

European Stress Tests for Nuclear Power Plants

National Action Plan

FINLAND

December 2012



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1. INTRODUCTION

There are two nuclear power plants operating in Finland: the Loviisa and Olkiluoto plants. The Loviisa plant comprises two VVER units (Soviet type pressurised water reactors) operated by Fortum Power and Heat Oy and the Olkiluoto plant two BWR units (boiling water reactors) operated by Teollisuuden Voima Oyj (TVO). In addition, a new nuclear power plant unit is being constructed by TVO at the Olkiluoto site (EPR type pressurised water reactor). At both sites there are interim storages for spent fuel as well as final repositories for intermediate and low level radioactive waste. Furthermore, a Triga Mark II research reactor is operated in Espoo by the Technical Research Centre of Finland. A decision has been made to stop the operation of the research reactor.

Following the accident at the Fukushima Dai-ichi nuclear power plant on the 11th of March in 2011 (TEPCO Fukushima Dai-ichi accident), safety assessments in Finland were initiated after Radiation and Nuclear Safety Authority (STUK) received a letter from the Ministry of Employment and the Economy (MEE) on 15 March 2011. The Ministry asked STUK to carry out a study on how the Finnish NPPs have prepared against loss of electric power supply and extreme natural phenomena in order to ensure nuclear safety. STUK asked the licensees to carry out assessments and submitted the study report to MEE on 16 May 2011. Although immediate actions were not considered necessary, STUK required the licensees to carry out additional assessments and present action plans for safety improvements. Assessments were conducted and reported by the Finnish licensees to STUK on 15 December 2011. STUK has reviewed the results of national assessments, and made licensee specific decisions on 19 July 2012 on the suggested safety improvements and additional analyses.

Finland also participated in the EU Stress Tests and submitted the national report to European Commission at the end of 2011. An EU level peer review on the report was completed by April 2012. The recommendations of the EU peer review have been taken into account in the regulatory decisions and will be considered in the development of national regulations. In addition, Finland participated in the second Extraordinary Meeting of the Convention of Nuclear Safety (CNS) in August 2012 and prepared a report introducing national actions in Finland initiated as a result of the TEPCO Fukushima Dai-ichi accident. All STUK's related decisions, the national report to European Commission and the report to the Extraordinary CNS have been published on STUK's website.

This report is the Finnish National Action Plan addressing the measures initiated on a national level and at the nuclear power plants as a result of the TEPCO Fukushima Dai-ichi accident. The report discusses national conclusions and activities in six topical areas. The first three topics (natural hazards, design issues and severe accident management) in Chapters 2-4 follow the structure of the EU peer review report "Compilation of recommendations and suggestions" including also the aspects discussed in the Extraordinary Meeting of the Convention on Nuclear Safety. The next three topics (national organisations, emergency preparedness and international co-operation) were not included in the EU Stress Tests but were discussed in the Extraordinary CNS. Issues identified in that meeting are addressed in Chapters 5-7. The relevant text from the EU peer review report "Compilation of recommendations and suggestions" and the topical reports of the second Extraordinary Meeting of the CNS is quoted in the beginning of each Section in

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italic. Chapter 8 concludes all activities taken, planned or already implemented in a table format including time schedules.

Based on the results of assessments conducted in Finland to date, it is concluded that no such hazards or deficiencies have been found that would require immediate actions at the Finnish NPPs. As presented in this report, areas where safety can be further enhanced have been identified and there are plans on how to address these areas. The experiences from the TEPCO Fukushima Dai-ichi accident are also taken into consideration in the ongoing renewal of the legislation and Finnish Regulatory Guides (YVL Guides).

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2. TOPIC 1: NATURAL HAZARDS

Necessary implementation of measures allowing prevention of accidents and limitation of their consequences in case of extreme natural hazards is a finding of the peer review that national regulators should consider. Deterministic methods should form the basis for hazard assessment. Probabilistic methods, including probabilistic safety assessment (PSA), are useful to supplement the deterministic methods.

External natural and human induced hazards are to be taken into account when selecting the NPP site in Finland, as well as in assessing the safety of NPPs. For new plants, there are specific requirements for protection against earthquakes, and these requirements are also applied when renewing or replacing systems and components at existing plants. For other external hazards, site-specific design requirements are defined according to the local conditions.

External conditions in Finland are moderate. No destructive earthquakes or tsunami waves have been observed. Storms are not comparable to tropical cyclones and strong tornadoes are quite rare. Snowstorms are not comparable to the North American blizzards. Nevertheless, the Finnish utilities have used considerable efforts to assess the effects of external events on nuclear facilities during the past twenty years. The assessments cover seismic events, external flooding, extreme weather, frazil ice formation and impurities in the seawater (including algae and oil spills from oil transport accidents).

The national studies and EU stress tests carried out after the Fukushima accident did not reveal safety problems requiring immediate action. However, the licensees were required to carry out several additional safety studies and start preliminary planning for some safety improvements.

The required studies and preliminary plans have been submitted to STUK. The approach suggested by the licensees has been mainly found acceptable but for some issues more detailed studies and comparison of different alternative actions has been required by STUK.

At the same time, the lessons learned from the TEPCO Fukushima Dai-ichi accident are taken into account in the ongoing renewing of STUK's regulatory guides (YVL guides). External events and "cliff edge" effects shall be considered more extensively in the design of nuclear facilities. More detailed requirements will be set on seismic safety, including seismic monitoring and safe shutdown after an earthquake. The effects of severe, long-standing external events shall be taken into consideration in emergency preparedness and rescue planning (see Sections 4.5, 6.1 and 6.6).

Finland has ongoing research projects on extreme weather phenomena, extreme seawater level variations and seismic issues in the national nuclear safety research programme SAFIR2014. Planning and implementation of the programme is managed and overseen by STUK. As a result of the TEPCO Fukushima Dai-ichi accident, a reassessment was made how the accident should be taken into account, and the research projects mentioned here were somewhat redirected. Some additional resources have also been allocated to the research of external events.

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Related to stress tests and results from the SAFIR2014 research programme STUK is initiating analyses for site specific hazard studies and reassessment of seismic fragilities of SSCs important to safe shutdown. Also assessment updates and possible qualification of the safety systems is under consideration.

2.1 Hazard frequency and margins

Re-evaluating the hazards posed by external events, such as earthquakes, floods and extreme weather conditions, for each nuclear power plant site through targeted reassessment of safety. The use of a return frequency of $10E-4$ per annum (0.1g minimum peak ground acceleration for earthquakes) for plant reviews/back-fitting with respect to external hazards safety cases. Formal assessment of margins for all external hazards including, seismic, flooding and severe weather, and identification of potential improvements.

For quantifiable phenomena, the associated hazard curves have been determined in cooperation with the national expert organizations (Institute of Seismology, Meteorological Institute) and reviewed by STUK using external experts. The estimates are reviewed and, if necessary, updated every few years.

A thorough review of the hazard curves was started in Finland already shortly before the Fukushima accidents in connection with the projects for building additional nuclear power plant units. Studies on external hazards are also included in the national nuclear safety research programme SAFIR 2014.

According to the current regulatory requirements, the design basis earthquake (safe shutdown earthquake) shall be determined so that the probability of exceedence is less than 10^{-5} per year. At the current sites the calculated site-specific peak ground acceleration is less than the minimum value 0.1 g recommended by the IAEA, and the value 0.1 g shall be used. Earthquakes exceeding the design basis have to be analysed in seismic PSA. The updated regulatory guides require more explicitly that earthquakes exceeding the design basis shall be analysed as design extension conditions (DEC C).

The updated regulatory guides will include more specific requirements on protection against other external hazards, including external flooding, and high and extreme meteorological phenomena. The frequency requirements for other external events have been harmonised with seismic requirements. The general design basis of a nuclear facility shall cover external events estimated to occur with a frequency higher than 10^{-5} per year. Events exceeding the design basis shall be analysed as design extension conditions (typically down to frequencies 10^{-7} per year).

The current requirements were not in force when the operating NPP units were built. The capacity of the operating units to withstand exceptional external events has been analysed later with deterministic and probabilistic methods. Based on the analyses, several plant modifications of the plant and operating procedures have been implemented. According to the PSA results, the risk caused to the operating units by external events is a relatively small fraction of the total risk. However, there are areas where possibilities for further risk reduction exist, for example decreasing the vulnerability of the Olkiluoto units 1 and 2 to loss of the ultimate heat sink (see Section 3.1) and improving the protection of the Loviisa plant against high seawater (see Section 2.2).

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Olkiluoto unit 3 fulfils the current requirements and mainly also updated requirements concerning external events. The design basis of Olkiluoto unit 3 for external events has been selected conservatively in the design phase. The design basis covers earthquakes, flooding, extreme weather and other natural hazards as well as human induced hazards. The design values correspond to return periods of up to 100 000 years and much longer for events with “cliff edge” type consequences. As the estimated conditions corresponding to such long return periods involve large uncertainties, considerable physical margins to the largest values observed in the neighbourhood of the site have also been ensured.

Assessment of the safety margins and effects of exceeding the design basis values has been done for all identified relevant external hazards (excluding intentional damaging of the plants) in connection with the external events PSAs which are mandatory for the Finnish NPPs. The external events related PSAs and their input are updated typically at intervals of 3 – 5 years.

Safety margins were assessed by the utilities and reviewed by STUK in connection with the national clarifications and EU stress tests after the Fukushima Dai-ichi accident. Based on the results, STUK required further clarifications on the following main points:

- seismic resistance of spent fuel pools including situations with water temperature exceeding the design bases;
- seismic resistance of fire fighting systems; and
- plans for improving flooding margin for the Loviisa plant by end of 2013.

For other hazards, the reassessment of the margins within the next few years was considered sufficient.

The ENSREG Peer Review Country Report for Finland included the following recommendation in section 2.1.3: *“During the country visit, it was noted that the updated seismic PSA has been prepared for both Loviisa and Olkiluoto NPPs. STUK is currently performing the review. Based on review results, it will be possible to conclude on the qualification status of the critical SSC identified in the seismic PSA. With this regard, STUK should consider additional assessment of critical SSC with respect of PGA = 0.1g (as recommended in the IAEA Safety Guide NS-G-3.3).”*

In the operating units, there are some SSCs with estimated HCLPF (High Confidence Low Probability of Failure) values less than 0.1 g, but the seismic risk has been estimated to be only a small fraction of the total risk. STUK will consider additional assessment of the critical SSCs and the need for safety improvements in connection with the detailed review of the seismic risk analysis. STUK will also take into consideration the external events guidance under development by WENRA according to the ENSREG Stress Test Peer Review Board’s recommendation. The licensees have plans to carry out seismic safety improvements for some components when they are replaced due to ageing.

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2.2 Flooding margin assessments

The analysis of incrementally increased flood levels beyond the design basis and identification of potential improvements. The use of a protected volume approach to demonstrate flood protection for identified rooms or spaces.

Flooding margin assessments have been included in the EU stress tests. The Finnish approach to protection against external flooding is based on sufficient elevation of the site ground level and water tightness of the nuclear facilities up to the ground level.

In the operating units, some vital parts of systems required for performing the critical safety functions are situated at or below the ground level. Consequently, the safety margins for external flooding exceeding the design basis are small. In Olkiluoto 3 the leakage through outer doors would be slow, but the rise of seawater above the design basis level would soon result in the loss of the ultimate heat sink due to the flooding of the essential service water pump rooms.

For all Olkiluoto NPP units, it is considered extremely improbable that the seawater level design basis is exceeded (less than 10^{-9} /year). The design water level is +3.5 m and the observed maximum value in the region is about +1.04 m (N60 reference system).

The protected volume approach is currently used in special cases, for example, for the Olkiluoto units 1 and 2 emergency core cooling equipment rooms, but the protection is intended for preventing spreading of internal flooding due to pipe breaks.

The licensee of the Olkiluoto NPP was requested to carry out a more detailed assessment on the effects of exceptionally high seawater level on the cooling systems of the spent fuel interim storage and their electric power supply. Cooling system pumps are situated at the +0.5 m level. The spent fuel interim storage is designed as watertight up to the seawater level +1.2 m. At higher seawater levels some seepage of water through the soil to the drainage system is anticipated. According to the licensee, the seepage would be stable and slow and the water could be removed with submersible pumps. Fast flooding of the interim storage would be possible through the doors if the seawater level exceeds +3.5 m and through the seam between the seawater pumping station and seawater pipe culvert at the level +2.5 m. The licensee has submitted plans for tightening the aforementioned seam and shall submit by the end of 2012 plans for further improving the protection of the interim storage against flooding, including increase of the capacity of the submersible pumps.

For the Loviisa plant the safety margin against flooding is smaller than for the Olkiluoto units. The design value for external flooding during operation is about +3.0 m and the observed maximum value is +1.75 m. The annual frequency of exceeding the +3.0 m design basis is estimated as $4 \cdot 10^{-7}$ /year. The licensee has been required to submit plans to improve protection against external flooding by the end of 2013. The licensee is examining site area protection with levees and the protected volume approach and also their combination to improve of the flooding resistance of the Loviisa plant. The licensee will make decisions based on updated flooding hazard estimates contracted from the Finnish Meteorological Institute.

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Loviisa NPP has improved in 2012 flood protection during certain annual shutdown states with open hatches in the condenser cooling seawater system, the design water level was increased from +2.1 m to +2.45 m and further increase to +2.95 m is considered. It should be noted that the annual shutdowns are scheduled during summer and early autumn whereas high seawater levels occur mostly in winter.

The ENSREG Peer Review Country Report for Finland included the following recommendation in section 2.3.3: *“An assessment of the drainage system capacity in case of high seawater level should be considered.”* STUK will consider the capacity of the drainage system in connection with the licensees’ plans for improving the protection against external flooding at the Loviisa NPP and at the Olkiluoto interim storage for spent fuel.

2.3 Secondary effects of earthquakes

The possible secondary effects of seismic events, such as flood or fire arising as a result of the event, in future assessments.

The licensees have been required to analyze and present the conclusions on the seismic resistance of the fire fighting systems by the end of 2012. The use of fire fighting water for other safety functions besides fire extinguishing shall be considered in the analysis. Seismic qualification of fire fighting systems has not been required previously as in Finland the possibility of consequential fires due to an earthquake is considered very small.

Other consequential effects are not considered possible at the Finnish sites due to geographical and geological reasons. As the nuclear facilities are founded on bedrock and the site topography is relatively flat, soil liquefaction and subsidence, landslides and dam failures are not relevant hazards. The same applies to severe tsunami type flooding as there are no active fault zones under the Baltic Sea and, on the other hand, due to the shallowness of the sea the formation of high tsunami waves is not considered physically possible.

2.4 Seismic monitoring

The installation of seismic monitoring systems with related procedures and training.

Seismic monitoring instrumentation will be installed in Olkiluoto unit 3 but the currently operating units do not have seismic monitoring systems. A new Regulatory Guide YVL B.7 on provision for external events in nuclear facilities includes more detailed requirements on seismic instrumentation in NPPs and other nuclear facilities. Decisions on the application of the requirements of the new guide to existing facilities, including the requirement on a seismic monitoring system, will be made by STUK after issuing the new guide.

2.5 Early warning notifications

The implementation of advanced warning systems for deteriorating weather, as well as the provision of appropriate procedures to be followed by operators when warnings are made.

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The operating procedures of the Finnish NPPs require the operating personnel to contact the Meteorological Institute under circumstances with increased possibility of hazardous meteorological or marine phenomena.

Long term climate variability and change is monitored by the licensees and safety authorities in cooperation with expert organizations in ongoing research programs.

2.6 Qualified walkdowns

The development of standards to address qualified plant walkdowns with regard to earthquake, flooding and extreme weather – to provide a more systematic search for non-conformities and correct them (e.g. appropriate storage of equipment, particularly for temporary and mobile plant and tools used to mitigate beyond design basis (BDB) external events).

Plant walkdowns are a mandatory part of verifying the seismic design before commissioning of NPPs or major plant modifications. In addition, plant walkdowns are an established practice in conducting and reviewing probabilistic safety assessment for external and internal hazards.

The licensees have used plant walkdowns in developing action plans due to the TEPCO Fukushima Dai-ichi accident. Some walkdowns have also been performed by STUK. More extensive walkdowns will be done in connection with the review of the plant modification plans to be submitted by the licensees. In the new regulatory guides requirements are presented concerning performing walkdowns, but more rigorous guidance for qualified walkdowns has not been developed by STUK.

3. TOPIC 2: LOSS OF ELECTRICAL POWER AND LOSS OF ULTIMATE HEAT SINK (DESIGN ISSUES)

The systems needed for residual heat removal from the reactor, containment and fuel pools require external power at both Finnish NPPs. At both sites, the ultimate heat sink is the sea. Depending on the design features of the plant, the time margins to withstand station blackout and loss of ultimate heat sink vary. A reliable supply of electrical power to the systems providing for basic safety functions at the Finnish NPPs is ensured by the Defence-in-Depth concept. As a result of multiple and diversified electrical power sources at different levels, the probability of loss of all electrical supply systems is considered very low at the Finnish NPPs.

However, as a result of the studies made after the TEPCO Fukushima Dai-ichi accident, further changes are expected to be implemented at both NPPs. Main changes are aimed at decreasing the dependency on plant's normal electricity supply and distribution systems as well as on the sea water cooled systems for residual heat removal from the reactor, containment and spent fuel pools.

3.1 Alternate cooling and heat sink

The provision of alternative means of cooling including alternate heat sinks. The enhancement of safety in shutdown states and mid-loop operation. The enhancement of the functional separation and independence of safety systems. The provision for a bunkered or "hardened" system to provide an additional level of protection with trained staff and procedures designed to cope with a wide variety of extreme events including those beyond the design basis.

At the Loviisa NPP, the availability of an alternate heat sink depends on the plant state and feed water availability. If primary circuit can be pressurized (i.e. reactor vessel head is in place), atmosphere can be used as an alternate heat sink as long as there is enough water available for dumping steam into atmosphere from the secondary circuit. There is separated diesel driven auxiliary emergency feed water system with two pumps which feeds water to the steam generators in case of loss of AC power. It is also possible to transfer heat to spent fuel cooling system and hence to intermediate cooling system, giving time for restoring ultimate heat sink.

The licensee at the Loviisa NPP considers a plant modification to ensure the decay heat removal in case of loss of seawater by implementing an alternative ultimate heat sink. The modification consists of two air-cooled cooling units per plant unit powered by an air-cooled diesel-generator. The other cooling unit would remove decay heat from the reactor and the other one ensures the decay heat removal from in-containment spent fuel pool and from the spent fuel storage pools. The cooling unit is connected to the intermediate cooling circuit, and it backs up the seawater cooled heat exchangers. The modifications in consideration would create a possibility to closed-loop operation also in case of loss of ultimate heat sink. The conceptual design plan is ready and the cooling towers are planned to be realised in 2014.

In addition, the licensee has evaluated measures needed to secure the availability of the auxiliary emergency feedwater system in the case of loss of electrical power, water supply for the diesel driven auxiliary emergency feed water pumps, and electricity supply

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for instrumentation needed in accidents. The modifications will be realised during 2012 and 2013, with the exception of improving the instrumentation by 2015.

At the Olkiluoto units 1 and 2, sea water is the primary ultimate heat sink and an alternative heat sink exists only partially. Both units can evaporate residual heat from the reactor core to atmosphere by conducting the steam produced inside the reactor pressure vessel to the condensation pool through the safety relief valves, by letting the condensation pool to boil, and by venting the steam from the containment to atmosphere through the filtered venting system. However, the systems required to pump water into the reactor pressure vessel are either dependent on the sea water based component cooling systems or on the condensation pool water, which means that the complete loss of sea water as the ultimate heat sink will eventually prevent the supply of water to the reactor pressure vessel.

Licensee is planning plant modifications on the current residual heat removal chain to decrease the dependence on the sea water cooling. A modification in the auxiliary feed water system is planned to enable cooling of the components by demineralised water in addition to sea water based cooling chain. By this modification system can remain operational for a significant period of time even during the loss of the primary ultimate heat sink (sea water). Modifications are scheduled for 2013-2015.

In addition, an independent way of pumping water to the reactor pressure vessel is being planned by the licensee in case of loss of AC power. The arrangement will be based on the fire fighting water system with additional booster pumps and an own diesel aggregate. Conceptual design plans will be submitted to STUK in January 2013.

At the Olkiluoto unit 3, the ultimate heat sink is the sea. In case of the total loss of the availability of sea water for cooling, the residual heat from the reactor core would be released to the atmosphere via the steam generators. During refuelling outage the containment filtered venting could be used. The spent fuel pools could be cooled by evaporation.

The licensee has assessed possibilities to implement external feed water connections to the steam generator secondary side, connections to external AC power supply and external make-up water injection into the reactor cooling system during refuelling outages in order to have independent means to fulfil residual heat removal function in case plant's normal systems are lost. STUK is currently evaluating licensee's plans.

Both licensees are investigating their cooling water reserves at site. They should take into account the situations where all plants in same site are in emergency including spent fuel pools.

The experiences from the TEPCO Fukushima Dai-ichi NPP accident will also be taken into consideration in the ongoing renewal of the legislation and Finnish Regulatory Guides (YVL Guides). The new regulatory guides are currently in the final draft stage. They will include new requirements concerning Defence-in-Depth level 3b which is aiming at managing design extension conditions (DEC). DEC C category includes rare and extreme external hazards. There will be a requirement that decay heat removal from the reactor and the containment and sufficient cooling of the fuel in fuel storages shall be

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possible also in rare and extreme conditions (DEC C) for 8 hours without material replenishment (especially diesel fuel and emergency cooling water reserve) or need to charge batteries. Decay heat removal shall be possible for 72 hours without any external help outside the plant.

The above modifications related to residual heat removal systems are reviewed taking into account this requirement on the protected autonomous systems.

3.2 AC power supplies

The enhancement of the on-site and off-site power supplies. Examples include adding layers of emergency power and adding independent and dedicated backup sources. Implementation of operational or preparatory actions with respect to the availability of operational consumables (e.g. ensuring the supply of fuel and lubrication oil).

At the Loviisa NPP, the current AC power supply systems include connections to 400 kV and 110 kV power grids, main generator (house load operation), four emergency diesel generators per unit, a diverse diesel power plant and a dedicated connection to a nearby hydropower plant, two SAM diesel generators, and the possibility to supply electricity from the neighbouring NPP unit. No modifications are planned to the current design concerning AC power supply.

At the Olkiluoto units 1 and 2, the current AC power supply systems include connections to 400 kV and 110 kV power grids, main generator (house load operation), four emergency diesel generators per unit, a gas turbine, a dedicated connection to a nearby hydropower plant, and the possibility to supply electricity from the neighbouring NPP unit. The licensee has been preparing for several years the possible renewal of all the eight emergency diesel generators. Several plans, surveys and studies have been prepared for this project but so far no investment decision for the EDG renewal has been made. The proposed renewal plan includes several safety improvements. First of all, the new EDGs would be equipped with two diverse component cooling systems. The primary EDG cooling would be provided by the sea water based cooling system, similar to present EDGs units. An alternative, automatically activated air based cooling system would be added to cope with the loss of sea water situations. This would provide extra protection against external hazards, internal hazards such as fires, as well as component failures. Also one extra diesel generator is under consideration to supply water to reactor in case of loss of other AC power.

At the Olkiluoto unit 3, the current AC power supply systems include connections to 400 kV and 110 kV power grids, main generator (house load operation), four emergency diesel generators, two station black out diesel generators, a gas turbine and the possibility to supply electricity from the neighbouring NPP unit. No modifications are planned to the current design concerning AC power supply.

At the Loviisa NPP, there is enough diesel fuel in the emergency diesel generator (EDG) tanks for at least 72 h of operation, and with realistic loads in case of an accident, the duration is evaluated twice as long. At the Olkiluoto NPP, there is enough diesel fuel for more than one week of operation of EDGs, if fuel transfer between different tanks is considered. Currently the emergency diesel generators (EDGs) at the Loviisa and Olkiluoto

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NPPs use conventional diesel fuel, which is available only in limited scope. An investigation of replacing conventional diesel with widely available biodiesel is being performed by the licensees and the diesel engine manufacturer.

In 2012 the licensee of the Loviisa NPP purchased a container to transfer diesel fuel at the site. The purpose of this container is to make fuel transfer between the tanks on-site easier and faster. In addition, the licensee has started an investigation to build a new fuel storage tank, from which it is possible to deliver fuel to the diesel generators' day tanks.

Both licensees are considering additional mobile power supply equipment (see Section 3.5).

3.3 DC power supplies

The enhancement of the DC power supply. Examples include improving the battery discharge time by upgrading the existing battery, changing/diversifying battery type, providing spare/replacement batteries, implementing well-prepared loadshedding/staggering strategies, performing real load testing and on-line monitoring of the status of the batteries and preparing dedicated recharging options (e. g. using portable generators). Study of RCP pump seal leakage following long term AC power failure. Ensure that the state in which isolation valves fail and remain, when motive and control power is lost, is carefully considered to maximise safety.

At the Loviisa NPP, some DC batteries depletion times are considered to be rather short. The duration of DC power supply is considered to be enhanced. Especially the reactor coolant pump seal water system functionality must be ensured. The licensee will submit a plan to STUK by the end of 2012. There is also an ongoing automation renewal project in which the depletion time of the batteries will be lengthened substantially.

It is possible to charge the batteries using the AC power sources. The licensee will install two new separate underground cables from the new diesel power plant to the 6.3 kV diesel busbar in 2012–2013, which will furthermore ensure and enhance battery charging possibilities.

At the Olkiluoto units 1 and 2, the depletion times of DC batteries are well above 10 h, in some cases tens of hours. It is possible to charge the batteries using the AC power sources. DC batteries supplying the severe accident monitoring systems can be also charged by mobile generators. The licensee is investigating the possibilities for fixed connection points for recharging of all safety important batteries using transportable power generators (see Section 3.5).

At the Olkiluoto unit 3, there are separate and diversified 2 h and 12 h battery backed power supply systems. The first set of batteries supplies all electrical equipment which require uninterruptible power in the nuclear island and the second set of batteries supplies loads which are important in case of a severe accident. Thus, the licensee evaluates that there is no need for upgrading the battery capacity.

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3.4 Spent fuel pools

The improvement of the robustness of the spent fuel pool (SFP). Examples include reassessment/upgrading SFP structural integrity, installation of qualified and power-independent monitoring, provisions for redundant and diverse sources of additional coolant resistant to external hazards (with procedures and drills), design of pools that prevents drainage, the use of racks made of borated steel to enable cooling with fresh (unborated) water without having to worry about possible recriticality, redundant and independent SFP cooling systems, provision for additional heat exchangers, an external connection for refilling of the SFP and the possibility of venting steam in a case of boiling in the SFP. The performance of further studies in areas where there are uncertainties, e.g. the integrity of the SFP and its liner in the event of boiling or external impact.

Regarding spent fuel pools, the approach in Finland is to “practically eliminate” the possibility of fuel damage. The licensees have evaluated alternative means of decay heat removal from fuel storage pools in case of loss of existing systems, and to supply coolant to fuel storage pools (including potential need for new instrumentation).

At the Loviisa NPP, the possibility to install independent air-cooled cooling units with no connections to seawater systems is investigated (see Section 3.1). The cooling units would take care of decay heat removal of reactors and fuel pools of both reactors and of spent fuel storage pools in case the ultimate heat sink is lost. The licensee has also planned additional water injection capabilities into the pool and in the in-containment pool boiling of the pool water as an alternative means to remove decay heat. Water injection could be provided through mobile water injection systems in order to recover the loss of water from the pools. The plant modifications concerning water injection to spent fuel pools will require further analysis before starting the detailed design work. The more detailed analysis will be performed in 2013.

Furthermore, the licensee will improve EOPs and SAM Guidelines to support heat removal from spent fuel pools by pool boiling and supplying additional water to the pools (see Section 4.3). Licensee is also studying the seismic resistance of the fuels pools as well as the influence of pool water boiling to the pool structures (see Section 2.1).

At the Olkiluoto units 1 and 2, the licensee has evaluated that water injection into the pool and boiling of the pool water could be used as an alternative means to remove decay heat from the pools inside the reactor building. To support monitoring of the water level in the reactor building spent fuel pools, there is a plan to equip all the fuel pools with a level measurement system with a measurement range from the normal water level down to the top of the fuel assemblies. Possibilities for adding makeup water from the fire fighting system to the pools from safe locations will be provided. The pool water level indications will also be routed to those locations. Modifications will be done during 2013-2014. External junctions to the interim spent fuel storage pool (outside the reactor buildings) water system will be added at the Olkiluoto NPP during the enlargement project of spent fuel storage in 2013. Feed of water to the fuel storage pools will be possible from fire-fighting vehicle via those junctions.

For the decay heat removal from the spent fuel pools in the fuel building of Olkiluoto unit 3, the possibility to use fire water systems and boiling of the pool water has been evaluated. Additional mobile pumps to provide water injection into the fire fighting wa-

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ter system are to be acquired before the start of operation of Olkiluoto unit 3. The needed external connection points, as well as temperature and level measurements are included in the design of the fuel building systems. Additional measurements to monitor the water level in the pools are to be implemented.

3.5 Mobile devices

The provision of mobile pumps, power supplies and air compressors with prepared quick connections, procedures, and staff training with drills. The equipment should be stored in locations that are safe and secure even in the event of general devastation caused by events significantly beyond the design basis. The enhancement of the capability for addressing accidents occurring simultaneously on all plants of the site. The establishment of regular programs for inspections to ensure that a variety of additional equipment and mobile devices are properly installed and maintained.

The licensee of the Loviisa NPP has studied the possibilities to utilize mobile power supply and mobile pumps to support safety functions. Based on the studies the mobile devices will be designed and could be used for the following targets:

- to manage subcriticality by boron supply and the supply of seal water for reactor coolant pumps,
- to ensure the secondary circuits mass balance,
- to ensure water supply to auxiliary emergency feed water systems
- to ensure the accident instrumentation,
- to ensure electrical power supply to primary circuit SAM depressurization valves
- to ensure heat transfer from the containment by ensuring water supply to containment external spray system
- to remove decay heat from spent fuel storage pools
- to power control rooms lighting and communication at site.

Investment decision for mobile power supply and mobile pumps will be made in 2012 after related assessments on the need and purpose of mobile devices have been completed. Implementation is planned to be made in 2013.

At the Olkiluoto units 1 and 2, the licensee started the investigation of needs and targets for mobile power supply in autumn 2011. Investigation includes also renewal of the present mobile SAM diesel generators. Five aggregates stored on the site are under consideration. Enhancing charging of batteries has also been found feasible to improve the availability of DC power. The licensee is investigating the possibilities for fixed connection points for recharging of the safety important batteries using transportable power generators. Investigation of needs and targets for mobile power supply has been started in autumn 2011 and is expected to be completed by the end of 2012. Procurement of the devices and needed modifications are expected to begin in 2013. Mobile pumps used for residual heat removal from the reactor and the spent fuel pools at the Olkiluoto units 1, 2 and 3 were discussed in Sections 3.1 and 3.4.

The above modifications related to mobile devices are reviewed taking into account the new YVL Guide requirement on the protected autonomous systems for the decay heat removal discussed in Section 3.1.

4. TOPIC 3: SEVERE ACCIDENT MANAGEMENT (ON-SITE)

A comprehensive severe accident management (SAM) strategy has been developed and implemented both at Olkiluoto 1&2 and Loviisa 1&2 plant units. Development of the strategies started after the accident in TMI and Chernobyl accidents. These strategies are based on ensuring the containment integrity which is required in the existing national regulations. STUK has reviewed these strategies and has made inspections in all stages of implementation.

Severe accidents have been considered in the original design of Olkiluoto 3. STUK has reviewed the overall SAM strategy and the approach has been accepted. No changes to this approach are expected based on current knowledge from the TEPCO Fukushima Dai-ichi accident.

As a result of the studies made after the TEPCO Fukushima Dai-ichi accident, no major changes at the plants are considered necessary. However, licensees are expected to consider all plant stages in the SAM procedures as well as any implications on them possibly arising from simultaneous multi unit accidents. In addition, there are many actions related to the update of the emergency plans.

4.1 Severe accident management hardware provisions

WENRA reference levels

The incorporation of the WENRA reference levels related to severe accident management (SAM) into their national legal frameworks, and ensure their implementation in the installations as soon as possible.

In Finland, Government Decree on the Safety of Nuclear Power Plants (733/2008) and the regulatory guides (YVL Guides) include requirements for severe accident management which are in compliance with the WENRA Reference Levels Issue F. In particular, Finnish regulations include requirements on dedicated, safety-classified and single-failure tolerant SAM systems and measurements. Based on the current knowledge from the TEPCO Fukushima Dai-ichi accident, no specific changes to the regulatory guides are foreseen related to the severe accident management systems.

The development of SAM strategy at the Finnish NPPs in the late 1980's led to a number of hardware changes. SAM strategy is based on the following SAM safety functions whose purpose is to ensure containment integrity and isolation:

- containment isolation,
- RCS depressurisation,
- in-vessel retention of corium by reactor pressure vessel external cooling (Loviisa NPP) or prevention of basemat melt through (Olkiluoto NPP),
- hydrogen management, and
- management of containment pressure by containment external spray (Loviisa NPP) or by containment filtered venting system (Olkiluoto NPP).

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In addition, sub-criticality and fuel pool cooling have to be ensured during a severe accident. All these issues are part of the SAM Guidelines.

Fixed severe accident management systems have been installed both at Loviisa and Olkiluoto operating NPPs. At the Loviisa NPP, the following modifications were made already prior to the Fukushima Dai-ichi accident:

- new manually actuated RCS depressurisation capability for SAM through motor-operated relief valves (two parallel lines with two similar valves in each line), installed 1996;
- modified hydrogen management scheme concentrating on two functions: ensuring containment atmosphere mixing to decrease the local hydrogen concentrations (a dedicated system for opening the ice-condenser doors to ensure adequate flow paths installed in 2001-2002) and controlled removal of hydrogen (passive autocatalytic recombiners (PARs) and a new glow plug system installed in 2003);
- containment external spray system installed in 1990-1991 to remove the heat from the containment in a severe accident when other means of decay heat removal from the containment are not operable (filtered venting system was not seen feasible for Loviisa NPP, as steel shell containments are vulnerable to subatmospheric pressures, which may arise after large amounts of non-condensable gases have escaped the containment);
- modifications carried out in 2000-2001 to enable in-vessel retention of corium by external cooling of the RPV: enable lowering of the lower neutron and thermal shield to allow free passage of water in contact with the RPV bottom, slight changes of thermal insulations and ventilation channels in order to ensure effective natural circulation of water, and construction of a strainer facility in the reactor cavity in order to screen out possible impurities from the coolant flow and thereby prevent clogging of the narrow flow paths around the RPV;
- creation of a dedicated independent SAM I&C, in particular, new measurements for monitoring containment conditions and thus the status of the SAM safety functions; and
- dedicated AC power supply system to provide power supply from an independent source for all essential SAM instruments and equipment and a dedicated SAM control room.

At the Loviisa NPP, the design basis for all SAM safety functions is that the actions can be done, when the other supplies have been lost, with dedicated independent SAM electrical systems and dedicated independent SAM I&C from SAM control room or main control room.

There is a system for hydrogen concentration monitoring in the containment at the Loviisa NPP. The measurements are not qualified for hydrogen burning conditions but some additional protections were added as part of the SAM project. Measurement results are used as supporting information to monitor threat to the containment integrity, and when evaluating whether it is safe to use the glow plug system, in case it has not been switched on already.

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At the Olkiluoto NPP units 1 and 2, the following modifications were done:

- protection of the penetrations in the lower drywell against direct contact with the molten corium;
- containment overpressure protection;
- containment filtered venting system;
- lower drywell flooding from wetwell;
- system for filling the containment with water from an external source (the fire water reservoir); and
- a dedicated instrumentation system for monitoring the conditions inside the reactor containment in connection with severe accidents.

The main provisions for severe accident management were installed at the Olkiluoto units 1 and 2 during the SAM project which was finished in 1989. Some additional measures (e.g. pH control inside the containment) were carried out during the plant modernisation project in 1998. All the accident management actions at Olkiluoto units 1 and 2 can be performed without the need for AC power, either manually or by using battery backed power sources.

There is a system for measuring hydrogen contents in the containment at the Olkiluoto units 1 and 2, but the system can't operate if the containment pressure exceeds 2.0 bar. In that case, a sample can be taken from the drywell by means of a syringe.

The SAM strategies and their implementation at Loviisa and Olkiluoto NPPs follow the requirements set in the Government Decree 733/2008 and the YVL Guides. The approach and the plant modifications have been approved by STUK. Since the systems for management and mitigation of severe accidents have already been implemented at Loviisa and Olkiluoto operating units and the corresponding procedures are in place, no further measures for this purpose are foreseen at the moment. However, the soundness and adequacy of the accident management schemes is being constantly assessed against the latest knowledge and experience obtained from different international sources.

STUK is still evaluating the design of Olkiluoto unit 3, but the overall SAM strategy and approach has been accepted. No such hazards or deficiencies that would require changes to this approach have been found, and STUK has not set any further requirements on the SAM approach of OL3.

Review of SAM hardware provisions following severe external events

Adequate hardware provisions that will survive external hazards (e.g. by means of qualification against extreme external hazards, storage in a safe location) and the severe accident environment (e.g. engineering substantiation and/or qualification against high pressures, temperatures, radiation levels, etc), in place, to perform the selected strategies.

The systematic review of SAM provisions focusing on the availability and appropriate operation of plant equipment in the relevant circumstances, taking account of accident initiating events, in particular extreme external hazards and the potential harsh working environment.

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In Finland, the SAM systems are not required to be seismically qualified because earthquake risks are low. The philosophy is to seismically qualify the systems used for severe accident prevention (systems for design basis accidents).

However, SAM systems at Olkiluoto units 1 and 2 are designed to withstand earthquakes (peak ground acceleration of 0.1 g). At the Loviisa NPP, the SAM systems are not designed to withstand earthquakes. Seismic analyses of these systems are not included in level 2 PSA and therefore there is no confirmation on the sufficient operability of these systems after an earthquake.

Availability of dedicated SAM systems and components in the severe accident environmental conditions has been verified as part of the qualification process, as required by Regulatory Guides. When creating the new SAM strategy at the Loviisa NPP in 1990's, new qualification criteria were introduced for the equipment inside the containment fulfilling SAM safety functions. This resulted in some cabling modifications in order to survive the harsh environmental condition due to a severe accident. At the Olkiluoto units 1 and 2, the containment monitoring system has been designed to operate under severe accident conditions. The system has no radiation or temperature sensitive components inside the containment.

The experiences from the Fukushima Dai-ichi accident will also be taken into consideration in the ongoing renewal of the Finnish Regulatory Guides (YVL Guides). For example there will be a new requirement for arrangements that enable the decay heat removal from the reactor out of the containment and arrangements to ensure sufficient cooling of the fuel in fuel storages. In spite that there are fixed severe accident management systems installed both at Loviisa and Olkiluoto operating NPPs, STUK required the licensees to investigate needs and possibilities to use mobile power supply and mobile pumps in accidents.

At the Loviisa NPP, the licensee is investigating possibilities to implement additional injection points for mobile pumps to provide more flexibility to the water supply of the containment external spray. These connections could provide capability to inject enough water for both units with one pump. The different possibilities will be analysed in more detail in 2013. Currently, the containment external spraying for heat removal from the containment can be carried out by fire trucks, individually for both of the units, in case of failure of the fixed pumps.

Presence of hydrogen in unexpected places

The preparation for the potential for migration of hydrogen, with adequate countermeasures, into spaces beyond where it is produced in the primary containment, as well as hydrogen production in SFPs.

Hydrogen leakages out of the containment during severe accidents has been analysed for all units, and the results show that design leakages do not cause a threat to the containment integrity. For spent fuel pools, the approach in Finland is to "practically eliminate" the possibility of fuel damage (see Section 3.4). The possibility of top venting of reactor hall will be added at the Olkiluoto units 1 and 2 in 2013 for the steam release in case of spent fuel pool boiling. Hydrogen possibly formed in the spent fuel pools could be exhausted through this route as well.

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4.2 Level 2 probabilistic safety assessments (PSAs)

A comprehensive Level 2 PSA as a tool for the identification of plant vulnerabilities, quantification of potential releases, determination of candidate high-level actions and their effects and prioritizing the order of proposed safety improvements.

The effectiveness of the severe accident management is further evaluated by the level 2 PSA studies, which show the possibility to carry out and the success of SAM measures in spectrum of initiating events and severe accident sequences.

The current level 2 PSA for Loviisa unit 1 covers full, low and non-power states and it includes accident sequences initiated by internal events, internal floods and weather events (incl. oil spills). Accident sequences initiated by fire events during full power were integrated into the level 2 PSA in December 2012. Fire events during low and non-power states are currently under development and will be integrated into the level 2 PSA in the future. The level 2 fire analysis is based on the level 1 fire analysis and it considers the same initiating fire events. Seismic events are not covered in level 2, but the fraction of overall risk from seismic events is very small. Loviisa unit 2 specific level 2 PSA studies are planned to be carried out in future, but due to the extensive similarities between the reactor units, no major differences are expected. Currently, the level 2 PSA studies do not cover the spent fuel storage. This issue will be discussed with the licensee after the new Regulatory Guides (YVL Guides) are published.

At the Olkiluoto units 1 and 2, level 2 PSA analyses include all level 1 core damage sequences, i.e. the analysis includes power operation, plant start-ups, shutdowns as well as refuelling outages. The initiating events considered include internal initiating events such as component failures and human errors, internal hazards such as flooding and fires, and external hazards such as extreme weather phenomena, seismic phenomena and marine oil spills. Events related to spent fuel storage are planned to be included during the ongoing storage extension project. Due to the similarity of the units, level 2 modelling is common to OL1 and OL2.

Both at the Loviisa and Olkiluoto operating NPPs, the frequency results for severe accidents and large releases are higher than the limits set in STUK's Regulatory Guide YVL 2.8. The frequency limits as such, apply for new NPP units to be built in Finland, and for old units the principle of continuous improvement of nuclear safety is applied.

At the Olkiluoto unit 3, level 1 PSA analysis has been extended with level 2 PSA. Risk integration has been performed over all plant damage states. It must be noted that STUK has not yet approved the PSA analyses for OL3, and thus the results have to be considered as preliminary and they need to be updated.

4.3 Enhancement of severe accident management guidelines (SAMGs)

The enhancement of SAMGs taking into account additional scenarios, including, a significantly damaged infrastructure, including the disruption of plant level, corporate-level and national-level communication, long-duration accidents (several days) and accidents affecting multiple units and nearby industrial facilities at the same time. The extension of existing SAMGs to all plant states (full and low-power, shutdown), including accidents initiated

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in SFPs. The performance of further studies to improve SAMGs. The validation of the enhanced SAMGs.

At the Loviisa NPP, immediate SAM measures are carried out within the Emergency Operation Procedures (EOP). After carrying out immediate actions successfully, the operators concentrate on monitoring the SAM safety functions with SAM procedures. The SAM procedures focus on monitoring the leak tightness of the containment barrier, and on the long-term issues. At the Loviisa NPP, licensee will improve EOPs and SAM procedures to support heat removal from spent fuel pools by pool boiling and supplying additional water to the pools. New EOPs for shutdown states, which cover the immediate recovery of SAM systems, have been developed in 2012 and are going through implementation.

At the Loviisa NPP, the SAM handbook contains background material for better understanding of the SAM strategy, SAM safety functions and accident phenomenology related to these safety functions, fuel storages, criticality issues and radiation protection during a severe accident. Relevant severe accident analysis results, experimental results, and thorough description of the SAM systems have been included. The handbook is used primarily by the emergency preparedness organization during the accident, and more generally also for training purposes.

Olkiluoto units 1 and 2 have event-oriented operating procedures for events within the scope of the design. To cope with emergency conditions beyond design, including severe accidents, a set of symptom-based emergency operating procedures is available. The focus of the severe accident EOPs is on ensuring the containment integrity. The symptom oriented accident management procedures (included in EOPs) apply to shutdown states, as well, although prevention of core damage is essential in situations with open containment. The licensee will improve EOPs to support heat removal from spent fuel pools by pool boiling and supplying additional water to the pools.

At the Olkiluoto 3 unit, event-based and symptom-based procedures (EOPs) are planned to be used for emergency operation. In case of a severe accident separate severe accident management guidance document will be provided for the emergency organization management team to help assess the accident conditions and determine what coping strategies need to be implemented.

EOPs and SAM Guidelines are verified and validated. For Olkiluoto unit 3 this work is still continuing.

4.4 SAM training and exercises

Regular and realistic exercises aimed at checking the adequacy of SAM procedures and organisational measures, including extended aspects such as the need for corporate and nation level coordinated arrangements and long-duration events. Training exercises should include the use of equipment and the consideration of multi-unit accidents and long-duration events. The use of the existing NPP simulators is considered as being a useful tool but needs to be enhanced to cover all possible accident scenarios.

Control room operators are required to participate in the simulator training every year. Emergency operating procedures are evaluated as a part of these simulator trainings.

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All individuals working at the power plant receive basic emergency preparedness training. Evacuation exercises for personnel are arranged annually at the power plant. Individuals assigned to the emergency preparedness organization receive task-specific basic training before being assigned to the task. Those in the emergency preparedness organization receive annual refresher training and advanced training.

Official emergency exercises are held annually at the both Finnish NPPs. Every third year a nation wide emergency exercise of the plant is held. The training simulator is used when practicing the accidents, but the simulators are not capable of extending the simulation into the severe accident domain at the moment. When there is need to practice severe accidents then table top training is used together with the training simulator at the Loviisa NPP. Severe accident simulation will be included in the ongoing I&C renewal project in Loviisa. At the Olkiluoto NPP, a PC-simulator has been developed to illustrate severe accident phenomena.

As a lesson learnt from the TEPCO Fukushima Dai-ichi accident, more consideration will be given to training exercises with multi-unit accidents and long-duration events as well as to exercises related to the spent fuel pools.

4.5 **Emergency preparedness and response (on-site)**

The enhancement of the capability for addressing accidents occurring simultaneously on all plants of the site. Examples include assuring preparedness and sufficient supplies, adding mobile devices and fire trucks and increasing the number of trained and qualified staff.

The Government Decree on Emergency Response Arrangements at Nuclear Power Plants is under renewal. In the new Decree there is e.g. a requirement to take the possibility of several reactor units' simultaneous accident into account in the emergency planning. Another new requirement in the Decree concerns the Reserve Emergency Centres which shall be located outside the power plant area. The Regulatory Guides set up by STUK will then be revised. This will be done in 2013. Required changes in the emergency plans and organisations need obviously to be trained and exercised after implementation.

STUK has requested the licensees to update the emergency plans and organisation taking into account an accident influencing multiple reactor units. Especially responsibilities, communication possibilities and the possible extension and prolongation of the situation have to be considered. The emergency plans will be updated at the both NPPs during 2013. The final organisational issues for Olkiluoto unit 3 are not provided yet. The accident situation simultaneously in more than one reactor unit of the Olkiluoto site will be reviewed again when considering the acceptability of the final plans.

Both licensees have also been requested to evaluate the suitability of emergency preparedness personnel to their duties. At the Olkiluoto NPP, the licensee has been requested to ensure the support resources needed for maintenance. Maintenance personnel need to be trained and regularly participate in exercises. The licensee has to also update the emergency plan with regard to radiation measurement patrols. Those persons who might be nominated to the patrolling duties in extended emergencies must be also trained for their tasks.

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Improved communications

The improvement of communication systems, both internal and external, including transfer of severe accident related plant parameters and radiological data to all emergency and technical support centre and regulatory premises.

In addition to the normal commercial telephone and data transfer connections (both wired and wireless), the emergency command centres are connected to the Finnish authorities' telecommunication network (VIRVE). Strengthening of the power supplies of the authorities' network base stations is under investigation. There is also a satellite telephone connection dedicated to the emergency situations both in Loviisa and in Olkiluoto.

External and internal communication systems at Loviisa NPP are backed up by the emergency diesels. Mobile communication equipment can also be recharged from the SAM diesel secured network.

Olkiluoto units 1 and 2 have their own connection facilities, to support operation of the internal telephone connections within the units. In case of loss of off-site power licensee's internal telephone connections will operate on battery backup for 24 h, and the external landline network and mobile telephone network are estimated to operate for a little less than 24 h. The battery backup arrangements of the mobile telephone network are dependent on the emergency response arrangements of the telephone operators.

Olkiluoto unit 3 will have a range of equipment for plant communication inside buildings, between buildings and with offsite locations. The communication systems are continuously supplied from the emergency power supply system. With the exception of the combined telephone and LAN system, each communication system is independent of the others, so that any failure in one will not cause problems in the others.

For the assessment of the safety status of the Finnish NPPs, relevant plant parameters and radiological data can be transferred with a real time computerised data system to emergency centres, technical support centres and the emergency response centre of STUK.

At the Olkiluoto NPP, the meteorological measurements in the power plant weather mast have the UPS secured capacity for 12 hours operation without the normal AC-power. In addition there is a possibility to connect an external power generator to the mast. External environment radiation monitors in Olkiluoto have local batteries for 1 to 2 weeks operation without the normal AC-power. The central units of the environment radiation monitoring system are equipped with UPS and they can be connected to an external power generator.

At the Loviisa NPP, the meteorological measurements in the power plant weather mast have the battery back-up for eight hours. The licensee is planning the renewal of the weather mast and it will investigate the possibility to build an additional mast in another location. The new arrangements will be equipped with possibility to connect an external power generator to the masts. The environment radiation monitoring system in Loviisa is also under renewal. The design basis of the new measurements is at least 3 months autonomic operation in emergency situations with long-term batteries.

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Large volumes of contaminated water

The conceptual preparations of solutions for post-accident contamination and the treatment of potentially large volumes of contaminated water.

The design of Finnish NPPs aims at maintaining the radioactive material inside the containment, and thus there should not be any need for treating large amounts contaminated water outside the containment. No preparations for possible solutions have been initiated at this stage.

On-site accessibility and habitability

The provision for radiation protection of operators and all other staff involved in the SAM and emergency arrangements. The provision of an on-site emergency center protected against severe natural hazards and radioactive releases, allowing operators to stay onsite to manage a severe accident. The enhancement of the main control room (MCR), the emergency control room (ECR) and emergency control centre (ECC) to ensure continued operability and adequate habitability conditions in the event of a station black-out (SBO) and in the event of the loss of DC.

Analysis of radiological conditions related to habitability of control rooms and emergency centres as well as accessibility for local manual actions during severe accident has been done and appropriate modifications have already earlier been implemented at the operating Finnish NPPs. Habitability and accessibility analyses have been done also for Olkiluoto unit 3.

At the Loviisa NPP, the main control rooms have filtered ventilation systems, but they are not designed against radiation from large amounts of radioactive material being outside the containment. In case the main control room is unavailable, e.g. due to fire, the main control room of the neighbouring unit can be used as an emergency control room to operate the unit in question to safe state. If both of the main control rooms are lost at the same time, e.g. due to high radiation levels, the shifts of the both units will be evacuated into the SAM control room. This SAM control room is common to both plant units, and there are separate monitoring and operation facilities for SAM systems for both units. The massive concrete structure of the SAM building, filtered ventilation and the possibility to use underground pathways ensure the SAM control room being accessible and operable during a severe accident.

The emergency centre of Loviisa NPP is located in a shelter. The emergency centre has its own emergency diesel generator that provides the required energy if the electricity cannot be provided in the normal ways. The amount of diesel fuel is estimated to be enough for approximately 300 h without refuelling. The emergency centre is shielded against direct radiation by thick concrete walls and filtered ventilation. If for some reason the emergency centre loses its ability to operate, the emergency preparedness organization can operate to the appropriate extent in the SAM control room. In addition to the emergency centres at site, the licensee has an opportunity to use rescue service facilities of town Porvoo. The material needed in management or emergency situation has been gathered in these facilities.

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At the Olkiluoto units 1 and 2, the main control rooms (MCR) are shielded against radiation and have filtered emergency ventilation systems. There are no emergency control rooms at the Olkiluoto units 1 and 2 at the moment. Each plant unit has an emergency centre, and there is a common sheltered reserve centre. The management of the emergency organization activates one emergency centre and normally the technical support group will occupy the reserve emergency centre. All emergency centres are shielded against radiation and have filtered emergency ventilation systems. In addition to the emergency centres at site, the licensee has an opportunity to use shelter facilities of town Rauma. The material needed in management or emergency situation has been gathered in these facilities.

At the Olkiluoto unit 3, the main control room and the emergency control room, as well as the emergency centre, are shielded against radiation and have filtered emergency ventilation systems.

Personal radiation protection gears are stored in several storages at the Finnish NPPs, like at the boundaries of the controlled area. The protective gears and measuring instruments for the radiation measuring patrols are also readily available. Iodine pills are stored e.g. in the emergency centres.

As a lesson learnt from the TEPCO Fukushima Dai-ichi accident, STUK requested the licensees to provide plans for access control and radiation monitoring of the staff and decontamination measures for personnel, vehicles and materials in case of the normal provisions at the plant site are not available (e.g. in extreme natural hazards or fallout). Emergency plans must be updated by the end of March 2013 and new procedures exercised by the end of 2013.

Support to local operators

Rescue teams and adequate equipment to be quickly brought on site in order to provide support to local operators in case of a severe situation. Assess operation in the event of widespread damage, for example, the need of different equipment to clear the route to the most critical locations and equipment.

Based on the advance planning, the regional rescue service participates in the Finnish power plant's rescue operations. Additionally, they have heavy duty clearing equipment. In an accident situation, based on their resources, they can prioritise their duties to provide assistance to the nuclear power plant and to clear access routes in and around the plant. Based on legislation, they have the option to present an official request for help from any authority to clear roads and to arrange alternative modes of transportation, such as boat and air transportation. In an accident situation, the rescue authority also has the right to requisition of private equipment.

After the TEPCO Fukushima Dai-ichi accident, STUK requested the licensees to provide plans to restore the access routes to the site. The plans shall be ready by the end of 2013.

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5. TOPIC 4: NATIONAL ORGANIZATIONS

The main stakeholders in Finland having a role or responsibilities with regard to nuclear and radiation safety are the Parliament, the Government, the Ministry of Employment and the Economy, the Ministry of Social Affairs and Health, the Ministry of the Interior, regional Rescue Authorities, licensees operating nuclear facilities and licensees using radiation, the Radiation and Nuclear Safety Authority (STUK), the Technical Research Centre of Finland (VTT), and the Universities.

As a result of the studies made after the TEPCO Fukushima Dai-ichi accident, no major changes are considered necessary in this area so far. However, prompt and flexible means to engage TSO resources and tools also in accident situations to support regulatory recommendations will be explored.

5.1 National infrastructure and framework for safety

Review and revision of nuclear Laws, Regulations and Guides. Where the Regulatory Body (RB) is constituted of more than one entity, it is important to ensure efficient coordination. Emphasis on the need for comprehensive periodic reviews of safety, using state-of-the-art techniques.

Policies and strategies for radiation and nuclear safety are expressed in Finland through legislation. Among the safety principles, the Nuclear Energy Act stipulates governmental and regulatory framework, licensing procedures, provisions for human and financial resources, framework for research and development, principles for continuous development and requirements to promote safety culture and management of safety. In addition, provisions for nuclear waste management are set down in the Act. A comprehensive periodic safety review is also enacted by the Act.

According to the Nuclear Energy Act (Section 54), the overall authority in the field of nuclear energy is the Ministry of Employment and the Economy. It prepares for example licensing decisions for the Government. According to the Radiation Act (section 5), the overall authority in the field of the use of radiation and other radiation practices is the Ministry of Social affairs and Health. According to Section 6 of the Radiation Act and Section 55 of the Nuclear Energy Act, STUK is responsible for the regulatory control of the safety of the use of radiation and nuclear energy. The rights and responsibilities of STUK are provided in the Radiation and Nuclear Energy Acts.

Many other governmental and local organizations, as well as the municipalities, have their own functions based on separate legislation as regards the construction and operation of facilities and conducting activities. Typical areas calling for coordination are environmental issues, security arrangements as well as emergency preparedness. In the areas of rescue services and security the Ministry of the Interior (MI) is the overall authority. In the IRRS mission carried out in Finland in October 2012, a suggestion was given that the relevant Ministries and STUK should develop Memoranda of Understanding for implementing their roles, responsibilities and cooperation with a view to ensuring that STUK is accountable while clearly maintaining its regulatory independence.

The responsibility for the safety rests with the licensee as prescribed in the Radiation and Nuclear Energy Acts. Accordingly, it is the licensee's obligation to assure safe use of

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radiation and nuclear energy. Furthermore, it shall be the licensee's obligation to assure such physical protection and emergency planning and other arrangements, necessary to ensure limitation of nuclear damage, which do not rest with the authorities. It is the responsibility of the regulatory body to verify that the licensees fulfil the regulations.

Nuclear power plant operating licences are granted in Finland for a fixed term but the length of the licence is not defined in the legislation. According to the Finnish regulatory guides, the licensees shall carry out a periodic safety review (PSR) at least every ten years. The Finnish PSR process and scope are in line with the IAEA guidance (NS-G-2.10). PSR is seen as a very important tool for promoting the continuous safety improvement approach. The last periodic safety reviews were finalised in Loviisa in 2007 and in Olkiluoto in 2009.

5.2 Functions and responsibilities of the regulatory body

Effective independence of the RB is essential, including the following aspects: transparency in communicating its regulatory decisions to the public, competent and sufficient human resources, adequate legal powers (e.g. suspend operation), and financial resources. Importance of inviting IRRS missions, and to effectively implement the findings, make the findings and their means of resolution publicly available, and invite follow-up missions.

The current Act on STUK was given in 1983 and the Decree in 1997. The duties of STUK are described in the legislation. STUK is administratively under the Ministry of Social Affairs and Health. The regulatory control of the safe use of radiation and nuclear energy is independently carried out by STUK. No Ministry can take for its decision-making a matter that has been defined by law to be on the responsibility of STUK. STUK has no responsibilities or duties which would be in conflict with regulatory control.

STUK has three Advisory Commissions: the Advisory Commission on Nuclear Safety, the Advisory Commission on Nuclear Security, and STUK's Advisory Commission. In addition, there is an Advisory Commission for Radiation Safety, which is working in connection to the Ministry of Social Affairs and Health.

Based on Section 7r of the Nuclear Energy Act and Section 70 of the Radiation Act STUK has been authorized to issue the detailed safety requirements (YVL and ST Guides). The experiences from the TEPCO Fukushima Dai-ichi accident are also taken into consideration in the ongoing renewal of the YVL Guides.

STUK receives about one third of its financial resources through the government budget. The costs of regulatory oversight are charged in full to the licensees. The model of financing has been applied since 2000 and has ensured that any decreases in government budget have not had direct influence on regulatory oversight activities. Therefore, STUK has been able to plan and allocate its resources (including recruitments) flexibly and according to the needs and on the areas of safety significance.

STUK trains its personnel continuously. Training programmes are established on organizational as well as on individual level reflecting the tasks and responsibilities of the staff members. Individual needs for training are identified in the course of work and annual planning. A specific self-assessment tool is used to explore the level of knowledge, skills and abilities available and necessary for regulatory functions.

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In addition to competence and resources of STUK's own staff, STUK uses technical support organizations as well as other consultants to support regulatory activities. However, also in these areas STUK's expertise has to be wide and deep enough to enable STUK to make the regulatory decisions.

The technical services for research on nuclear safety during normal operation and accident situations as well as in the case of radiological emergencies are mainly provided by the VTT Technical Research Centre of Finland and to some extent also by Finnish universities. STUK and licensees in Finland order safety related research from VTT to support normal operation as well as to support knowledge on the behaviour of the plant in accident conditions. Based on the experience of the TEPCO Fukushima Dai-ichi accident follow-up in March 2011, STUK will explore possibilities to engage VTT support promptly and flexibly also in accident situations.

The Integrated Regulatory Review Service (IRRS) mission was conducted at the request of the Government of Finland from 15 – 26 October 2012. The mission team found that STUK is a competent and highly credible regulator and is open and transparent. It also concluded that STUK is very active in promoting experience sharing both nationally and internationally. The IRRS team identified also areas for further improvement to enhance overall performance of the regulatory system, including:

- although STUK operates in practice as an independent regulatory body, the government should strengthen the legislative framework by establishing the regulator as a body separate in law from other arms of government
- Finnish legislative framework should be further developed to cover authorization for the decommissioning of nuclear facilities and the final closure of nuclear waste repositories
- STUK can further enhance the effectiveness of its inspection activities by enhancing the focus of inspection on the most safety-significant areas and developing a formal qualification programme for inspectors.

Based on the recommendations and suggestions an Action Plan has been prepared by STUK. The follow-up mission is planned to be conducted in 2015.

5.3 Openness, transparency and communication

Active stakeholder engagement in the decision making process builds public confidence. International bilateral cooperation can be beneficial (e.g. joint regulatory inspections). The transparency of the operators activities needs to be enhanced.

The Decree on STUK defines STUK's tasks. One of the tasks is to inform about radiation and nuclear safety matters and participate on training activities in the area. STUK utilizes internet to inform public and interested stakeholders about nuclear and radiation safety in general, risks related to radiation and use of nuclear energy, safety requirements, roles and responsibilities of STUK, STUK's organization, current activities and operating experience, significant regulatory decisions taken, events and publications and safety research. STUK web pages can be found (www.stuk.fi) in Finnish, Swedish and in English. STUK has also made itself available in social media (facebook and twit-

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ter). In addition to internet STUK utilizes also other means to communicate with public and interested stakeholders, such as meetings, seminars, and training courses.

STUK consults interested parties (public, advisory bodies, licensees, ministries, other authorities etc.) in e.g. in licensing steps (when issuing safety assessments), when drafting new regulations, and in the areas related to other authorities (e.g. security, emergency preparedness).

Finland has several bilateral agreements for exchange of information on nuclear facilities and on notification of a nuclear and radiation emergency, e.g. with Sweden, Norway, Russia, Ukraine, Denmark and Germany. In addition, STUK has done bilateral arrangements with several foreign regulatory bodies, which cover generally exchange of information on safety regulations, operational experiences, waste management etc. Such an arrangement have been made with NRC (USA), ASN (France), FANR (United Arab Emirates), NSSC and KINS (Republic of Korea), TAEK (Turkey), ENSI (Switzerland), NISA (Japan), SUJB (Czech Republic), and Rostekhnadzor (Russian Federation).

5.4 Human and organizational factors and competence for safety

There is a need to further develop human resource capacity and competence across all organizations in the field of nuclear safety. Governmental level commitment is needed to ensure that a long-term approach is developed for capacity building.

The competence of the licensees as well as the vendor and main subcontractors is one of the key review areas in the licensing processes for the use of radiation and nuclear energy. During the lifetime of the facilities, the competence remains a key subject to the regulatory control by STUK. STUK is currently updating the legislation and regulatory guides and is going to set goals and requirements on the resources needed to be available for the licensee during normal operation as well as during emergencies.

The Nuclear Energy Act was amended in 2003 to ensure funding for a long term nuclear safety and nuclear waste management research in Finland. Money is collected annually from the licence holders to a special fund. The research projects are selected so that they support and develop the competences in nuclear safety and to create preparedness for the regulator to be able to respond on emerging and urgent safety issues. These national safety research programmes are called SAFIR and KYT. They have an important role in the competence building of all essential organizations involved in nuclear energy. In 2011, research needs originating from the TEPCO Fukushima Dai-ichi accident were studied, and an appendix addressing the topics for further research (e.g. spent fuel pool accidents) was added to the research programme.

Due to planned expansion of the use of nuclear energy, a comprehensive study has been conducted in Finland to explore the need of experts and education of experts in Finland to meet the needs from the organizations in the field. The study was completed in March 2012.

(http://www.tem.fi/files/33402/Report_of_the_Committee_for_Nuclear_Energy_Competence_in_Finland.pdf)

6. TOPIC 5: EMERGENCY PREPAREDNESS AND RESPONSE AND POST-ACCIDENT MANAGEMENT (OFF-SITE)

The requirements for off-site plans and activities in a radiation emergency are provided for in the Decree of the Ministry of the Interior issued in 2011. Off-site emergency plans are prepared by regional rescue authorities. Legislation and plans define clearly the roles and responsibilities of stakeholders having a role in an emergency. Emergency exercises are conducted annually between the licensee and STUK. Every third year all authorities are training together at each site.

As a result of the studies made after the TEPCO Fukushima Dai-ichi accident, no major changes are identified in this area so far. However, there is a need to ensure accessibility to the site in case of extreme weather conditions, a sufficient amount of radiation protection equipment and radiation monitoring capabilities for rescue services and communication capabilities. In addition, there is a need to ensure that the resources of rescue authorities can be reasonably coordinated between radiological and other emergencies, should they happen simultaneously. The coordination of activities and sharing of resources between different regional rescue authorities also needs to be enhanced. Discussions between rescue authorities, STUK and the licensees are ongoing.

6.1 National off-site emergency preparedness organization

Review and improvements to aspects of national emergency preparedness and response. Expansion of the set of scenarios on which the plan was based – multiple units on a site, multiple sites, initiating event impacts in more than one country.

The Finnish concept of off-site nuclear emergency response has been developed since 1976, when the first public authorities' off-site emergency plan was prepared. The development has been a continuous process since then.

The primary safety principle in Finland is that of remote nuclear power plant (NPP) siting, meaning also restrictions on land use within about 5 km radius from the nuclear power plant. In off-site emergency planning another planning zone is applied for an area within a radius of about 20 km. A detailed off-site emergency response plan is required in this area including rapid alerting and evacuation possibility of the population if necessary. The plan is to be prepared by the regional rescue service authority. For the areas outside 20 km radius, the requirements imposed by a potential nuclear accident have to be taken into account in the general emergency planning and arrangements. Thus the nuclear and radiation accident preparedness covers the whole country in Finland. There are no plans to increase these 5 km and 20 km zones at the moment but the training and exercising will target the outer regions also.

In addition to actual emergency rescue planning, the authorities are also required to be prepared for long-term actions following a nuclear accident. These include e.g. decontamination of environment, management of waste containing radioactive substances, radiation monitoring and surveys, health control of the population, measures concerning agricultural and other production and measures to ensure uncontaminated food and feeding stuffs.

A close local co-operation between the regional rescue services, regional police departments, NPP licensees and the Radiation and Nuclear Safety Authority (STUK) has taken

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place since several years. Now, a National Nuclear Power Plant Emergency Preparedness Forum is to be launched in order to co-ordinate this work. The Ministry of the Interior (MI) and the Ministry of Social Affairs and Health (MSH), the regional rescue service authorities, STUK and the NPP licensees will be participating. The forum will handle at least issues related to:

- long term accidents of several NPP units,
- recovery phase actions,
- emergency measures outside the planning zones,
- scope of the emergency exercises,
- radiation monitoring capability during prolonged emergency situations,
- communication capability during prolonged emergency situations,
- availability of the emergency centres with respect to power supply, filtration of the intake air and the distance from the NPPs,
- public information, information between the authorities,
- clearance of the roads, alternative transport ways and means,
- decontamination resources and facilities,
- supply of contractor staff during the emergencies,
- warning the population.

6.2 Intervention levels

Develop reference levels for the application of immediate countermeasures such as sheltering, iodine distribution and evacuation. Develop radiological reference levels for rescue and emergency response personnel in extreme events. Development of reference level for trans-border processing of goods and services such as container transport. Re-examination of approach and associated limits to govern the "remediation" phase. Improvement of the approach to establish contamination monitoring protocols and locations during the recovery. Develop criteria for the return to evacuated area and criteria for return to normal from emergency state.

STUK has prepared so called VAL Guides, which contain the intervention strategy in Finland. VAL Guides contain protective measures and intervention levels in early and intermediate phases of a nuclear or radiological emergency, for various types of emergencies (such as fallout from nuclear detonation, severe accident in a NPP, malicious acts, contamination due to radioactive substances etc.). VAL Guides contain reference levels of exposure during the first year and factors, other than radiation, affecting choice of protective measures and protective measures to be considered during nuclear or radiological emergencies and transition to recovery. VAL Guides are to be put into force by the Ministry of the Interior.

VAL Guides include principles and dose limits for protection of workers in the early and intermediate phases of a nuclear or radiological emergency. Indicative operational intervention levels for different protection measures of emergency workers are presented

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as well as intervention levels for workers involved in urgent protection measures, mitigating the consequences of the accident and other necessary work.

Environmental measurements are carried out by STUK, rescue service and Defence Forces. In Finland, there is a network of environment and foodstuffs laboratories which have the capability to measure gamma radioactivity levels in the food and environmental samples. STUK coordinates operation and provides technical support if needed. In addition, STUK has delivered regional hospitals monitoring equipment for monitoring iodine in thyroid. This measuring capability is meant for screening the public for contamination of iodine.

STUK provides guidance and advice and collects measurement results made by different authorities to prepare an overview picture of the radiation levels in contaminated area. This information is needed to focus monitoring to the areas of interest. The food industry has its own quality control and measuring procedures to make sure that food is safe to consumers. STUK is presently finalising its monitoring strategy for nuclear or radiological emergencies. A new project will be launched in 2013 to develop further monitoring arrangements and capabilities as well as co-operation procedures.

6.3 Information to the public

According to the Rescue Act and the Decree of the Ministry of the Interior concerning informing public during nuclear or radiological emergencies, the authority in charge is responsible for informing public on protective measures and other activities to be carried out. Authorities at governmental, provincial, and municipal level provide information on their own activities and give instructions regarding their own sphere of responsibility. In case of a nuclear power plant accident there are many organisations providing information. Thus special attention needs to be paid to coordination of timing and content.

Further improvement of arrangements for the coordination of information to the public and media during emergencies is needed to ensure that the messages issued by different authorities are consistent. Guidelines for co-operation among authorities have been written in a guidebook published in November 2012. To help the implementation of guidelines seminars and workshops will be organised from the beginning of 2013.

In an accident situation the principal information route to the public is FM radio, TV and internet. The first outdoor warning to the public close the NPP is given by general warning signal via sirens or loudspeakers. By arrangement with broadcasting companies, urgent RDS-notifications can be transmitted promptly over the FM-radio and TV. There is a new specific law for warning messages via radio and TV. Law is entering into force on 1st June 2013.

6.4 Training of personnel, emergency drills

Increasing the scope of off-site exercise programs. Exercising all interface points (national, regional, municipal,...). Increasing emphasis on drilling with neighbouring countries. Performing of longer term exercises to reflect the challenges of extreme events. Train intervention personnel for potentially severe accident conditions. Rapid intervention team to provide support to sites. Education of the public and the media in aspects related to emergencies (e.g. radiation does and their effects).

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The off-site emergency plan prepared by the regional rescue service authority includes a training program. The training shall comprise co-operation between authorities as well as training in the special tasks of each authority in a nuclear power plant accident.

Every third year a full scale command post exercise is organised for each domestic nuclear power plants. In these exercises all established emergency arrangements are tested including mobile monitoring. In addition to the licensee and the regional rescue authority in question, a large numbers of authorities on local, regional and national level take part in the exercise. In each exercise there is a representation of private sector, too. In addition, representatives of media are invited to take part in the exercise. Scenarios of these exercises are usually severe on-site situations, and real time weather is used. However, exercises exceeding 24 hours or exercises containing aspects of recovery have not been organised systematically, and should be included in the exercise calendar.

Neighbouring countries (the Nordic countries and Russia) are invited to take part in Finnish exercises. Correspondingly Finland takes part in exercises organised by neighbouring countries. Finland also regularly takes part in the exercises organised annually by the EC and every fourth year by the IAEA. Thus cooperation and communication and coordination of actions internationally are tested at regular intervals. Requests and provision of international assistance is often included in the objectives of the international exercises. Based on an initiative from political level, Finland will host an international exercise in spring 2013 in which the Nordic and Baltic countries will take part in.

Permanent coordination groups (SVPP) have been established for both Loviisa and Olkiluoto NPPs in order to ensure coordinated and consistent emergency plans, to improve and develop emergency planning and arrangements and to share lessons learnt from the exercises, regulations and other information. Also extensive emergency preparedness training is coordinated by these groups. Members of these groups are the regional rescue service and police authorities, STUK and the licensee (NPP). SVPP groups organise annual joint training for the staff of licensee, STUK and regional rescue and police authorities. In addition, each organisation organises training according to their detailed training programme.

STUK has organised special training courses for representatives of media for five times, and almost 100 journalists have been trained on different aspects concerning use of nuclear energy and use of radiation in health care and industry. Risks of nuclear or radiological emergencies as well as protective measures needed are included in the programme.

6.5 Monitoring of the radiation situation 24/7

STUK monitors constantly the radiation situation throughout the country. The aim is to identify potential radiation hazards quickly and to take efficient measures to protect the population against the harmful health effects of radiation. In addition to STUK, the Ministry of the Interior, the Finnish Meteorological Institute, and the Finnish Defence Forces and their organizations participate in radiation monitoring.

The dose rate of external radiation is measured by a monitoring network maintained by STUK and local rescue authorities. The network comprises almost 300 automatic sta-

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tions. Additionally real-time airborne spectrometric measuring stations are situated e.g. at a distance of 20-30 km from the NPPs. All signals of abnormal detections in either external dose rate network or spectrometric measuring stations are received by STUK expert of duty who is obliged to activate necessary actions to verify abnormal detection and activate emergency response if it is not the case of e.g. malfunction of the monitor. Actions shall be activated within 15 minutes on 24/7 basis.

6.6 External risks, including extreme weather conditions

Enhancing radiation monitoring and communication systems by additional diversification / redundancy. Hardening of support infrastructure (Emergency Response Centers, Sheltering facilities, essential support facilities (like Corporate Offices) with back-up power, environmental radiological filtering, etc.

In Finland, main natural external threats of NPPs and the society at the same time are e.g. extreme low and high temperatures in extended periods, storms in different seasons of the year (incl. snow storms) and elevated sea water levels. Examples of other external threats are e.g. oil transport accident on the Baltic Sea, collapse of the electrical grid or data network. The risks of these situations are regularly evaluated both for NPPs and for all important functions of the society. Often there is a possibility to enhance the regional preparedness based on the predicted circumstances.

After the TEPCO Fukushima Dai-ichi accident, evaluations to enhance the off-site actions were initiated between STUK, licensees and regional rescue services. Ensuring accessibility of the NPP site was considered an essential part to support accident management on-site. Thus clearance of the roads leading to the site e.g. after extreme storms is under evaluation, and further enforcements to support this is being considered. Furthermore, sufficient amount of radiation protection equipment and radiation monitoring capabilities for rescue services is being checked and supplemented, if necessary.

Even though there are several independent telecommunication systems available during normal situations, the need for strengthening the power supply to the Finnish authorities' communication network base stations is under investigation. As the ultimate back-up, the satellite telephones have been already installed in the emergency centres of the Finnish NPPs and STUK respectively.

A new National Nuclear Power Plant Emergency Preparedness Forum is to be launched in order to co-ordinate the co-operation between the NPP licensees, regional rescue services, regional police departments and STUK. The forum will handle issues related e.g. to long term accidents of several NPP units, radiation monitoring and communication capabilities, availability of the emergency centres, and clearance of the roads (see Section 7.1).

A transportable, insulated and heated container for personnel protective equipment and radiation measuring instrument is to be purchased at the Eastern Uusimaa Emergency Services Department to quickly provide a certain amount of equipment in such a case when the normal storages in the NPP are unavailable e.g. due to the external hazards or fallout. The container can be transported by a truck and it can be connected to the electricity grid or to the movable power engine. The container is estimated to be in use on

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2014. Investigation for remote storage of protective equipment is underway in Satakunta-region closer to Olkiluoto NPP, as well.

Finnish authorities have a Natural Disaster Warning System (LUOVA), which is coordinated and run by the Finnish Meteorological Institute. It secures information gathering and transfer to competent safety authorities about regional storms, tornados, significant snowfall, significant lightning, rural and urban flooding, and sea level rise. Also European events like nearby forest fire, wide and sudden snow storms, storms etc are monitored, and followed. Global seismic and tsunami events are reported without delay. This guarantees in advance warning and continuous situation assessment for the authorities and the population potentially concerned.

Future development of NPP off-site emergency planning should seriously consider all aspects of coordinated resource allocation when there might be serious limitations of communication and transport as well as a simultaneous situation requiring urgent health and property saving actions and NPP emergency actions to protect the population in the same region. Also the construction of NPPs on the new sites where there is no NPP today sets new challenges to the authorities.

7. TOPIC 6: INTERNATIONAL CO-OPERATION

Finland has signed the international conventions and treaties aiming at a safe and peaceful use of nuclear energy, and is committed to transparency and enhancing nuclear safety internationally through international co-operation and implementation of the IAEA Action Plan. Finland participates actively in the work of international organisations such as the IAEA, the OECD/NEA and the EC.

Utilization of operating experience feedback is seen as a very important tool to improve safety worldwide. Finland believes that the international operating experience process should be improved to ensure that lessons are learned from operating experience and measures are taken to avoid recurrence of significant events.

7.1 Strengthening international peer review processes

Strengthening the peer reviews process of CNS and of missions (IAEA, WANO and Industry).

The transparency and international co-operation are one of the corner stones in the Finnish nuclear safety policy. Finland has signed the international conventions and treaties aiming on safe and peaceful use of nuclear energy. After the TEPCO Fukushima Dai-ichi accident, Finland signed among 130 other countries in the General Conference in September 2011 the IAEA Action Plan.

Finland regularly hosts international peer review and also offers its experts for the review in other countries. Finland also supports activities to improve peer review services and has already participated in the development of IAEA's peer review services (e.g. IRRS and the OSART missions for construction).

The latest peer reviews are the following:

- IAEA carried out an OSART safety review in Loviisa in March 2007, with a follow-up review in July 2008.
- WANO peer review to Loviisa was performed in March 2010.
- WANO peer reviews have been carried out at the Olkiluoto nuclear power plant during the year 2006. A follow-up for the last WANO peer review was carried out in August 2009.
- IAEA's International Physical Protection Advisory Service (IPPAS) mission was carried out in Finland in 2009. The follow up mission was hosted in April 2012.
- In 2009 STUK organized a Peer Review of STUK's waste management related activities. All EU member states were invited and representatives from 11 countries participated in the peer review.
- In 2011 STUK hosted a peer review of the emergency preparedness with the OECD NEA countries.
- STUK participated in the work carried out by the working group of European authorities (European Pilot Study on Demonstrating the Safety of Geological Disposal), which resulted in a recommendation for safety case content for final disposal at different stages of final disposal. The recommendations were published in 2011.

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- Finland had IRRS mission in 2001 and the follow-up mission in 2003. IRRS mission was carried out to the regulatory body in October 2012 and the follow-up mission is planned in 2015. Findings will be addressed in the action plan which is currently under preparation.
- IAEA has agreed to carry out a pre-OSART (Operational Safety Review Team) mission to Olkiluoto 3 NPP in 2013 depending on the project schedule with regard to fuel loading.

Finland continues the hosting and participation in the international peer reviews and will report the findings of these peer reviews as well as progress of the action plans in the CNS report. As a result of the TEPCO Fukushima Dai-ichi accident there is no need for changes in this activity in Finland.

7.2 Co-operation with international organizations and working groups

Optimisation of the Global Safety Regime.

In Finland international co-operation and transparency belong to the cornerstones of the development of the national safety policy and regulations as well as operation of the nuclear facilities. All of the involved organizations including ministries, the regulatory body, the utilities and research organizations take actively part into international co-operation at relevant forums, e.g. IAEA, EU, OECD/NEA, WENRA, VVER forum, NERS, ETSO, WANO, ENISS, and EUR. Each of these working groups aims at enhancing nuclear safety and they have made initiatives in respect to lessons learned from the TEPCO Fukushima Dai-ichi accident in March 2011. Information about the ongoing work is shared nationally and within the involved organizations. As a result of the IRRS mission in October 2012, the IRRS team gave Finland a good practice on active contribution to the global improvement of radiation and nuclear safety through participation in relevant international activities and devoting high quality expertise to this activity. Finland is committed to do so also in the future.

Finland acknowledges that the growing number of international meetings, assessments, peer reviews and expanding mandates is placing high demands on existing human resources. It is also acknowledged that it is the task of the member countries to give directions to the international organisations to focus resources on most significant areas and to avoid overlapping activities and actions by various organisations. While participating in the international co-operation, Finland will act actively and initiatively to ensure on its part that resources are allocated with a graded approach to most significant areas and avoiding also overlapping activities.

7.3 Strengthening communication mechanisms through regional and bilateral cooperation

Countries should cooperate with neighbouring and regional countries and exchange information on their civil nuclear power programmes.

Finland has bilateral agreements with neighbouring countries and also with some other countries having a nuclear program. The bilateral agreements include provisions to exchange information on the design and operation of nuclear facilities as well as on regulatory frameworks and approaches. As an example, STUK has continued bilateral co-

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operation in the form of meetings and conferences with the nuclear safety regulatory authorities of Sweden, Russia, France and the USA, among others. In the field of emergency preparedness Finland has bilateral and international agreements on exchange of information.

As a result of the TEPCO Fukushima Dai-ichi accident there has been no need to for any new agreement to mechanism of communication. However, there has been a need to enhance the exchange of information during the event and coordination of the protective measures recommended by the regulatory body. This topic is discussed in a new working group under Reactor Harmonization Working Group of WENRA for which Finland also participates.

With regard to assistance on embarking countries, Finland is a member of the IAEA's Regulatory Co-operation Forum (RCF) which coordinates and implements assistance to newcomer countries. In addition, Finland has provided support to embarking countries via EC's INSC programme.

7.4 Effectiveness of experience feedback mechanisms

Information exchange and feedback should be enhanced by using the established mechanisms (e.g. IRS, INES) and organisations (e.g. WANO). The current focus is on reporting events and not necessarily on learning from the events. Effectiveness of Operating Experience Feedback should be assessed and its implementation should be included in peer reviews.

Finland promotes learning from the operating experience by several means. The evaluation of foreign operational occurrences and incidents is based on the reports of the IRS Reporting System (IAEA/NEA) and on the reports of other national regulatory bodies. IRS reports are also evaluated by the licensees. Reports for the IRS System on safety-significant occurrences at Finnish nuclear power plants are written by STUK.

STUK has also participated in co-operation between international organisations such as the IAEA, the OECD/NEA and the EU, which exchange information on safety issues and operating events. Other forums that STUK uses to obtain information are WENRA, the VVER Forum and the NERS Forum as well as some bilateral agreements.

At the Loviisa NPP, the main external operating experience information to be handled comes from WANO (World Association of Nuclear Operators) Moscow Centre which links all the VVER reactor operators. Additional information and reports are received from the VVRE Club, IAEA, OECD/NEA and NRC (U.S. Nuclear Regulatory Commission).

At the Olkiluoto NPP, the main sources of information of the operating experience feedback group are ERFATOM (the owners group for Nordic BWR operators), KSU (Swedish nuclear training centre), WANO and the Swedish Forsmark NPP. Information is also coming directly from several sources (IAEA and OECD/NEA, IRS), Loviisa power plant (e.g. operating experience meetings and reports), vendors (Westinghouse Atom, Alstom Power Sweden AB), component manufacturers, the WANO Network, BWROG (BWR Owners Group) and BWR Forum (FANP).

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As a result of the TEPCO Fukushima Dai-ichi accident there has been no need to for any new forum for the exchange of operating experience. However there is need to improve the effectiveness of the lessons learned process globally. This could be achieved by requiring licensees' and regulators to report corrective actions taken in the country as a result of significant events. In addition, utilisation of international operating experience feedback should be an essential part of the international peer review missions.

7.5 Utilization of IAEA safety standards

Strengthening and expanded use of IAEA Safety Standards. The IAEA Safety Standards should be taken into account in developing national nuclear safety regulations. These Safety Standards have a role to play in seeking continuous improvements to safety at existing nuclear power plants.

According to the Finnish nuclear safety policy the Finnish nuclear legislation and regulations aim at high safety level at the Finnish nuclear facilities. Continuous improvement is one of the fundamental principles of the Finnish nuclear safety policy. The legislation and the regulations are kept up to date and all the stakeholders are committed to practices typical to high reliability organizations. The IAEA safety standards are used as a reference when developing the Finnish regulations.

STUK takes actively part in the preparation of the IAEA safety standards. Finland is represented in all of the safety standard committees, the commission on safety standards and the Standing Advisory Group on Safeguards Implementation (SAGSI).

8. IMPLEMENTATION OF ACTIVITIES

This Section concludes all activities taken, planned or already implemented in a table format including time schedules. References are given to Sections 2-7 regarding more detailed description of the related responses and conclusions.

Table 1. National level activities.

No.	Action/Activity	Related Section	Status	Schedule
Topics 1-4 – Natural Hazards, Design Issues, Severe Accident Management and National Organisations				
1	Including new issues (extreme external hazards, spent fuel pool issues) in the national research programme	Sections 2 and 5.4	In progress	2012-2014
2	Implementing the new requirements to Finnish Regulatory Guides (YVL Guides)	Sections 2, 3.1 and 4.5	In progress	2013
3	Preparations to implement rapid support from TSOs to the authority in emergencies	Section 5.2	In progress	2013
Topic 5 – Emergency Preparedness and Response and Post-Accident Management (Off-Site)				
4	National Nuclear Power Plant Emergency Preparedness Forum to be launched in order to co-ordinate issues related to: –long term accidents of several NPP units, –recovery phase actions, –emergency measures outside the planning zones, –scope of the emergency exercises, –radiation monitoring capability during prolonged emergency situations, –communication capability during prolonged emergency situations, –availability of the emergency centres with respect to power supply, filtration of the intake air and the distance from the NPPs, –public information, information between the authorities, –clearance of the roads, alternative transport ways and means, –decontamination resources and facilities, –supply of contractor staff during the emergencies, –warning the population	Section 6.1	In progress	2013 ->
5	Further improvement of arrangements for the coordination of information to the public and media during emergencies is needed. Guidelines for co-operation among authorities have been written in a guidebook published in November 2012. To help the implementation of guidelines seminars and workshops will be organised from the beginning of 2013.	Section 6.3	In progress	2013

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6	Emergency exercises exceeding 24 hours or exercises containing aspects of recovery have not been organised systematically, and should be included in the exercise calendar.	Section 6.3	In progress	2014
7	Ensuring sufficient amount of radiation protection equipment and radiation monitoring devices for rescue services	Section 6.6	In progress	2014
Topic 6 – International Co-operation				
8	Participation in the IAEA-ISSC work	Section 7.2	In progress	According to the work of the IAEA-ISSC
9	Participation in the WENRA RHWG work	Section 7.2	In progress	According to the WENRA RHWG
10	Participation in the CNRA and CNRA STG on Fukushima	Section 7.2	In progress	According to the CNRA and STG
11	Participation in the MDEP STC and EPR design specific working group	Section 7.2	In progress	According to the MDEP STC and EPRWG
12	Participation in EU Stress Tests	Section 1	Implemented	06/2012

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Table 2. Measures at the Loviisa NPP units 1 and 2.

No.	Action/Activity	Related recommendation	Status	Schedule
Topic 1 – Natural Hazards				
101	Evaluation of fragility of the spent fuel pools at high temperature and at high pressure	Section 2.1	Implemented	09/2012
102	Updating the seismic fragility analyses of <ul style="list-style-type: none"> - the spent fuel pools - fire fighting systems 	Sections 2.1 and 2.3	Implemented In progress	09/2012 05/2013
103	improving preparedness for high seawater level	Sections 2.1 and 2.2	Under evaluation	2013*
104	Analysis of consequences of beyond design basis low and high temperature	Section 2.1	Implemented	12/2011
105	Analysis of consequences of tornados and downbursts on plant structures and systems	Section 2.1	Implemented	12/2011
Topic 2 – Design Issues				
106	Implementation of an alternative ultimate heat sink	Section 3.1	In progress	2014
107	Securing the availability of the auxiliary emergency feed water system	Section 3.1	In progress	2012-2013
108	Acquiring a container to transfer diesel fuel at site	Section 3.2	Implemented	2012
109	Enhancing the battery power sources	Section 3.3	Under evaluation	12/2012*
110	Acquiring mobile power supply and mobile pumps	Section 3.5	In progress	2013
111	Connecting the additional diesel power engine to the plant switchgears by a dedicated cable	Section 3.3	Implemented	10/2012
112	Evaluation of demineralised water reservoirs	Section 3.1	Implemented	12/2011
113	Evaluation of demineralised water usage in an accident concerning all units and spent fuel pools at the site	Section 3.1	In progress	12/2012
114	Enhancing the diesel fuel transfer capabilities on-site; acquiring a new diesel fuel storage tank at site	Section 3.2	Under evaluation	2014*
115	Evaluation of suitability of biodiesel for the diesel engines	Section 3.2	In progress	12/2012
116	Ensuring the water injection into the spent fuel pools and monitoring the conditions of the pool	Sections 3.4 and 4.3	Under evaluation	03/2013*
Topic 3 – Severe Accident Management				
117	Capability of dealing with multi-unit severe accidents; updating of emergency plans and organisation	Section 4.5	In progress	06/2013
118	Improving the containment decay heat removal in case of multi-unit accidents	Section 4.1	In progress	2013
119	Plans for restoring the access routes to the site	Section 4.5	In progress	12/2013
120	Evaluation of suitability of emergency preparedness personnel to their duties	Section 4.5	In progress	03/2013
121	Plans for access control and radiation monitoring of the staff and decontamination measures in extreme natural hazards	Section 4.5	In progress	12/2013

* Schedule means the time schedule for the evaluation. After that the licensee proposes the possible measures and their schedule.

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Table 3. Measures at the Olkiluoto NPP units 1 and 2.

No.	Action/Activity	Related recommendation	Status	Schedule
Topic 1 – Natural Hazards				
201	Updating the seismic fragility analyses of the spent fuel pools and fire fighting systems	Sections 2.1 and 2.3	In progress	02/2013
202	Improvement against exceptionally high seawater level on the cooling systems of the spent fuel interim storage	Section 2.2	Under evaluation	12/2012*
203	Analysis of consequences of beyond design basis low and high temperature	Section 2.1	Implemented	12/2011
204	Analysis of consequences of tornados and downbursts on plant structures and systems	Section 2.1	Implemented	12/2011
Topic 2 – Design Issues				
205	Conceptual design of independent way of pumping water into the RPV	Section 3.1	Under evaluation	01/2013*
206	Conceptual design and implementation of modification to prevent overheating of the auxiliary feed water system (independent of sea water cooling)	Section 3.1	In progress	2013-2014
207	Evaluation of suitability of biodiesel for the diesel engines	Section 3.2	In progress	12/2012
208	Implementation of mobile power supply (including recharge of DC batteries)	Section 3.5	In progress	2013
209	Evaluation of demineralised water reservoirs	Section 3.1	Implemented	12/2011
210	Evaluation of demineralised water usage in an accident concerning all units and spent fuel pools at the site	Section 3.1	In progress	11/2012
211	Ensuring the water injection into the spent fuel pools and monitoring the conditions of the pool	Sections 3.4 and 4.3	In progress	2013
Topic 3 – Severe Accident Management				
212	Capability of dealing with multi-unit severe accidents; updating the emergency plans and organisation	Section 4.5	In progress	03/2013
213	Reactor building top venting for steam escape; hydrogen possibly formed could be exhausted through this route as well	Sections 3.4 and 4.1	In progress	2013
214	Plans for restoring the access routes to the site	Section 4.5	In progress	12/2013
215	Enhancement of the emergency plan on radiation measurement patrols	Section 4.5	In progress	03/2013
216	Enhancement of adequacy of the maintenance personnel in case of emergency	Section 4.5	In progress	03/2013
217	Evaluation of suitability of emergency preparedness personnel to their duties	Section 4.5	In progress	03/2013
218	Plans for access control and radiation monitoring of the staff and decontamination measures in extreme natural hazards	Section 4.5	In progress	12/2013
219	Improvement of communication capabilities	Section 4.5	Implemented	12/2012

* Schedule means the time schedule for the evaluation. After that the licensee proposes the possible measures and their schedule.

Table 4. Measures at the Olkiluoto NPP unit 3.

No.	Action/Activity	Related recommendation	Status	Schedule
Topic 1 – Natural Hazards				
301	Analysis of consequences of beyond design basis low and high temperature	Section 2.1	Implemented	12/2011
302	Analysis of consequences of tornados and downbursts on plant structures and systems	Section 2.1	Implemented	12/2011
Topic 2 – Design Issues				
303	Evaluating modifications required for independent decay heat removal system	Section 3.1	Under evaluation	to be decided
304	Ensuring the water injection into the spent fuel pools with mobile pumps	Section 3.4	In progress	Before start of operation
Topic 3 – Severe Accident Management				
305	Capability of dealing with multi-unit severe accidents; updating the emergency plans and organisation (in connection with Olkiluoto units 1 and 2)	Section 4.5	In progress	03/2013