

Joint Statement Protesting
Nuclear Regulatory Authority's Draft Approval of Sendai Nuclear Power Plant's
Conformation to New Nuclear Regulatory Standards

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*Issued by:
The Nuclear Regulation Authority Citizen Watchdog Group
and 7 other organizations*

Today, the Nuclear Regulation Authority (NRA) issued a draft report on Kyushu Electric's Sendai Nuclear Power Plant application for restart, stating the NRA's review found the plant conforming to the New Regulatory Standards. We strongly protest this report.

The NRA review to inspect conformation to the New Regulatory Standards does not learn from the lessons of Tokyo Electric's Fukushima Daiichi accident, and, for the following reasons it is clearly evident that the situation is far from being able to issue such conformation to New Regulatory Standards.

1. **In spite of acknowledging the warnings issued by experts that assessments on the effects of volcanoes cannot predict volcanic eruptions, the NRA review is ignoring this fact, thus violating its own Volcanic Effects Assessment Guide.**
 - Although Kyushu Electric's claim which states that the possibility is extremely small that a gigantic volcanic eruption (caldera eruption) would occur during the operation of the nuclear power plant is not substantiated with sufficient evidence, the NRA, with not a single volcano expert on its committee, without asking the opinion of experts, and with virtually no discussion, allowed this claim to pass.
 - With volcano experts stating that a huge volcanic eruption (caldera eruption) is difficult to predict, the government admitted the difficulty of being able to predict the extent and timing of such eruptions. Being able to predict the extend of the volcanic eruption and when pyroclastic flow will occur is absolutely necessary because nuclear fuel must be removed from the power plant site beforehand and because this removal takes years to complete. In spite of this, the NRA has only put monitoring in place for now, and has tossed aside this issue as an issue to be handled in the mid-term future.
2. **The NRA is requiring absolutely no measures to be undertaken to prevent contaminated water from being released into the ocean and other areas in the event of a serious accident**

The New Regulatory Standards require that, even though the containment has been breeched during a serious nuclear accident, countermeasures must be undertaken to limit the dispersal of radiation. Although it is stated that the New Regulatory Standards are based on lessons learnt from the Fukushima Daiichi nuclear accident, the review process completely ignored the serious situation of contaminated water emissions currently occurring at the Fukushima Daiichi plant and did not require measures be undertaken to prevent radioactive emissions from the Sendai Plant in the event of an accident.

Moreover, at the Sendai Nuclear Power Plant, 300 tons of groundwater is being pumped out daily, and when the pump equipment no longer functions in the event of a serious accident, groundwater would

enter the nuclear power plant facility and mix with the contaminated coolant water that has leaked from the bottom of the containment, thus creating the danger that large quantities of contaminated water would be generated. No countermeasures have been put in place to prevent such an occurrence.

3. Measures to prevent breaching of the containment and hydrogen explosions in the event of a serious accident are inadequate---cross-checking to verify the reliability of the analysis code has not been undertaken

Kyushu Electric has a shocking plan in the event of a serious accident involving loss of coolant and loss of power. The company plans to abandon cooling of the reactor vessel and instead will switch to pooling water at the bottom of the containment vessel and having the molten fuel which has breached the reactor vessel fall into the pooled water. The company claims that this would not lead to breach of the containment vessel nor hydrogen explosions, but its claims are only based on computerized analyses.

The accuracy of the computer code used by Kyushu Electric has been put into question. Nevertheless, the Nuclear Regulation Authority / Nuclear Regulatory Agency did not undertake a cross-check with another computer code, a procedure which is normally undertaken.

4. Seismic motion has been underestimated

The NRA did not have the method utilized for estimating the effects of a tsunami, the Takemura Method, used for estimating the earthquake motion at the Sendai Plant. The Takemura Method takes into account the special characteristic of Japanese earthquakes. If the Takemura Method had been utilized, it would have approximately doubled the earthquake motion estimation for the Sendai Plant.

Although the inadequacy of the New Regulatory Standards regarding estimation of volcanic effects became evident during the review process, as Chair of the NRA Shunichi Tanaka points out, the New Regulatory Standards do not guarantee safety.

With regards to the nuclear accident emergency preparedness plans which NRA Chair Tanaka calls "the second wheel" of a two-wheel vehicle (the other wheel being the New Regulatory Standards) the situation is as follows:

- Kagoshima Prefecture has stated it will abandon plans to evacuate people living beyond the 10-kilometer radius who require special support. It has instead forced responsibility for undertaking plans for these people upon the welfare facilities and hospitals. As a result, no plans are in place for these people. These people are being abandoned, sacrificed.
- As for the emergency preparedness plans for the general public, there is not enough capacity at the evacuation points to take in the people who have evacuated, thus no environment exists for remaining there. Also, there is a possibility that these evacuation points will be downwind. Moreover, the plans do not take into account the possibility of an earthquake, tsunami, or some other event occurring simultaneously to the nuclear accident. Plans for distributing potassium iodine are not in place. The screening points (the locations to undertake measurements and decontamination of radioactive materials) has not been established and no resolution for this is in sight. The possibility that evacuation may be required beyond a 30- kilometer radius has not been taken into consideration, etc.

Numerous issues remain problematic. An effective nuclear accident emergency preparedness plan is not in place. The greater the efforts put into making such plans concrete, the more apparent it becomes that there are great difficulties with evacuation.

The Sendai Nuclear Power Plant restart process should not be allowed to continue under these circumstances. The Nuclear Regulation Authority (NRA) should retract its review report. Restart of the Sendai Nuclear Power Plant must not proceed.

原子力規制を監視する市民の会
The Nuclear Regulation Authority Citizen Watchdog Group

反原発かごしまネット
Anti-Nuclear Kagoshima Network (ANK Net)

玄海原発プルサーマルと全基をみんなで止める裁判の会
People's Action Against The Genkai Nuclear Power Plant

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Green Action

美浜・大飯・高浜原発に反対する大阪の会
Osaka Citizens Against the Mihama, Oi and Takahama Nuclear Power Plants (Mihama-no-Kai)

国際環境NGO FoE Japan
International Environmental NGO FoE Japan

福島老朽原発を考える会
Citizens Against Fukushima Aging Nuclear Power Plants (Fukuro-no-Kai)

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