

Environmental Impact Assessment Report

for the Facility for Treatment and Conditioning of Radioactive Waste with a High Volume Reduction Factor at Kozloduy Nuclear Power Plant

CHAPTER 6

DESCRIPTION OF THE MEASURES ENVISAGED TO AVOID, REDUCE OR WHERE POSSIBLE, STOP THE SIGNIFICANT ADVERSE EFFECTS ON THE ENVIRONMENT AND PLAN FOR IMPLEMENTATION OF THESE MEASURES

CONTENTS

6. Description of the measures, envisaged to avoid, reduce or where possible, stop the significant adverse effects on the environment and plan for implementation of these measures	1
6.1 Measures for mitigation and minimisation of the adverse impact on the environment	1
6.1.1 Measures for mitigation and minimisation of the adverse impact on the environment indicated by the Designer	1
6.1.2 Measures for mitigation and minimisation of the adverse impact on the environment indicated by the EIA experts – authors of the EIA-R	5
6.2 Recommendations to the Environmental Management	14
6.3 Recommendation to the PMF site monitoring plan	15
6.4 Recommendation to the PMF emergency plan	15

6. DESCRIPTION OF THE MEASURES, ENVISAGED TO AVOID, REDUCE OR WHERE POSSIBLE, STOP THE SIGNIFICANT ADVERSE EFFECTS ON THE ENVIRONMENT AND PLAN FOR IMPLEMENTATION OF THESE MEASURES

This chapter presents the proposed basic measures for minimization and mitigation measures of the harmful environmental impacts on the environment and human health as a result of the implementation of the Investment Proposal. They are established to meet the requirements of the Bulgarian and EC regulatory requirements as well as the underlying requirements from the documents of the European Bank for Reconstruction and Development (EBRD).

Each treatment alternative implies the performance of a series of measures to address the negative effects of the project. The scope and duration of those will depend on both the project itself and on the characteristics of the site and the installation.

Those measures may be preventive if they avoid the impact or attenuate it by modifying the concerned project activity causing it. At this point the mitigation and preventive measures will be identified and will be concluded in proposals for measures to be implemented in the Project related to avoidance, mitigation or compensation of the adverse impact on the environment.

As **Attachment 16** in Chapter 11, Section 11.1 is shown the framework drafts of an Environmental and Social Action Plan (ESAP) (**Attachment 16.1**), an Environmental Management Plan (EMP) – A. Mitigation Plan and an EMP – B. Monitoring Plan (**Attachment 16.2**). The EMP – B. Monitoring Plan is also indicated in section 6.3.

These plans summarize the mitigation activities and actions as required by the EBRD. The “draft plans” are developed as framework plans (skeleton) which have to be completed (implementation of all actual necessary measures) by the investor (KNPP) under the responsibility of the Environmental Manager.

6.1 Measures for mitigation and minimization of the adverse impact on the environment

6.1.1 Measures for mitigation and minimization of the adverse impact on the environment indicated by the Designer

Table 6.1.1-1 Plan for implementation of the measures indicated by the Designer

No	Description of the measure	Period/Phase	Result
1.	Implementation of the first barrier in the PMF to prevent the release of radioactive contamination into the room air, where the new treatment facility will be located, is the installation itself (feeder, plasma furnace, secondary combustion chamber and flue gas system). The physical	Design Commissioning Operation	Occupational health and safety Protection of the occupational and public health Environmental protection

No	Description of the measure	Period/Phase	Result
	boundary of the process flow will be confined within different enclosures, mechanical equipment, confinements and vessels.		
2.	Implementation of the second barrier consisting in the equipment that houses radioactive waste is under a controlled under-pressure by means of the extraction fans. Under-pressure conditions will be imposed in all operating conditions. Furthermore, all the existing gases will be routed to the KNPP ventilation stack- 2 (VS-2) of AB-2 through different filtering and cleaning stages (existing and new).	Design Commissioning Operation	Occupational health and safety Environmental protection
3.	Implementation of the third barrier to an unlikely hypothetical radioactive release of the PMF - the building itself where sub-atmospheric conditions are required during operating conditions. Even though the building is not a leak tight confinement building, the existing ventilation system guarantees sub-atmospheric conditions from the external area and the suctioning of possible indoor contamination through HEPA filters before being released through the ventilation stack - 2 to the environment.	Design Commissioning Operation	Occupational health and safety by minimization of the residual contamination in the internals of the equipment, reducing the risk of spread of contamination and the operator dose. Protection of the occupational and public health Environmental protection
4.	Technological measure, consisting in a stable matrix of the cold slag constitutes an inherent barrier to radionuclides dispersion from RAW. Once cooled down in the Slag Collection Chamber (SCC), the RAW material becomes a solid	Design Commissioning Operation	Occupational health and safety Protection of the occupational and public health Environmental

No	Description of the measure	Period/Phase	Result
	metallic-like matrix. This solid material serves as an intrinsic physical barrier against dispersion of radionuclides from the RAW.		protection
5.	Establishing of Instruction for periodical cleaning where maintenance activities are carried out, preventing the accumulation of contamination along all the operation stage.	Design Commissioning Operation	Occupational health and safety Protection of the occupational and public health Environmental protection
6.	The periodical cleaning of the respective components inside the PMF to be carried out by special adapted vacuum cleaner aiming to minimize the spread of contamination. It will be used to clean the refractory concrete of the PTC when repaired, the insides of the STC, the boiler, the bag house, the HEPA-filters, confinement of ash collection chamber, etc. and also the surroundings during and after maintenance activities.	Commissioning Operation	Occupational health and safety Protection of the occupational health
7.	Before a planned shutdown of the PMF, the last waste batch fed to the system can be very low contaminated. By this procedure the residual radiation into the different components is reduced and in fact is "flushed out" and decontaminated.	Operation	These activities will minimize the residual contamination in the internals of the equipment, reducing the risk of spread of contamination and the personnel doses.
8.	In any case, for manholes or covers, which have to be opened for maintenance or inspection and are considered critical in terms of potential spread of contamination, temporary confinements consisting of aluminum frames and plastic foils to be installed	Construction Operation	Occupational health and safety by minimization of the residual contamination in the internals of the equipment, reducing the risk of spread of contamination and

No	Description of the measure	Period/Phase	Result
	(e.g. on top of PTC for refractory replacement).		the operator dose.
9.	Maintenance or inspection at confinements is normally executed with extra protective clothing and wearing of masks in order to protect operators or maintenance people from contamination. The suspected contaminated plastic foils from maintenance activities can be treated in the PMF.	Operation	Occupational health and safety by minimization of the residual contamination in the internals of the equipment, reducing the risk of spread of contamination and the operator dose.
10.	The operators and the radiation protection agent to perform regularly control on the contamination around the plant equipment to detect occurring contamination at an early stage. Thoroughly cleaning is preventing the spread of contamination due to immediate decontamination work.	Operation	Occupational health and safety by minimization of the residual contamination in the internals of the equipment, reducing the risk of spread of contamination and the operator dose.
11.	Efficient performance of the programs required by the standards in force in relation to Radiological Protection.	Design, Operation Decommissioning	Protection of the human health and of the environment
12.	Maintain and update of the above mentioned documents, which are directly related with the provision of radiation protection at the respective facility.	Design, Operation Decommissioning	Protection of the human health and of the environment
13.	The off gas treatment system to achieve emission values under the below listed thresholds: Total dust – 1 mg/m ³ ; CO-5 mg/m ³ ; TOC- 1 mg/m ³ ; HCl – 1 mg/m ³ ; HF-1 mg/m ³ ; SO ₂ -5 mg/m ³ ; NO _x – 100 mg/m ³ ; Heavy metals: Sum of Cd and Tl – 0.005 mg/m ³ ; Hg-0.005 mg/m ³ ; Sum of Sb, As, Pb, Cr, Cu, Mn, Ni, V, Sn- 0.05 mg/m ³ ; Dioxins and Furans - 0.01	Design, Operation	Protection of the atmospheric air, the soils, the vegetation and the human health against pollution

No	Description of the measure	Period/Phase	Result
	ng/Nm ³ .		
14.	Introduction of Continuous Emissions Monitoring (CEM) of the off-gas emissions.	Design, Operation	Protection of the atmospheric air, the soils, the vegetation and the human health against pollution.
15.	The wastewater discharge system of the facility to be insulated.	Design, Operation	Protection of the surface and groundwater against contamination.
16.	Observance of the best practices in the technological process and maintenance in normal operational conditions of the PMF.	Design, Operation	Protection of the human health and of the environment.

6.1.2 Measures for mitigation and minimization of the adverse impact on the environment indicated by the EIA experts – authors of the EIA-R

The measures given in table 6.1.2-1 encompass all phases of the Investment Proposal implementation and are compliant with the provisions of Appendix 2 to art.14 (1), item 5 of the EIA Regulation (title amended SG3/2006) prom. SG 25/2003, amended SG 3/2006, SG80/2009, SG29/2010, last amended SG3/2011. The measures are in compliance with the Regulatory frame concerning RAW including and the Regulation on radiation protection during activity with source of ionizing radiation (SIR).

Table 6.1.2-1 Plan for implementation of the measures indicated by the EIA experts - authors of the EIA-R

No	Description of the measure	Period/Phase	Result
1.	Establishment, maintenance and regular update of Instructions for radiation protection of the facility; Internal emergency plan for the facility, including measures for fire, explosion and accident protection.	Design Operation Decommissioning	Provide radiation protection for the respective facility. Protection of the human health and the environmental components
2.	Establishment, maintenance and regular update of Internal regulations and/or procedures for receiving, storage, return and accounting of sources of ionizing radiation at the facility.	Design Operation Decommissioning	Provide radiation protection for the respective facility. Protection of the human health and the environmental components

No	Description of the measure	Period/Phase	Result
3.	Establishment, maintenance and regular update of Internal rules and procedures for collection, sorting, processing, handing over, storage and accounting of the generated radioactive waste at the facility.	Design Operation Decommissioning	Occupational health and safety
4.	Establishment, maintenance and regular update of Internal regulations and/or procedures for using individual means of radiation protection of the personnel and for maintaining of personal hygiene from the point of view of radiation safety.	Design Operation Decommissioning	Occupational health and safety
5.	Establishment, maintenance and regular update of Internal regulations and/or procedures for radiation control at the facility and for individual occupational dose control of the personnel and program for radiation control in the radiation protected area and the monitored area around the facility.	Design Operation Decommissioning	Protection of the human health and the environmental components
6.	Establishment, maintenance and regular update of Orders, appointing the persons responsible for the radiation protection at the facility; the persons responsible for receiving, handling, storing, accounting and controlling the sources of ionizing radiation at the facility; the persons responsible for notification in case of incidents and accidents with sources of ionizing radiation; the executives and the radiation protection operators at the facility, as well	Operation Decommissioning	Protection of the human health and the environmental components

No	Description of the measure	Period/Phase	Result
	as the persons, authorized to work with sources of ionizing radiation at the facility.		
7.	Establishment, maintenance and regular update of Internal regulations and procedures for the way of giving the right for individual work with sources of ionizing radiation, holding of initial, routine current and periodical training and checks of the knowledge and skills of the personnel.	Operation Decommissioning	Protection of the human health and the environmental components
8.	Establishment, maintenance and regular update of Job descriptions of the personnel in their sections, related to activities with sources of ionizing radiation.	Operation Decommissioning	Protection of the human health and the environmental components
9.	Establishment, maintenance and regular update of Rules for authorization and provision of radiation protection of outside teams summoned for the liquidation and limitation of the consequences of an accident that has occurred at the facility.	Operation Decommissioning	Environmental and human health protection
10.	Classification of the work places and of the radiological areas in the PMF, strict control on the personnel access in there.	Operation Decommissioning	Minimization of the occupational health risk
11.	Performance of regular dosimetric controls of the PMF operational staff and of the maintenance staff in compliance with Regulation 32/7.11.2005.	Operation Decommissioning	Minimization of the occupational health risk
12.	Performance of regular radiation control of the ambient air in the PMF premises and facilities.	Operation Decommissioning	Minimization of the occupational health risk

No	Description of the measure	Period/Phase	Result
13.	To wear protective clothes and gloves in the PMF controlled areas.	Operation Decommissioning	Minimization of the occupational health risk
14.	When work is performed in areas with probability of air active contamination or not captured surface contamination the use of protective means for the respiratory system is imperative.	Operation Decommissioning	Minimization of the occupational health risk
15.	During the outages for cleaning, prophylactic, calibration, decontamination or repair of the PMF – to wear protective clothes and breathing mask.	Operation Decommissioning	Minimization of the occupational health risk
16.	Monitoring of the occupational health of the operation and maintenance staff in accordance with the national statutory requirements and KNPP rules.	Operation Decommissioning	Minimization of the occupational health risk
17.	Execution of all medical prophylactic measures, prescribed by KNPP for the staff working in area class A.	Operation Decommissioning	Minimization of the occupational health risk
18.	Optimization of the facility operation and special attention to DeNO _x system operation, respective observation of the NO _x releases.	Operation	Mitigation of the NO _x average daily emissions on a value of less than 100mg/m ³
19.	At the outlet of the off-gas cleaning system Continuous Emissions Monitoring (CEM) equipment will be installed to verify that all exit gases are within the proper ranges. That means off-gas effluents will be measured before the exhaust point to assure that the limits and recommendation of the EC document are fulfilled.	Design Operation Decommissioning	Minimization of the public health risk. Environmental protection

No	Description of the measure	Period/Phase	Result
	Optimization of CEM system including calibration and protective maintained.		
20.	Following a Continuous Emissions Monitoring (CEM) of the active releases through the ventilation stack of AB-2.	Operation	Minimization of the public health risk.
21.	Update of the Emergency Preparedness Plan with the incorporation of the PMF facility.	Operation Decommissioning	Minimization of the public health risk.
22.	Prevention activities related to the public disclosure for the occurrence of incidents and accidents.	Operation Decommissioning	Minimization of the public health risk
23.	Maintain and continuous update of all operational documentation – instruction, ordinances, reports, etc.	Operation	Optimal operation process to avoid incidents or irregular operation status and releases of emissions in the atmosphere
24.	Maintenance of the components of the off-gas cleaning system in good condition for reaching the best effect of its functioning.	Design Construction Operation Decommissioning	Minimization of the public health risk Environmental protection
25.	To ensure that during normal operation, expected operational conditions and design basis accidents in the facility the dose limits determined in art. 9, items 1 and 2, as well as item 3 – for the period after closure of the facility, according to the Regulation for safety during RAW management, will not be exceeded. For that purpose sensors should be mounted to ensure “online” control of the radiation gamma background.	Design Operation Decommissioning and closure	Minimization of the health risk. Environmental protection.
26.	Development and execution of a Program for in-house radiological monitoring, which should be part of the overall Program for radiological monitoring of the plant site.	Design Construction Operation Decommissioning and closure	Minimization of the health risk. Environmental protection.

No	Description of the measure	Period/Phase	Result
27.	The dismantling activities to be carried out under strict preliminary control on the already realized dose exposure and under periodic control during the dismantling activities.	Decommissioning and closure.	Minimization of the occupational health risk
28.	Prior released waste water shall be collected and necessary parameters will be measured. The waste water shall be released into existing KNPP liquid collection system in a controlled manner and in accordance with the licensed conditions.	Design Construction Operation	Surface and ground water protection against contamination
29.	All chamber interfaces to be flanged sealing surfaces to prevent leaks in or out of the furnace. The system to operate under negative pressure to prevent leakage into the cell.	Design Construction Operation	Surface and ground water protection against contamination
30.	In order to prevent the spillage of hazardous liquids spillway trays (containments) to be placed below the tanks. In case of spillage the liquid to be maintained in the spillway tray until the disposal by the proper means.	Design Construction Operation	Surface and ground water protection against contamination Minimizations of the consequences in case of accidents
31.	Prohibition of use of materials containing priority substances in the construction of structures, engineering facilities and others, leading to actual or possible contact with the groundwater.	Design Construction	Drinking water protection.
32.	Reconstruction or construction of drainage. All the drains will be collected in a vessel to be processed properly afterwards in dependence of their radioactivity.	Design Construction Operation	Surface and ground water protection against contamination Minimizations of the consequences in case of accidents

No	Description of the measure	Period/Phase	Result
33.	Introduction of special operation instructions aiming the strict observation of the PMF process mode.	Operation	Continuous control on the whole facility functioning to prevent leaks
34.	Regular control and appropriate maintenance of the active drainage pipeline in order to prevent potential leakages and radioactive contamination.	Operation	Surface and ground water protection against radioactive contamination
35.	Control over compliance with the conditions of permits for water use.	Construction Operation	Drinking water protection. Control of water use.
36.	Control over compliance with the conditions of permits for discharges of generated wastewater.	Construction Operation	Surface and ground water protection against contamination
37.	Control over compliance with prohibitions against direct discharge of water containing hazardous and noxious substances in the protection zones of groundwater.	Construction Operation	Drinking water protection.
38.	Optimizing water use for industrial purposes by introducing rotations.	Construction Operation	Protection of water resources
39.	Control on prohibitions on the disposal of priority substances that can lead to their indirect discharge into groundwater.	Construction Operation	Ground water protection against contamination
40.	Control of industrial areas for industrial and hazardous waste.	Construction Operation	Surface and ground water protection against contamination
41.	Compliance with the regulation for assessing the environmental impact during construction and technologies which are likely to affect the quantity and/or quality of drinking water.	Construction Operation	Protection of drinking water.
42.	Monitoring of wastewater containing harmful and hazardous substances.	Construction Operation	Protection of waters against pollution by priority substances.
43.	Monitoring of water and water bodies affected by the discharge of wastewater containing harmful and hazardous	Construction Operation	Protection of waters against pollution by priority substances.

No	Description of the measure	Period/Phase	Result
	substances.		
44.	Control of air pollution on water status.	Construction Operation	Protection of waters against pollution.
45.	Establishment of soils monitoring plan – 6 and 12 months upon commissioning of the PMF. Definition of the radionuclide content in the layer 0-2 cm, 2-5 cm and 5-10 cm.	Design Operation	Soils and biodiversity protection
46.	Regular monitoring in accordance with KNPP plan for soil monitoring in the 36 monitoring stations.	Operation	Soils conservation
47.	Observance of the best practices in decommissioning of such facilities.	Decommissioning	Biodiversity conservation
48.	Continue with the established at KNPP practice for management of the hazardous chemical substances in incorporating the substances necessary for the PMF operation.	Construction Operation	Environmentally friendly waste management and minimization of the health risk
49.	Introduction of the WMA requirements for separate collection of packaging waste according to art. 33, par. 4 from WMA.	Construction Operation	Environmentally friendly waste management
50.	Handing over the waste from ferrous and nonferrous metals to companies holding the license under art. 67 of the WMA on contractual basis.	Construction Operation	Environmentally friendly waste management
51.	Handing over the non-radioactive waste to companies holding the license under art. 12 of the WMA on contractual basis.	Operation	Environmentally friendly waste management and minimization of the health risk
52.	Updating the record books for the waste in accordance with Ordinance № 2/2013 on the procedures and forms for providing information on waste	Construction Operation Decommissioning	Environmentally friendly waste management

No	Description of the measure	Period/Phase	Result
	management activities and procedures for the conduct of public records (SG 10/05.02.2013).		
53.	In case of shortage of capacity of existing warehouses for temporary storage of waste to build a site for temporary storage of waste prior to their submission for utilization, including recycling.	Construction Operation Decommissioning	Environmentally friendly waste management
54.	Elaboration of RAW management procedures in dependence of the type, mode of generation and further treatment.	Operation Decommissioning	Environmentally friendly waste management and minimization of the health risk
55.	Implementation of the accounting documents and waste flow tracking data base (part of DEMANS) on the incoming quantities, quantities of temporary storied and treated wastes on the PMF territory as well as the wastes handed over for further treatment.	Operation Decommissioning	Environmentally friendly waste management and minimization of the health risk
56.	Elaboration of a Design project for PMF decommissioning. Part of this project shall be the procedures for waste activity inventory in view of further treatment.	Decommissioning	Environmentally friendly waste management and minimization of the health risk

6.2 Recommendations to the Environmental Management

To guarantee the application of a systematic approach to managing the environmental and social issues and impacts associated with Employer's activity, different plans and programs are established including an **Environmental Management Plan (EMP)**.

Effective management systems, appropriate to the size and nature of the business activity of KNPP, allow the company to better manage risks, take advantage of opportunities, enhance their social and environmental performance and reputation and often lead to improved financial performance. A successful and efficient environmental and social management system is a dynamic, continuous process, initiated and supported by management, and involves meaningful communication between KNPP, its workers, and the local communities affected by the project. This implies the application of a systematic approach, integrating planning, implementation, review and response to the specific results on structural basis in order to achieve continuous improvement of the project implementation. This plan shall outline the responsibilities of KNPP within the process of appraisal activities such as risk assessment, auditing, or management of the environmental and social problems arising from project implementation. The project stakeholder's engagement shall be in separate part of this process. The plan shall include at minimum the following goals:

- To identify and assess environmental and social impacts and issues, both adverse and beneficial, associated with the project;
- To adopt measures to avoid, or where avoidance is not possible, minimize, mitigate, or offset/compensate for adverse impacts on workers, affected communities, and the environment
- To identify and, where feasible, adopt opportunities to improve environmental and social performance.
- To promote improved environmental and social performance through a dynamic process of performance monitoring and evaluation
- To identify people or communities that are or could be affected by the project, as well as other interested parties
- To ensure that such stakeholders are appropriately engaged on environmental and social issues that could potentially affect them through a process of information disclosure and meaningful consultation
- To maintain a constructive relationship with stakeholders on an ongoing basis through meaningful engagement during project implementation

Environmental and social issues and impacts will also be analyzed for the relevant stages of the project cycle. These may include preconstruction, construction, operations, and decommissioning or closure and reinstatement. The appraisal will also consider potential transboundary and global issues, such as impacts from effluents and emissions, increased use or contamination of international waterways, greenhouse gas emissions, climate change mitigation and adaptation issues, and impacts on endangered species and habitats. Proposal of framework of Environmental and Social Action Plan (ESAP) was elaborated and include as attachment 16.1.

6.3 Recommendation to the PMF site monitoring plan

To be able to check that the residual impacts identified are the only ones which might occur it is proposed to implement a standalone **site monitoring plan (SMP)** as evaluation measure as inseparable part of the KNPP Monitoring Plan. This would ensure that no unexpected impacts arise and that the proposed mitigation measures are working adequately. If unexpected impacts do arise, this would give an opportunity to take remedial action.

In order to control the effectiveness of mitigation measures in avoiding or reducing impacts, it will be necessary to define the measuring points and the frequency and methodology used for such measurements; and also the values that are to be expected, in order to be able to detect differences between the actual situation and that predicted.

In order to achieve the ecological goals for achieving, maintaining and improving the good condition of waters in the Danube basin water management by 2015, the Plan for environmental monitoring should include measures for protection of the drinking water under Program 7.1.3 with code BG1MB022, BG1MB011 and BG1MB018; measures to regulate water abstraction of fresh surface water and groundwater under Program 7.1.4 with code BG1MB039 and BG1MS014; measures to regulate emissions by introducing prohibitions on the introduction of pollutants from point sources under Program 7.1.5.1 and 7.1.5.2 with code BG1MS016, BG1MS017 and BG1MB076; measures to regulate emissions by introducing prohibitions on the introduction of pollutants from diffuse sources of pollution under Program 7.1.6 with code BG1MB098, BG1MB082, BG1MB108, BG1MB109 and BG1MB085; measures for water pollution from priority substances under Program 7.1.7 with code BG1MB055 and BG1MB056. These measures are indicated in EIAR chapter 6 as recommended by Danube basin water management.

A framework monitoring plan (Environmental Management Plan (EMP) Part B Monitoring Plan, includes some advises how and what has to be implemented to supervise all proposed mitigation measures and it can be seen in Chapter 11, Section 11.1, **Attachment 16.2– B**.

6.4 Recommendation to the PMF emergency plan

KNPP Plc has its own Emergency Plan. In connection with the implementation of this IP the Plan shall be updated integrating also the emergency action in case of accidents or incidents on PMF.

The updated Emergency Plan shall be coordinated with the competent authorities. Important preventive measure is the regular training of the personnel for actions in case of incidents or accidents, including simulation of accident situation and tests on the knowledge and response reactions of the personnel.

To include the measures to prevent or reduce the impact on surface and groundwater emergency pollution under Program 7.1.8 from the Management plan for the river basins, section 7 with code BG1MB0114, BG1MB117 and BG1MB118. To develop rules to act in case of major accidents. Immediately to notify the appropriate authorities in emergency situations that creates opportunities for contamination of the

water body, and to provide for measures to reduce and/or eliminate the consequences of the pollution. These measures are indicated in EIAR chapter 6 as recommended by Danube Region Basin Directorate.

The Emergency Plan provides information on emergency preparedness, demonstrating in a reasonable manner that, in the event of an accident, all actions necessary for the protection of the public, workers and the environment will be taken.

Emergency planning arrangements, commensurate with the hazards, shall be established and maintained according to KNPP Emergency Plan. Incidents significant to safety shall be reported to the client in a timely manner.