Draft of points for answer to the Permanent Mission of Japan (Note: these points incorporate advice received from the INES Advisory Committee)

The application of INES and determination of an INES rating following an event is a national responsibility. The use of INES as a communication tool should be done as part of the broader communication strategy of the national authorities.

In assisting Japan to decide on whether to apply INES in the case of a leak from a water tank in the H4 area at Fukushima Daiichi NPS, IAEA suggests to take into account the following:

- Along with efficient communication to the public about the safety significance of the event, the highest priority now is to mitigate the leak and take actions that will prevent similar occurrences.
- The recent leak from a water tank in the H4 area is the most recent of a number of events that involved leakage of contaminated water from the facilities that have been established to implement the necessary recovery operations. Previous similar events were not rated on the INES scale. The Japanese Authorities may wish to prepare an explanation for the media and the public on why they want to rate this event, while previous similar events have not been rated.
- One possible communication strategy, rather than using INES as a communication tool to rate each event in series of similar events, would be to elaborate an appropriate communication plan to explain the safety significance of these types of event. With clear content and appropriate frequency of messages, such a plan could be highly effective. This would avoid sending confusing messages to the media and the public on a possibly long series of INES-rated events at the lower levels of the scale, for the duration of the entire recovery operation.
- Whatever communication strategy is adopted, it is important that the information required
 to properly determine the INES rating against all relevant criteria is collated, and that a
 defensible rating is determined. Frequent changes of rating will not help to communicate
 the actual situation in a clear manner.

Answers to specific questions from the Permanent Mission of Japan:

QUESTION 1

While the accident at TEPCOs Fukushima Daiichi NPP has not yet totally come to its conclusion, would it be appropriate to apply the INES scale assessment to those facilities (i.e., the storage tank) that were established as emergency-response measures, in the same manner as nuclear power plants built under the concept of defence-in-depth?

ANSWER TO QUESTION 1

INES is applicable for use as a communication tool to any nuclear or radiological installation operated with the specific purpose of protecting workers, public and the environment against the hazards of ionising radiation. It could therefore be an option for the Japanese authorities to apply

INES to the event of water leakage at the storage tank in the H4 area at the Fukushima Daiichi site. As a general matter, the "defence in depth" criterion can be applied in the context of INES ratings for facilities established in response to an emergency situation. Such facilities and measures (including the storage tanks in the H4 area at the Fukushima Daiichi site) are under regulatory control and have been approved to meet safety requirements. So, in this regard, INES could be applied. However, other factors also need to be considered including the overall clarity of communication and the way such messages may be perceived by the public, media and international community. As noted above, the application of a comprehensive communication plan, rather than just an INES rating, would help with communicating clearly to all stakeholders including the public.

QUESTION 2

It is considered that the contaminated water stored in the tank in question has been recovered as a result of discharge of nuclear materials to the area beyond design basis, at the time when the accident at Fukushima Daiichi NPP occurred. Would it not be a problem if this case of leakage is not assessed in the framework of INES, because the leakage is regarded as a part of the accident at Fukushima Daiichi NPP and the accident was assessed as INES level 7?

ANSWER TO QUESTION 2

It would be an option for the Japanese authorities to consider this event to be separate from the Fukushima Daiichi accident, as this event occurs in a "new" installation designed for specific radiation safety purposes.