

Policy for announcing nonconformance cases involving nuclear material protection

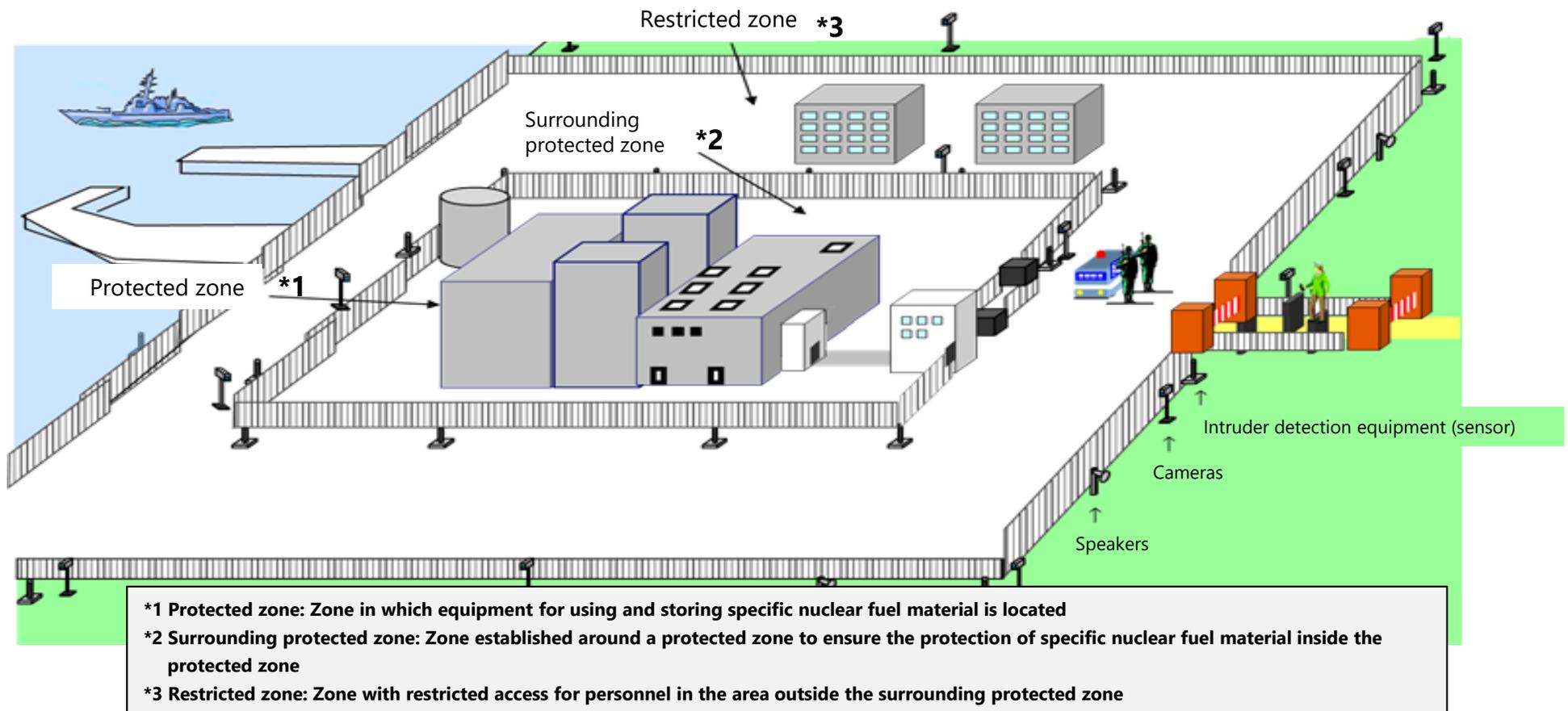
September 22, 2021

Tokyo Electric Power Company Holdings, Inc.

1. Nuclear Material Protection

- Nuclear material protection is defined as the prevention of behavior such as sabotage and unauthorized removal of nuclear fuel material through theft and other means by taking the required measures for protection against destructive behavior aimed at facilities and protective equipment and against interference in the handling of nuclear fuel material.
- It is required by the laws and regulations* to take measures for the protection of nuclear material where intrusions into all areas of the station are prevented and detected (discovered) at an early stage. Operators are also required to strictly control information concerning protective measures so that there are no leaks.

***Article 91 of the Ministerial Ordinance for Commercial Nuclear Power Reactors concerning the Installation, Operation, etc.**



2. Background and Summary of Review

- We publicly announced "Current approach to public disclosure of information concerning nuclear material protection" on April 7, 2021, based on conditions and other matters causing significant anxieties and distrust in the regional residents and society at large which were brought about by a series of incidents related to nuclear material protection.

Current approach to disclosing information pertaining to nuclear material protection (released on 4/7)

Any troubles pertaining to nuclear material protection shall be publicly disclosed at a suitable point in time (※) and information shall be shared to the extent that nuclear material protection weaknesses are not made public.

(※) After substitute protective measures have been implemented following the incident, or after receipt of an assessment by the Nuclear Regulation Authority, etc



- Currently, only "disclosures at a suitable point in time" are taken; At this time, the policy is being created that specifies concrete operations such as clarifying standards for public disclosure based on the seriousness of each matter.

3. Policy for announcing nonconformance cases involving nuclear material protection

- Nonconformance matters concerning nuclear material protection (see note) (human errors and issues for equipment concerning nuclear material protection) shall be **disclosed in a time and way that does not make vulnerabilities of protective measures publicly known.**
- However, how public disclosure of information is to be handled when there has been criminal or illegal conduct shall be decided upon per case after having separate discussions with security agencies.
- **Serious matters** in the above **shall be disclosed through press releases after confirming that vulnerabilities in protective measures are addressed** and after receiving assessment from the Nuclear Regulation Authority.
- Other minor matters shall be properly disclosed on the station's website after confirming that the vulnerabilities in protective measures have been eliminated.
- **"Standards for announcements concerning nuclear material protection" (attachment 1) shall be referenced when making decisions** for disclosures based on the announcement classification that applies to the current issue in plant equipment, etc.
- Announcement classification of each matter shall be decided after having discussions in internal meetings (performance improvement meetings [PIM]).
- In PIM, in addition to personnel from the Nuclear material protection division that attended in the past, top personnel from the PR department who have connections outside the station shall also now attend and give advice.

Note: "Nonconformance" are situations where conditions differ from the ideal or conduct (decisions) differs from ideal conduct (decisions).

⇒ A wide range of nonconformance is targeted, such as equipment failures found during normal plant inspections, to issues that are obligated to be reported by law and regulations.

[Attachment 1] Standards for announcements concerning nuclear material protection

Announcement classification	Event descriptions (examples)	How to conduct disclosure	[Reference] Examples of targets (past examples in parenthesis)
I	<p>Matters with issues in nuclear material protection</p> <ul style="list-style-type: none"> Events violating nuclear material protection regulations (findings rated "white" or higher in nuclear regulatory inspection / findings rated "white" or higher in self assessment) Confidential information concerning nuclear material protection leaked externally Large-scale malfunction of equipment related to nuclear material protection 	<p>Disclose through press releases after confirming that vulnerabilities in protective measures are gone and after receiving assessment from the Nuclear Regulation Authority</p>	<ul style="list-style-type: none"> When someone enters the station with unauthorized use of an entrance card, etc. (when unable to be prevented) Large-scale collapse of protection fencing KK: Case of unauthorized use of ID card (September 2020) KK: Partial loss of function in nuclear material protection equipment (February 2021)
II	<p>Matters with effects on nuclear material protection</p> <ul style="list-style-type: none"> Events violating nuclear material protection regulations (finding rated "green" in nuclear regulatory inspection / finding rated "green" in self assessment) Management information concerning nuclear material protection leaked externally Medium-scale malfunction of equipment related to nuclear material protection 	<p>Same as above</p>	<ul style="list-style-type: none"> When someone enters the station with an expired / improperly used entrance card, etc. (when unable to be prevented) Collapse of protection fencing KK: Improper use of ID card between parent/child (August 2015) Fukushima Daini: Improper management of passage door in boundary of protection area (May 2021)
III	<p>Matters with minor effects on nuclear material protection</p> <ul style="list-style-type: none"> Location of confidential information / management information concerning nuclear material protection is unknown (when not leaked, but mistakenly disposed) Small-scale malfunction of equipment related to nuclear material protection 	<p>Properly disclose on the station's website after confirming that vulnerabilities in protective measures have been eliminated</p>	<ul style="list-style-type: none"> When unauthorized use of an entrance card is discovered and prevented Damage to protection fencing that does not lead to collapse
Other	<p>Nonconformance events concerning nuclear material protection outside of the above items</p> <ul style="list-style-type: none"> Minor issues that do not effect monitoring with monitoring equipment Loss of entrance cards / ID cards / etc. 	<p>Same as above</p>	<ul style="list-style-type: none"> Minor failures of sensors, cameras, and other equipment that do not effect monitoring and there is backup equipment When someone trying to enter the station with an expired / improperly used entrance card etc. is discovered and prevented Damage to protection fencing that does not lead to collapse

***Only include information that does not lead to public disclosure of vulnerabilities in nuclear material protection**

[Attachment 2] Image of announcements on station's website

Announcement image

Tokyo Electric Power Company Holdings- Kashiwazaki-Kariwa Nuclear Power Station
Nonconformance information concerning nuclear material protection

◆ Nonconformance is when conditions differ from ideal conditions or conduct (decisions) differs from ideal conduct (decisions). A wide range of nonconformance is targeted, such as equipment failures found during normal plant inspections, to issues that are obligated to be reported by laws and regulations.
 Please visit the page below to read about grades of nonconformance.
<https://www.tepco.co.jp/niigata○○.pdf>

- 1. Grade I: 0 cases
- 2. Grade II: 1 case

No.	Announcement classification	Nonconformance event	Correction actions confirmed to be completed on	Comments
1	II	● [Announcement completed on (month)(day)] https://www.tepco.co.jp/	2021/○/○	

- 3. Grade III: 2 cases

No.	Announcement classification	Nonconformance event	Correction actions confirmed to be completed on	Comments
1	III	●	2021/○/○	
2	Other	●	2021/○/○	

*Only a summary of events is disclosed because the information involves nuclear material protection measures.

© Announcement timing / scope

- **Serious nonconformance matters** in nuclear material protection shall be **disclosed through press releases** after confirming that vulnerabilities in protective measures are gone and after receiving assessment from the Nuclear Regulation Authority. **Other minor matters** shall be properly **disclosed on the station's website** after confirming that vulnerabilities in protective measures have been eliminated.

⇒ Announcements will be more extensive than in the past while being given in a time and way that does not make vulnerabilities in protective measures publicly known.

© Announcement standards

- Create "Standards for announcements concerning nuclear material protection" and **clarify decision criteria and procedures for the seriousness of cases involving announcements.**

- **Announcement classifications are to be discussed in internal meetings (performance improvement meetings [PIM])** and classification is decided for each matter. **In PIM,** in addition to personnel from the nuclear material protection division that attended in the past, **top personnel from the PR department who have connections outside the station will also now attend and give advice.**

⇒ Disclosures will be conducted based on clearer standards and more proper work processes.