ROMANIA



National Commission for Nuclear Activities Control



Romanian National Action Plan post - Fukushima



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INTRODUCTION

Following the Fukushima Daiichi accident occurred in March 2011, the Romanian authorities and the nuclear industry have started to perform reassessments of nuclear safety and emergency preparedness arrangements and to implement improvements, in line with the international efforts in this direction.

The safety reassessments conducted in response to the Fukushima accident included the "stress tests" review required by the European Council for all the European nuclear power plants, in compliance with the specifications and criteria issued by the European Commission, based on the work done by the European Nuclear Safety Regulators' Group (ENSREG) and the Western European Nuclear Regulators' Association (WENRA).

Before the requirements for the stress tests were issued, the licensee, National Company Nuclearelectrica, owner and operator of Cernavoda NPP, had already initiated measures in response to the Significant Operating Experience Report issued by the World Association of Nuclear Operators (WANO) SOER 2011-02 (Fukushima Daiichi Nuclear Station Fuel Damage Caused by Earthquake and Tsunami), including:

- a thorough plant walkdown for verifying protection against seismic, fire and flooding events;
- acquisition and testing of mobile diesel generators;
- development of new operating procedures for response to Station Blackout and to total and extended Loss of Spent Fuel Pool Cooling events.

Following the official issue of the ENSREG specification for stress tests, CNCAN requested the licensee to do a reassessment of the protection against beyond design basis events, including extreme external events and the emergency preparedness and response arrangements.

There are currently several public reports which document the actions taken by the National Commission for Nuclear Activities Control (CNCAN) and Cernavoda NPP to take account of the lessons learned from the Fukushima accident:

- National Report of Romania on the implementation of the stress tests (December 2011);
- Peer-Review Country Report for Romania (April 2012);
- National Report of Romania for the 2nd Extraordinary Meeting under the Convention on Nuclear Safety (May 2012).

A national action plan has been developed for bringing together the actions identified from regulatory reviews, self-assessments, peer-reviews and generic recommendations at international level. This action plan has been elaborated by CNCAN taking account of the guidance provided by ENSREG. The target date for implementing all the actions is the end of 2015.

CNCAN monitors the licensee's progress in the implementation of the planned improvements and continues to perform safety reviews and inspections to ensure that all the opportunities for improvement are properly addressed taking account of the lessons learned from the Fukushima accident. The action plan will be reviewed periodically and revised as necessary.

GENERAL INFORMATION ABOUT CERNAVODA NPP

Romania has one nuclear power plant, Cernavoda NPP, with two units in operation, pressurised heavy water reactors of CANDU 6 design (CANadian Deuterium Uranium), each with a design gross output of 706.5 MWe. Unit 1 and Unit 2 started commercial operation on the 2nd of December 1996 and on the 1st of November 2007, respectively. Cernavoda NPP Units 1 and 2 cover up to 19% of Romania's total energy production.

Cernavoda NPP is owned and operated by the National Company Nuclearelectrica (Societatea Nationala Nuclearelectrica - SNN). SNN is the license holder for Cernavoda NPP.

The Romanian Government has plans to further increase nuclear generating capacity through completion of the project of Units 3 and 4 of the Cernavoda NPP. All the design improvements resulting from the "stress tests" for the operating units will be implemented also in Units 3 and 4.

All of the Cernavoda NPP units are pressurised heavy water reactors (PHWR), of CANDU-6 type, designed by AECL (Atomic Energy of Canada Ltd.). Extensive information on the design of the Cernavoda NPP is provided in the national report elaborated by CNCAN on the implementation of the "stress tests", which is publicly available.

GENERAL INFORMATION ABOUT THE ACTION PLAN POST-FUKUSHIMA

The action plan has been developed by CNCAN, based on the safety reviews performed after the Fukushima accident. It takes account of the outcome of the peer-review organised by ENSREG, as well as of the actions agreed at the 2nd Extraordinary Meeting under the Convention on Nuclear Safety.

The revision 0 of the action plan reflects the situation as of December 2012. The action plan will be reviewed quarterly by CNCAN to verify the progress with its implementation and revised, as necessary, to reflect any relevant new information and developments.

CNCAN will publish the action plan on its website and will inform the public periodically on the progress with implementation.

PART I

TOPIC 1 - EXTERNAL EVENTS

1.1. Overview of activities performed and planned by the licensee

Protection against earthquakes

A seismic margin assessment was performed for Cernavoda NPP, with a review level earthquake (RLE) established at a reasonably high level seismic ground motion, based on site seismicity and plant specific design features. The seismic margin assessment shows that in comparison with the original design basis earthquake of 0.2g, which has a frequency of 1E-3 events/year, all SSCs which are part of the safe shutdown path after an earthquake would continue to perform their safety function up to 0.4g, which has a frequency of 5E-5 events/year. This margin is considered adequate as it meets the safety goals applied internationally for new NPPs. Additional margins exist beyond the value of 0.4g, but they have not been quantified.

The potential of Cernavoda NPP units flooding induced by an earthquake exceeding the DBE has been analysed by considering all the failure mechanisms consisting of failure of dams and other hydrological or civil structures collapsing and the tsunamigenic potential of a Black Sea originating earthquake. The results of these analyses show that the effect of these failure mechanisms has physically no potential for seismically induced flooding of the Cernavoda site.

The potential for seismic induced internal plant flooding was also analysed and it was concluded that this does not pose a threat to the equipment qualified to perform the essential safety functions after an earthquake. The inspections conducted post-Fukushima confirmed the design robustness and good material condition regarding the fire protection.

The seismic walk-downs and subsequent seismic robustness analyses done as part of the seismic margin assessment have not revealed a need for any safety significant design change. However, several recommendations resulted from these inspections, such as increasing the seismic robustness of the batteries, have been considered by the licensee as part of the regular plant seismic housekeeping program.

Protection against external flooding

Based on the analysis results obtained by making use of the latest deterministic tools and complemented by probabilistic approach, it was concluded that the Cernavoda NPP design intent in relation with flooding hazards provides sufficient safety margins, therefore no further measures were envisaged in this area.

However, following a generic recommendation from a "stress test" peer review, concerning the improvement of volumetric protection of the buildings containing safety related equipment located in rooms below plant platform level (so that protection does not rely solely on the elevation of the platforms), potential measures have been identified and design modifications were approved to replace selected doors with flood resistant doors and penetrations sealing. Sand bags have also been made available on site to be used as temporary flood barriers, if required.

Currently, improvement initiatives are undergoing for volumetric protection (replacement of selected access doors with flood resistant doors and room penetrations sealing) of several areas were safety related equipment are located underground (e.g. SCA, T/B basement, Class III SDG fuel transfer pumps house), in addition to the passive protection measure ensured by the plant platform elevation.

Based on review of the enhanced design provisions and operating procedures, the plant strategy in response to internal and external flooding events will be revised and required modifications of plant procedures will be performed. Flood protected areas are periodically inspected as per dedicated plant routines.

Protection against extreme weather events

Based on the assessment performed, the licensee concluded that adequate safety margins exist in relation to extreme weather conditions, taking account margins provided in the design of the safety related SSCs as well as the time available for preventative measures in slow developing scenarios.

For cases in which the extreme weather conditions could affect the availability of the off-site power supply and / or the transfer of heat to the ultimate heat sink, based on the review of severe weather conditions and their impact on the plant, it was concluded that these would not generate worst accident scenarios as compared with SBO, LOUHS and SBO + LOUHS events.

Even though the possibility to have on site winds corresponding to the 1000 year return period is very remote, the specific procedure which is in place for extreme weather conditions (and covers also the actions to be taken in case of high winds) has been revised to include more proactive actions.

1.2. Overview of activities performed and planned by the regulator

The regulatory reviews post-Fukushima have been performed in the context of the "stress tests" and have focused on verification of the completeness and quality of the stress test reports and of the supporting analyses prepared by the licensees. CNCAN has reviewed the methodology used for the assessment of external events and the results and has acknowledged that these reflect the current standards and good practices and state-of-the-art knowledge.

The "stress test" peer-review for Romania acknowledged the comprehensive studies and work performed to increase protection of the Cernavoda plant against seismic events and the substantial and recent studies for the assessment of flooding hazards.

As regards compliance with the "stress test" specifications devised by ENSREG, the country report resulting from the peer review states that "although the Romanian report complies entirely with the ENSREG stress tests specifications, it does not adequately address in depth margins to cliff edge effects for earthquakes and extreme external events" and "The Romanian report is judged to be adequate and at an appropriate level of detail except for earthquakes and extreme external events where it does not adequately address weak points and cliff-edge effects and the measures for the prevention of cliff-edge effects".

The above statements from the peer-review report for Romania are due to the fact that the ENSREG specifications requested "an evaluation of the range of earthquake severity above which loss of fundamental safety functions or severe damage to the fuel (in vessel or in fuel

storage) becomes unavoidable" and "the range of earthquake severity the plant can withstand without losing confinement integrity.

Regarding the protection against earthquakes, the assessments performed for Cernavoda NPP demonstrated that the safety functions for the success paths for seismic events are fulfilled with a margin of minimum 0.4g, corresponding to an event with a frequency of occurrence of less than 1 in 20000 years. In addition, based on deterministic studies performed by national competent institutes for earth physics, seismic events yielding a PGA > 0.2g are considered physically not possible. There are no cliff-edge effects occurring for PGA $\leq 0.4g$. Therefore, assessments of plant behaviour for PGA values greater than 0.4g have not been performed, meaning that any additional seismic capacity above this value has not been quantified, especially in the context that there is no agreed methodology yet for the performance of assessments focused on cliff-edge effects rather than of seismic margins expressed in HCLPF values.

The licensee's re-assessment of the protection against external flooding has not identified the need for any further activities, since the margins for such events were judged as sufficient. Based on the analysis results obtained by making use of the latest deterministic tools and complemented by probabilistic approach, it was concluded that the Cernavoda NPP design intent in relation with flooding hazards provides sufficient safety margins, therefore no further measures were envisaged in this area. CNCAN has found the assessment satisfactory. However, the "stress test" peer-review team suggested that the regulator and the licensee consider improving the volumetric protection of the buildings containing safety related equipment located in rooms below plant platform level (so that protection does not rely solely on the elevation of the platforms). This was accepted as a generic improvement suggestion and actions for implementation are in progress.

The reassessment of protection against extreme weather events has been less systematic than the reassessment of protection against seismic and flooding events. This was due to the shorter time available for the review, since the initial specifications for the "stress tests" did not explicitly include requirements for the assessment of extreme weather events. Based on the assessments performed to date, it was concluded that the worst-case scenarios that could be initiated by extreme external events are bound by SBO, LOUHS and SBO + LOUHS. The "stress test" peerreview considered that the information presented is limited and the safety margins to cliff-edge effects are not quantified.

The peer-review report for Romania recommends that CNCAN further investigates safety margins to cliff-edge effects for extreme external events. This is a generic issue and the peer review revealed that there is a lack of consistency identified at international level with respect to the assessment of natural hazards, that significant differences exist in national approaches and difficulties were encountered with beyond design margins and cliff-edge effects assessments.

The ENSREG report on the stress tests performed for European nuclear power plants recommends that "WENRA, involving the best available expertise from Europe, develop guidance on natural hazards assessments, including earthquake, flooding and extreme weather conditions, as well as corresponding guidance on the assessment of margins beyond the design basis and cliff-edge effects". CNCAN will use of the outcome of this work. Further studies will be required once a common methodology is developed and agreed upon, in accordance with the ENSREG recommendations following the peer-review of the "stress tests" for European NPPs.

TOPIC 2 - DESIGN ISSUES

2.1. Overview of activities performed and planned by the licensee

In compliance with the "stress test" specifications, the licensee has analysed the following scenarios:

- loss of offsite power;
- station blackout (SBO);
- loss of primary ultimate heat sink (UHS);
- loss of both primary and alternate ultimate heat sinks;
- loss of primary ultimate heat sink with station blackout.

For each scenario, the licensee has identified the plant design capabilities to fulfill the safety functions (shutdown reactor, cooldown the reactor core, contain and monitor the plant parameters), including the supplementary measures available on site.

The licensee has increased the protection against SBO and LOUHS scenarios by specific design changes and operational measures, in order to ensure that such events would not lead to fuel failures. A new emergency operating procedure for responding to SBO has been developed and implemented.

Two 880 kW, 0.4 kV mobile diesel generators (one for each of Unit 1 and Unit 2) have been procured immediately after the Fukushima accident and have been tested by powering the 380 VAC EPS buses and the EWS pumps. The capacity of each mobile diesel generator is almost equivalent to that provided by the design non-mobile EPS diesel generators. Since then, the licensee has already replaced the above mentioned Diesel generators with other 2 Diesel generators 2x1MW (to cover entirely the EPS loads), which are more versatile as they can supply also 6KV loads supplementary to 0.4 KV loads.

Furthermore, the licensee has procured a mobile diesel engine driven pump which is available on site along with 2 electrical mobile submersible pumps already available on site. Also, two smaller diesel generators were procured for electrical power supply for the two pumps that can provide water in the domestic water system from the deep underground wells.

The licensees implemented also modifications for increasing the safety margins, such as providing the possibility for manual operation of important equipment for ensuring heat removal path (e.g. MSSVs).

In order to minimize the time for connecting the mobile Diesel generators, the licensee has installed special connection panels to the loads which may be supplied from these Diesels.

2.2. Overview of activities performed and planned by the regulator

The regulatory reviews post-Fukushima have been performed in the context of the "stress tests" and have focused on verification of the completeness and quality of the stress test reports and of the supporting analyses prepared by the licensees. Starting with September 2011, CNCAN has performed reviews and inspections of the measures taken by the licensee to cope with SBO and LOUHS scenarios and has found them satisfactory. The inspections of the new equipment and procedures, including their maintenance and testing, will be part of the annual inspection plans established by CNCAN.

The country review report issued for Romania after the finalisation of the peer-review process

organised in the framework of the "stress tests" acknowledged the work performed by the licensee and by CNCAN and did not include any particular recommendations related to the management of SBO and LOUHS.

There are no further regulatory activities scheduled in relation to SBO and LOUHS scenarios, except for the regulator monitoring and verification of licensee's maintenance, testing and training associated with the new equipment installed, the design changes performed and the operational measures implemented.

TOPIC 3 – SEVERE ACCIDENT MANAGEMENT AND RECOVERY (ON-SITE)

3.1. Overview of activities performed and planned by the licensee

After the Fukushima accident, the licensee has performed a re-assessment of the accident management programme, including a review of the arrangement for severe accident management and recovery on-site.

The SAMGs for Cernavoda NPP have been developed based on the generic CANDU Owners Group (COG) SAMGs for a CANDU-6 type of plant. In developing the generic SAMGs, COG adopted the Westinghouse Owners Group (WOG) approach, with the necessary technical modifications suitable for implementation in CANDU plants, based on extensive CANDU specific severe accident analysis and research. Preparation of plant-specific SAMGs was done by customisation of the generic COG documentation package for Cernavoda NPP, removing extraneous information not applicable to the station, incorporating station-specific details and information and making any other adjustments required to address unique aspects of the plant design and/or operation.

The SAMGs have been developed based on the existing systems and equipment capabilities. A limited and focused set of information requirements was defined to support SAMG diagnostics and evaluations. The primary source is from plant instrumentation, supplemented by additional measurements and data expected to be available through emergency response procedures and Computational Aids where appropriate.

An On-Site Emergency Plan is in place to respond to any emergency, ranging from the lowest incident classification ("Alert" level) to the highest classification ("General Emergency") that requires the evacuation of all non-essential personnel on-site. Off-site emergency response is under the responsibility of the local, county and national authorities.

The licensee has also performed a conservative evaluation of the on-site vital areas habitability and accessibility, based on selected severe accident scenarios.

Based on the review performed in the framework of the "stress test", the licensee's organisation for accident management and emergency response has been found adequate. The resources allocated are sufficient also for the situation in which both units would be affected by an accident.

Improvement measures have been identified and are under implementation for increasing the reliability of the communication systems and of the on-site emergency control centre. The set-up of an Alternative Off-site Emergency Control Centre is in progress. Also, improvements to the plant instrumentation are planned to support the implementation of the SAMGs.

The human and equipment resources appointed for emergency response activities have been assessed and allocated, based on the assumption that both Cernavoda NPP Units would be affected by an accident, in conformance with the specifications for the "stress test".

Design provisions and accident management measures are in place to prevent and mitigate radioactive releases for a range of accidents, including severe core damage scenarios. The robustness of the CANDU design to severe accidents has been acknowledged as a strong point in the peer-review conducted in the framework of the European "stress tests". Accidents involving loss of cooling to the SFB do not pose a threat in terms of radioactive releases.

Several design improvements have been identified to enhance the capability to maintain containment integrity in case of severe accidents and their implementation is in progress. These include the provision of water make-up to calandria vessel and calandria vault to arrest the progression and relocation of the core melt, the provision of hydrogen monitoring systems and passive autocatalytic recombiners for hydrogen management and the installation of filtered containment venting systems.

3.2. Overview of activities performed and planned by the regulator

The regulatory reviews post-Fukushima have been performed in the context of the "stress tests" and have focused on verification of the completeness and quality of the stress test reports and of the supporting analyses prepared by the licensees.

In addition to the review of the licensee's stress test report, a set of inspections have been performed by CNCAN staff for verifying the quality of the process implemented by the licensee in the development of plant specific SAMGs, training records from training in the implementation of the SAMGs, the availability of up-to-date emergency operation procedures at the points of use, the procedures for connecting the mobile diesel generators and the related test reports, the procedures for injecting fire water into plant cooling systems, etc.

The country review report issued for Romania after the finalisation of the peer-review process notes the good progress in the implementation of SAMGs, associated with a significant number of hardware modifications during a short time period and provides recommendations for:

- review of severe accidents and the development of SAMGs for shutdown states;
- verification of the completeness of event-based and symptom-based EOPs for all accident situations:
- continuation of the MCR habitability analysis (e.g. to account for situations involving total core melt with voluntary venting);
- finalisation of the incorporation of requirements for severe accident management in the national regulations.

CNCAN drafted a mandatory regulation containing requirements on accident management. This regulation is currently in the stage of external consultation with the stakeholders prior to formal issuance.

As a continuation of the reviews performed post-Fukushima, CNCAN is in process of finalising the assessment of all proposed design changes and is going to perform subsequent inspections to verify their implementation. A more in-depth review of the existing set of EOPs and SAMGs is also planned, together with follow-up inspections on the implementation of the severe accident management programme and increased participation as observers in the emergency drills performed by the licensee.

PART II

TOPIC 4 – NATIONAL ORGANISATIONS

Following the Fukushima accident, CNCAN has focused on the technical reviews of the protection of the plant against extreme external events and of beyond design basis accident analysis, severe accident management and emergency response. The lessons learned from the Fukushima accident are still under development as regards the organisational factors that have contributed to the accident. However, recognising the importance of these factors, CNCAN will perform an evaluation of its own organisation and of the regulatory framework and processes, with the aim of identifying opportunities for improvement, in addition to those already identified from previous self-assessments and peer-reviews such as the IRRS mission received in 2011. The implementation of the recommendations and suggestions from the 2011 IRRS mission provided is ongoing.

CNCAN will review the lessons learned from the Fukushima accident as more information becomes available and will take account of any generic implications as regards organisational factors relevant for nuclear safety and decision-making in emergency management.

In addition, CNCAN is committed to continue to keep itself informed of any new information related to the lessons learned from the Fukushima accident and bring this to the attention of all national organisations in the nuclear field, especially to licensees and to public authorities involved in emergency response.

Following the Fukushima accident, the licensee performed a review of their On-Site Emergency Organisation and modified it in order to assure an improved response in case of a severe accident. The Technical Support Group (TSG) has been supplemented with the Electrical Systems Specialist position, the Operation Specialist position from TSG has been designated as SAMG Technical Adviser and the Safety Analyses Specialist and Process Systems Specialist from TSG have been designated as SAMG Evaluators. In addition, the licensee is committed to take account of and use any applicable lessons learned from the Fukushima accident with respect to organisational factors.

TOPIC 5 – EMERGENCY PREPAREDNESS AND RESPONSE AND POST-ACCIDENT MANAGEMENT (OFF-SITE)

The licensee reviewed and revised the Emergency Plan and Procedures, Conventions, Protocols and Contracts in place, in order to better accommodate emergency response to severe accidents coincident with natural disasters. Cernavoda NPP has agreed a protocol with a number of state bodies (e.g. the Constanta County Inspectorate for Emergency Situations, Police County Inspectorate, etc.,) to ensure the transportation of Cernavoda personnel, fuel supplies, etc. to the site should access become hindered due to extreme meteorological conditions, natural disasters or other traffic restrictions. Also, Cernavoda has protocols in place with medical centres and hospitals in the region, for the provision of medical services (first aid, initial treatment and decontamination, treatment of overexposed personnel).

In addition, the licensee has identified potential improvements in the cooperation with local and national authorities involved in emergency response in case of radiological and nuclear accidents

and has proposed them for consideration by CNCAN and IGSU.

The licensee has also taken actions to set up an alternative Off-site Emergency Control Centre, which will be located in an existing facility in Constanta city (60 km away from Cernavoda). Improvements to the communication systems have also been identified and have been implemented or are in progress.

CNCAN has organised meetings with the representatives of the licensee and the representatives of IGSU and of other national organisations with roles in emergency response and has contributed to the review of national (off-site) emergency response strategy with an assessment of the lessons learned from the Fukushima accident.

The recommendations made by CNCAN are being incorporated in the revision of the national response plan for radiological and nuclear emergencies.

TOPIC 6 – INTERNATIONAL COOPERATION

Romania is committed to international cooperation for improving nuclear safety and emergency preparedness and response and maintains relations with a number of nuclear regulatory authorities and organisations worldwide, through bilateral arrangements and commitments under international conventions in the nuclear field.

The international activities in which CNCAN is involved include those organised by the IAEA, those organised by WENRA and its technical working groups, the annual meetings of the Senior Regulators from countries that operate CANDU NPPs, the periodic meetings of the European High Level Group on Nuclear Safety and Waste Management (ENSREG) and its working groups and the contribution to the initiatives at European Union. CNCAN also participates, as observer, in the annual session of the Nuclear Law Committee (NLC) of the NEA/OECD (Nuclear Energy Agency of the Organisation for Economic Co-operation and Development) and keeps itself informed of activities of the CNRA (Committee of Nuclear Regulatory Activities) and CSNI (Committee on the Safety of Nuclear Installations) committees of NEA/OECD.

In order to ensure the exchange of information relevant to nuclear safety, CNCAN has a number of bi-lateral agreements with regulatory bodies from other countries. Also, CNCAN has established agreements or arrangements with neighbouring countries on notification and assistance in case of nuclear accidents.

With regard to technical assistance received from international organisations, CNCAN is a beneficiary of technical cooperation projects managed by the IAEA, at national and regional level. Through these projects, CNCAN received expert missions and support in the organisation of international and national seminars.

In the period 2009 - 2011, CNCAN and the Norwegian Radiation Protection Authority (NRPA) have funded an IAEA Extra Budgetary Programme (EBP) on safe nuclear energy in Romania. This programme was aimed at improving nuclear safety and emergency preparedness in Romania and its activities have been completed in April 2011. A new such programme is planned for implementation starting with 2013 and the activities envisaged include development of regulatory requirements, guidance and safety review methodologies to take account of lessons learned from Fukushima.

CNCAN has participated in various meetings organised by IAEA, WENRA and ENSREG for reviewing the implications of the Fukushima accident and for devising actions for the reassessment of safety in the light of the lessons learned to date.

CNCAN staff has participated in the peer-review process in the implementation of the "stress tests" for European nuclear power plants and is committed to implement the resulting recommendations and suggestions. In addition, CNCAN has shared experience on the measures taken post-Fukushima not only with the European regulators, but also with the CNSC and with the other regulators from countries operating CANDU nuclear power plants (in the framework of the CANDU Senior Regulators' Group).

CNCAN will continue to participate in the regulatory groups working on action plans for improving safety at international level, as well as in technical cooperation activities aimed at disseminating and acting upon lessons learned from the Fukushima accident. Also, CNCAN will consider benefitting from relevant peer-review services provided by the IAEA, in addition to the IRRS missions.

The licensee maintains close cooperation with organisations such as IAEA, WANO, INPO, COG, FORATOM, etc. and participates in the industry technical working groups in charge of evaluating the factors that contributed to the Fukushima accident and the lessons learned. In addition, the licensee will continue to benefit from international peer-reviews and participate in international cooperation activities aimed at improving nuclear safety and emergency preparedness and response.

PART III

Conclusions and generic activities

The main safety re-assessments performed by Romania after the Fukushima accident have been based on the ENSREG "stress test" specifications and WANO SOER 2011-02 recommendations. In the period 2011 - 2012, the focus has been of finalising these reviews and on implementing as many of the resulting actions as possible, with a clear schedule for the remaining items.

In the meantime, the analysis of the causes and of the implications of the Fukushima accident has progressed and various regulatory authorities and international organisations have performed their own reviews of different scopes and levels of detail, resulting in actions of potential generic applicability. While most of these actions are covered by those identified in the ENSREG Compilation of Recommendations and Suggestions from the Review of the European Stress Tests and in the Final Summary Report of the 2nd Extraordinary Meeting (EM) of the Contracting Parties to the Convention of Nuclear Safety (CNS), there may be additional lessons learned which are worth of addressing in a national action plan.

CNCAN will monitor the development of lessons learned on the Fukushima accident and of the generic actions arising from regulatory and industry safety reviews and will update its national action plan as necessary to reflect any relevant and applicable new information.

PART IV

The Romanian National Action Plan is summarised in Table 1, which provides an outline of the main improvement activities resulting from the post-Fukushima safety reviews performed to date. The table identifies, for each action, the organisation(s) responsible for implementation (SNN - the licensee, CNCAN, or both), the status of the action (implemented, in progress, planned or under evaluation) and the target date for completion.

The correspondence between the national actions in Table 1 and the actions outlined in the "stress test" peer-review report for Romania, in the compilation of generic recommendations isued by ENSREG and in the Summary Report of the 2nd EM of the CNS is provided in Tables 2, 3 and 4, respectively.

The National Action Plan is not a frozen document. It will be reviewed periodically and updated to reflect progress in its implementation, as well as any necessary changes to reflect new knowledge and experience.

Table 1 – Romanian Action Plan post-Fukushima - Summary of improvement activities

Action	Responsible for implementation	Status	Target date for implementation
Topic 1 – External events (earthq	uakes, floods and	l extreme weat	her conditions)
1. Review the specific procedure which is in place for extreme weather conditions in order to include the appropriate proactive actions for plant shutdown.	SNN	Implemented	-
2. Identification of potential measures to improve protection against flooding.	SNN	Implemented	-
3. Provision of on-site of sand bags to be used as temporary flood barriers, if required.	SNN	Implemented	-
4. Improvement of the seismic robustness of the existing Class I and II batteries.	SNN	Implemented	-

Action	Responsible for implementation	Status	Target date for implementation
5. Design modifications to replace selected doors with flood resistant doors and penetrations sealing (for improving the volumetric protection of the buildings containing safety related equipment located in rooms below plant platform level).	SNN	In progress	End of 2014
6. The seismic walk-downs and subsequent seismic robustness analyses done as part of the seismic margin assessment have not revealed a need for any safety significant design change. However, several recommendations resulted from these inspections, which have been included in the regular plant seismic housekeeping program. These do not impact on the seismic margin assessment.	SNN	In progress	End of 2014
7. The regulator to consider routine inspections of the flood protection design features.	CNCAN	In progress	End of 2013
8. The peer review recommended that a seismic level comparable to the SL-1 of IAEA leading to plant shutdown and inspection is established. It was suggested to the regulator to consider implementing adequate regulations. Currently the actions taken by the licensee following an earthquake are based on decision making criteria that include the estimated damage to the plant (walkdowns using a specific procedure) rather than on pre-defined level.	CNCAN	Planned	End of 2013

Action	Responsible for implementation	Status	Target date for implementation
9. Elaboration of more detailed regulatory requirements on the protection of NPPs against extreme external events, taking account of the lessons learned from the Fukushima accident and of the results of the "stress tests" peer reviews.	CNCAN	Planned	End of 2014
10. The peer review concluded that there is only little information about margins to cliff edges due to external events and weak points. Further work is proposed in this area and it is recommended that CNCAN obtains good quality programmes from licensees and ensures that the work is appropriately followed up.	CNCAN	Planned	Depending on the development of a common methodology, at EU-level, for assessing margins to cliff-edge effects due to external events
Торі	c 2 – Design Issue	es	
11. Procurement and testing of mobile equipment (e.g. mobile diesel generators, mobile pumps, connections, etc.).	SNN	Implemented	-
12. Provision of a facility to open the MSSVs after a SBO.	SNN	Implemented	-
13. Provision of connection facilities required to add water using fire fighters trucks and flexible conduits to supply the primary side of the RSW/RCW heat exchangers and SGs under emergency conditions.	SNN	Implemented	-
14. Specific emergency operating procedures to cope with Station Blackout and Loss of Spent Fuel Pool Cooling events.	SNN	Implemented	-

Action 15. The option of charging the batteries or the installation of a supplementary uninterruptible power supply for the SCA is being considered by the licensee as a potential improvement.	Responsible for implementation SNN	Status Under evaluation	Target date for implementation End of 2015
Topic 3 – Severe Acciden	t Management ar	nd Recovery (O	n-Site)
16. Validation of the station Severe Accident Management Guidelines (SAMG) through emergency exercises.	SNN	Implemented	-
17. Training for severe accident scenarios, including as part of the emergency drills.	SNN	Implemented (Refreshment training will be performed periodically)	-
18. Special agreements were established with the local and national authorities involved in the emergency response in order to ensure that in case of a SBO coincident with loss of primary UHS the plant has absolute priority to grid reconnection and supply of light and heavy equipment and the necessary diesel fuel.	SNN	Implemented	-
19. Accident management provisions for events in the spent fuel pools (natural ventilation for vapours and steam evacuation, seismically qualified firewater pipe for water make-up).	SNN	Implemented	-
20. Improvement of the existing provisions to facilitate operator actions to prevent a severe accident in SFB (water level and temperature monitoring from outside the SFB building).	SNN	In progress	End of 2014

Action	Responsible for implementation	Status	Target date for implementation
21. Installation of PARs for hydrogen management.	SNN	Implemented in Unit1 in 2012 (completed)	-
		In progress for Unit 2	End of 2013 (for Unit2)
22. Installation of dedicated emergency containment filtered venting system for each NPP unit.	SNN	Planned for 2013 in Unit1 and for 2014 in Unit 2	End of 2013 for Unit1 and of 2014 for Unit2
23. Additional instrumentation for SA management e.g. hydrogen concentration monitoring in different areas of the reactor building.	SNN	Planned	End of 2013
24. Improvements to the reliability of existing instrumentation by qualification to SA conditions and extension of the measurement domain.	SNN	Planned	End of 2014 (Unit 1) End of 2015 (Unit 2)
25. Implementation of a design modification for water make-up to the calandria vessel and the calandria vault (completed for Unit 2 calandria vessel).	SNN	In progress	End of 2013
26. Verification of the completeness of event-based and symptom-based EOPs for all accident situations.	SNN CNCAN	In progress	End of 2013
27. Severe accident management requirements to be included in a regulation.	CNCAN	In progress	End of 2013
28. MCR habitability analysis to be continued (e.g. assessment of total core melt with voluntary venting, implementation of close ventilation circuit with oxygen supply).	SNN	Planned	End of 2014

Action	Responsible for implementation	Status	Target date for implementation
29. Review of Level 1 PSA & completion of Level 2 PSA (to include SFB accidents).	SNN	In progress	End of 2013
30. Measures have been identified (and will be implemented) that aim to improve the reliability of the: (i) communication system and, (ii) on-site emergency control centre.	SNN	(i) In progress (ii) Completed	End of 2013
31. Cernavoda NPP will establish a new seismically qualified location for the onsite emergency control centre and the fire fighters. This location will include important intervention equipment (mobile DGs, mobile diesel engine pumps, fire-fighter engines, radiological emergency vehicles, heavy equipment to unblock roads, etc) and will be protected against all external hazards.	SNN	In progress	End of 2015
32. Review of SAMGs taking account of plant modifications and upgrades performed after Fukushima.	SNN CNCAN	In progress	End of 2014
33. The development of SAMGs specifically for shutdown states is under consideration.	SNN	Planned	End of 2015
Topic 4 –	National Organis	sations	
34. Improvement of on-site emergency organisation.	SNN	Implemented	-
35. Review of lessons learned from the Fukushima accident with regard to organisational factors and applicability to national organisations in the nuclear sector.	CNCAN SNN	In progress	End of 2013

Action	Responsible for implementation	Status	Target date for implementation
36. Implementation of recommendations from the 2011 IRRS mission.	CNCAN	In progress	End of 2013
37. Review of the national regulatory framework for nuclear safety to identify and implement actions for improvement.	CNCAN	In progress	End of 2014
Topic 5 – Emergency Preparednes	s and Response a	nd Post-Accide	ent Management
38. Review the existing protocol with Public Authorities in order to ensure the necessary support for the Cernavoda NPP personnel in case of severe accident, when the roads are blocked due to extreme meteorological conditions, natural disasters (earthquakes, flooding, etc.) or other traffic restrictions.	SNN	Implemented	-
39. Installation of Special Communication Service phones in each Main Control Room (Intervention Support Center) and Secondary Control Area.	SNN	Implemented	-
40. An alternative off-site emergency control centre is being developed.	SNN	In progress	End of 2014
41. A review of the national off-site response is in progress to take account of the lessons learned from the Fukushima accident.	CNCAN + other national authorities	In progress	End of 2013

Action	Responsible for implementation	Status	Target date for implementation
Topic 6 – In	nternational Coop	peration	
42. Identification and consideration of additional relevant peer-review services.	CNCAN SNN	Planned	End of 2013
43. Participation in international activities for sharing experience on lessons learned from the Fukushima accident and on actions taken to improve safety.	CNCAN SNN	In progress	Continuous activity

 $Table\ 2-Correspondence\ between\ the\ recommendations\ in\ the\ peer-review\ report\ for\ Romania\ and\ the\ improvement\ actions\ outlined\ in\ Table\ 1$

#	Reference for a recommendation or suggestion in the peer review report for RO	Action item in the NAP - Table 1
1.	2.1.3 [] The absence of a seismic level comparable to the SL-1 of IAEA leading to plant shutdown and inspection is regarded a critical issue at the background that the probability of large earthquakes occurring during the lifetime of the plant is extremely high (recurrence intervals for the Vrancea seismic zone: 50y for Mw>7.4).	Action 8
	It is suggested to the regulator to consider implementing adequate regulations. Currently the actions taken by the licensee following an earthquake are based on decision making criteria that include the estimated damage to the plant (walkdowns using a specific procedure) rather than on pre-defined ground motion design response spectra.	
2.	2.1.3 [] There is only little information about margins to cliff edges, weak points and no evidences that further improvements in the seismic upgrading have been considered. Further work is proposed in this area and it is recommended that the CNCAN obtains good quality programmes from the licensees and ensures that the work is appropriately followed up.	Actions 9 and 10
	2.3.3 There is limited information about extreme weather conditions. []There is no information about the plant capability beyond the design basis, no identification of cliff edge effects and weak points.	
3.	2.2.3 [] A number of safety significant equipment is located underground and improvements of the provisions to protect them against flooding (other that the elevation of the plant platform) should be considered (volumetric protection). [] It is suggested to the regulator to consider routine inspections of the flood protection design features.	Actions 2, 3, 5 and 7
	2.2.2.4 Possible measures to increase robustness:	
	It is suggested to consider improving the volumetric protection of the buildings containing safety related equipment located in rooms below plant platform level [].	

4.	4.2.1.2 [] During the Country visit the utility has presented the new EOP for SBO. The verification of completeness of existing EOPs for all types of accident (multiple failures) has been discussed as a possible area of improvement.	Actions 26
	4.2.2.2	
	The following areas for improvement have been identified:	
	- Verification of the completeness of event-based and symptom-based EOPs for all accident situations should be undertaken	
	4.3 [] The following points are provided for Romania's consideration; []	
	 Verify the completeness of event-based and symptom-based EOPs for all accidental situations. 	
5.	4.2.1.2 [] The current SAMGs are only applicable to the at-power state of reactor. Romania considers the at power SAMGs would still provide valuable guidance to respond to an accident that originated from a shutdown condition, because severe accident phenomena are largely independent of the initial state of the plant. However, the development of SAMGs specifically for shutdown states is under consideration.	Action 33
	4.2.2.2 The following areas for improvement have been identified: []	
	 Further study is required for shutdown states. Including: SAMGs development, identification of possible weakness in case of external event 	
	4.3 [] The following points are provided for Romania's consideration;	
	 The licensee should examine, for particular plant shutdown states, any possible weaknesses of the Cernavoda NPPs in agreement with the stress test specifications. 	
	 SAMGs for shutdown states should be developed (it is noted that it is under consideration) 	

6.	4.2.1.5 The habitability of the MCR and SCA was assessed for various types of accidents (such as limited core damage with containment isolation failure or SA with no containment failure) and it is concluded, that all (five) shift crews can perform their work either from the MCR or from the SCA without exceeding an integrated dose of 100 mSv in the seven days following an accident.	Action 28
	However, the case of a total core melt accident associated to a containment failure (or voluntary venting) has not been assessed.	
	4.2.2.2 The following areas for improvement have been identified: []	
	- MCR habitability analysis to be continued (e.g. implementation of a close ventilation circuit with oxygen supply)	
7.	4.3 [] The following points are provided for Romania's consideration; []	Action 27
	- CNCAN should finalize the incorporation of severe accident management requirements in the Romanian regulation and, if possible, some qualitative or quantitative safety objectives related to the protection of the population. This should be done for existing power plants. Such objectives should then, in response to the continuous plant safety improvement, be incremented at each PSR	

Table 3 – Correspondence between the generic recommendations compiled by ENSREG and the improvement actions outlined in Table 1

#	Reference in the Compilation of Recommendations and Suggestions from the Review of the European Stress Tests	Action item in the NAP - Table 1 / comments
1.	2.1. European guidance on assessment of natural hazards and margins []	Actions 9 and 10
	The peer review Board recommends that WENRA, involving the best available expertise from Europe, develop guidance on natural hazards assessments, including earthquake, flooding and extreme weather conditions, as well as corresponding guidance on the assessment of margins beyond the design basis and cliffedge effects.	CNCAN is a member of WENRA and is following the developments of the dedicated working groups.
2.	2.2. Periodic Safety Review [] The peer review Board recommends that ENSREG underline the importance of periodic safety review. In particular, ENSREG should highlight the necessity to reevaluate natural hazards and relevant plant provisions as often as appropriate but at least every 10 years.	Implemented This is a mandatory requirement in Romania. A regulation on PSR was issued in 2006. The first PSR for Cernavoda NPP Unit 1 has been completed in 2012.
3.	2.3. Containment integrity [] Urgent implementation of the recognised measures to protect containment integrity is a finding of the peer review that national regulators should consider.	Actions 21 and 22
4.	2.4. Prevention of accidents resulting from natural hazards and limiting their consequences [] 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.	Actions 1 - 14, 18, 25 - 27, 30, 31, 37 - 39, 41

5.	3.1.1 Hazard Frequency	Implemented
	The use a return frequency of 10 ⁻⁴ per annum (0.1g minimum peak ground acceleration for earthquakes) for plant reviews/back-fitting with respect to external hazards safety cases.	Based on the seismic margin assessment performed for Cernavoda NPP, all SSCs which are part of the safe shutdown path after an earthquake would continue to perform their safety function up to a PGA corresponding to an earthquake having an estimated frequency of 5E-5 events/year.
6.	3.1.2 Secondary Effects of Earthquakes	Implemented
	The possible secondary effects of seismic events, such as flood or fire arising as a result of the event, in future assessments.	The secondary effects of earthquakes have been considered in the safety reviews performed for the "stress tests" and in response to WANO SOER 2011-02.
7.	3.1.3 Protected Volume Approach	1
	The use a protected volume approach to demonstrate flood protection for identified rooms or spaces.	Actions 2, 3, 5 and 7
8.	3.1.4 Early Warning Notifications	Implemented
	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.	Protocols are in place with the National Meteorological Administration and the procedure for responding to extreme weather events has been reviewed and revised (see Action 1).
9.	3.1.5 Seismic Monitoring	Implemented
	The installation of seismic monitoring systems with related procedures and training.	

10	2.1.(0126-13W-11-1	T1
10.	3.1.6 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).	Implemented
11.	3.1.7 Flooding Margin Assessments	Implemented
	The analysis of incrementally increased flood levels beyond the design basis and identification of potential improvements, as required by the initial ENSREG specification for the stress tests.	(described in the national stress test report issued in December 2011)
12.	3.1.8 External Hazard Margins	
	In conjunction with recommendation 2.1 and 3.1.7, the formal assessment of margins for all external hazards including, seismic, flooding and severe weather, and identification of potential improvements.	Action 10
13.	3.2.1 Alternate Cooling and Heat Sink	Implemented
	The provision of alternative means of cooling including alternate heat sinks. Examples include steam generator (SG) gravity alternative feeding, alternate tanks or wells on the site, air-cooled cooling towers or water sources in the vicinity (reservoir, lakes, etc) as an additional way of enabling core cooling.	(described in the national stress test report issued in December 2011)
14.	3.2.2 AC Power Supplies	
	The enhancement of the on-site and off-site power supplies. Examples include adding layers of emergency power, adding independent and dedicated backup sources, the enhancement of the grid through agreements with the grid operator on rapid restoration of off-site power, additional and/or reinforced off-site power connections, arrangements for black start of co-located or nearby gas or hydro plants, replacing standard ceramic based items with plastic or other material that are more resistant to a seismic event. Another example is the possible utilization of generator load shedding and house load operation for increased robustness, however, before introducing such arrangements the risks need to be properly understood.	Implemented (described in the national stress test report issued in December 2011) See also Actions 11 and 18

15.	3.2.3 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 (increasing resistance to common-mode failures), providing spare/replacement batteries, implementing well-prepared load shedding/ 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).	Actions 4 and 15
16.	3.2.4 Operational and Preparatory Actions	
	Implementation of operational or preparatory actions with respect to the availability of operational consumables. Examples include, ensuring the supply of consumables such as fuel, lubrication oil, and water and ensuring adequate equipment, procedures, surveillance, drills and arrangements for the resupply from off-site are in place.	Implemented (described in the national stress test report issued in December 2011)
17.	3.2.5 Instrumentation and Monitoring	
	The enhancement of instrumentation and monitoring. Examples include separate instrumentation and/or power sources to enable monitoring of essential parameters under any circumstances for accident management and the ability to measure specific important parameters based on passive and simple principles.	Actions 20, 23 and 24
18.	3.2.6 Shutdown Improvements	
	The enhancement of safety in shutdown states and mid- loop operation. Examples of improvements include, reducing or prohibiting mid-loop operation, adding dedicated hardware, procedures and drills, the use of other available water sources (e. g. from hydro-accumulators), requiring the availability of SGs during shutdown operations and the availability of feedwater in all modes.	Action 33
19.	3.2.7 Reactor Coolant Pump Seals	This is not considered
	The use of temperature-resistant (leak-proof) primary pump seals.	applicable, due to specific CANDU design features.
20.	3.2.8 Ventilation	This is not considered
	The enhancement of ventilation capacity during SBO to ensure equipment operability.	applicable, due to specific CANDU design features.

21.	3.2.9 Main and Emergency Control Rooms	Implemented
	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 (this also applies to Topic 3 recommendations).	
22.	3.2.10 Spent Fuel Pool	
	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 (e. g. submerged in the SFP), an external connection for refilling of the SFP (to reduce the need for an approach linked to high doses in the event of the water falling to a very low level) and the possibility of venting steam in a case of boiling in the SFP.	Implemented (described in the national stress test report issued in December 2011) See also Actions 19 and 20
23.	3.2.11 Separation and Independence	Implemented
	The enhancement of the functional separation and independence of safety systems. Examples include the elimination of full dependence of important safety functions on auxiliary systems such as service water and the introduction of an alternate source of cooling.	(described in the national stress test report issued in December 2011)
24.	3.2.12 Flow Path and Access Availability	Implemented
	The verification of assured flow paths and access under SBO conditions. Ensure that the state in which isolation valves fail and remain, when motive and control power is lost, is carefully considered to maximise safety. Enhance and extend the availability of DC power and instrument air (e. g. by installing additional or larger accumulators on the valves). Ensure access to critical equipment in all circumstances, specifically when electrically operated turnstiles are interlocked.	(described in the national stress test report issued in December 2011)

25.	3.2.13 Mobile Devices	Implemented
	The provision of mobile pumps, power supplies and air compressors with prepared quick connections, procedures, and staff training with drills. Mobile devices are intended to enable the use of existing safety equipment, enable direct feeding of the primary or secondary side, allow extended use of instrumentation and operation of controls, allow effective fire-fighting, and ensure continued emergency lighting. 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 (this also applies to Topic 3 recommendations).	(described in the national stress test report issued in December 2011) See also Actions 11, 13 and 31
26.	3.2.14 Bunkered/Hardened Systems	Action 31
	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 (this also applies to Topic 3 recommendations).	
27.	3.2.15 Multiple Accidents	Implemented
	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 (this also applies to Topic 3 recommendations).	(described in the national stress test report issued in December 2011)
28.	3.2.16 Equipment Inspection and Training Programs	Implemented
	The establishment of regular programs for inspections to ensure that a variety of additional equipment and mobile devices are properly installed and maintained, particularly for temporary and mobile equipment and tools used for mitigation of BDB external events. Development of relevant staff training programmes for deployment of such devices.	

29. **3.2.17** Further Studies to Address Uncertainties

The performance of further studies in areas where there are uncertainties. Uncertainties may exist in the following areas:

- The integrity of the SFP and its liner in the event of boiling or external impact.
- The functionality of control equipment (feedwater control valves and SG relief valves, main steam safety valves, isolation condenser flow path, containment isolation valves as well as depressurisation valves) during the SBO to ensure that cooling using natural circulation would not be interrupted in a SBO (this is partially addressed in recommendation 3.2.10).
- The performance of additional studies to assess operation in the event of widespread damage, for example, the need different equipment (e.g. bulldozers) to clear the route to the most critical locations or equipment. This includes the logistics of the external support and related arrangements (storage of equipment, use of national defence resources, etc.).

These are considered covered by the reviews already performed and actions taken in the framework of the "stress tests".

30. **3.3.1 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. This would include:

- Hydrogen mitigation in the containment Demonstration of the feasibility and implementation of mitigation measures to prevent massive explosions in case of severe accidents.
- Hydrogen monitoring system Installation of qualified monitoring of the hydrogen concentration in order to avoid dangerous actions when concentrations that allow an explosion exist.
- Reliable depressurization of the reactor coolant system Hardware provisions with sufficient capacity and reliability to allow reactor coolant system depressurization to prevent high-pressure melt ejection and early containment failure, as well as to allow injection of coolant from low pressure sources.
- Containment overpressure protection Containment

Actions 21 - 25 and 27

	venting via the filters designed for severe accident conditions.	
	• Molten corium stabilization - Analysis and selection of feasible strategies and implementation of provisions against containment degradation by molten corium.	
31.	3.3.2 SAM Hardware Provisions	Actions 21 - 25, 27 and 31
	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.	
32.	3.3.3 Review of SAM Provisions Following Severe External Events	Actions 27 and 32
	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.	
33.	3.3.4 Enhancement of Severe Accident Management Guidelines (SAMG)	Action 32
	In conjunction with the recommendation 2.4, 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.	
34.	3.3.5 SAMG Validation	To be considered, depending
	The validation of the enhanced SAMGs.	on the outcome of Action 32 and to the extent practicable given the recommendations in para. 3.3.4 of the ENSREG compilation of recommendations.

35.	3.3.6 SAM Exercises	
	Exercises aimed at checking the adequacy of SAM procedures and organizational measures, including extended aspects such as the need for corporate and nation level coordinated arrangements and long-duration events.	Actions 16, 17, 41.
36.	3.3.7 SAM Training	
	Regular and realistic SAM training exercises aimed at training staff. 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.	Action 17
37.	3.3.8 Extension of SAMGs to All Plant States	Actions 27 and 33
	The extension of existing SAMGs to all plant states (full and low-power, shutdown), including accidents initiated in SFPs.	The SFP design, the modifications implemented post-Fukushima and the existing emergency operating procedure for response to loss-of-cooling to the SFP events preclude the need for SAMGs for the SFP.
38.	3.3.9 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.	Actions 30 and 39
39.	3.3.10 Presence of Hydrogen in Unexpected Places	Actions 19, 21 and 23
	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.	
40.	3.3.11 Large Volumes of Contaminated Water	To be considered, taking
	The conceptual preparations of solutions for post-accident contamination and the treatment of potentially large volumes of contaminated water.	account of developments in international guidelines on this matter.
41.	3.3.12 Radiation Protection	Implemented
	The provision for radiation protection of operators and all	See also Action 28

	other staff involved in the SAM and emergency arrangements.	
42.	3.3.13 On Site Emergency Center 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.	Actions 30 and 31
43.	3.3.14 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.	Actions 31, 34, 38 and 41
44.	3.3.15 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. Although PSA is an essential tool for screening and prioritizing improvements and for assessing the completeness of SAM implementation, low numerical risk estimates should not be used as the basis for excluding scenarios from consideration of SAM especially if the consequences are very high.	Action 29

45. 3.3.16 Severe Accident Studies

The performance of further studies to improve SAMGs.

Examples of areas that could be improved with further studies include:

- The availability of safety functions required for SAM under different circumstances.
- Accident timing, including core melt, reactor pressure vessel (RPV) failure, basemat melt-through, SFP fuel uncovery, etc.
- PSA analysis, including all plant states and external events for PSA levels 1 and 2.
- Radiological conditions on the site and associated provisions necessary to ensure MCR and ECR habitability as well as the feasibility of AM measures in severe accident conditions, multi-unit accidents, containment venting, etc.
- Core cooling modes prior to RPV failure and of recriticality issues for partly damaged cores, with un-borated water supply.
- Phenomena associated with cavity flooding and related steam explosion risks.
- Engineered solutions regarding molten corium cooling and prevention of basemat melt-through.
- Severe accident simulators appropriate for NPP staff training.

Implemented as described in the national stress test report issued in December 2011.

In addition, see Actions 27 - 29 and 32 - 33.

Table 4 – Correspondence between the generic recommendations in the CNS 2^{nd} EM Summary Report and the improvement actions outlined in Table 1

#	Reference in the Summary Report of the 2 nd EM of the CNS	Action item in the NAP - Table 1 / comments
1.	23. At the Extraordinary Meeting discussions focused on a range of topics, which should be considered in the preparation of National Reports for the 6 th Review Meeting. With the goal of better fulfilling the objectives of the Convention, the Contracting Parties agreed that in particular the National Reports should cover:	This information has been provided in the national stress test reports and in the national report to the 2nd EM of the CNS.
	a) For existing nuclear power plants, the results of reassessments of external events, of periodic safety assessments and of any peer reviews, and any follow-up actions taken or planned, including upgrading measures.b) For existing nuclear power plants, any actions taken or planned to cope with natural hazards more severe than those considered in the design basis.	Updated information will be provided in the national report for the 6 th Review Meeting of the CNS.
2.	c) For new nuclear power plants, improved safety features and additional improvements, if any, to address external hazards and to prevent accidents and, should an accident occur, to mitigate its effects and avoid off-site contamination.	Implemented New regulations on siting, design and construction of NPPs have been issued in 2010.
3.	d) Upgrading of accident management measures for extreme natural events, including for example measures to ensure core cooling and spent fuel pool cooling, the provision of alternate water sources for the reactor and for the spent fuel pool, the availability of the electrical power supply, measures to ensure containment integrity, and filtration strategies and hydrogen management for the containment; the development of probabilistic safety assessments to identify additional accident management measures should be considered as a possible future activity.	This information has been provided in the national stress test reports and in the national report to the 2nd EM of the CNS. Updated information will be provided in the national report for the 6 th Review Meeting of the CNS. (See also Actions 11 - 33)
4.	e) Measures taken or planned to ensure the effective independence of the regulatory body from undue influence, including, where appropriate, information on the hosting of IRRS missions.	This information has been provided in the national stress test reports and in the national report to the 2nd EM of the CNS. Updated information will be provided

		in the national report for the 6 th Review Meeting of the CNS. (See also Actions 35 - 37)
5.	f) Enhancements of emergency preparedness and response measures, including for example for multi-unit sites, approaches and methods of source term estimation and initiatives in the field of remediation. The enhancements should include defining the additional responsibilities up to appropriate levels of the national government and the development of procedures and joint actions of various agencies and improvements in international cooperation.	Implemented for on-site response. A review of the national off-site response is in progress to take account of the lessons learned from the Fukushima accident. (See Action 41)
6.	g) Information on how IAEA safety standards are taken into account.	IAEA Safety Standards are taken into account in the development of regulations and are also used in self-assessments, regulatory inspections and in external reviews. More information will be provided in the national report for the 6 th Review Meeting of the CNS.
7.	h) Information on activities undertaken to enhance openness and transparency for all stakeholders.	Action 35
8.	24. Safety culture and human and organizational factors were identified as crosscutting issues, which affect the consideration of external events, design, severe accident management, including operator training, the good functioning of national organizations and emergency preparedness and response. Particular attention should be given to these in preparation of National Reports for the next Review Meeting.	Action 35

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LIST OF ACRONYMS

AC Alternating Current

CANDU Canadian Deuterium Uranium CL I/II/III/IV Class I/II/III/IV electrical power

CNCAN National Commission for Nuclear Activities Control

CNS Convention on Nuclear Safety
COG CANDU Owners Group
DBE Design Basis Earthquake

DC Direct Current
DG Diesel Generator

EOP Emergency Operating Procedure EPS Emergency Power Supply EWS Emergency Water Supply

HCLPF High Confidence Low Probability of Failure

IAEA International Atomic Energy Agency INPO Institute of Nuclear Power Operations

MCR Main Control Room MSSVs Main Steam Safety Valves NPP Nuclear Power Plant

PHWR Pressurized Heavy Water Reactor

PSHA Probabilistic Seismic Hazard Assessment

R/B Reactor Building

RLE Review Level Earthquake SAM Severe Accident Management

SAMG Severe Accident Management Guidance

SBO Station Blackout

SCA Secondary Control Area SDG Stand-by Diesel Generator

SFB Spent Fuel Bay

SG Steam Generator (boiler)

SNN National Company Nuclearelectrica (licensee for Cernavoda NPP)

SSCs Structures, Systems and Components

T/B Turbine Building

TSG Technical Support Group

UHS Ultimate Heat Sink

WANO World Association of Nuclear Operators