



EUROPEAN UTILITY REQUIREMENTS FOR LWR PLANTS

British Energy plc • Electricité de France • Fortum • Iberdrola • NRG • Rosenergoatom • SOGIN • swissnuclear • Tractebel • TVO • Vattenfall • VGB Powertech

STATENS KÄRNKRAFTINSPEKTION
Klarabergsviadukten 90
SE-10658 Stockholm
SWEDEN

For the attention of Mrs J. Melin

Copy to WANO Paris, Foratom,

WENRA works on safety harmonisation-interaction with industry

Dear Mrs Melin

Following the letter you sent us on April 6 2004, the presentation you gave to some of us during the EUR seminar held in May 2004 in Stockholm and the paper about WENRA Missions you published in the July 2004 issue of DGNSR magazine "Contrôle", we understood WENRA would carry on the following programme to promote the emergence of common safety principles and to eventually harmonise the national safety regulations:

- 1) A draft of the study on harmonisation of Reactor Safety in WENRA countries would be available by the end of 2004.
- 2) Each of the safety regulators would interact with its licence holders to assess the consequences of implementation of the proposed Reference Levels into the national regulation.
- 3) Around the end of 2005 WENRA would finalise its common set of Reference Levels from the feedback of these national reviews.
- 4) Country by country the regulators would adapt the national regulations to make them meet the common Reference Levels. This may last till 2010.

No direct interaction seems to be foreseen in this process between WENRA and European industry as a whole.

We discussed this during our last EUR Steering Committee meetings and concerns showed up that can be summarized as follows (without any importance order):

- The owners/operators of European nuclear plants that participate to EUR welcome the idea of harmonisation of the safety requirements. The European electricity market is becoming a reality and major competition distortion conditions would appear with different national rules.
- Many of the nuclear electricity producers already have stakes in different European countries and this trend should go on increasing. The companies are more and more managed at European level and very different national rules of the game would jeopardise the benefits expected from asset consolidation.
- The owners/operators are the main stakeholders in nuclear business. This gives them legitimacy to be involved in the early steps of the rule making. They already have a large experience in harmonisation of the design requirements at European level through the development of the EUR document.

As a consequence the owners/operators would appreciate the possibility to enter discussion with WENRA as a group in addition to national discussions. Practically, we would like to propose coordination be set up between WENRA and the EUR organisation as industrial partner. We believe our proposal would help to converge quicker. The national frame could be nevertheless kept to deal with the national specificities.



On behalf of the other EUR Steering Committee members let me convey you again our very positive appreciation about the harmonisation works undertaken by WENRA. We really expect a collaboration frame can be set up between WENRA and EUR through which mutual benefit can be found.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'B. Roche'.

Bernard Roche
Chairman of EUR Steering Committee