

Opinion of the Peer Review Team to the letter to AEC from Taiwan Environmental Protection Union of 2013/08/15

Entrance date: 2013/08/16

In the following we want to give the peer review team's opinion to the letter to AEC from Taiwan Environmental Protection Union which we got on 2013/08/16:

Proceeding as it was done in Europe

The peer team will exactly proceed in the Taiwan peer review as we did it in Europe.

This was the commitment from the very beginning and was underlined again at the preparatory meeting in Brussels and this was as well the condition, when the members of the review team were recruited. All were told that the Taiwan review will be done in the same way as it was done during the 17 preceding peer reviews in Europe.

Experience

All team members of the Taiwan review team have **experience** on nuclear regulation and with the European nuclear stress tests, the national action plans and their peer reviews.

Committed to internationally accepted safety principles

All team members are coming from European regulators. None is on the pay-roll of utilities or political groups or other stakeholders, all are only committed to the verification of best practices and to the internationally accepted principles of science and technology in the nuclear field. All learned from Fukushima, and in the aftermath from the European peer reviews and all want to learn from the Taiwanese stress tests. On the other hand, the peer review team wants to support Taiwan in improving the safety of its NPPs.

Independence

All team members are coming from and working and living in Europe and are absolutely independent in respect to commercial, political or other interests which could influence their deliberations and findings in Taiwan. Taiwan is not a neighboring country to one of the home countries of the reviewers. Therefore, the highest possible **independence** is ensured in this review.

Transparency of the peer review

The team performs this peer review as transparent as it can be done without jeopardizing the quality of this comprehensive work, which has to be done within a limited period of time (even though the time of the Taiwan visit is – due to logistical reasons – about twice as long as compared to the European peer reviews). **Transparency** was a key issue from the very beginning of the whole process of this peer review. From the very beginning, the team applied highest standards in this area and wants to continue this until the end of the review.

Comprehensive public communication with all stakeholders

Following this spirit of high transparency, the comprehensive public communication with all stakeholders and the posting of all important information which the team received from all sides during the peer review process on a dedicated website became a new and helpful element. This high transparency of the process forces all stakeholders to do their best, to be open and to tell everybody how things are "really" from their viewpoints. Especially the intensive communication and the inputs of NGO representatives, mostly via mails and Internet, were an important information source and support for approaching the safety issues. This communication widened the team's view and improved the awareness in respect to specific nuclear safety issues of Taiwan.

Meeting with NGOs during the Taiwan visit

Up to now, this strategy of communication and participation seems to be very successful and stimulates also the communication between the regulator and other stakeholders in the nuclear field in Taiwan. The team hopes to continue this communication and looks forward to the meeting with NGOs during the Taiwan visit on September 25th. During this meeting we will inform the NGOs about the details of the Taiwan visit, i.e. the schedule, issues of special interest, site visits and so on. We will have these items in detail not earlier, as we have to discuss them within the team and with AEC in Taiwan during the entrance meetings. The requests of NGO representatives in respect to detailed and comprehensive information about the process of the Taiwan visit are fulfilled.

Goal: Qualified peer review on basis of the European Stress Tests Specification

However, a peer review open to the public during the entire Taiwan visit, as it is proposed by NGO representatives, would be a totally different approach and in fact contradict the internationally accepted approach of what constitutes a peer review (i.e. "experts reviewing experts"). Such an approach might be considered for future reviews, but would first require a careful organizational development. Consequently, it is also not covered by our mandate which we got from the EU and ENSREG. Furthermore, no such "combined public-experts" review approach is known to the peer review team in the nuclear field or, in fact, in any other field of review of hazardous industries. Therefore, following such an ad-hoc approach would deteriorate the efficiency of the review and it would be impossible to cover all scheduled safety issues in the necessary quality. The goal to do a qualified peer review on basis of the European Stress Tests Specification could not be achieved. Therefore, following our mandate and our commitment to perform high quality work, the team has to insist on a proceeding as it was done in Europe.