WANO MC Corporate Peer Review for NPPD  
15-24 May 2022  
  
CORPORATE GOVERNANCE (CO.2)

**Performance Objective**

Corporate governance provides the needed organisational structures, policies, processes and programmes to establish and implement high standards for the operation, maintenance and organisational support of the nuclear stations.

**Area for Improvement CO.2-2**

**Integrated Risk Management is not fully implemented and understood.**

The Company has Corporate policies and expectations, defining unacceptable risk conditions and including procedures to cope with risk. However, at implementation level, the Team has identified possibility for further improvement, related to availability of guidance, clear understanding and assessment of risks.

**Causes and Contributors**

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**Supporting Facts**

1. NPPD provided the Plant with Requirements and Guidelines for risk management,( *but we have difficulties to find them in Plant documentation system, for futher investigation).* (CO-03-SS-03)
2. Benchmarking in Risk Management is with REA only, which has limited additional value as it is already well known at NPPD. (CO-01-PA-05)
3. On question, how the NPPD has identified and evaluated risks in his area of responsibility. Deputy CEO replied, that his departments can identify delay in providing of finance, other risks to get insurance, but the planning department is responsible for Risk Management and there is a procedure for risk identification and mitigation. (CO-01-SS-11)
4. In the Emergency Diesel Generator (EDG) building of the safety system train №4, the EDG #4 diesel oil pressure control box 14LTE40 had a button labelled "Emergency Stop" in English stamped with a paper label with written message in two languages: Russian and Farsi. The fire extinguishers ПК №10, 11 also had paper labels written just in Farsi language. It was explained that the FP team uses labels in one language, the EDG team uses labels in two languages. The use of three different languages in plant documents, premices, buildings was an issue during the PR in 2019 as not having one common system increase the risk of miscommunications between different generations of plant staff. (CO-03-HL-03)
5. In the Emergency Diesel Generator (EDG) building of the safety system train №4, a metallic chair with imitation leather and sponge parts was in the EDG #4 control room which causes unnecessary extra fire load. It was explained with the need of the staff to sit during longer term tests. It means the (fire) risk in the EDG building was not evaluated in proper details. (CO-03-HL-02)
6. On question what are the most significant risks were identified in your area of responsibility the PIESM manager stated, that the highest risk is implementation of modification and they pay attention to identify all risks related to particular modification on initial stage during preparation and validation of proposal of modification. And than the station is monitoring the modifications according to check points. (CO-05-SS-05)
7. The NPPD managing director stated that there is a need to close the Risk management loop (identification, mitigation action and effectiveness review). (CO-01-VE-07)
8. According to MS&S manager, Risk Management System implementation is at initial stage at NPPD subsidiaries, he is aware of two pilot TAPNA projects. (CO-03-SS-09)

**Current Perspective**

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