1. **General comments:**

Taking into account that Self-Assessment Stress Test report for the BNPP-1 has been provided by the BNPP-1 operating company and Russian company in 2012, the comparison between this report and WENRA recommendation” Contents and Format of the Stress Test Report (Appendix 4 of TOR)” is given in table 1:

Table 1: Comparison between BNPP-1 Stress test report and WENRA recommendation

|  |  |  |  |
| --- | --- | --- | --- |
| **Item No.** | **WENRA Contents and Format** | **BNPP-1 Self Assessment Report** | **Remake** |
| 1 | General data about site/plant | | |
| 1.1 | Brief description of the site characteristics | Hass been described | Need to be review |
| 1.2 | Main characteristics of the units | Hass been described | Need to be review |
| 1.3 | Systems for providing or supporting main safety function | Partially described | To be review and completed |
| 1.4 | Significant differences between units | For the BNPP-1 is not applicable | **-** |
| 1.5 | Scope and main results of Probabilistic Safety Assessments | Has not been included in report | To be added to the report |
| 2 | Earthquakes | | |
| 2.1.1 | Design basis | Hass been described | Need to be review |
| 2.1.2 | Provisions to protect the plant against the design basis earthquake | Hass been described | Need to be review |
| 2.1.3 | Compliance of the plant with its current licensing basis | Partially described | To be review and completed |
| 2.2 | Evaluation of safety margins | Partially described | To be review and completed |
| 3 | Flooding | | |
| 3.1 | Design basis | Partially described | To be review and completed |
| 3.2 | Evaluation of safety margins | Hass been described | Need to be review |
| 3.2.2 | Measure which can …. | Partially described | To be review and completed |
| 4 | Extreme weather conditions | | |
| 4.1 | Design basis | Partially described | To be review and completed |
| 4.2 | Evaluation of safety margins | Partially described |
| 5 | Loss of electrical power and loss of ultimate heat sink | | |
| 5.1.1 | Loss of electrical power | Hass been described | Need to be review |
| 5.1.2 | Loss of the ultimate heat sink | Hass been described | Need to be review |
| 5.2 | Spent fuel storage pools | Hass been described | Need to be review |
| 6 | Severe accident management | Partially described | To be review and completed |

* 1. Base on table 1, it is recommended to consider a task (or section) in the TOR with the title :

**“TASK XXX: Review of the Self-Assessment Stress Test report of BNPP-1 “** and define the activities of this task.

* 1. Item 4.2.2, Page 13, Task 1: Development of the detailed methodology for the

Stress Test:

This section of TOR need to be corrected taking into account that the stress test report of BNPP-1 has been prepared in 2012. In this regard, detailed methodology of Stress Test shall be developed for the BNPP-1 stress test exercise based on ENSREG/WENRA recommendation and in the next step BNPP-stress test report shall be corrected based on this methodology.

* 1. Item 4.2.3, Page 18, 4.2.3, Task 2: Support to NPPD in preparation of the Self-Assessment Stress Test report:

The objective of this task shall be support NPPD with the completion (instead of preparation) of the Self-Assessment Stress Test report. Therefore the activities of this task which is indicated in the TOR shall be revised based on this point.

* 1. Taking into account that based on the activity which was down from 2012 up to now (2016) for the Self-Assessment Stress Test report of BNPP-1, the conceptual design of implementation of mobile equipment has been prepared by the TSO of BNPP-1,it is recommended to consider the following task in the TOR:
* TASK XXX: Review of the Conceptual and detail design for implementation of Mobile equipment (in the scope of stress test) in the BNPP-1.
* TASK XXX: Supply tools (computer codes and other tools) to the NPPD in order to assist NPPD (TSO) to performed additional deterministic safety analysis (DBA, BDBA & SA) which is in the scope of stress test report.
  1. It is recommended that the scope of stress test assessment, methodology of stress test, specification of stress test and format of final self-assessment report comply with INRA requirements instead of ENSREG/WENRA requirements.
  2. Any predefined activity for the contractor shall be approved by the BNPP before commencement.
  3. The activity which shall be performed by the BNPP, can be down by the contractor taking into account that the BNPP-1 will provide the budget for these activities.
  4. Prior to Road Map preparation, it is strongly recommended to specify the scope of cooperation between NPPD and the European Commission, considering the fact that the self-assessment report for BNPP-1 has been developed in 2012. The cooperation might be expanded to the area of modernization and design for implementation of mobile equipment at BNPP-1.

1. **Specific Comments:**
   1. Page 7, 4th paragraph:

“The plant is owned and operated by the Bushehr Nuclear Power Plant (BNPP) Operation Company…” shall be replaced with “The plant is operated by the Bushehr Nuclear Power Plant (BNPP) Operation Company…”.

* 1. Page 11, Section 4.1.1:

“This project is aimed to support the Nuclear Operator of Iran – Bushehr NPP in conducting of the stress test on the basis of the European Nuclear Safety Regulatory Croup (ENSREG) technical specification.” Shall be replaced with “This project is aimed to support the Nuclear Operator of Iran – Bushehr NPP in conducting and implementing of the stress test on the basis of the European Nuclear Safety Regulatory Croup (ENSREG) technical specification”.

* 1. Page 11, Section 4.1.3

In target groups shall also be included: The Technical Support Organization (TAVANA).