

**Response to
the Polish party's request (Ref. DOOS-tos.442.9.2011.JA), dated 27.01.2014**

Issues (remarks) # 1, 2, 3, 4, 5, 7

All these issues will be reviewed in the “Designing” Stage as stated during the expert consultations held in August-September 2013 in Kyiv.

Issue # 6

SE NNEGC Energoatom points out that the civil structures were not subjected to any modifications which could negatively affect their technical condition.

The technical information as requested by the Polish party, includes specific technical characteristics that have to be systematized and analyzed, and then will be provided in the form of standardized indicators in the Safety Analysis Report for KhNPP Unit 3 and Unit 4. Therefore, that information can not be provided in the current stage.

Issue # 8

First, the Ukrainian party has submitted a specific description of an Emergency Plan of NPP which is strictly compliant with the IAEA recommendations, and two diagrams depicting: 1) **Unified System of Civil Defense and the place held by SE NNEGC Energoatom in this System;** and 2) **Interoperability of NNEGC Energoatom with various state institutions in case of emergencies.**

Second, the provided information also included the data on “off-site emergency plans”, particularly, the document reads

“Arrangements for and implementation of urgent protective actions in case of radiological emergency as well as preventive iodine prophylaxis for the public of Ukraine are regulated by the «Model plan of response to radiological emergencies in the district subsystems of the Unified Civil Defense System, the territories of which pertain fully or partially to the radiation-control area of NPP” (as approved by MEU according to Order No.339 dated 06.05.2008) and the “Plan of response to radiological accidents» (as approved by Joint Order No. 87/211 of SNRIU and MEU on 17.05.2004, registered with the Ministry of Justice of Ukraine on 10.06.2004 (Ref. No. 720/9319) and amended by Order No. 24/126 of SNRIU on 02.03.2010).

In case of nuclear or radiological emergency at Ukraine NPP, the central and local authorities shall, under the effective laws, make decisions and act according to the relevant territorial and departmental plans, taking into account the NPPs' and Utility's (Operator's) recommendations along with the recommendations of other duly authorized agencies.

At the same time, the adequacy of solutions as well as expediency and effectiveness of the actions taken by local and central authorities in case of emergency at NPP, are determined by the general level of training of these agencies and their preparedness to act under emergencies, and

by the adjusted algorithm established for providing their interactions with all emergency response participants..”.

It has to be reiterated that in the event of accident and emergency at NPP in operation the **external response and external support (off-site) are regulated by the above stated «Plan of Response to Radiological Accidents»** (State Nuclear Regulatory Inspectorate of Ukraine and the Ukrainian State Service for Emergencies).

The control as well as actions and interaction of managerial bodies of forces and means involved in this case to prevent or eliminate emergencies at NPPs of Ukraine (that also includes allocating additional resources of external institutions), are exercised in accordance with the procedure specified in the “State-level Plan of Response to Emergency” which was approved according to Resolution No. 1567 by the Cabinet of Ministers on 16.11.2001 (as amended by Resolutions No. 313 and Resolution No. 442 of the Cabinet of Ministers of Ukraine, dated 11.03.2004 and 07.05.2008, respectively).

The issues related to arrangements and implementation of urgent protective actions in case of radiological accidents are regulated by the “Plan of Response to Radiological Accidents” and the **“Model plan of response to radiological emergencies in the district subsystems of the Unified Civil Defense System (UCDS), the territories of which pertain fully or partially to the radiation-control area of NPP”** (as approved by MEU according to Order No.339 dated 06.05.2008). In case of nuclear or radiological emergency at Ukraine NPP in operation, the central and local authorities shall, under the effective laws, make decisions and act according to the relevant territorial and departmental plans, taking into account the NPPs’ and Utility (Operator’s) recommendations along with the recommendations of other duly authorized agencies.

The “Plan of Response to Radiological Accidents” (Section III - “Emergency Planning”), determines that:

“... For timely and prompt response to radiological accidents and for effective actions undertaken to protect the public and territories... the following plans of response to radiological accidents shall be developed:

On-site emergency plans, intended for the sites on which practical activities related to the radiological and radiation & nuclear technologies are actually implemented;

Plans of response of territorial subsystems of UCDS of local level;

Plans of response of functional subsystems of UCDS of regional level”.