|  |
| --- |
| Synthesis of Regional comments on Policy Document 5 |
|  |  |  |  |  |
| **Pg no.****in PD5** | **Subject** | **Region** | **Comment** | **Discussion/resolution** |
| n/a | General comment | MC | “On the whole we see no need to update PD5 because a WANO MC initiative to add Category 5 for new entrants was aimed at reducing the financial burden on new entrants, as a new entrant does not have any profit, but there is an understanding that a new entrant should be involved at an earlier stage. We should share our operating experience. We believe it would be better to expand category 1 and there is no need to update PD 5.” | This position is contrary to the conclusion of the ELT following the work done after discussions on the position paper issued at the end of 2016 on managing new entrants. All regional comments were processed and discussed at the ELT and a decision was made to proceed with updating the document. |
| n/a | General comment | PC | “Is it really necessary to have all RC aligned on RC fees, or are RCs allowed to have their own fee system in place where regional affiliation fees are concerned?”  | Page 18 of PD 5 draft refers: "This appendix provides expectations and guidance. Individual regional governing boards may elect to deviate from this guidance on a case-by-case basis. The aim should be to align wherever possible to this guidance." This statement says that it is not mandatory to follow the fee structures given in PD5 at a regional level.Proposed action: It is suggested that the words "on a case-by-case basis" be replaced with "according to regional circumstances". |
|   |   |   |   |   |
| Page 1 | No comments | n/a | n/a | n/a |
| Page 2 | No Comments | n/a | n/a | n/a |
| Page 3 | No comments | n/a | n/a | n/a |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Page 4and 18 and 19        | Fee structure for new units         | TC  | 1. Agree with proposed fee of 75% but,
 | The majority view of ELT is to have a £100k joining fee for new members. The basis for the joining fee as proposed during the prior ELT was to compensate existing members for the fact that they funded a lot of WANO’s foundation documents and intellectual property. The payment of this fee to WANO LO will result in a reduced budget need from all existing WANO members, as LO membership fees are determined by LO budget on an annual basis.Proposed action: Retain the proposed £100k joining fee.Two RC believe the 75% fee should be paid earlier than fuel loading, at CFT. PC says stay at 50% from nuclear concrete to grid connection. MC also OK with PC position, but prefers no fixed fee, only a fee for services delivered.Additionally MC wishes to change existing 100% point from connection to grid to after pilot operations.The basis for the increases in membership fee has been the experience of AC/TC on the increase in WANO activity necessary to deliver support (NUA, PSUR, ORA, CPO) to new entrants. The strategic position of WANO is to increase and improve the amount of NUA activity, to address the risks from emergent units. It is unfair on existing members to sponsor this additional WANO resource deployment.Proposed action: One more round of ELT discussion with a final recommendation. London’s proposal remains to implement what is in the draft version of PD5.  |
| 1. this fee should apply earlier from Cold Functional Test
 |
| AC  | 1. The fee should be 100% not 75% and
 |
| 1. this fee should apply earlier from Cold Functional Test
 |
| 1. The £100k joining fee is perhaps too low.
 |
| PC  | 1. Stay with existing structure & timings; ie. 50% from nuclear concrete through to grid connection.
 |
| 1. Agree to £100k joining fee
 |
| MC    | 1. Don’t agree with £100k joining fee as members have no income yet and this will be a barrier to becoming a member.
 |
| 1. Propose no fixed membership fee as a category 5 member in LO or RC and member only pays directly for “cost of services delivered”
 |
| 1. If not 2 above, stay with existing fee structures of 50% at fuel loading
 |
| 1. Don’t agree that connection to grid should be the 100% payment point; only after “pilot operation”
 |
|   |   |   |   |   |
| Page 5  |  No comments | n/a | n/a | n/a |
|   |   |   |   |   |
| Page 6 |  Affiliated organisation |  AC |  Definition is not clear. | We are trying to distinguish between organisations like INPO, that directly represent members as “Operator Representative Organisations” and those like JANSI (and future potentially CNEA), who do not directly represent members. Proposed action: add e.g. INPO to Operator Representative Organisation definition and add e.g. JANSI to Affiliated Organisation definition. |
|   |  Emerging Organisation |  AC |  Member should be “Emerging” only until they transfer to full membership. | Agree; that is what PD 5 says should happen as soon as nuclear concrete is poured. No further proposed action. |
|  |   |   |   |   |
| Page 7   |  No comments | TC MC PC |  n/a | Cat 3: (See current list of Cat 3 members at end of this table)The definition implies that any owner that has a Cat 1 member plant, is eligible to register as a Cat 3 organisation. Affiliated organisations (see comment on page 6 above) also fall under this umbrella as cat 3. Plants undergoing decommissioning may also elect to stay as Cat 3 members. Current wording of definition does need to be changed to make this clearer.Proposed action: Change wording of definition:“A qualifying *Owner* of a Category 1 *Operator*, *Affiliated Organisations* and plants undergoing decommissioning activities.For the purposes of this definition, a *qualifying owner* shall be required to have a credible influence over the Operator, nominally at least a 25% ownership. Applicants with a lower ownership share will be considered on a case-by-case basis.”Cat 5: Proposed action: Change wording of definition:“An Emerging Organisation throughout the tendering, licensing, construction and commissioning phase of their first new nuclear power plant. Cat 5 members will transfer to either Cat 1 or Cat 2 at the time of pouring of nuclear concrete on the nuclear island.”   |
|  Cat 3 member definition |  AC | Lack of clarity in the definition and descriptions |
|  Cat 5 member definition |  AC |  Clarify wording of definition |
|   |   |   |   |   |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Page 8 |  Affiliation table | TC  | No answers provided to Q2 and Q 3 | WANO global level policy documents should not specify how a regional governing board or regional general meeting should be governed. This level of detail is to be decided by the regional charter and local procedures. The intention of PD5 is to specify those requirements that should apply to the global WANO governance structures.Proposed action: Add a clarifying statement to the bottom of the table:“Regional Charters will provide specific local, detailed rules that apply to the participation rights of different categories of membership (1, 2 or 3) in the Regional Governing Boards and Regional General Meetings.” |
|  | AC  | Agrees with the proposed table and Q2 & Q3 |
|  | PC | 1. Agrees with the proposed Q2 & Q3
 |
|  |  | 1. Suggests table should deal with Cat 1, 2, 3 for regional board practices and voting rights.
 |
|  | MC | 1. Suggests adding regional general meetings as a line to the table
 |
|  |  |  |  |  |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Page 9 | London affiliation option | TC | Objects to the inclusion of the note specifying that the arrangement of affiliation to London is interim, to be stopped after Shanghai becomes a full regional centre.  | The way PD 5 is now written clearly specifies the way that Cat 5 members, affiliated to London, transition to become members of a region. Hence the note can be deleted without a problem. However, once Shanghai is a fully operational region in several years’ time, it is expected that new entrants will directly affiliate to the region of their choice from day 1. PD5 will need to be re-written at that time. The note here was merely to indicate to future generations, that this is the intention, it was not to imply enforced affiliation with Shanghai. Suggested action:Leave the statement as a reminder of future intention, as it does not imply enforced affiliation to Shanghai in future. |
| AC | 1. Similar comments to TC on London affiliation and the future affiliation once Shanghai is fully functional as a TRC.
 |
| Principles of membership | AC | 1. Concerned that the item (g) may conflict with definition of Category 3 membership
 | Reviewed against the revised definition provided above (P7 discussions) and found not to be in conflict. No further action. |
|  |  |  |  |  |
| Page 10  | No comments |  |  |  |
| Page 11 | No Comments |  |  |  |
|  |  |  |  |  |
| Page 12 | Emerging organisation, cat 5 membership (g) | TC PC | Agree that the PC comment be dropped. | No Further action. |
|  | Interaction plans (h) | AC | Last bullet on scheduling PSUR applies after membership moves to RC from LO | Agreed. Action. Move this bullet to the regional responsibility paragraph (n) |
|  |  |  |  |  |
| Page 13 | No comments |  |  |  |
|  |  |  |  |  |
| Page 14 | Confidentiality (c) | AC | Should this statement be left to the Policy 4 - confidentiality | Policy 4 does spell out the requirements and obligations. So this can be removed from this PD5. It was inserted as a reminder, but is unnecessary here.Action: Remove the statement. |
|  | Other Organisations (d) | AC | Other organisations shouldn’t represent members | Agreed.Action: Propose new wording:“These organisations can participate in a limited range of WANO activities (e.g……) and, when acting in support of a WANO member, attend selected workshops and meetings.” |
|  |  |  |  |  |
| Page 15 | No comments |  |  |  |
|  |  |  |  |  |
| Page 16 | Fees for members having some units that are shut down, while others are still running (b) Q4 | TC | Regions should determine their own policy for fees to be charged to members having some units shut down | There is a clear distinction between a site that has shut down all units, and those that have still one or more units operating. When a site has no units operating, then the option is for it to leave WANO or continue as a Cat 3 (with attendant LO and RC fees as appropriate).However, if a unit is still functional, then WANO is still delivering PR and other services to the combined site, which includes the shutdown units. The shutdown units are therefore still partly drawing on WANO’s resources, and hence the existing 0.25 at both the LO and RC level would seem to be appropriate.Given the fact that PD5 provides non-mandatory guidance on regional fees, it is proposed to leave the wording unchanged. |
| AC | No fee, because we shouldn’t provide any services |
| PC | No fee for shut down units; regional alignment is not necessary |
| MC | Retain the 0.25 formula for London and Regional fees as per existing PD5 |
|  |  |  |  |  |
| Page 17 | No comments |  |  |  |
|  |  |  |  |  |
| Page 18 | Fee table and Q5Should regional fees be uniform and aligned? | TC | Cat 3 fees should be determined by RC | Given the fact that PD5 provides non-mandatory guidance on regional fees, it is proposed to leave the wording unchanged. |
|  | AC | We should work towards uniformity |
|  | PC | Uniformity is not a priority; leave up to RC |
|  | MC | Leave as is (£100k?) |
|  |  |  |  |  |
| Page 19 | Rated output power | AC PC | Specify source – e.g. IAEA databaseSpecify Net or Gross and source – e.g. IAEA database | Agreed. Will specify more clearly |
|  | £15k for added MSM | PC | Why £15k, should this rather be focussed on cost according to number of resources deployed? | Agreed. Revise the wording. |
|  |  |  |  |  |
| Page 20 | Fee table | AC | Comments already dealt with under page 4 for 100% fee at Hot / Cold? Functional Testing | n/a |
|  | Dual/multiple affiliation | TCAC | Prefer a multi-party agreement to define how fees are split between the different participating regions based on scope of delivery of services, rather than a fixed fee situation. | The majority ELT view favours a multi-party negotiation to determine split in fees and resource obligations. The PC suggestion of a ceiling on not exceeding 100% of single region affiliation may be too restrictive.Proposal: Change wording to simply reflect that dual/multiple affiliation service provision, regional member fee and regional secondee commitments are to be negotiated between all parties. (Don’t specify a ceiling, to allow specific circumstances to be negotiated.) |
|  |  | PC | As above, but total combined fee and secondee commitment should not exceed that for single affiliation. |
|  |  | MC  | Stay with current PD5, fees of secondary affiliation are determined by that region’s GB and suggested to normally be 25% of full fee. |

**List of current London “letters of agreement”:**

|  |  |  |
| --- | --- | --- |
| **Organisation** | **Type of organisation** | **Membership category** |
| Fennovoima |  New build project | Should be Cat 5 in future |
|  PGE (Poland) |  New build project | Should be Cat 5 in future |

**List of current Category 3 members:**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Region** | **Organisation** | **Type of organisation** | **Membership category** | **Comply with new PD5 now?** |
| **Atlanta** | CANDU Owners Group | Research & Sc. Services & Ops support | Affiliated Organisation - Cat 3 | Yes Cat 3 |
|  | Horizon Nuclear Power | Early new build project | Should be Cat 5 in future or choose to be a Cat 1 | No, now Cat 3 |
| **Moscow** | Ignalina NPP | Owner of shut down plant | Decommissioning - Cat 3  | Yes Cat 3 |
|  | Chernobyl NPP | Owner of shut down plant | Decommissioning – Cat 3  | Yes Cat 3 |
|  | Atomenergoremont | Maint. & repair service branch of Rosatom | These organisations fit the definition of an Affiliated Organisation – Cat 3 | Yes Cat 3 |
|  | Atomtechenergo | Test & commissioning branch of Rosatom |  Yes Cat 3 |
|  | Gidropress | Design & construction branch of Rosatom |  Yes Cat 3 |
|  | RASU | C&I, automation branch of Rosatom |  Yes Cat 3 |
|  | VNIIAES | Research & Sc. Services & Ops support |  Yes Cat 3 |
|  | MVM | Owner of PAKS I | Owner – Cat 3 | Yes Cat 3 |
| **Paris** | NDA |  “Owner” of Sellafield | Owner – Cat 3 | Yes Cat 3 |
| **Tokyo** | JANSI |  Research & Sc. Services & Ops support | Affiliated Organisation – Cat 3 | No, now Cat 1 |

**Table showing the relationship between “Eligible bodies” and Categories of membership:**

|  |  |  |  |
| --- | --- | --- | --- |
| **Eligible bodies** | **Definition** | **Category of membership** | **Examples** |
| **Operator** | Organisation (operating company) that operates at least 1 NPP or fuel reprocessing facility for commercial purposes | Category 1 if not represented by an Owner or Operator Representative Org.  | AC – OPG, Bruce, EskomMC – Rosenergoatom, PAKS 1PC – EDF, Engie, ElectrobrasTC – KHNP, PAEC, NPCIL |
| Category 2 if represented by an Owner or Operator Representative Organisation | AC – HaiyangMC – nonePC – Daya Bay, ForsmarkTC – Chubu, Hainan, Kansai |
| **Owner** | Non-regulatory organisation that owns all, or a portion of at least 1 NPP or fuel reprocessing facility being operated for commercial and peaceful purposes | Category 1 if representing an Operator (That will be a category 2 member). | AC – SPICMC – none : no cat 2 membersPC – CGN, RWE, LeibstadtTC – CNNC  |
| Category 3 if its plants are Category 1. | AC – noneMC – MVMPC – NDATC - none |
| **Operator Representative Organisation** | Organisation that provides NPP owners with a non-regulatory nuclear safety mission compatible with that of WANO, which has significant influence on the nuclear safety and reliability of operating companies and **DIRECTLY** represents other members of WANO | Category 1 | AC – INPOMC – nonePC – VGBTC – JNO  |
| **Affiliated Organisation** | Organisation that provides NPP owners with a non-regulatory nuclear safety mission compatible with that of WANO, which has significant influence on the nuclear safety and reliability of operating companies and **DOES NOT** **DIRECTLY** represent other members of WANO | Category 3 | AC – COGMC – VNIIAESPC – noneTC – JANSI |

|  |  |  |  |
| --- | --- | --- | --- |
| **Associate Member** | Regional Centres of WANO | Cat 4 | AC, MC, PC, TC |
| **Emerging Organisation** | Organisation that will later become an Operator or Owner of their first nuclear power plant, that is currently in the tendering, licensing, construction and commissioning phases of the project. | In future will be category 5 until nuclear concrete, but may elect to upgrade to a category 1 member earlier if they choose to do so. | LO – Fennovoima, PGE |
| **Other Organisation** | Organisation that supports an Operator or Owner in their safety and reliability efforts on their plants. (These organisations do not formally become members of WANO, but conclude agreements with WANO that allows access to a limited set of WANO products and services). | No membership category, have special agreement with WANO for access to WANO products and services | Possibly in future Technatom to provide leadership training in Spanish language; designers and suppliers to new build projects of Cat 5 members; etc. |