

RESPONSES RECEIVED FOLLOWING THE REVIEW OF THE DRAFT REPORT “COOPERATION ON NUCLEAR SAFETY”

Number	Party	Chapter / Section	Text to be corrected (first ... last word)	Comment by reviewing party	Response of the Dutch Safety Board
1	FANC	Summary		Optionally, Mol/Dessel can also be referred to as a nuclear site. The FANC itself always refers to 4 nuclear sites: these are Mol/Dessel and Fleuris in addition to Doel and Tihange.	Section 1.4 includes an explanation of the scope of the investigation which clarifies why only Doel and Tihange are mentioned in the summary.
2	FANC	Summary		Is it the municipality or the citizens that must be informed?	The Dutch Safety Board mainly focused on the question of how citizens are informed. The provision of information to municipalities is also relevant in licensing procedures. This is covered in chapter 3 of the report.
3	EPZ	Summary	“entering into agreements with neighbouring countries about cross-border information provision with regard to licensing procedures (<i>as referred to in Section 3.4 General Administrative Law Act</i>), so that residents across the border within a 20-kilometre radius.....”	The first text has been added to clarify that it concerns uniform, public licensing procedures, within the legal frameworks. The second text has been added to clarify that it concerns cross-border information provision, so informing citizens across the border.	The Dutch Safety Board adopted the second addition but did not adopt the first because the legal basis for the licensing procedures differs between the countries.
4	Twente safety region	1.3		Section 1.3 states the purpose and the investigation questions. Investigation question 3 concerns how the public is kept informed of incidents, licensing procedures and the action to take in the event of a nuclear accident. In the report, the text that conveys this investigation question is fragmented, spread across the chapters two to four inclusive. I consider the importance of this topic to be such that it requires separate discussion in an additional “Risk and crisis communication” chapter. This will significantly enhance the report's readability.	The Dutch Safety Board does not see any added value in changing its report structure.
5	Twente safety region	1.4		Section 1.4 states that the Dutch Safety Board has assumed that the national and international mechanisms to control and supervise the safety of nuclear power plants function properly. This conclusion is not supported by investigation or third-party research into the safety of nuclear power plants in the Netherlands with regard to: laws and regulations, licensing, supervision and enforcement, and incident and crisis management. Possible failures of (parts of) this system could lead to incorrect conclusions being drawn.	This is a basic assumption by the Dutch Safety Board; it is not a conclusion reached by the Dutch Safety Board based on its own investigation.
6	Twente safety region	1.5	“Members of the project team on the environment.”	The social environment and type of nuclear power plant at Chernobyl differ significantly from those in the West (relevant to crisis management but this is not what the report is about). Fukushima is more suitable for making a comparison with the situation in the West.	Section 1.5 contains a factual description of the investigative approach. The purpose of the visit to Chernobyl nuclear power plant was to gain insight into the potential long-term effects of a very severe nuclear accident on the environment and not to make a comparison with the situation in the Netherlands, Belgium and Germany.
7	FANC	1.6		Does the Dutch Safety Board draw up its findings/criteria unilaterally? Does it have a (democratic) mandate for this with respect to Belgian nuclear installations?	The Dutch Safety Board draws up its own frame of reference which is based on both current laws and regulations and the Board's own expectations of the parties involved.

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8	Federal Public Service of the Interior (Directorate-General Crisis Centre)	2.1.1	Delete "depending on the type of design casing."	Describing the recognisability of the reactor building in a nuclear power plant in a public report has no substantive added value to the report but could create a security risk within the framework of public order/terrorism.	This information is publicly available. The Dutch Safety Board therefore sees no reason to omit this information from the report.
9	Twente safety region	2.2		Chapter 2 includes background information about nuclear energy, recent nuclear accidents, the nuclear power plants in or near the Netherlands and incident reports from these facilities. With respect to the nuclear accidents described in section 2.2, it can be said that these are illustrative in a number of areas, but as a whole are barely comparable with the situation that could occur in the event of an accident in one of the nuclear power plants in or near the Netherlands.	The Dutch Safety Board does not conclude that a nuclear accident in the Netherlands will have the same consequences as those described in chapter 2. The Dutch Safety Board's intention in presenting these examples is to make clear that the consequences of a serious nuclear accident can be far-reaching.
10	FANC	2.4.2		Data per site and not per reactor (gives a false impression of the vulnerability of the Belgian sites in comparison with Borssele and Emsland).	The figures concerned already take account of the number of reactors per site. The number of shutdowns has been averaged across the number of reactors on the site. The same applies to the number of INES reports.
11	ANVS	3.2.2	"The ANVS took no action to consult with the FANC and organise this involvement."	This was not a licensing procedure with public participation. It was a legislative amendment providing for the extended service life with a view to energy supply. Insofar as it was possible and appropriate from a constitutional standpoint for ANVS to arrange involvement in this non-public procedure, in consultation with the FANC, this was not logical from the perspective from which this legislative amendment was made. After all, the ANVS is only concerned with nuclear safety and not with energy supply. In view of this, the observation appears to be incorrect. The ANVS requests clarification of this situation.	The text doesn't refer to a legislative amendment providing for the extended production of energy, and thus does not refer to energy supply. The passage in the report concerns an administrative procedure for assessing and approving the Long Term Operation of the reactors involved. Additional requirements were imposed on the nuclear power plants under this procedure. The procedure definitely concerned nuclear safety. Because of potential concerns in the Netherlands, the (legal predecessor of the) ANVS should have arranged to be regularly informed by the FANC.
12	Municipality of Borsele	3.2.3	"The only way for these citizens to find out ... or at the nuclear power plant's site."	You conclude that the municipalities provide information on public notice boards. This disregards publication via the digital world which is not only much more accessible, but also has a greater reach. I would suggest reconsidering the conclusion that follows the sentences that are quoted.	The passage sets out the working method for procedures for the Doel and Tihange nuclear power plants as stipulated under Belgian law. The passage does not relate to the procedures for the Borssele nuclear power plant and therefore does not relate to the working method that is stipulated in Dutch legislation. This is clarified in the text by including that it only concerns Doel and Tihange.
13	RIVM	3.3.4	"The Netherlands receives incident reports from the Doel, Tihange and Emsland nuclear power plants, so that ... "	Engie, which operates Tihange, and the South Limburg safety region have a direct information line which we believe already arranges for the forwarding of reports. We also believe that forwarding to the Netherlands from Emsland is arranged via the NDKK. There are, however, a large number of parties involved and we are not entirely clear about which of these parties this sub-conclusion applies to.	As concerns the incidents at the Tihange nuclear power plant, agreements on forwarding incident reports haven't been put into practice yet. The NDKK holds annual consultations on incidents. There could, therefore, be a long interval between an incident at the Emsland nuclear power plant occurring and it being discussed with Dutch partners during NDKK meetings. The passage in the report concerns the direct forwarding of incident reports from Germany to Dutch organisations, such as the Twente safety region and the ANVS, and does not concern the information exchange at the annual NDKK meetings.
14	ANVS	3.3.5		In addition to this, the ANVS is working on making its website more accessible and making it more comprehensible with respect to failures in the Dutch nuclear installations. Improvements have already been achieved over the last year, but further improvements are possible, by using more graphic explanations for example. The ANVS, together with Belgium and Germany, is also developing initiatives to provide information about incidents in nuclear power plants abroad to local residents more quickly and to make this information more comprehensible.	The report sets out the facts as encountered by the Dutch Safety Board during its investigation. Initiatives for improvement fit the Board's recommendation with regard to the information provision to citizens.

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15	ANVS	3.3.5		The ANVS recognises various dilemmas and complications that play a role in communications about incidents and unusual events. A significant dilemma is the balance between the importance of rapid communication about incidents on the one hand and the precondition that all information provided must be 100% correct on the other hand. The ANVS considers one of its responsibilities during incidents to be striking the correct balance between speed, accuracy, clarity to citizens and the level of detail in its communication. A complicating factor in communicating about nuclear safety and radiation risks is that counter-arguments to much of the government's information are invariably presented by, for instance, civil-society organisations and sometimes even by the scientific community. This makes it much more difficult to achieve the intended aim of providing the public with guidance with respect to a complicated topic like nuclear safety. The second complicating factor is that the information provided on this topic does not always reach all citizens. From the studies quoted in your report, it appears that many people, including those who are concerned, are not interested in information when there are no incidents. You may like to reflect on this context for public communication in your report.	The Dutch Safety Board considers this context to be sufficiently addressed in the report, where applicable.
16	Twente safety region	3.3.5		Section 3.3.5 concludes that harmonisation of the communication about incidents between neighbouring countries can help avoid public concern. Here the question arises how meaningful it is to communicate about incidents or unusual events that are so insignificant that they don't matter to the public. Yet the mere act of issuing a message constitutes a signal to the public that something is amiss. It is difficult for the average citizen to evaluate the value of these reports. An example of a tweet sent by the ANVS with a link to a message: "14 unusual events in Dutch nuclear installations'. In 2016 the Dutch nuclear installations reported 14 unusual events involving a failure in the safe operation of the installation. These were technical shortcomings in the installation or human errors." The rest of the article explains that the events were so insignificant that there was never any danger to the environment. However, by actively communicating about 14 unusual events there is a significant risk of contributing to unrealistic perceptions. It is therefore important to be critical about what should and should not be communicated.	It is a given that media are alert to incidents at nuclear power plants and publish news reports, even if it concerns incidents with no consequences for safety. This is precisely why the Dutch Safety Board believes that it is important for the nuclear regulatory authorities to actively communicate about these incidents and to provide clarity on them.
17	Experts from the Superior Health Council	4		The report emphasises the exchange of information between authorities and the provision of information to citizens. There is no mention of assistance, for instance during evacuation. This is an omission because the Dutch Safety Board itself admits that its investigation focused on matters where "proper [...] coordination [...] is required".	This comment concerns choices made by the Dutch Safety Board with respect to the scope of its investigation. For this reason the comment has not been incorporated in the report.
18	Twente safety region	4.1.3		Footnote 145, part of section 4.1.3, gives what I believe to be a very arbitrary list of a number of ministers "who are involved". Relevant ministries, such as Economic Affairs (licensing, trade and industry) and Agriculture, Nature and Food Quality are not mentioned.	The footnote mentions the ministries "who are involved" that could play a role in managing a crisis that arises from a nuclear accident. The Dutch Safety Board has based this list on the following documents: the National Plan for Nuclear and Radiological Emergencies, that mentions the Minister of Security and Justice, the Minister of Health, Welfare and Sport and the Minister of Defence, and the National Manual on Decision-making in Crisis Situations, that in addition mentions the role of the Minister of Foreign Affairs in the event of an accident abroad with consequences for Dutch nationals who are in that country. The Minister of Economic Affairs has no longer a role in licensing since 2015.

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19	ANVS	4.2		The Netherlands only ever uses current plans during a crisis so that in a crisis situation it is clear to all the parties involved which basic principles and which elaborations are leading.	At the time of the investigation, the Dutch Safety Board determined that the various current national and regional plans were not aligned with each other. According to the Board, this type of situation creates uncertainty about which basic principles are the guiding basic principles. In the course of the investigation parties have caught-up. As a result, the lack of clarity in the Netherlands has diminished. With respect to the neighbouring countries, a lack of clarity still exists.
20	NCTV	4.2 and 4.4		In light of this tension, I would like to ask you to further refine your findings with respect to planning and exercises where possible. This will give parties clarity about which plans you believe need to be refined and what your criteria are for determining if exercises are conducted properly. This refining will allow the parties involved to take even more targeted action and cooperatively implement any possible improvements.	The Dutch Safety Board uses its own frame of reference (see chapter 1) in which the Dutch Safety Board outlines its expectations with respect to the subjects of the investigation. In sections 4.2 and 4.4, the Dutch Safety Board describes its findings concerning planning and exercises and shows what they mean in light of the frame of reference. The points requiring improvement according to the Board are explained in the relevant sections sufficiently. As far as the crisis plans are concerned, Appendix E contains further clarification. For each plan, the appendix outlines the extent to which it deals with cross-border cooperation and takes account of cross-border scenarios.
21	Twente safety region	4.2.1		Section 4.2.1 indicates that the safety regions that are situated within the zones around the nuclear power plants are responsible for preparing the so-called "direct measures". This concerns 20 of the 25 safety regions. A number of regions have not included a nuclear accident in their regional policy plan and therefore do not prepare for one. In addition, the upcoming amendment to the Safety Regions Decree will only impose obligations to prepare for a nuclear accident by planning on three safety regions (Zeeland, Central and West Brabant, and Twente). This obligation will not be imposed on other safety regions that are situated fully or partly within a 100-kilometre zone around a nuclear power plant.	Among other things, the Council Directive 2013/59/Euratom lays down that countries must formulate specific crisis plans with respect to the risks of category A-objects, such as nuclear power plants. The future amendment of the Safety Regions Decree will incorporate this additional provision in Dutch law. This is explained in Appendix D (laws and regulations). The safety regions in the zones around the nuclear power plants are and remain responsible for executing the direct measures that are designated for these zones. Depending on the distances, various safety regions must prepare for evacuation and/or sheltering the population and/or the emergency distribution of iodine tablets among the population. Safety regions within a distance of 100 kilometres from the nuclear power plants must have an operational plan available for the emergency distribution of iodine tablets. The Dutch Safety Board does not have any information that shows this is no longer necessary.
22	RIVM	4.2.1	"... policy in North Rhine Westphalia and Lower Saxony is based on ..."	According to our information, the age limit for iodine prophylaxis is determined by the individual German Länder and not by the German federal government.	The Dutch Safety Board has no information indicating that this is the case. The documents the Dutch Safety Board has accessed with respect to the age limit for iodine prophylaxis, have been drawn up by the German Commission on Radiological Protection (<i>Strahlenschutzkommission</i>), part of the federal government. For this reason, the report refers to the federal policy.
23	Zeeland safety region	4.2.1	"According to its..... to beyond the 100-kilometre radius, when applicable."	The question is whether this measure is feasible in this situation in terms of both logistics and crisis communication. Please mention that the national iodine distribution working group and the policy advice committee <i>GHOR Nederland</i> have advised the Minister of Health, Welfare and Sport to implement the pre-distribution throughout all of the Netherlands and not only within a 100-kilometre radius. The minister has not adopted this advice, however.	The Dutch Safety Board has not investigated the practical feasibility of the Dutch policy.

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24	Twente safety region	4.2.1		On page 87 a sentence states that according to its harmonisation policy, the Netherlands can opt to expand the area for emergency distribution for people up to and including the age of 18 years and pregnant women, to beyond the 100-kilometre radius, when applicable. The national iodine distribution working group and the policy advice committee <i>GHOR Nederland</i> have advised the Minister of Health, Welfare and Sport to implement the pre-distribution throughout all of the Netherlands and not only within a 100-kilometre radius. The minister has not adopted this advice, however. An absolute condition for a safety region being able to execute this type of distribution is to have a proper plan; a relative condition is an own supply of iodine tablets.	See the previous response.
25	Twente safety region	4.2.2		Section 4.2.2 states that the crisis plans are not in line both within and among countries as a result of policy and updating cycles not being coordinated. It is concluded that this is a temporary situation, but carries the risk of causing additional delays in decision-making on the measures to be taken. The experience of the Twente safety region has taught us that this is not a temporary situation but a persistent one. Our conclusion is that plans are overtaken by new developments as quickly as they have been adopted.	It is a fact that plans constantly need to be adjusted. Harmonisation of plans therefore requires ongoing attention. The passage in the report specifically focuses on the basic principles that form the basis for preparing the response to a nuclear accident. The parties concerned have declared to the Dutch Safety Board that the revision of plans (current or upcoming) will lead to the harmonisation of the plans, so that inconsistencies in basic principles are temporary.
26	Engie Electrabel	4.3		The report makes little mention of Engie Electrabel's continuous efforts to also inform Dutch citizens living near the Doel nuclear power plant about our daily operations, the projects and nuclear safety. We share information every six months in the Doelbewust information magazine with a circulation of 70,000 copies in, among others, the Dutch municipalities of Clinge, Emmadorp, Graauw Heikant, Hengstdijk, Hoogerheide, Huijbergen, Hulst, Kloosterzande, Lamswaarde, Nieuw-Namen, Ossendrecht, Putte, Reimerswaal, Sint Jansteen, Ter Hole, Vogelwaard, Walsoorden, Woensdrecht and Zandberg. The Consultative Board comprises 18 members, 6 of whom are Dutch citizens from the municipalities around the Doel nuclear power plant. The management of the Doel nuclear power plant regularly visits the local authorities of these municipalities to provide them with more information about our nuclear activities. These initiatives are not a legal obligation but are part of our transparent communication policy as a socially responsible corporation.	It is true that the report does not comment on risk communication by the operators of the nuclear power plants in the Netherlands, Belgium and Germany. This is a conscious choice because the responsibility lies with the government. This justification can also be found in the introduction to section 4.3.
27	Province of East Flanders	4.3.1		We can put this link on the website.	The Dutch Safety Board takes note of this comment.
28	ANVS	4.3.2	"No coordination has taken place between the Netherlands and Belgium, nor between the Netherlands and Germany on the content of information to the public about the measures to be taken."	The Netherlands participates in international consultation on crisis communication. The Belgian colleagues participate in two of the four existing working groups: the International working group and the Risk Communication working group. The Risk Communication working group convened on three occasions in 2017. Among other things, this resulted in a joint table-top exercise in the field of communication, a list of contacts, a glossary of terms and in an agreement to harmonise messages. The next meeting will convene on 21 November 2017. The ANVS proposes to adjust the description in the report to the actual situation.	In the course of the investigation the Dutch Safety Board did not receive any data to suggest that the countries have mutually harmonised the advance information that they provide to the public about the possible consequences and measures to be taken in the event of a nuclear accident (risk communication). Nevertheless, the Dutch Safety Board has observed that the provision of information to the public has become a topic of discussion between the countries in the meantime.
29	NCTV	4.6.2	"..... has sent a liaison from the South Limburg safety region to Liège"	This conclusion cannot be about the liaison from NCC to CGCCR as all conversations at CGCCR are in two languages. This sentence could probably refer to the liaison from the South Limburg safety region to Liège.	The internal evaluation report drawn up by the NCC following this exercise, states that the parties in the crisis organisation speak to each other in French (due to the fact that the provinces involved are French speaking). According to NCC's internal report, this leads to the conclusion that a liaison officer from the NCC must have a command of French to be able to participate in the crisis organisation's discussions.

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30	Infrastructure and Water Management	4.7		I understand the focus on crisis communication with the public in your report. To complete the picture, I would like to suggest that you also further elaborate the role of the safety regions in the field of communication. Up until activation of the national crisis organisation they are responsible for crisis communication. Providing information with an unambiguous meaning and measures to protect the public, is an important central government task when the national crisis organisation is activated.	The report discusses the role of the safety regions in relation to crisis communication. The Dutch Safety Board believes that the role of the safety regions in this respect is given sufficient attention in the report.
31	Infrastructure and Water Management	4.7.1	"there is no coordination reaching the public"	There is always a single organisation responsible for crisis communication so that communication with the public is unequivocal at all times. Whether this is the safety region or the National Core Team for Crisis Communication (NKC) depends on the scale-up level of the crisis.	In the event of a nuclear accident, a number of safety regions may have to deal with the necessity to inform the public. In the initial phase of such a crisis, that is to say before the national crisis structure has been activated, it is up to the safety regions to provide the public in their region with information. The investigation data do not reveal that a single organisation provides for or coordinates communications from the various safety regions at that time. Due to this fact, messages can differ from each other in the initial phase of a nuclear accident.
32	Infrastructure and Water Management	4.7.1	"..... measures taken in the Netherlands may differ from those taken in Germany"	If a measure is taken in Germany, it is adopted by the Twente safety region. This agreement has been set out in the safety region's emergency response plan (the same applies to Zeeland safety region and Central and West Brabant safety region).	In its report, the Dutch Safety Board states that the Netherlands intends to follow the accident country. Nevertheless, differences in the preparation of measures could result in differences in the response to a nuclear accident. Even if countries adopt each other's measures during a nuclear accident, the possibility of one country having prepared a smaller or larger area than the other will continue to exist. The Dutch Safety Board believes that, given the fact that countries yet are facing difficulties in reaching agreement on the preparation of measures, it is less likely that they reach agreement on this matter during a crisis.
33	RIVM	5	No suggestion for correction but a comment with respect to a conclusion.	Not only the authorities but other services within the central government too, including the safety regions, share information and use each other's expertise, from policy up to and including implementation.	Conclusion 2 only concerns the information exchange between the nuclear regulatory authorities in relation to their task of supervising the safety of nuclear power plants.
34	Zeeland safety region	5	"While it is easy for the public to will struggle to understand it."	Should the objective be to have the public understand what is wrong or should the public become more and more familiar with the action to take in the event of a nuclear accident? The impression is that the latter is important and the former is a hardly attainable objective. Here too, the suggestion is to organise risk communication in a generic way ("all hazard"), so that the cohesion and the action to take will sink in better. In this regard, in the longer term there may be more awareness among young(er) people on what action to take in the event of an accident, making the public more self-reliant.	Governments have the task of providing the public with the best possible information about the risks from nuclear power plants, events (incidents) and the possible consequences as well as the measures to be taken in the event of a nuclear accident. One is no more important than the other. The Dutch Safety Board issues no opinion on this in its report. Due to the specific characteristics of nuclear accidents which distinguish them from other accidents, such as exposure to ionising radiation, it is not desirable to solely organise communication in a generic way, as is currently the case in practice.
35	Twente safety region	6		Page 85 describes that only a limited number of safety regions have decided to prepare for a nuclear accident based on their own risk assessment. Based on a default disaster scenario (<i>maatramp</i>) it is, however, to be expected that any radioactive contamination will probably not be limited to the territory of one of these safety regions. The National Plan for Nuclear and Radiological Emergencies (NCS) and the corresponding Response Plan NCS are also based on a national-level crisis. The Twente safety region suggests recommending that in the upcoming amendment to the Safety Regions Decree the Ministry of Security and Justice expands the obligation to prepare for nuclear accidents to at least all of the safety regions that are situated entirely or partly within the 100-kilometre zone around a nuclear power plant. In this way, a cohesive system of regional plans can be drawn up under the umbrella of the NCS.	In its investigation, the Dutch Safety Board did not focus its investigation on the Dutch situation but on the cooperation with the neighbouring countries (please refer to the investigation questions). Based on the investigation there is no reason to include a recommendation as suggested.

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36	Twente safety region	6		By implementing the pre-distribution in the 100-kilometre zones, the Netherlands is ahead of Belgium and Germany, as far as iodine prophylaxis is concerned. Policy changes announced in both Belgium and Germany could change this and therefore should be monitored. A proper response to any implementation of these policy changes is advisable in order to prevent public unrest. The Twente safety region recommends that the Dutch Safety Board includes proposing the above to the Minister of Health, Welfare and Sport in the report.	The Dutch Safety Board sees no reason to include an additional recommendation as suggested since the Dutch Safety Board already recommends harmonising the basic principles for the response to a nuclear accident (see the first bullet point in recommendation 1).
37	Zeeland safety region	6		Suggestion for addition: To the Dutch Minister of Health: in the short term, expand the planning zones for pre-distribution of iodine tablets to those up to and including 18 years of age to the Netherlands as a whole.	See the responses to comments 24 and 35.
38	Municipality of Borsele	6		I note your observation that recognition of the public's concern with respect to the safety of the nuclear power plants in the three countries involved could be improved. A nuclear safety support centre could play an outstanding role in this. I therefore propose that the expert safety region, which is the Zeeland safety region, establishes this support centre. After all, the safety region level is closest to the public whose concerns about safety ought to be recognised.	The Dutch Safety Board does not see this comment as grounds for including a recommendation as suggested.
39	Zeeland safety region	6		I note your observation that recognition of the public's concern with respect to the safety of the nuclear power plants in the three countries involved could be improved. A nuclear safety support centre could play an outstanding role in this. I therefore propose that the expert safety region, which is the Zeeland safety region, establishes this support centre. After all, the safety region level is closest to the public whose concerns about safety ought to be recognised.	The Dutch Safety Board does not see this comment as grounds for including a recommendation as suggested.
40	ANVS	Appendix D.4.2	"The Nuclear Energy Act stipulates that" (Concerns a description of the responsibilities for preparing the response to a nuclear accident)	The description is factually correct but it is incomplete. What is missing is the reference to section 14 of the Regulation on the Safety of Nuclear Power Plants (<i>Regeling nucleaire veiligheid kerninstallaties</i>) which, among other things, governs the internal emergency plan for the nuclear installation. The ANVS requests the description be completed on this point.	This section governs the company emergency plan for the nuclear power plant itself. The investigation only focuses on managing the consequences outside the power plant (off-site) and does not consider managing the consequences within the power plant (on-site).
41	Infrastructure and Water Management	Appendix E.1	Figure 20, box "Ministry of Infrastructure and the Environment"	In Figure 20, the Crisis Communication Plan for Nuclear and Radiological Emergencies 2017(<i>Crisiscommunicatieplan Stralingsincidenten 2017</i>) should be added alongside the National Plan for Nuclear and Radiological Emergencies and the Response Plan NCS already shown in the box for the Ministry of Infrastructure and the Environment.	Appendix E solely discusses the plans for the response (approach and measures) to a nuclear accident. The individual crisis communication plans that parties have drawn up for their communications in the event of a nuclear accident are not included in this appendix.
42	RIVM	Appendix E.1	No suggestion for correction but a comment with respect to Figure 20.	There is also a NCS communication plan. Shouldn't it be mentioned here in light of the recommendations?	See the response above.

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43	Federal Public Service of the Interior (Directorate-General Crisis Centre)	Appendix E.2	<p>"In this regard, the emergency plan mentions: - the notification of the emergency at national and local level;</p> <ul style="list-style-type: none"> - the radiological-technical analysis of the emergency; - the exchange of information about the population protection measures that are proposed or have been taken; - the coordination of the national policy measures; - the information to the media and the population; - the direct contacts between local authorities and the strategic and operational coordination at this level; - the exchange of correspondents; - the mutual support." 	In a report that is constructively critical of cross-border cooperation and puts forward points for improvement in this regard, it is appropriate to be complete in the domains that are mentioned in the draft version of the Belgian nuclear crisis plan for which cooperation between homologous bodies between neighbouring countries must be provided. All the more because this cooperation must not only lead to the exchange of information but also to the coordination of policy and communication.	It is correct to say that the relevant aspects are mentioned in the federal crisis plan. With the exception of alerting by and to neighbouring countries, the plan however does not delve deeper into the way in which the cooperation with the neighbouring countries is or will be organised with respect to these aspects. For the elaboration, the plan refers to procedures that are yet to be drawn up and to the upcoming revision of the provincial governors' emergency response plans.
44	RIVM	Appendix G.1	No suggestion for correction but a comment with respect to Figures 20 to 25 inclusive.	All power plants regularly have unplanned shutdowns. This is evident and visible to all in the case of wind turbines and solar farms, but not so for other types of power plants. Has there been an investigation of whether a shutdown due to a safety-relevant incident is a predictor for the safety of a power plant? It would also be interesting to know how the unplanned shutdowns in nuclear power plants (not in connection with a safety-relevant incident) compares to the same type of unplanned shutdowns of wind turbines, solar farms, gas- and coal-fired power plants, et cetera. This could also possibly help answer the question of whether an unplanned shutdown is a safety-indicator. The production factor (the relationship between the capacity delivered over a year and the installed capacity) could be a useful indicator of this.	The safety of nuclear power plants was no part of the investigation conducted by the Dutch Safety Board.
45	Experts from the Superior Health Council	General		Naturally, the investigation must be limited. This report concerns the cooperation between the Netherlands, Belgium and Germany. It does not, therefore, pass judgement on the safety of nuclear power plants and the quality of the supervision of the safety of the nuclear power plant. So it surprises me to read an implicit judgement. For example, "The Dutch Safety Board has no reason to doubt the effectiveness of this system" and "The Dutch Safety Board has assumed that the [...] mechanisms to control and supervise the safety of nuclear power plants function properly". This can be considered to be a judgement without investigation.	This is a basic assumption by the Dutch Safety Board; it is not a conclusion reached by Dutch Safety Board based on its own investigation.
46	Experts from the Superior Health Council	General		Because of the coastal micro climate and prevailing wind direction, an accident in Gravelines can quickly reach the Netherlands. Some attention to the French situation could also be useful to structure a more participative approach in Belgium and the Netherlands. Structural cooperation with the local population was given substance in France. Participation was structured in the CLI-ANCLI concept with input from (retired) competent nuclear experts and certified measurement laboratories that are independent of the authorities. There are already French contacts with the FANC and with the Belgian municipalities in Westhoek, but an interregional meeting with the public and experts from the authorities, including the Superior Health Council and Nuclear Transparency Watch, on cross-border emergency planning was cancelled unilaterally by the FANC in 2015. The recommendations of the European ALARA network for optimising radiation protection in Europe, whose workshop on emergency exposure did take place last May, shows the participation trends in Europe just like the NERIS platform which focuses on further research needs. The report was published on www.EU-ALARA.net this month and includes interesting elements about communication and harmonisation.	The Dutch Safety Board did not investigate the working method of the French authorities with respect to public participation. The Dutch Safety Board does not see reason to adjust the passages on communication and harmonisation based on the document referred to in this comment.

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47	Experts from the Superior Health Council	General		The report mentions the information you were given about the earlier historical intentions for improved cooperation and coordination between the Netherlands and Belgium after the Harrisburg and Chernobyl accidents. These were given fleeting attention in the press and policy at the time. Twenty years after Chernobyl there was a step towards bilateral cooperation in a political agreement which to this day has not been converted into operational agreements. Within the Benelux cooperation with respect to crisis management, attempts are being made to align homologous bodies, a prerequisite for improved coordination.	The Dutch Safety Board takes note of this comment but sees no reason for a broader outlining of this context than already included in the report.
48	ANVS	General		You note that the structure of the crisis plans is unsatisfactory and that some plans are not up to date. The report does not mention where the structure of planning is unsatisfactory and which plans are not up to date. It could be useful to specify the shortcomings as well as any suggestions for improvement that the Dutch Safety Board may have.	Appendix E contains further clarification of the various crisis plans. For each plan, the appendix outlines the extent to which it deals with cross-border cooperation and takes account of cross-border scenarios. In addition, for each plan the Appendix shows the basic principles for the preparation of the response to a nuclear accident (planning zones) that are presented in the plans. A comparison between the planning zones makes clear that the plans differ in this regard.
49	ANVS	General		In your report you advocate standardisation of planning zones on either side of the border. In a number of European countries, we can observe a trend towards expanding those planning zones. This expansion appears to be driven in part by public opinion while there is no reason for this based on risk assessments or from European legislation. Regardless of the differences in preparation policy, in the event of a nuclear accident in one of our neighbouring countries the Netherlands will adopt the measures of the accident country as much as possible (Harmonisation policy, 2014).	The Dutch Safety Board cannot derive the assertion that the trend toward expansion is partly driven by public opinion from the data obtained in its investigation. According to the Dutch Safety Board, it is irrelevant that European legislation does not impose an obligation for expansion. Even if countries adopt each other's measures during a nuclear accident, the possibility of one country having prepared a smaller or larger area than the other will continue to exist. The Dutch Safety Board believes that the fact that countries yet are facing difficulties in reaching agreement on the preparation of measures, it is less likely that they reach agreement on this matter during a crisis.
50	ANVS	General		With respect to the intensification of cooperation with neighbouring countries, I can report that there was a meeting at Benelux level on 18 September 2017 where initiatives for more intensive cooperation on the nuclear dossier were discussed. There were consultations between the prime ministers of the Benelux countries on 8 November 2017, during which it was confirmed that international cooperation and coordination in this policy area will be intensified.	The Dutch Safety Board takes note of this information but sees no reason to record the individual consultations and initiatives in its report.
51	Infrastructure and Water Management	General		Your investigation focused on cross-border cooperation in the field of licensing, supervision and crisis management in the event of a nuclear accident. The draft report gives good insight into the complexity, the large number of actors and the mutual relationships in those three fields. I share your analysis of what is already being done well and what requires improvement. Furthermore, I would like to propose that the report also indicates the roles, tasks and competencies of the Ministry of Security and Justice, the Ministry of Health, Welfare and Sport and the Ministry of Foreign Affairs in relation to the areas you investigated.	In Appendix C, devotes attention to the relevant organisations without mentioning all organisations that could play a role in the field of licensing, supervision and crisis management.
52	RIVM	General		The RIVM shares your analysis of what is already being done well and what requires improvement. I believe the investigation can be complemented by also outlining the tasks, competencies and responsibilities of the other departments (in this case the Ministry of Security and Justice, the Ministry of Health, Welfare and Sport and the Ministry of Foreign Affairs) in this policy area.	See the previous response.

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53	Infrastructure and Water Management	General	'Ministry of Infrastructure and the Environment'	Due to the recent name change, please replace it with "Ministry of Infrastructure and Water Management" throughout the report.	The names of the relevant ministries changed as result of the formation of the Dutch government in October 2017. For the sake of clarity in the report the Dutch Safety Board has opted to use the "old" names in the report and to use footnotes to indicate that the names of the ministries and the ministers changed as of October 2017. Recommendations 1 and 2 are addressed to the current Dutch government member who has nuclear safety in its portfolio. This is the State Secretary for Infrastructure and Water Management.
54	NCTV	General		In your report you mention the importance of comprehensible and unequivocal communication with the public on both the risks as well as during a crisis. Cross-border coordination with the aim of achieving this clarity is crucial to strengthen trust amongst the public, to minimise unrest where possible and to promote the proper handling of that same public in the event of a nuclear accident. Through www.crisis.nl , the Dutch government has created a single information point for the public to access information about various risks and crises. Further to this, the safety regions provide information about existing risks and about the action to take in the event of an actual incident affecting the region concerned. Your final report could delve deeper into the overall context within which the Netherlands gives substance to the provision of unequivocal and accessible information (risk communication and crisis communication).	The Dutch Safety Board takes note of this comment but sees no reason for a broader outlining of the context than already included in the report.
55	South Limburg safety region	General		On 7 September 2017 there was a informative Board meeting for members of the municipal councils, members of the provincial council, mayors and aldermen in Limburg. This meeting was devoted entirely to the Tihange nuclear power plant. In addition, there was a meeting for the media and for action groups during which the South Limburg safety region brought them up to date on the current state of affairs and developments. The Euregional "nuclear and radiological emergencies" working group has been active for a number of years. Belgian, German and Dutch colleagues participate in this working group. In this respect, I want to mention the intensive cooperation and coordination with the North Limburg safety region in this dossier as well. The South Limburg safety region does not see the matters above reflected in your report. You are using 1 October 2017 as the cut-off date for relevant facts. The additions above relate to the period prior to 1 October 2017.	Given the broad scope of the investigation, the report does not discuss the individual collaborations and working groups in which nuclear safety and/or cross-border cooperation are the subject of debate. References have been included in the report where it is of added value. The Dutch Safety Board is aware that parties have organised meetings, sessions and activities that relate to nuclear power plants. The Dutch Safety Board has chosen not to mention them all separately.
56	Zeeland safety region	General		The provision of information to the public is addressed in various places in the report. It is not clear how this term relates to terms such as risk communication and crisis communication. Suggested amendments to the text: There is a need to have information that is validated, comprehensible and trustworthy, that can be shared with the public through normal risk and communication channels. Note: trustworthy ("vertroubaar" in Dutch) means that the information must originate from a party that the citizens trust. For example, at this point in time a message from the Belgian government with respect to Tihange and Doel nuclear plants will not be trusted in the Netherlands even if the content of the information is undeniably reliable.	The Dutch Safety Board is not adopting the word "vertroubaar" since it is not an accepted term in Dutch.