuation zones in case of any larger accident in the area of 0 – 5 km from a NPP and preparation zones in the area from 5 to 30 km. All municipalities in both zones have been directed to prepare new evacuation plans that also include estimation of evacuation times.

Mr Glorieux emphasised the fact that in case of Fukushima disaster psychological factors have been underestimated and proposed that the working group should put more emphasis on their impact on emergencies.

Ms Železnik provided to the participants information on the work of international forum focusing on stakeholder engagement called ICRP dialogue initiative (www.icrp.org/page.asp?id=189). It was established in autumn 2011 as cooperation between ICRP members and Fukushima Prefecture, several cities and villages in Japan, civil society organizations and universities in Japan, other international (France, Norway and Belarus) and national institutions related to radiation protection. The aim was to organize a forum to stimulate a dialogue with all concerned parties in the Fukushima Prefecture, and to identify the problems and the challenges of the rehabilitation of living conditions in the long-term contaminated territories. Some conclusions are very related to psychological consequences of the Fukushima accident.

THE FUTURE PROSPECTS AND ACTIVITIES OF NTW

Ms Rivasi explained to the participants her view on the future perspective of NTW. Three main pillars remain: ageing of reactors, management of radioactive wastes (with the focus on how civil society is involved) and EP&R WG. The task of working groups will be to raise questions, address them to the responsible authorities and put pressure on the authorities to provide well explained and comprehensive answers. First then conclusions should be drawn and send to policy and decision makers as well to the public. Questionnaires are an important tool yet it is to be recommended not to rely on written answers but it would be better to get some oral answers through informal contacts with the experts and the officials and first afterwards address them with a written form questionnaire. NTW representative will take part on conference on Aarhus convention on July 2 in

Maastricht. It is expected that the new government in Ukraine will comply to the Espoo convention. Ms Rivasi explained the relevance of Espoo Convention for environmental impact assessment of both new reactors and even more for life span extension of the existing reactors since most of the existing reactors in Europe are close to the end of their planned life time however many of them are planned to be refurbished to operate for additional 20 – 40 years. It is however not clear yet if Espoo convention also affects reactors that are not situated (or planned to be situated) close to the borders. In order to be able to deal with those and other issues and to extend the network NTW should start to seek for new funding opportunities not only at the EU level but also within each country of the origin of its members by the members. NTW already contacted 10 foundations and with 6 that demonstrated interest to support NTW activities further contacts will be undertaken. As from present arrangement with Foundation for the Progress of the Humankind we can in best case hope that in 2015 will remain at the present level.

Mr Haverkamp emphasised the importance of the environmental impact assessment (EIA) provisions of the Espoo convention on extension of operation licence as indicated by its Implementation Committee. After remark of Mr. Herirard Dubreuil and Dement that in France EIA is needed for new reactors whereas life-span extension only requires new safety review Mr Haverkamp explained differences in EIA approaches and pointed out that in case of life-span extension safety review should not be sufficient since in decades after start of operation of an NPP also environment might have changed significantly (for example there might be more tourist facilities in the vicinity) therefore not only new safety review but also new EIA should be required.

Followed the intervention of Mr Haverkamp **Mr Lheureux** explained that CLIs in France are involved in life-span extension and safety of NPP however not EIA therefore it is very important to have a clear pictures on impact of Espoo convention on EIA in case of life-span extension in France.

In the opinion of **Ms Rivasi** one of the priority tasks of NTW should be to explore transposition of Espoo convention in national legislation and its impact on IEA in case of life-span extension of NPPs. This issue should be however also addressed to EU commissioners Oettinger and Potočník.

Mr Demet was curious on NTW activities regarding nuclear waste management directive.

Mr Haverkamp reminded that plans for management of nuclear wastes should be delivered by national authorities to the EC till August 15 2015 yet the strategic environmental impact assessment is envisaged only for transport, storages close to borders and reprocessing plants.

In the opinion of **Mr Boilley** main issues for the public are safety and waste management therefore they should be in the focus of NTW activities however also energy policy in the EU general should be put in consideration. If Germany will continue with its activities to abandon commercial use of nuclear energy this will have consequences all across the EU and for the EU nuclear policy.

Ms Simionova emphasised that NTW should also needs to take a look on the situation from a perspective of EU periphery. Bulgaria is in terms of energy supply almost completely dependent from Russia and this will not change soon regardless to EU energy policy. Another important aspect is that many young people in recent decade left the country and in the vicinity of NPP only old and poor people are living that are far from sight of the authorities and can hardly put any pressure on the authorities to improve EP&R. They are left behind and do not know what to do in case of an

emergency. Therefore NTW should both involve people and exercise some external pressure on the NPP Kozloduj operator and authorities regarding improvement of safety and EP&R.

Mr Demet reminded that NTW in few months succeeded to get recognised and involved in decision making and emphasised the importance to involve in NTW activities more members of newly elected European Parliament. In his opinion without successful lobbying NTW cannot reach its objectives therefore lobbying should be one of NTW's priorities.

Mr Delalonde emphasised that the gap between local decision making and centralised state planning should remain within the focus of NTW. NTW should insist on demand on well prepared and with due diligence exercised crises exercises and their quality evaluation because they raise awareness, create lively debates and involve strong human moments where barriers between people and institutions involved might be removed.

In the view of **Ms Mischuk** EU policies are important for Ukraine from the perspective of the EU integration also in the field of transparency and public participation. New government is drafting new law on EIA that should open space for public consultations and in general positive developments are expected.

Mr Haverkamp pointed out that in spite public consultations under Espoo convention are not mandatory that does not mean that public participation should not be taken into a due account. More pressure on the authorities to argument better when rejecting requests of a civil society is needed. More legal complaints should be started where there is no due account for example where »reasonable alternatives« are not taken into consideration. Lack of assessment »beyond design accidents« also needs to be taken into consideration. That however does not mean that every country needs to be prepared for massive evacuation for each new NPP. As for lack of assessment of nuclear waste one should have the idea what to do with the waste prior to construction of NPP.

Mr Boutin expressed his concerns regarding public participation practices that often turn into pure rituals and only rubber stamp what has been decided behind closed doors. He called for increased capacities for counter expertise as a powerful weapon for more transparency and substantive role of civil society in decision making.

Mr Demet expressed doubts regarding participative democracy that too often turns into hypocrisy. He warned from the attempts of the authorities to treat as terrorism symbolical violence (as carried out for example by Greenpeace) that aims to rise attention of the public on the nuclear issues and demonstrate weak points of nuclear safety. ANCCLI resisted against exclusion of Greenpeace from nuclear policy arena and achieved that Greenpeace is considered as a partner in the dialogue with the authorities.

According to **Mr Herirad Dubreuil** participative democracy is a form where state remains responsible for the common good. NTW and Aarhus convention have other perspective – we are all responsible for common good – but this is not public participation. NTW therefore needs to carry out of constant pressure – including legal tools. NTW needs to ask when and how public consultations will be carried out and get involved into the semantics and agenda settings.

Ms Rivasi expressed her satisfaction that the meeting is also attended by the representative of EC and proposed to organise a meeting with the member of European Parliament who is chairing the

committee for energy transition in order to discuss energy transition and its impacts on nuclear policies in EU. She recalled the lessons from the past that people turn either to political ignorance or terrorism if their claims are neglected or disregarded for a longer time. NTW is addressing major challenges also from the perspective of democracy in Europe and the idea of European Union itself. Lack of progress toward more transparency and inclusive governance in the field of nuclear safety would contribute to erosion of democratic governance and would undermine strivings to have more democracy in Europe both at national and at EU level. NTW has major challenges ahead that are important for future of Europe and democracy in Europe.

PRESENTATIONS OF THE PLANS FOR EP&R CROSS BORDER ROUND TABLES

Mr Lheureux presented involvement of ANCCLI in discussions about emergency and post-accident situations. ANCCLI does not separate emergencies and post accidents and established the working group (GPPA) that is dealing with both of them. Working groups use OPAL - an awareness tool to promote the linking of local stakeholders and encourage them to work together on preparation for emergencies. Working group will present National Radiological Emergency Plan that has been made in traditional top down manner without participation of stakeholders to CLIs. It is necessary to provide coherence between national plan and local plans and to test how local plans might work out in reality which is not possible without engagement of municipalities and local civil initiatives. A unified approach will not work out since the situation in north of France differs very much from the one in south. On May 16th ANCCLI tested the robustness of the CODIRPA program in the case of a situation of long emissions (15 days). IN ANCCLI's opinion the program is based on too much zoning which will cause serious difficulties for a crisis manager to take emergency measures while anticipating post-accident previsions. ANCCLI also requires engagement a local reflection on the recommendations of the national doctrine with the elected representatives (ASN – ANCCLI). In order to share best practices, exchange of experiences on relationships between CLI and neighbouring countries ANCCLI established Cross border working group that will deal with cross-border issues of NPPs Cattenom, Chooz, Gravelines, Fessenheim. On June 19 2014 the workshop on "protection measures for population in emergency situations - PPI" will take place where legislation in France, positions of neighbouring countries , ways to exchange the information and ways to improve cross border co-operation will be discussed. Working group will focus on practical recommendations on measures to protect the population like sheltering, adaptation of emergency plans to local realities (taking into account that most of population will fled by its own cars), scope and mode of distribution of iodine tablets (scope, mode), information distribution and education of local population. Those issues are also related to ACN round tables in France that will continue after renewal of *High Committee for Transparency and Information in nuclear safety* (HCTISN) and will focus on implementation of the recommendations made during the first ACN France roundtable: improvements of the processes of public consultation and access to Information and ability to provide independent expertise for citizens inclusively access to laboratory analyses at universities. ACN round tables will also focus on implementation of the Aarhus Convention in the context of the extension of reactor operating time and in the context of the governance of the operational phase of geological repositories and on preparedness for emergencies and their management by taking into account the need to adapt existing emergency plan to post-Fukushima lessons. ANCCLI also considers

to organise in the last quarter of 2014 (with support of the EC) an Europe wide ACN round table on EP&R.

Ms Železnik asked for some more detailed information on dates of planned activities and how ANCCLI will proceed with preparation of national report.

Mr Lheureux answered that until ANCCLI's High Committee will be renewed no stapes forward can be made.

Mr Heriard Dubreuil explained that ACN round tables in France are organised in partnership with the ministry of environment therefore at present one needs to wait to the appointment of the new minister.

Mr Demet noticed that last year ACN debates were organised with the public but were criticised that are not opened enough to the public. In spite of the new law on organise energy transition the position of the new minister Ms Segoyen Royal on nuclear is not yet clear.

Mr Delalonde explained that at the beginning of energy transition debate nuclear industry was not involved but now this is changing while Segolen Royal is at very first in favour of "soft measures" that would enable more public participation in the debate on energy transition and not for strict legal provisions on public participation.

Ms Deront asked for more information on OPAL tool.

Mr Lheureux explained that OPAL is software designed by IRSN and ANCLII some 5 years ago. It is a tool for presenting the impact of post-accident situations on the territory around NPP. This tool is developed to sensibilize and to inform local actors (mayors) about the post-accident stake at local level. The situation is different at different sites therefore this affects preparation of the post-accident plans and decision making.

Mr Delalonde pointed out that OPAL is not a tool for general public but for the elected decision makers at the local level since it could in the opinion of the minister of interior create fear among local inhabitants if the scenarios would be published. The problem however is that it was proclaimed by the minister of environment to be used as a monitoring tool. In the opinion of Mr Delalonde it should be also used for awareness raising rather than only for basic design of emergency scenarios.

BULGARIA

Mr Sandov presented activities to organise round table in Bulgaria. Greens of Bulgaria identified interests of nuclear safety regulation and radiation protection authorities from Moldova, Romania, Serbia, Greece, Macedonia and Kosovo to take part on the event, however the round table organised on March 11 in Sofia on lessons of Fukushima for the future of nuclear energy showed that in new political circumstances in Bulgaria it is very challenging to bring the Bulgarian authorities and NPP Kozloduj operators on the table. Therefore round table on cross border EP&R of NPP Kozloduj planned for June 20 till is postponed to the 2nd half of September 2014 due to non-availability of the experts and non-responsiveness of the institutions in Bulgaria.

Ms Železnik asked all organisers of round tables to provide till June 20 2013 a short description of the detailed objections of RT, draft agenda and an action plan with the list of invited institutions and persons, target groups, rough estimation of costs by main categories and identification of financial sources to cover the costs of the event.

CZECH REPUBLIC

Mr Haverkamp pointed out the reality of NTW finances that demands to find outside funding and not to rely on NTW finances therefore it is important to find funders first. He also explained that the EP&R round table on Temelin will be organised by Ms Artmann on September 26 or 27 somewhere in South Bohemia.

UKRAINE

Ms Mischuk presented the plan for round table in Ukraine. She explained the current situation in the country where after system has reloaded to more democratic set up there are also opportunities for more participation in policy making. On the other side situation is quite confused and the priorities are not clear and some new top decision makers have few knowledge on the field they are responsible for. It is expected that Association Agreement with the EU will be signed this months. Recent situation also provided evidences that there are no plans for emergencies in general and no plans how to master terrorist threats. Under given circumstances would not make sense to organise a small low profile event therefore it is planned to organise in October or early November 2 day event with 70 participants: relevant authorities and NGOs from Ukraine and neighbouring countries (Belarus Hungary, Poland, Slovak Republic), representatives of the EU Delegation in Ukraine and other interested international organizations and representatives of NTW. In order to assure participation of officials cooperation and helping hand of Ukraine regulatory authorities will be needed however first contacts are positive. Draft agenda is already set (see ppt presentation), the costs are estimated at 10.000 € and fund raising activities have already started.

Ms Železnik asked Ms Mischuk to provide the provisional dates for the event till June 20.

BELGIUM

Mr Glorieux presented Belgium is a small country with no less than 20 commercial nuclear reactors within our just outside its borders and one 125 MW research reactor, fuelled by HEU, at the nuclear research centre and a nuclear radioactive waste storage and handling company in Mol, at 5 km from the Dutch border. The Belgian EP&R system is based on the assumption that the worst possible accident in one of its NPP's will only release a very limited amount of radioactivity into the environment outside the NPP-site (INES 5 type Three Mile Island). Therefore EPZ's are restricted to 10 km for evacuation and 20 km for the pre-distribution of iodine tablets. The high concentration of NPP's, the high population density, the proximity of cities, and the nearness of neighbouring countries, makes of nuclear EP&R a big challenge in Belgium. Round table will be organised in close

cooperation with CLI and is scheduled for beginning on November at Gravelines. It is aiming to assure equilibrium of pro and anti-nuclear oriented participants from local and provincial government and NGOs.

POLAND

Mr Harembski explained that Poland started planning procedures for its first NPPs five years ago and yet operation of NPP is still quite distant in time therefore it would be quite abstract to discuss EP&R in a form of a round table since one can expect it, at this stage, not to attract too much public attention and participants. At present, it is transportation of nuclear fuel and nuclear waste that is carried out in Poland and in his opinion it could come much more in focus of such a round table – be it national or cross-border. Therefore, as far as envisaged NPPs in Poland are concerned, it might be enough to have, this year, a low profile event in a form of a discussion with relevant authorities on basic principles and design of EP&R.

Ms Źeleznik reminded Mr Harembski and Mr Niczyporuk on their primary task to collect relevant information according to the WG methodology and admitted that there is no point for Poland to strive for organizing a 'fully-fledged' round-table on EP&R which would meet requirements set in other countries with incumbent nuclear policies. It would be very beneficial to the NTW's cause, if a low profile RT is held but it should be treated as a very additional and not an indispensable task for Poland. She also expressed an opinion that nuclear fuel transportation has similar radioactivity as the natural background and it is a security and not an EP&R issue.

SLOVENIA

Ms Źeleznik presented the situation in Slovenia and Croatia and plans for round table on EP&R of NPP Krško. In Slovenia emergency preparedness and response plan in case of nuclear or radiological accident were after Fukushima renewed at national, regional and local levels yet their relevance for a real emergency situation needs to be critically assessed. It is also to be seen to what extent lessons from drills have been taken into consideration and what is the actual state of preparedness of civil rescuers, fire brigades and medical personnel. It also needs to be seen how much cities of Krško and Zagreb have learned from the EU project „Preparedness on the evacuation in case of nuclear accident“ - they have taken part together with the city of Cernavoda (Romania) and a number of institutions. Croatian provisions has however not yet been taken into consideration since Croatia started EP&R provisions first in 2013 where the main challenge is how to evacuate the city of Zagreb that is situated 30 km from NPP Krško in prevailing wind direction and has about million inhabitants. Round Table is planned for the first half of October and will be half a day event with participation of national nuclear safety and radiation protection authorities from both countries, EP&R officers from NPP Krško, representatives of municipalities, fire brigades and civil rescue teams from municipalities of Krško, Brežice (both Slovenia), Samobor, Velika Nedelja and Zaprešić (Croatia), representatives of ex nuclear public partnerships from Krško and Brežice plus some NGOs from both countries.

WHAT IS GOING TO HAPPEN WITH ENCO STUDY?

Mr Haverkamp asked Mr Patel when EC communication on ENCO study will be published and reminded that Mr Garribba (DG Energy) has promised publishing of the communication before the summer break.

Mr Patel answered that EC is still analysing the results of the study and its findings and conclusions. In terms of next steps, the EC will issue a communication as a follow up. This analysis of EP&R issues in the EU is a follow-up activity to the stress tests, and the initiative follows largely on comments made by NGOs at that time. Nuclear safety is a current priority together with the waste directive and the new directive on radiation protection. EC initially planned to issue the communication at the end of 2013, however at the last planning stage it was postponed till mid of 2014. The current planning suggests that the Communication may be adopted by the present Commission, i. e. till the end of the summer. EC DG Energy is interested on NTW comments. The study was a “snap shot” and is considered as a starting point for a long term process so you are most welcome to write to the Commission and present your points. The communication is likely to indicate appropriate future orientations and actions.

Mr Heriard Dubreuil stated that ENCO is already integrated into WG EP&R activities, however NTW will be first able to provide whole set on conclusions and recommendations after EP&R round tables will be carried out.

Mr Haverkamp pointed out that he is worried because stress tests have been meant to integrate lessons learned from Fukushima (lose of heat sinks, fall out of electricity supply) but ENCO study does not take this and giving only very general conclusions. Its approach is very problematic since it aims to raise quality of tools and measures to improve confidence but the later can be only a result of good work in practice and not good tools and measures as such.

Ms Železnik confirmed that critical assessment of ENCO study will be a part of WG EP&R activities however the statement on it will be first prepared after round tables and reflection of the their results.

Mr Boilley pointed out that the study is not taking into account the fact that after large incident in a NPP there is no way back to normal situation. The study has not been focused on the protection of the people but rather on the way to improve the image that operators and authorities to have an adequate approach and tools to deal with major nuclear accident.

In the opinion of **Mr Heriard Dubreuil** there are two tasks related to the issue: the review the existing provisions that are in place and here ENCO has done the job yet it still remains to evaluate whether those provisions are enough and if they can be put in practice at all in case of a real emergency. At the first glance it seems that main lessons from the accident of Fukushima have been not taken into consideration by ENCO study since it presumes that also in case of major accident it is enough to provide good information and guidelines in order to build trust and achieve that institutions and people will act according to the plan that has not been designed with their active participation. Therefore EC should not make definitive position on the approach of ENCO study and its conclusions.

PRESENTATION OF THREE SCENARIOS OF RELEASE OF NUCLEAR MATERIALS FROM PLANNED NPP IN POLAND IN BEYOND THE PLANED ACCIDENT CASE

Mr Haverkamp presented 3 scenarios of release of nuclear materials from 3 types of actually planned NPP in Poland modelled the potential spreading of radioactivity after non-design accidents in many nuclear power stations on the basis of the FlexRISK modelling work carried out by the University of Vienna. Source terms are not imagined scenarios but the scenarios presented in the documentation for NPPs that are currently under construction or under stopped constructions. General conclusions of the study is that all 3 generation 3 NPP have less potential for sever accident but much bigger impacts and in worst case scenario there might be 1000 time more nuclear materials released than from the accident in Fukushima. This has tremendous consequences for EP&R yet in Polish legislation beyond planned accident situation is not requested by Environmental Impact Assessment study for a NPP.