

LTR-1000-214856

2018/12/13

No



To: Mr.A.V.Vostrikov

**Deputy General Director of Rusatom Service JSC for Operation Support –
ATEX JSC Managing Director**

Sub: The FSAR report of emergency conditions in BNPP

Dear Sir,

In response to your letter No. 340-01-20/1478 dated 12.11.2018, hereby we inform that according to the article 13.3.1.5 of BNPP-1 FSAR, three mode of functioning have been specified:

- 1) Normal operation of Bushehr-1 NPP – design limits and/or conditions for safe operation of Bushehr-1 NPP are not violated;
- 2) Condition «Site Area Emergency» – Events resulting in a major decrease in the level of protection for the public or on-site personnel.
- 3) Condition «General Emergency» - Events resulting in an actual or substantial risk of a release requiring implementation of urgent protective actions off-site.

Since level 1 includes normal operating condition of the plant, according to the article 13.5.2.2.2, sub-article g of FSAR document the criteria to declare *emergency conditions* are provided and used in two levels and merely by radiological criteria mentioned in the document “BNPP-1 personnel protection plan in case of accident”. Thus since other criteria for accident declaration such as impairment in critical safety function, damage to the core or spent fuel, natural events, fire, security events, toxic gas release, etc. should be also taken into account in protection plan for declaring level of emergency according to IAEA requirements, BNPP has taken measures to update information necessary for identifying level of emergency based on IAEA documents “Criteria for Use in Preparedness and Response for a Nuclear or Radiological Emergency- General Safety Guide- GSG-2 (tables 12 and 13)”. This document is being reviewed by technical support organization (TAVANA Co.) in order to be replaced with previous emergency classification and be used in BNPP after modifying and receiving the approvals of NNSD. Therefore it is requested that you issue order for modifying and taking into account new emergency classification in design in order to make the process of actions consistent.

Sincerely yours

H.Ghaffari

Bushehr NPP Manager and Managing Director