

6 November 2009

ORIGINAL: English

**EU-27 REGULATORS PEER
REVIEW**

**EFFECTIVENESS OF STUK'S
REGULATORY
INFRASTRUCTURE
FOR WASTE SAFETY**

Helsinki, Finland

2 to 6 November 2009

REPORT
TO
RADIATION AND NUCLEAR SAFETY AUTHORITY (STUK)
Helsinki, Finland

Mission date: 2 to 6 November 2009

Regulatory body: STUK

Location: STUK Headquarters, Helsinki, Finland

Regulated facilities and practices: *Nuclear power plants, fuel cycle facilities, medical and industrial sources, research applications, waste facilities, decommissioning and remediation, ...*

Organized by: STUK

EU Review Team:

BOYDON , Frans (Team leader)	UK
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EXECUTIVE SUMMARY

On 2-6 November 2009 a team of 11 European regulators carried out an EU 27 Peer Review of STUK's processes for regulating radioactive waste management activities in Finland. Due to the short time period of the review it focussed its attention upon STUK's regulation of the proposed spent fuel repository at Olkiluoto and its associated rock characterisation facility at ONKALO.

The team concluded that STUK has a well established and apparently effective and efficient basis for regulating nuclear waste management in Finland. This is particularly impressive as the development of the Olkiluoto repository is at an early stage without as yet a fully developed safety case. Nevertheless the team feels that generally STUK needs to review its guides and regulations which are currently based upon NPP to ensure that they are sufficiently clear for the purposes of regulating waste management and to ensure greater transparency of requirements to stakeholders

1. INTRODUCTION

STUK has invited European regulators to participate in an EU-27 Peer Review of its processes for regulating radioactive waste management activities in Finland. This peer review took place on 2-6 November 2009.

Within the time frame available the team was unable to carry out a review of all STUK's activities in the area of radioactive waste management e.g. at the nuclear reactor sites, so focussed its attention upon the regulation of the proposed spent fuel repository at Olkiluoto and its associated rock characterisation facility ONKALO both to be managed by the prospective Licensee company Posiva Oy.

The team recognised that STUK had carried out its own internal peer review and the team findings in this report are in addition to those findings. In common with STUK's own peer review the team decided to carry out its peer review using the modules defined by the chapters GS-R-1, "Legal and Governmental Infrastructure for Nuclear, Radiation, Radioactive Waste and Transport Safety".

Following the Finnish Governments' Decision in Principle (DiP) in December 2000 and subsequent endorsement by the municipality in Eurajoki and the Parliament, Posiva started activities to establish an underground rock characterisation facility (URCF), as required in the DiP.

Posiva plans to submit a license application in 2012 for the construction of a spent fuel repository which will include the integration of the URCF as part of the repository. Thus, although the URCF is not licensed as a nuclear facility STUK is reviewing and assessing the ongoing works of Posiva as if the Onkalo URCF facility was licensed as a nuclear facility.

STUK has used the experiences from the regulatory overview of the construction of the URCF so far to develop and improve the regulator guidance documents as well as STUKs internal guidance documents, i.e. the management system of STUK.

STUKs system of regulatory guides on nuclear safety (YVL – external guides and YTV – internal guides) contains guidance on radioactive waste management, including management and disposal of spent nuclear fuel and regulation of these activities. STUK is currently in the final stages of establishing new regulatory guides that better address the planned licensing of a repository for spent nuclear fuel which will replace some of the previous guidance documents.

1.1 REFERENCES FOR THE REVIEW

The most relevant document used for the review was the IAEA safety standard GS-R-1, "Legal and Governmental Infrastructure for Nuclear, Radiation, Radioactive Waste and Transport Safety". This document was a basis for the questionnaire prepared and answered by STUK in advance of the mission.

1.2 CONDUCT OF THE REVIEW

On the 1 November 2009 in Helsinki, an opening team meeting was conducted to discuss the specifics of the mission, to clarify the basis for the review and the background, context and objectives of the mission and to confirm the methodology for the review and evaluation.

The mission entrance meeting with STUK senior management was held on Monday, 2 November 2009. Opening remarks were made by STUK Director General Jukka Laaksonen, the STUK Nuclear Waste and Material Department Director Tero Varjoranta and by the Team leader Frans Boydon.

On 3 November 2009 the team visited Olkiluoto to see the facility and existing waste repository for LILW. Advantage of the visit was taken to interview Juhani Vira (Vice President of Research for Posiva) to obtain information to assist the team in its review discussion taking place later in the week. The topics covered included:

- The process by which Posiva understands STUK's requirements of the safety case,

- The process by which Posiva would inform STUK of changes to its safety case,
- The need for Posiva to demonstrate that it understands its safety case and manages the change to an operational company from one of design, research and construction whilst ensuring that necessary skills are available,
- The role of STUK in Posiva's interactions with stakeholders,
- Past difficulties in interpreting STUK requirements from expert team findings,
- Funding
- Transport responsibilities
- How and whether retrievability needs to be considered,
- How the encapsulation plant and the repository would be licensed (together or separately), and
- Regulatory issues associated with dealing with a facility which is not yet a licensed facility.

During the remaining days of the mission, a systematic review was conducted for all the following review modules:

- Module 1 - Legislative and governmental responsibilities
- Module 2 - Management system of the regulatory body
- Module 3 - Authorization process and requirements on the applicant(s)/licensee(s)
- Module 4 - Review and Assessment procedures
- Module 5 - Inspection and Enforcement
- Module 6 - Development and implementation of regulations and guidance
- Module 7 - Organization of the Regulatory Body
- Module 8 - Stake-holder relationship, public involvement

The review was conducted through meetings, interviews and discussions and visits to Olkiluoto site.

The Review Team identified a number of good practices and made recommendations and suggestions where changes are necessary or desirable for the continuous improvement of the effectiveness of regulatory oversight over the Olkiluoto site.

The exit meeting was held on Friday, 6 November 2009, with the STUK Director General and all other STUK staff involved in the mission. A copy of the final report of the mission was presented to STUK during this exit meeting.

2. LEGISLATIVE AND GOVERNMENTAL RESPONSIBILITIES AND DEVELOPMENT AND IMPLEMENTATION OF REGULATIONS AND GUIDANCE (MODULE 1 AND 6)

The legislative and statutory framework established to regulate waste management are: the Nuclear Energy Act (1987) (NEA) that prescribes that generators of nuclear waste are responsible for all nuclear waste management (storage and disposal) and have to provide adequate financial resources for these activities, and the Radiation Protection Act (1988) that regulates radioactive waste arising from other practices than nuclear power activities. These two Acts were updated in 2008. The Transparency Act also ensures an appropriate framework for transparency in the regulation of radioactive waste. These are supplemented by 4 decrees one of which deals specifically with safety of disposals. Another one relating to safety in NPP addresses issues of temporary storage of waste and nuclear fuel. These decrees were also revised in 2008. STUK guides further complement this regulatory infrastructure with detailed binding requirements.

A few highlights are worth mentioning:

- STUK considers that the responsibilities of the different bodies (i.e. STUK and ministries) are clearly defined and that lately good communication has been established with the different ministries (e.g. transportation, health,..) to clarify their respective roles;
- STUK has only limited relations with the Ministry of Environment as this Ministry appears to have very restricted competence and interest in the area of nuclear power production and waste management.
- STUK has additional responsibilities rather than being only a regulator (e.g. STUK is responsible for orphan waste management and STUK also provides commercial services)

Good Practices:

GP1&6 1: The overall regulatory framework (legislative infrastructure and STUK regulations) seems to address in a comprehensive way the issues of waste management and clearly defines the responsibilities. STUK has been given by law appropriate means for regulating waste management facilities and implementing coercive actions.

GP1&6 2: In Finland there is long term coherent political commitment to implement a geological repository and the regulatory process for implementing the geological disposal is well defined.

GP1&6 3: STUK is highly involved in the issue of national regulations relating to waste management issues (STUK establishes draft documents for Ministries)

GP1&6 4: The process for issuing guidance is well established and involves a staged consultation procedure with the various interested parties (operators, experts, Advisory Committee for Safety). STUK has implemented a periodic review for updating its guidance

Recommendation

R1&6 1: It is recommended that STUK should finalise the development and update of its internal and external guidance with regard to waste management regulation and supervision. This is because it is felt that currently there may be gaps and a lack of clarity regarding some of this guidance and the date for the license application is imminent.

Suggestions

S1&6 1: Although STUK appears to be independent (with respect to its competence and powers given by law), some modifications in the governmental organisation and the process for issuing licences could be considered. The Ministry of Employment and Economy appears to have the leading role for all aspects of nuclear energy. The fact that it is issuing the license under the NEA

and at the same time is promoting the use of nuclear energy is a clear conflict of interest, although this has apparently not lead to any specific problems so far.¹

S1&6 2: Although radioactive waste management streams are relatively straight forward STUK should contemplate issuing a national plan for all of its radioactive waste management (rather than just for NPP waste). For some waste (including some for which STUK is directly responsible but also for waste that will arise from research reactors decommissioning) there is no identified disposal stream.

S1&6 3: Consideration should be given as to whether detailed disposal solutions for all types of waste should become a prerequisite in the NEA for granting a Decision in Principle for new NPP as currently these arrangements are only considered at a late stage in the authorisation process.

S1&6 4: The regulations should be made consistent with respect to the issue of retrievability and STUK should define the safety requirements necessary to take into account this principle.

S1&6 5: In order to avoid conflicts of interest, STUK should contemplate modifications to some of its non regulatory activities to ensure that the same degree of oversight is applied to these roles perhaps by sub-contracting to private companies which it could then regulate. Examples include: STUK is responsible for nuclear waste facilities while at the same time being the regulator for these activities. STUK provides services to operators of nuclear facilities (such as radiation protection monitoring, environmental monitoring) whereas it also regulates radiation protection and discharges from these installations. This could lead to a loss of public trust in the independence of the regulator.

¹ Although not within the scope of this mission a further conflict of interest exists. This is because STUK reports directly to the Ministry of Social Care and Health (and receives part of its budget out of this ministry) which is also the Supreme Authority for the use of radiation in health care.

3. ORGANISATION AND MANAGEMENT SYSTEM (MODULE 2 AND 7)

STUK has good organisational and management systems. The processes supporting these systems are reported in a comprehensive way. If these processes are correctly implemented, they should allow STUK to fill its mission in an efficient way.

Good practices

GP2&7 1: STUK is in a position to adapt its resources to meet the increased demands from the repository construction.

GP2&7 2: STUK has a very efficient process to identify its future competence and resource needs. These needs are reassessed together with the strategic plan revisions to inform training and resource requirements.

GP2&7 3: Waste management inspectors at STUK participate in inspections at nuclear power plants and this is considered as very positive in order to furthering cross-fertilisation.

Suggestions

S2&7 1: STUK should consider creating some working groups consisting of STUK staff and external experts to benchmark safety related computer codes used by the license applicant.

S2&7 2: STUK should consider introduce a marking system for operator performance as a part of STUK inspection practices. This system should facilitate the communication with the operator in order to illustrate trends in performance.

S2&7 3: STUK should continue to increase its interactions with Posiva to enable better understanding of the safety related expectations of the regulator, and to resolve open technical issues.

S2&7 4: STUK should consider implementing mechanisms/processes in order to verify assessment work performed by external contractors (and ensuring independence where appropriate).

S2&7 5: STUK should consider formalising processes to assist in its use of external expertise. Procedures should describe the conditions under which such external support is required, on which basis the experts are nominated, the selection criteria and the way expert judgement and results are assessed and used.

4. AUTHORISATION BY THE REGULATORY BODY (MODULE 3)

The licensing process consists of three steps:

1. Decision in Principle – granted by the Government but must be confirmed by Parliament
2. Construction licence – granted by the Government
3. Operating licence – granted by the Government

The operating licence for the Olkiluoto LILW repository is valid until 2051. For the spent fuel repository, it is not yet decided whether there will be a separate licence for the encapsulation facility. Retrievability is no longer included in the revised Nuclear Energy Act of 2008 however, the Decision in Principle for the repository was prepared before revision of the Act and includes retrievability as an option.

Closure is not defined in the law, nor does the operating licence of the LILW repository contain any provisions for closure. The ownership of the repository will pass from the operator to the state after a confirmation by STUK that the licence holder has fulfilled its obligations for disposal. “Monitoring and control” after closure is mentioned in the law, but is not defined in detail yet.

Only facilities with considerable general significance require a Decision in Principle. The classification of significant systems, structures and components is described in YVL 2.1, which is applied by analogy to waste management facilities.

The format and content of documents to be submitted in support of a licence application are described in the Nuclear Energy Decree and in specific regulatory guides. STUK is in the process of developing such guidance which is specific to waste repositories. The current drafts of E.3 and E.5 focus primarily on safety issues and provide only little guidance on the format of the documents to be submitted by the applicant. Such guidance is foreseen in the IAEA GS-R-1 para.5.4.

Periodic safety reviews need to be carried out at least every 15 years (government decree and guide E.5). This ensures that feedback from previous stages and from operating experience are taken into account.

Recommendation

R3 1: A separate authorisation procedure for closure is recommended to be included in the nuclear legislation as this is not currently included. Guidance on closure should be included in the guide on disposal of nuclear waste. Closure is an important process, by which the repository is converted from an operated and continuously supervised facility into a facility which must provide passive safety over long timescales. Closure therefore has to be very carefully planned well in advance.

Suggestions:

S3 1: Complete a guide for the classification of significant systems, structures and components for waste management facilities as currently this guidance is only available for NPPs.

S3 2: Guides E.3, E.4 and E.5 should include more details on requirements concerning the format and the contents of the documentation to be submitted for authorization.

S3 3: STUK should clarify whether the encapsulation plant will be subject to a separate license from the repository.

5. REVIEW AND ASSESSMENT PROCEDURES (MODULE 4)

STUK has a well established review and assessment procedures from its experience with nuclear power plants and is implementing an analogous system for its assessment of the repository documents.

Good practices

GP4 1: There is a structured process for tracking documentation between Posiva and STUK.

Recommendations

R4 1: It is recommended that STUK should consider better defining its targets (and their derivation) for probabilistic safety assessment especially with respect to radiation protection because of the long term planned life of the facility.

R4 2: It is recommended that STUK should clarify in its regulations what its requirements are of an operating licensee. These requirements should ensure that Posiva is staffed with sufficient and appropriate competence and resources that properly understand the basic safety principles and the safety case, that it has appropriate safety management systems and that staff are properly authorised and qualified to carry out safety related tasks.

Suggestions

S4 1: STUK should provide clarity upon how expectations that disposal systems are optimised are enshrined within its expectations and requirements.

S4 2: STUK should request that Posiva sets operational limits and waste acceptance criteria at an early stage for the encapsulation and repository facilities based on normal and abnormal scenarios with time derived from the safety case. This is considered important to aid future planning.

S4 3: STUK should consider recording the basis of decisions upon whether to accept or reject suggestions proposals from external experts. For reasons of traceability and clarity, it is important to keep thorough records of what advice has been supported or rejected by STUK in its regulatory review and assessment activities, and what advice has been rejected.

S4 4: STUK should consider developing systematic internal guidance for the development of review plans (project plans).

S4 5: STUK should clarify if institutional control after closure will be a legal requirement (see also recommendation 3.1).

S4 6: STUK should consider a method of recording and tracking decisions and agreements made during the authorisation process.

6. INSPECTIONS (MODULE 5)

STUK currently exerts regulatory control over the ONKALO construction using internal guide (YTV5.2.4) with the ultimate aim of ensure that the host rock demonstrates properties that are essential for demonstrating the long-term safety of the proposed repository. In this context, inspections are carried out on-site to verify the practical implementation of the regulatory requirements and these also cover the management system and safety culture of the implementer. During the subsequent demonstration phase further inspections may be carried out to help build confidence in the safety case developed by POSIVA. Later-on, inspections will be arranged on research activities to follow-up the construction, operation and closure of the project.

The inspections are carried out on a periodic basis and planned using a well established and documented STUK programming methodology which also provides detailed information on the targets and contents of the planned inspections. Further inspections or participation at POSIVA audits on suppliers can be arranged when needed.

STUK inspectors are highly qualified experts who can also be involved in the regulatory review activities at STUK headquarters.

STUK puts high emphasis on the need for proper documentation and a process for following up issues and observations of the inspections. Inspection protocols are accessible to the public on request. An electronic system is being developed to aid the reporting and follow-up of inspection findings.

Legislation is in place for STUK to enforce its orders for corrective actions in a graded manner both during and after inspections and guidance is available to inspectors on how to use those measures.

While there are no legal requirements as to the qualification of inspectors, training of new inspectors is done via standard STUK training courses, the mapping of qualifications and the development of a tailored training programme, partly building on senior tutor inspectors.

Good Practices:

GP5 1: STUK has fully integrated its inspection activities at ONKALO in its well developed overall inspection methodology which covers systematic and detailed periodic planning, reporting, follow-up and legally supported enforcement measures. These are documented in a comprehensive set of guidance, while at the same time provides sufficient flexibility for their adaption to specific circumstances.

GP5 2: Inspection protocols, including a description of the inspection purpose, identified non-conformities and time limits for corrective actions, are available to the public on request. This greatly helps in the establishment of public trust in the regulatory oversight of STUK.

GP5 3: An electronic system is being developed to aid reporting and follow-up of inspection findings, including very helpful features such as tracking of imposed deadlines for corrective actions. This system will improve the access to inspection results and their interrogation as well as helping to avoid failures to follow-up corrective actions.

GP5 4: STUK establishes an individual training map for each freshly recruited inspector, building on the already existing knowledge and capabilities. This helps to speed up the training process and avoids wasting time for unnecessary standard training courses.

GP5 5: Inspectors carrying out review tasks at headquarters, provides a much better understanding of the overall regulatory approach rather than limiting tasks to field inspections.

Suggestions:

S5 1: STUK is encouraged to develop additional guidance as to define more precise inspection targets, criteria and benchmarks. Currently inspectors decide on specific findings based primarily on their personal judgement against benchmarks developed by Posiva whereas STUK benchmarks could provide a better basis for taking corrective actions.

S5 2: Whenever appropriate STUK should adapt its detailed inspection guidance for inspections carried out by STUK on NPP reactors, to inspections on geological disposal facilities.

S5 3: STUK should clarify its use of consultants for waste management inspections especially their rights, duties, notification procedures etc which have been clearly defined for OL3.

S5 4: STUK should develop a methodology for the inspection and evaluation of safety culture. The use of indicators during routine inspections and trending as applied by regulators in some other countries should be studied in this context.

S5 5: STUK is encouraged to complete an outline inspection concept for the 2012 demonstration phase preceding the licence application. In particular STUK is encouraged to develop a vision on which of Posiva's R&D activities STUK would like to pursue and validate. The demonstration phase is key in the context of the construction licence, therefore STUK should put high emphasis on developing confidence in the safety case and its underlying investigations, tests and experiments.

S5 6: STUK should consider integration of inspection findings in the overall evaluation process. Currently their role is unclear.

S5 7: STUK should further develop the tracking of decisions, possibly as part of the electronic reporting and follow-up system as at present only issues arising and observations appear to be catalogued.

S5 8: STUK is encouraged to develop specific training courses for inspectors to provide a detailed understanding of the overall regulatory approach for geological disposal, specific inspection methodologies and tools rather than just relying on a mentoring system.

S5 9: It was not clear whether STUK's internal QA system to ensure that regulatory decisions and activities are properly endorsed and of the right quality is actually written down. If not then STUK is encouraged to develop a written system of internal QA.

S5 10: Once the first module of the electronic reporting and follow-up tool is in operation, STUK should aim at a further development of the system towards an integrated tool for the recording and follow-up of all verification activities conducted both on-site and at headquarters.

7. STAKEHOLDER RELATIONSHIP, PUBLIC INVOLVEMENT (MODULE 8)

STUK informs and communicates with several stakeholders on a regular basis. Besides fulfilling the legal reporting requirements and participating in many international activities, STUK invests a considerable amount of resources into communication with the public. In fact the team considers STUK's way of dealing and communicating with the public to be a veritable highlight.

In the area of public information, STUK focuses on the need for clear information as quickly as possible. This includes information put on the STUK website, press releases, articles in print media and interviews, information campaigns, leaflets, open door events, and introductory courses for journalists (in special 5-day courses, which are organized about once a year).

The information on decisions taken by STUK, reviews of safety cases and licence applications, as well as inspection reports are available upon request according to the public information law. Certain publications, which STUK considers to be of wide public interest, are put on the web.

A few highlights are worth mentioning:

- Municipalities have a veto right at the Decision in Principle stage only and STUK undertook a large public information exercise at that time
- STUK focuses on *local* public and *local* decision makers to gain confidence and to improve their factual knowledge whilst retaining its independence from the industry.
- Extended efforts to find out the local public's needs by seeking professional expert knowledge.
- Clear strategy on public relations: No common events with Posiva, only on invitation of the municipality.
- STUK high-level management tour to start with. Senior management committed to this role of STUK.

Good Practices:

GP8 1: STUK's strategy to obtain public confidence is very effective: well-defined key audience, clear objectives in public communication and realistic analysis of stakeholders' information needs.

GP8 2: STUK has defined clear and simple principles for communication with the public:

- a. STUK provides prompt, best available information instead of delayed, correct and detailed scientific information
- b. STUK takes no energy policy view
- c. STUK keeps independent from nuclear industry
- d. STUK focuses on information needs at municipality level

GP8 3: All staff involved in the review of disposal sites are trained in public communication.

Suggestions:

S8 1: STUK should review its policy to make available reports and reviews on their website. Reports on for example, safety case reviews, reviews of licence applications, or inspection reports, are not on STUK's website, but are only available upon request. For the interested public it is difficult to know what STUK reports are actually available on request.

S8 2: STUK is encouraged to publish on their website their licensing requirements for the construction of a repository for spent fuel. STUK is also encouraged to make available their plans and procedures for the review of the licence application. The licensing requirements are an

important part of the licensing process, which should be as transparent as possible to the stakeholders especially as the Construction License application is due in 2012.

S8 3: STUK may wish to consider placing its own internal guidance and details of its review documents on the internet where appropriate. These would be available through Freedom of Information but their open publication may increase public confidence.

8. OVERALL CONCLUSIONS

The team has concluded that STUK has a well established and apparently effective and efficient basis for regulating nuclear waste management in Finland. This is particularly impressive as the development of the Olkiluoto repository is at an early stage without as yet a fully developed safety case. Nevertheless the team feels that generally STUK needs to review its guides and regulations which are currently based upon NPP to ensure that they are sufficiently clear for the purposes of regulating waste management and to ensure greater transparency of requirements to stakeholders.



APPENDIX I – LIST OF PARTICIPANTS

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APPENDIX II – MISSION PROGRAMME

MISSION PROGRAMME	
<i>Sunday, 1 November 2009</i>	
16:00	<i>Opening Team Meeting</i>
<i>Monday, 2 November 2009</i>	
09.00 - 17.00 17.00 – 18.00	<i>Presentations</i>
	<i>Team Meeting</i>
<i>Tuesday, 3 November 2009</i>	
08.00 -22.00	<i>Visit to Olkiluoto and Discussion with Posseva</i>
<i>Wednesday, 4 November 2009</i>	
08.30 – 18.00	<i>Meetings and Discussions with STUK</i>
<i>Thursday, 5 November 2009</i>	
08.30 – 12.00	<i>Writing and completing draft report</i>
13.00 – 17.00	<i>Meeting with STUK to discuss report and carry out any changes</i>
<i>Friday, 6 November 2009</i>	
09.00 – 10.00	<i>Complete presentation on Findings</i>
10.00 – 11.30	<i>Close out Meeting</i>

APPENDIX III – COMPOSITIONS OF THE WORKING GROUPS

Tem	Subject Area	Mission Experts	Lead Counterparts
I	LEGISLATIVE AND GOVERNMENTAL RESPONSIBILITIES DEVELOPMENT AND IMPLEMENTATION OF REGULATIONS AND GUIDANCE	<ul style="list-style-type: none"> • Geraldine Dandrieux • Darius Lukauskas • Juraj Homola • Wolfgang Hilden 	<ul style="list-style-type: none"> • Mari Andersin • Arja Tanninen • Risto Paltemaa • Kai Hämäläinen • Esko Ruokola
II	MANAGEMENT SYSTEM OF THE REGULATORY BODY ORGANIZATION OF THE REGULATORY BODY	<ul style="list-style-type: none"> • Frederic Bernier • Peter Lietava • Geraldine Dandrieux • Juraj Homola 	<ul style="list-style-type: none"> • Risto Paltemaa • Airi Kannisto • Kaisa-Leena Hutri • Rainer Laaksonen
III	AUTHORIZATION PROCESS AND REQUIREMENTS ON THE APPLICANT(S)/LICENSEE(S)	<ul style="list-style-type: none"> • István Végvári • Alexandru Rodna • Bengt Hedberg • Hans Wanner 	<ul style="list-style-type: none"> • Jussi Heinonen • Petri Jussila • Airi Kannisto

Tem	Subject Area	Mission Experts	Lead Counterparts
IV	<p style="text-align: center;">REVIEW AND ASSESSMENT PROCEDURES</p>	<ul style="list-style-type: none"> • Frederic Bernier • Peter Lietava • Bengt Hedberg • Frans Boydon 	<ul style="list-style-type: none"> • Arto Isolankila • Ari Luukkonen • Esko Eloranta • Paula Ruotsalainen • Marko Alenius • Tero Varjoranta
V	<p style="text-align: center;">INSPECTION AND ENFORCEMENT</p>	<ul style="list-style-type: none"> • Alexandru Rodna • Darius Lukauskas • Wolfgang Hilden • Frans Boydon 	<ul style="list-style-type: none"> • Jussi Heinonen • Katriina Labbas • Kai Jakobsson • Henri Niittymäki • Arto Isolankila
VI	<p style="text-align: center;">STAKEHOLDER RELATIONSHIP, PUBLIC INVOLVEMENT</p>	<ul style="list-style-type: none"> • István Végvári • Hans Wanner • Bengt Hedberg 	<ul style="list-style-type: none"> • Risto Isaksson • Tero Varjoranta