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NUCLEAR ENERGY AGENCY
COMMITTEE ON NUCLEAR REGULATORY ACTIVITIES

COMMENDABLE PRACTICES ON TRANSPARENCY IN NUCLEAR REGULATORY COMMUNICATION WITH THE PUBLIC

Report jointly prepared by the CNRA Working Group on Public Communication of Nuclear Regulatory Organisations and by the Working Group on Transparency Activities of the European Nuclear Safety Regulators Expert Group (ENSREG)

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ORGANISATION FOR ECONOMIC CO-OPERATION AND DEVELOPMENT

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NUCLEAR ENERGY AGENCY

The OECD Nuclear Energy Agency (NEA) was established on 1st February 1958 under the name of the OEEC European Nuclear Energy Agency. It received its present designation on 20th April 1972, when Japan became its first non-European full member. NEA membership today consists of 29 OECD member countries: Australia, Austria, Belgium, Canada, the Czech Republic, Denmark, Finland, France, Germany, Greece, Hungary, Iceland, Ireland, Italy, Japan, Korea, Luxembourg, Mexico, the Netherlands, Norway, Poland, Portugal, the Slovak Republic, Spain, Sweden, Switzerland, Turkey, the United Kingdom and the United States. The European Commission also takes part in the work of the Agency.

The mission of the NEA is:

– to assist its member countries in maintaining and further developing, through international co-operation, the scientific, technological and legal bases required for a safe, environmentally friendly and economical use of nuclear energy for peaceful purposes, as well as

– to provide authoritative assessments and to forge common understandings on key issues, as input to government decisions on nuclear energy policy and to broader OECD policy analyses in areas such as energy and sustainable development.

Specific areas of competence of the NEA include safety and regulation of nuclear activities, radioactive waste management, radiological protection, nuclear science, economic and technical analyses of the nuclear fuel cycle, nuclear law and liability, and public information.

The NEA Data Bank provides nuclear data and computer program services for participating countries. In these and related tasks, the NEA works in close collaboration with the International Atomic Energy Agency in Vienna, with which it has a Co-operation Agreement, as well as with other international organisations in the nuclear field.

COMMITTEE ON NUCLEAR REGULATORY ACTIVITIES

The Committee on Nuclear Regulatory Activities (CNRA) shall be responsible for the program of the Agency concerning the regulation, licensing and inspection of nuclear installations with regard to safety. The Committee shall constitute a forum for the exchange of information and experience among regulatory organisations. To the extent practical, the Committee shall review developments, which could affect regulatory requirements with the objective of providing members with an understanding of the motivation for new regulatory requirements under consideration and an opportunity to offer suggestions that might improve them or avoid unwarranted disparities among member countries. In particular, it shall review current management strategies and safety management practices and operating experiences at nuclear facilities with a view to disseminating lessons learnt. In alignment with the NEA Strategic Plan, the Committee shall promote co-operation among member countries to use the feedback from this experience to ensure high standards of safety, to further enhance the efficiency and effectiveness of the regulatory process and to maintain adequate infrastructure and competence in the nuclear safety field.

The Committee shall promote transparency of nuclear safety work and open public communication. The committee shall maintain an oversight of all NEA work that may impinge on the development of effective and efficient regulation.

The Committee shall focus primarily on existing power reactors and other nuclear installations and the construction of new power reactors; it may also consider the regulatory implications of new designs of power reactors and other types of nuclear installations. Furthermore, it shall examine any other matters referred to it by the Steering Committee. The Committee shall collaborate with, and assist, as appropriate, other international organisations for co-operation among regulators and consider, upon request, issues raised by these organisations. The Committee shall organise its own activities. It may sponsor specialist meetings and working groups to further its objectives.

In implementing its programme the Committee shall establish co-operative mechanisms with the Committee on the Safety of Nuclear Installations to work with that Committee on matters of common interest, avoiding unnecessary duplications. The Committee shall also co-operate with the Committee on Radiation Protection and Public Health and the Radioactive Waste Management Committee on matters of common interest.

FOREWORD

After having identified in the 1990s that public trust towards the nuclear regulators could be different from one country to another, the NEA Committee on Nuclear Regulator Activities created the Working Group on Public Communication (WGPC) and has also held three successful international workshops: *Investing in Trust: Nuclear Regulators and the Public* (Paris, December 2000), *Building, Measuring and Improving Public Confidence* (Ottawa, May 2004) and *Transparency of Nuclear Regulatory Activities* (Tokyo, May 2007). These workshops and the on-going activities and meetings of the WGPC have proven to be valuable forums where experience is exchanged amongst countries.

As a follow-up of the 2007 Workshop, the WGPC surveyed, in cooperation with the European ENSREG/WGTA, member countries in early 2009 on their transparency practices. Eighteen countries responded to the survey, drawing on their own expert knowledge and regulatory experience for their response. The purpose of this document is to report on the survey's key findings and to illustrate the practices of Nuclear Regulatory Organisations (NRO) in the area of transparency. The document, in particular, draws out those areas of common practice amongst the different countries.

While considering the key findings from this survey and the many practices regarding transparency of the NRO that can be transposed from one country to another one has to keep in mind that this study presents the status of current practices in 2010. Those practices will certainly be evolving in the future, each country benefiting from this mutual exchange. It will be probable of interest to repeat such a study within a decade to see progress made, this is why the Transparency questionnaire is given in Appendix 1 for future users.

ACKNOWLEDGEMENTS

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EXECUTIVE SUMMARY

This report was jointly prepared by the Working Group on Public Communication of Nuclear Regulatory organisation of the Nuclear Energy Agency (NEA) Committee on Nuclear Regulatory Activities (CNRA) and by the Working Group on Transparency Activities (WGTA) of the European Nuclear Safety Regulators Expert Group (ENSREG).

As a follow-up of the 2007 Workshop, the WGPC surveyed, in cooperation with ENSREG/WGTA, member countries in early 2009 on their transparency practices. Eighteen countries (see Appendix 4 for full list) responded to the survey, drawing on their own expert knowledge and regulatory experience for their response. The purpose of this document is to report on the survey's key findings and to illustrate the practices of Nuclear Regulatory Organisations (NRO) in the area of transparency. The document, in particular, draws out those areas of common practice amongst the different countries.

The questions from the various sections of the survey are provided in appendix 1.

Key findings

In developing this guidance document the WGPC has recognised that the definition and practice of transparency is significantly influenced by the specific operating environment of the NRO. The WGPC has therefore sought to highlight common principles and good practice, of which there are many, in such a way that other NROs may use this document to review their own transparency practices and learn from the experience of others as appropriate in their own operating environment.

A general observation is that the public's expectations of NROs have significantly increased in every country and as a result all NROs agree that the more transparent an NRO is the greater chance it has to gain public confidence. Much effort has been made by every country to evolve and improve its communication practices.

However, in their quest to be open and transparent, NROs continue to face the challenge of striking the right balance between openness and security-related considerations. Many of those involved in the survey cited the need to protect some information whilst still accommodating the public's desire to be well informed.

From a legal perspective, Acts related to the Freedom of Information (FOI), which give the public the right of access to all types of recorded information, have been in force since 2006 in every Organisation for Economic Co-operation and Development (OECD) countries. In some of these countries, there is also specific legislation ensuring nuclear regulatory transparency.

There are a variety of ways in which NROs communicate with the general public. The most popular and the most important tool is web-sites as they allow timely dissemination of information and allow two-way dialogue to be established. Through the survey results, the WGPC found that there is an increasing trend for NROs to publish information on regulatory decisions on their web sites.

Another key finding of the survey was the considerable variation of type and form of stakeholder engagement practices from country to country. Consultation is the most common activity but this is most often government, rather than NRO, led and many innovative web-based engagement tools are being piloted or implemented by some countries.

Using the media as a way to bring information about nuclear matters actively to the attention of the public was seen to be an important communications approach and one adopted by most countries. Indeed the latest 'European Barometer on Nuclear Safety' (March 2010) confirmed that EU citizens consider the media to be their main source of information on issues relating to the nuclear industry. The survey found that there are many activities organised by NROs with the media in an effort to ensure that a good communication line is well-established before any crisis situation arises.

A key aspect of building the confidence of the general public was considered by the WGPC to the internal culture of the NRO towards openness and transparency. The survey found that many NROs have specific codes of practice to ensure transparent behaviours and through internal surveys this can sometimes be measured and monitored. However, there are very few ways in which this is currently measured with stakeholders and this is seen by NROs as an area where improvements could be made.

Overall, the survey and resulting report has provided a useful insight into the common and often innovative communications practices in place to ensure openness and transparency. NROs have made significant improvements in their communication with the public since the WGPC was originally formed. It is clear that for many, plans are in place to further expand their practices as technology continues to advance and as the public's expectations continue to rise. This presents both an opportunity and a challenge for all NROs.

1.   INTRODUCTION AND OPERATING CONTEXT

As a follow-up of the Nuclear Energy Agency (NEA) Committee on Nuclear Regulatory Activities (CNRA) Workshop on Transparency of Regulatory Activities held in Tokyo in May 2007, the Working Group on Public Communication of Nuclear Regulatory organisation (WGPC) surveyed, in cooperation with Working Group on Transparency Activities (WGTA) of the European Nuclear Safety Regulators Expert Group (ENSREG), member countries in early 2009 on their transparency practices. The questions from the various sections of the survey are provided in appendix 1. Eighteen countries (see Appendix 4 for full list) responded to the survey, drawing on their own expert knowledge and regulatory experience for their response.

The findings from the analyses of the answers of the survey are grouped in this report along with the sections of the survey.

This section of the document puts into evidence that it is clear that although countries may define transparency somewhat differently and may have different approaches to transparency, there is general agreement that the more open and transparent a regulatory body is, the greater chance it has to gain the confidence of the public.

The summary findings are:

- The public demand on information and transparency is increasing
- All NROs recognize the importance of openness and transparency and are in their quest to establish good practice in transparency and be proactive with information
- The definition of transparency is different from one country to another
- Most NROs have many challenges associated with openness and transparency in their cultural, societal context

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1.1   The current societal context

We live in an age where access to information, particularly through the Internet, continues to expand every day. Along with greater access to information, there is the increasing demand of the public for transparency, particularly in matters and decisions affecting their lives.

The public demands to know more about Nuclear Regulatory Organisation's (NROs) and their activities resulting in regulators providing more information and interactions with the public to help make nuclear safety activities more understandable and transparent.

NROs around the world recognise the importance of openness and transparency to the success of their programmes to protect public health and safety. All agree that good practice in transparency and being proactive with information helps to protect against perceptions of secrecy and to instil public confidence and accountability.

Transparency however often means different things in different countries. In one country, transparency means almost total access to all information and documents that a government authority has

in its possession. In another country, transparency means clearly explaining the decision-making process and how the regulator uses the information it has in that process. While in another country, "transparency" is understood as the right to get an answer to any question.

Since 2006, the NROs of every countries of the Organisation for Economic and Co-operation Development (OECD) have been governed by the Freedom of Information (FOI) Act that gives the public the right of access to all types of documents which public authorities have in their possession. In addition, some NROs must also adhere to specific legislation requiring implementation of nuclear regulatory transparency, including public participation in decision-making.

1.2   The main challenges to creating an open and transparent culture

NROs face many challenges in their quest to be open and transparent with their stakeholders – government, nuclear operators, non-governmental organisations (NGOs), media, work colleagues, and particularly the general public.

In response to the question: What are the main challenges associated with openness and transparency? The most frequently identified challenge was striking the right balance between openness and security-related considerations with many responders citing the need to protect proprietary, commercial, and privacy information whilst still accommodating the public's desire to be well informed.

Other challenges include deciding how much transparency is needed to satisfy the public and how information, that is often highly technical and complex, can be presented in a meaningful way through the use of clear and simple language.

NROs also need to carefully manage expectations regarding transparency which most recognised could be achieved with good communications providing the rationale for regulatory decisions through convincing, clear and accurate information.

In several countries, the NROs have been intensifying their actions with regard to transparency. For instance in France, the Autorite de Surete Nucleaire (ASN) has published since 2002 follow-up letters to all the inspections carried out in basic nuclear installations amounting to more than 750 follow-up letters per year. Since 1 July 2008, the NRO has extended this publication to include radiotherapy follow-up letters (more than 150 per year) and, as of mid 2010, intends to publish all the follow-up letters to the inspections of small-scale nuclear facilities. Small-scale nuclear activities include the industrial sector (suppliers of medical and non-medical sources), research and the entire medical sector. In total, the ASN will make more than 1,500 follow-up letters available on its website every year. Since October 2008, ASN has also made the opinions and recommendations of its Advisory Committees available on its website.

Transparency can be influenced by industry operators (licensees) and therefore interaction between NROs and licensees is necessary. In some cases NROs have to agree with licensees exactly whose responsibility it is to inform the public, and on which issues – the credibility of NROs could be at stake if transparency roles and responsibilities are not clear.

In Norway, the NRO has experienced differences of opinion with licensees about what openness and transparency actually means in everyday practice. Occasionally, the NRO has been in a position where it has had to inform the public on matters that should have been addressed by the licensee.

And while NROs have to be aware of a potential side-effect of openness – the possible misinterpretation of information – they must not let that prevent them from responding to the public and stakeholders' expectations of transparency.

NRO also have to be able to measure the degrees of transparency both within the NROs and externally, among licensees. Valid and broad ranging indicators will allow NROs to assess successes and failures. High levels of transparency in the work of the NROs are vital in cultivating confidence in nuclear safety, especially in light of renewed interest in nuclear power in many countries.

Staffing levels within NROs is also another important consideration when setting openness and transparency policies. Many countries are concerned that dealing with issues around transparency could diminish resources needed to carry out safety-related tasks. They are keen to ensure that they can bring regulatory decisions closer to the public and optimise transparency without affecting their role as an efficient and effective regulator.

In some countries the introduction of the Freedom of Information Act and Environmental Information Regulations has put a significant burden on resources, because it has had to deal with a significant number of complex requests for information that are very time consuming.

2.   INFORMATION DISCLOSURE AND TRANSPARENCY – THE LEGAL POSITION

This section of the document looks at the laws and requirements for the disclosure of information, how NROs and industry interact, how information is released and the issue of dealing with disclosure of sensitive information.

The summary findings are:

- All responding countries have a legal basis for disclosure of information
- Practices on proactive disclosure of information vary
- Most NROs interact with industry (licensees) to encourage more transparency
- The FOI Act provides guidance on the format for disclosing information
- Most responding countries have a 4-week (30-day) timeframe for disclosure
- For sensitive information, most countries redact/withhold parts of a document
- There are very few differences of opinion about disclosure between NROs and industry – in all countries the NRO makes the final decision

2.1   Laws and requirements for NROs on the disclosure of information

All countries have a legal basis for the disclosure of information. In most cases, there is a general Freedom of Information Act (FOI), as well as special laws, codes of practice or guidelines relating to environmental information. Practices on proactive disclosure of information vary a great deal among the countries surveyed.

In Canada, the CNSC is currently reviewing its criteria for public reporting - partly a result of recent developments regarding a licensee that experienced a small leak of heavy water. At the time of the incident, it was determined that there was no risk to the public or the environment and therefore no public notification was required. Later, however, the media learned of the event and the resulting reporting led to undue public speculation. As a result, the CNSC encourages licensees to proactively report all noteworthy incidents – even those that are below regulatory limits and not of an emergency nature - regardless of any risk or threat. The criteria for reporting to the public are being reviewed.

In Korea, there are a number of laws that place duties on the industry to disclose. There is also a Ministry of Education, Science and Technology (MEST) notice applicable to nuclear installations, which lays down regulations on reporting and the public announcement of accidents and incidents for nuclear power facilities. This requires licensees to release, via the Internet the following working day, the information reported to the NRO. The licensee must also inform the media of the event the following working day. The Korean NRO must be proactive with the public demand under the national Comprehensive Plan for Nuclear Safety and release the requested information to the public within 10 days under the FOI act of the Korea Institute of Nuclear Safety (KINS).

In France, there is a definition of transparency of nuclear activities within legislation enacted in 2006 which states "Transparency in the nuclear field consists in the set of provisions adopted to ensure the public's right to reliable and accessible information on nuclear security."

In Spain, the Nuclear Safety Council (CSN) has also placed transparency as one of the greatest goals. The recent modification in 2007 of its Creation Act (Law 22/Law 15/1980, of 22nd April, Creating the Nuclear Safety Council, amended by Law 33/2007) establishes that NRO must inform to the public about the relevant facts related to nuclear and radioactive facilities, as well as about the decisions of the Plenary Council's Meeting.

2.2   Interactions between regulators and industry

Many countries have laws or requirements that place duties on licensees to disclose information. In some countries, licensees are encouraged to proactively offer information, while others rely solely on FOI requests to disseminate information to the public.

Regulators' transparency must be balanced by openness in the industry, and most NROs encourage transparency and communication among licensees and industry stakeholders. In some countries, there is a requirement for public information and consultation programmes around licence applications.

Levels of interaction between NROs and licensees vary enormously. Some NROs have informal agreements; some regularly encourage licensees to promote their activities; others liaise with licensees on major issues; while others have no agreements/guidelines in place.

For instance, to conduct safety regulation appropriately and improve communication with the industry while ensuring transparency, one NRO (Japan) has planned to hold a Nuclear Safety Regulation Round Table meeting with a wide range of participants from the industry for the first time in July 2010 and continue to hold such meetings thereafter.

In some countries, legislation ensures that licensees inform the public about the safety assessment status of their nuclear installations, regularly inform them of their activities and give access to relevant documents.

2.3   How and when information is released to the public

Freedom of Information legislation requires NROs to follow guidance on the way in which information is made available to the public. Information is normally released only in the format – either hard copy or electronic – that is received by the NRO. In multi-lingual countries, specific language regulations apply, but nowhere is there a strict 'simple language' requirement for information given out to the public despite the use of clear and jargon-free language being cited by NROs as a key objective for how they communicate.

Some countries have provision for the disclosure of information within specific timescales. For example in Switzerland the time period is 20 days with an option of a 20-day extension. However, for regular, non-emergency information, the timeframe is almost universally four weeks, or 30 days, allowing an extension of this period under certain conditions.

In Norway, under the provision of its FOI Act (revised in 2009), the NRO must release information within 3 days after an inquiry for information is received.

In Canada, CNSC provides information in the country's two official languages and via paper or machine readable formats, such as CD. On receiving the access to information request, the NRO has 30 calendar days to reply. However, if necessary, extensions can be granted:

- where the government institution can demonstrate a large volume of records or meeting the original time limit would interfere with the operations of the government institution;

- when consultations are necessary with other government institutions and cannot be completed within the original timeframe;

- when consultations with third parties are necessary and cannot be completed within the original timeframe;

- if meeting the original timeframe would reasonably interfere with the operations of government;

- for translation purposes.

2.4   Policy on disclosure of information

All countries emphasise that they want to be as transparent and open as possible, and many have specific policies or programmes in place to address the issue. All agree that they are doing their best to accommodate the public's desire to be "well-informed" as much as possible, and to ensure the public's right to know on a quick and clear access basis.

The US NRC has a Management Directive on the release of information to the public with a policy that requires the NRO to routinely make as much information as possible relating to its health and safety mission, in accordance with its legal responsibilities to protect specific types of information, available to the public. The NRO wants to make information it anticipates will be of interest to the public, available automatically to preclude people having to file FOI requests. The policy aims to:

- ensure that documents will not be provided to one licensee, or member of the public, unless they can be made available to everyone;

- ensure that documents created by staff are developed and issued without improper influence, real or perceived by special interest groups or those regulated by the NRO;

- provide guidance to staff about the types of documents that should be released to the public;

- ensure that a review for sensitive information is conducted before public release of documents, to determine if the document contains information that could be useful to a terrorist.

In Hungary the NRO operates in an environment where the public has a right to know all economic and financial information on the NRO including contracts and all staff expenses. Therefore by law (called glass-pocket law), they must place all such information on their web-site.

2.5   Disclosure of sensitive information

In their efforts to be as open and transparent as possible, most NROs actively address the problem of disclosure of information that could be considered commercially sensitive. Information to be released into the public domain must be agreed in advance with all parties concerned.

In the United Kingdom, under the provisions of its FOI Act, the NRO seeks the comments of third parties before the disclosure of any information/documents provided by them. However, the NRO will ultimately make the final decision regarding disclosure of that information. In Belgium prior consent is only required when the information/document is protected by copyright.

Release of information is often subject to exclusions or exemptions for certain categories of material. All countries have exemptions from transparency in intellectual property, commercial confidentiality and

security-related information. Most countries refer to their specific FOI laws, data protection provisions and security of information regulations to define what information should be exempt from release.

Generally, information that cannot be released includes information obtained in confidence such as personal information; third party information, trade secrets or information obtained in confidence that is scientific, technical, financial, or commercial in nature; solicitor-client information, cabinet confidences or information that causes harm to the security of government.

In the interests of transparency and openness, all countries withhold or redact parts or sections of documents, rather than withhold the whole document. Most countries have to justify withholding information – some issue general statements citing security or commercial reasons, while in the interests of continued openness, others give individual reasons according to each separate request for information.

In some countries, the law does not allow the use of 'general' statements. In every case for which the law offers the possibility of refusing to disclose the information, an explanation as to why the disclosure is refused must be provided.

Finding the right balance between the public's right to know, the demand for more and more information and commercial or security considerations is not always easy and legal frameworks help NROs with specific guidance in this area.

Legal judgements resulting from court cases where a decision was taken on this balance are relatively uncommon, especially in light of how many FOI requests, telephone, email or postal enquiries as well as queries from democratically elected officials, are handled by the NROs on a daily basis.

2.6   Classifying information for disclosure

In most countries, documents received by NROs from nuclear operators are evaluated and classified on receipt, and they would be re-evaluated on subsequent receipt of a FOI request. Regulators' initial assessments would not be released usually; documents are only released, in whole or in part, by the NRO when final versions are agreed.

Differences of opinion between NROs and operators regarding the extent of disclosure of information do not often occur and in all countries, the NRO would take the final decision about disclosure.

In some countries, released information is placed on the NROs' website, depending on the type of document and its clarity for non experts. In some countries, released documents are not routinely published on the NROs website because translation into different languages would be required, or there are other concerns.

3.   ROUTINE ACCESS TO INFORMATION

This section of the document looks at the ways in which NROs share information with the public, how they promote their work and specifically how the use of the Internet has influenced the way NROs communicate.

The summary findings are:

- All NROs use web-sites as they are recognised as the most effective way to communicate. The majority use the web to publish information on specific events/incidents
- There is a growing trend to release information about regulatory decisions
- The majority of responders do not proactively publish information about security matters
- Guidance is published for those submitting to an NRO applications to operate nuclear installations
- Most of the responding countries publish bilateral or multilateral agreements
- Half of those responding disclose peer reviews such as IAEA International Regulatory Review Service (IRRS) mission reports
- Many NROs produce annual reports on their activities
- The majority of responding countries publish information about the International Nuclear and Radiological Event Scale (INES) and how it works

3.1   The importance of web-sites as a communications tool for NROs

NROs, like other major organisations, regularly use web-sites as it is an important, if not the most important communication tool.

Printed media, although very regular, can no longer compete with the Internet. The Internet facilitates the delivery of unlimited quantities of information. It is widely accessible, can be quickly updated and the information can be accessed in many cultures and languages. As information communication technologies are developed, disseminating information will get even faster and easier.

Governments of most countries increasingly aim to incorporate the public in their decision-making processes and the Internet is a universal method of communicating with a wide range of audiences.

The Internet allows immediate public reaction, questioning and dialogue and is a mean by which mutual communication is easily established. Through their websites, NROs are able to provide the public and other stakeholders with as much timely information as possible – and therefore be more open and transparent than ever before. Web-sites allow the NROs to raise awareness of their work and how they strive to keep the public safe from the harmful effects of man-made nuclear radiation throughout society.

In general, the most readily available forms of information about nuclear regulation provides the public and other stakeholders with knowledge about nuclear safety and legislation, event and emergency information, policies and guidance, international co-operation, international agreements and commitments, and NRO corporate information, which make clear the role, responsibilities and activities of the regulatory body.

3.2 Sharing nuclear safety and security information with the public

In almost all countries NROs publish information on their websites about the safety of the nuclear activities and most websites have at least a list of nuclear installations. They release information about regulatory decisions, with the majority of countries of NROs issuing press releases after decisions are made. Many provide the public with full details of decisions, and even with reasons for the decisions. But the NROs do not proactively release any information regarding security matters. In some countries, only policy documents are provided, in other countries, audit reports are available.

With regards to legislation, almost all NROs provide direct access to their nuclear safety legislation. In a few countries, the legal framework for nuclear activity exceeds the remit of the NRO, and in others, their websites link to environmental protection agencies.

NROs publish guidance for those applying to operate nuclear installations, but less often they publish documents that are for use internally by NRO staff and serve as guidance for decision–making process, technical guidance and quality management systems.

As far as international co-operation is concerned, almost all countries make public a list of bilateral or multilateral agreements and national reports prepared according to the Convention on Nuclear Safety and the Joint Convention of the Safety of Spent Fuel Management and the Safety of Radioactive Waste Management. More than half of NROs who responded release questions and answers to both conventions.

But less than half of the countries involved in the survey make public the full text of international agreements. Many NROs disclose international peer reviews, for example the most recent IRRS peer review carried out by the IAEA, and a national response to the most recent IRRS missions.

A table showing the types of information NROs post to their websites can be found in Appendix 2.

3.3 Promoting the NROs work and publications

NROs consider promoting their work an important part of being more open and accountable. All NROs inform the public about their role and responsibilities and provide explanations on how their organisation works. As an example, an effective mean for Spain´s Nuclear Safety Council to inform citizens and stakeholders on relevant matters are visits organized to its Center of Information, which between 2009 and 2010 totalized 7,345. Through a guided tour of this interactive facility´s 29 modules, the visitor learns of various different aspects relating to ionising radiations, their uses and risks, as well as of the protection that is required to guarantee safety in their application. Similar approaches have been carried out also in Korea. Korea Institute of Nuclear Safety provided tailored "Community Partnership Programs" specially designed for the various target groups: students, teachers, parents, policeman, journalists, taxi drivers, soldiers and general public as well as NGOs. Participants in the programs counted about 11,272 between 2009 and 2010.

On most NRO websites, information about strategic plans, general NRO policy, work plans, job vacancies, contact details and other documents such as press releases, news and newsletters, copies of articles in journals, 'frequently asked questions' and answers, as well as information on publications, conferences and symposia, image and video galleries can be found. People can also sign up for email alerts.

Many NROs prepare annual reports about their activities including safety assessments, which are available on their websites. Only half of NROs annual reports contain information on security matters, which also reflects the differences in NRO remit within the countries.

Some NROs have actual written policies on producing information in a way that is accessible to specific audiences. Text is tailored for selected website users, with the aim of meeting accessibility requirements – many websites include special educational sections for children, students and teachers, and some have sections dedicated to medical specialists or the media. In addition, some NROs distribute leaflets and brochures that are dedicated for specific public groups or organisations, which can also be found on NRO websites.

It is not common to find items such as agendas or minutes of senior/decision-making boards, or internal reviews/lessons learned, on NRO websites.

As specific practice it is worthwhile to mention that in Canada CNSC uses webcasting of public hearings and that in Belgium the NRO makes use of blogs for two-way communication with the public and other stakeholders.

Nine NROs make public their regulatory decisions concerning applications for new nuclear power installations, licence renewals/lifetime extension applications via press releases after decisions are made.

Some of them also use their websites to make public information about specific decisions and the reasons behind those decisions. In these cases, there are also information/news releases to the media about the decisions, but it is not common to publish specific pre-decision documents and points raised by the public/consultees to on the web. Some NROs provide information to the public about only the most important decisions and some only provide this information on request.

A few NROs publish significant, but less major changes to operating licence conditions, changes to site boundaries and changes in the ownership of operating companies (licensees) on their websites.

Operator originated documents relating to NROs regulatory decisions, such as full safety case reports, technical justification and/or depth safety analysis, are generally not made public. However, some NROs post summaries on their websites, giving basic information or describing the main topics of applications.

Site specific, routine regulatory information produced by an NRO such as individual inspection reports after site visits are published on websites in some countries, and others produce regular reports for local community stakeholders. In addition, some countries publish annual inspection plans, annual overviews and evaluation of conducted inspections. Some also make public quarterly reports on INES level 1 radiotherapy events[1] that are reported to the NRO, or quarterly results of the NRO reactor oversight programme, and information about significant events under proactive disclosure principles.

Individual inspection reports on security matters, combined reports and visit follow-up letters, annual site specific reviews/reports on security matters are made public only in a few countries.

Examples of applying specific regulatory powers to ensure compliance with laws/licence conditions are published by some NROs, usually as part of other reports. Information about prosecutions is generally not made public before the case is completed, and then summary information after the court has ruled is reported in few cases on NRO websites. However, more often a news release is used to give the media – and subsequently the public – information on prosecution outcomes.

Correspondence between NROs and operators that are not connected with inspections and site specific reviews is open to the public in only a few countries.

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[1] Note: Currently (summer 2010) INES applies to events related to the equipment and radiation workers of radiotherapy, but not to the medical patients undertaking the radiotherapy.

In Korea, a survey has been carried out by the NRO on a yearly basis to ask the public how they are satisfied with the publications the NRO provide. Based on the survey results, the NRO takes new challenges by producing more documents in cartoon, pictures, table and figures and also diversified versions for students and children.

Some novel practices on the web include:

- a radiation dose calculator (Ireland);

- online questionnaire about public satisfaction with the work of the NRO (Slovakia);

- 'Know More Channel', parliamentary requests and a glossary of frequently-used industry terms (Spain).

NROs also promote their work by publishing lists of publications, meetings, e-bulletins and articles.

3.4   Reporting of events

The majority of countries with operating nuclear facilities use their websites to inform the public about specific events. The information consists of:

- preliminary accident notification, confirmed INES rating information and report

- preliminary and confirmed INES rating incident notification and confirmed INES report (INES level definition)

As far as anomalies or events with no safety significance are concerned, six countries put information about them on their websites.

Explanations about the INES scale and how it works, or links to the respective IAEA site, are published by most countries, including information about the routine monitoring of the radiological situation affecting surrounding sites.

Twelve NROs use their website to publish advice on action the public should take in case of nuclear emergencies. Some NROs publish specific reports on programmes of emergency exercises at sites, while the majority publishes this information as part of other non-specific reports.

4.   PUBLIC ENGAGEMENT

This section of the document looks at how NROs engage in two-way dialogue with stakeholders and how the public is involved in influencing decision-making of NROs.

The summary findings are:

- Most NROs have stakeholder engagement processes but the form and level of public involvement varies from country to country
- There are a number of innovative methods of engagement being deployed or piloted by NROs
- Consultation is a common activity but is usually the responsibility of Government not the NRO - Most NROs are not required to consult on regulatory process
- Some formal engagement meetings take place but this varies - Informal meetings are used by most NROs

Most NROs have some form of stakeholder engagement with interested groups, but the form and level of public involvement varies.

The minimum is information that is shared via websites (as described in Section C of the survey). However, the extent to which they do this depends on a variety of factors, including: the specific subject; the legal requirements in that country; whether the NRO or a ministry leads the public engagement; the culture and the degree of public concern anticipated. Several countries reported this is being developed further.

NROs deploy a variety of methods to exchange information and views and these are detailed more fully in Appendix 3. Examples include public meetings, formal consultations, email alerts/bulletins, advertising and media articles.

4.1   Opportunities for stakeholders to inform decision-making

In general terms, opportunities for the public to influence, are via comments and feedback received, whether in informal or formal meetings/hearings/tribunals, or in written form of some kind – such as letters, submissions or e-mail.

4.1.1 - Formal opportunities

Various types of consultation with the public or other stakeholders, such as statutory public bodies, are commonly required for amending or introducing new legislation. This is often the responsibility of government or federal administrations, rather than the NRO. Some organisations mention involving non-governmental organisations (NGOs) in such consultations and proposals or consultation documents are usually placed on websites for wide access.

Fewer than half of the countries responding use formal hearings as part of their mechanisms for giving transparency to decision-making and allowing engagement of interested groups. In a number of these countries, the hearings are required by law, and considerable resources may be invested in these processes, including advertising, web-casts and, on occasions, meetings in the vicinity of a proposed or existing nuclear site.

As well as with more controversial 'new build' projects, in some countries hearings may also take place on enforcement matters and licensing of nuclear facilities, materials, and waste.

Rarely a country will have very specific legislation on public engagement. For instance in Canada, the Constitution Act 1982 requires that Aboriginal groups be consulted if there is exists a possibility that regulatory activities impact on their established or potential rights.

Some national laws require opportunities for public involvement, other than through hearings, at various stages in construction, operation and decommissioning of a nuclear power plant. For example, site suitability assessments for proposed new sites may be required to be made public, and decommissioning a nuclear reactor must have an environmental impact assessment (EIA), with extensive information being made public. Depending on where the responsibility lays nationally, these public engagements may be the responsibility of the NRO or the relevant ministry.

Some countries hold information committees for construction, operation and decommissioning/dismantling authorisations. These will gather representatives of the municipality and the autonomous region where the facility is/will be located, as well as relevant other ministries and the NRO.

The table in Appendix 4 shows the number of NROs that have confirmed in the survey that they share information about specific applications/regulatory decisions (listed in the first row) on their websites, the level of information provided and at what stage (listed in first column).

Some aspects of environmental protection - not always the responsibility of the same NRO as the one responsible for safety - require public involvement and the provision of information.

4.1.2 - Informal opportunities

Many countries use periodic meetings/roundtables with stakeholders as an opportunity to inform the NRO – but the stakeholder groups involved varies. Some of these do not involve the public, for example expert advisory groups or roundtables with radiologists.

Some report having stakeholder representatives on the NROs Board and Advisory Committees, from where advice is sought.

The public is often given the opportunity to be involved in periodic meetings near nuclear sites – sometimes in person, or sometimes through locally elected representatives of the municipality. Practices vary, but they are usually organised by the operator/licensee of the local nuclear plant, or by the NRO. The meetings generally also involve other stakeholder groups such as social representatives (trade unions). Issues or questions raised at the meetings by stakeholders are either responded to immediately during the meeting or are followed-up afterwards as soon as possible. In some cases, all questions asked and answers given are published on a web-site accessed by all interested parties.

In the UK, the NRO is considering generic designs of potential new nuclear reactors before formal applications for a site are received. The NRO is seeking to be open and transparent with these early stages. The public and other stakeholders are able to see detailed information about the designs and safety/environmental performance, by accessing information on the websites of the designers – subject to exclusions for security or commercial interests. Comments are encouraged via these websites and the companies responding within 30 days. The comments and responses are reviewed by safety and environmental regulators. The NRO publishes, on its website, regular detailed reports throughout the staged assessment process which are sent to those people registered for the e-bulletin. They also post to the website regulatory issues that require resolution.

Feedback from survey information can also influence services provided, such as emergency planning information, and feed into strategic plans.

4.2   Responding to comments on regulatory matters

From the table in Appendix 4, it can be seen that for the highest profile regulatory decisions, involving formal processes such as building new nuclear power reactors or waste repositories, about a third of countries said they respond to individuals who have commented.

However, often individual points of views are addressed in the document resulting from consultation, for example the Disposition Report or Public Memorandum/final decision document, which lists how the comments have been addressed or taken into consideration. These are made public, usually via website and/or official journals.

4.3   Consulting with the public/stakeholders on regulatory processes/arrangements

Most NROs are not required to consult with the public or other stakeholders on regulatory processes. However, there are other business reasons to involve such groups on these matters, and some NROs do so frequently, while others do so only occasionally - or never.

One NRO (Korea) states that its approach is not to consult, but to 'report its current regulatory issues and listen to comments from the public/stakeholders through regular meetings, safety forums and workshops'.

Many NROs seek comments from relevant technical specialists/professional bodies on new requirements or guidance and as relevant, from industry.

4.4   Examples of stakeholder feedback informing NRO decisions

Some countries are required to consult on technical guides and instructions. One recent document received 73 comments and around 70% of these informed modifications to the final text in some way. Others chose to seek the views of industry and selected other stakeholders, including NGOs, on certain internal guidance. A similar number of comments were received as the 'technical guides and instructions' mentioned, again with a large percentage informing the development of the final text.

In another country, NGOs proposed that Environmental Impact Assessments (EIA) should be performed during construction of nuclear power plant units and the relevant Ministry of Environment agreed this will be performed before permission to operate can be granted by the NRO. Comments received on EIA have affected the conditions applied to the decommissioning consent, for example the number of transporter journeys.

One NRO held four public meetings regarding making security information public and received around 100 comments. The comments were taken into consideration and staff recommended to the senior authority to make more information public. This body voted not to change the current policy, but left the door open to future consideration of the issue.

Another NRO heard from 260 interveners at public hearings during one year and received a number of comments from the public and stakeholders that ultimately modified the content of regulatory documents.

One NRO usually gets five or six comments from local residents from every site-specific meeting. The NRO develops and integrates the public's comments and requests into a regulatory process for better decisions.

4.5   Alternative methods being piloted or considered

E-alerts or web-based bulletins are quite widely used to bring up to the minute information to those registered, either as it appears on the NROs website, or periodically. Some allow users to indicate the types of alert they want to receive, for example choosing categories such as new publications, press releases, new items, research papers, customer satisfaction surveys, public consultations, etc.

In another effort to supply more tailored information to specific stakeholder audiences, the NRO in Spain is exploring a dedicated training channel called 'Canal Saber' ('Know more Channel'). The Canal Saber offers accessible web-based information on science-related topics linked to the activity of the NRO. The channel is divided into different sections, some of them interactive, allowing the public to get, or deepen, their knowledge of topics of interest (ionizing radiation, its uses, the operation of nuclear power plants and the NROs emergency preparedness, among others), a glossary, animated graphics, free access to NROs publications and specialised literature used in training.

In Ireland, the NRO is piloting an SMS information service – making use of a technology in common use (Short text Messages Service – SMS -for mobile phone) – to improve public access to services. For example, an SMS texting information service for accessing information on radon was set up. One of the aims of the service was to allow the public to automatically request an information pack from wherever they were, day or night. Anyone looking for this information just had to text the keyword (in this case RADON) and their name and address to a text number and then an information pack was posted to them. The SMS service enabled people to request information immediately on hearing of the issue, rather than needing access to a computer or waiting for a helpline to be open. While this system was piloted for requesting radon information packs, other potential uses for public access to information were identified such as accessing information on nuclear emergency plans or getting updates on current advice in an emergency, etc.

Blogs are being considered by a few countries, but have yet to be used much in practice.

Web-casts are used to facilitate access to major events such as public hearings in a few countries.

Web-streaming has been used by one NRO (UK) to very quickly get on to the website's key sections/messages from a major conference.

Used on a dedicated recruitment website, one NRO (UK) has recorded 'Vodcasts' of staff of varying levels of seniority and across many technical disciplines. This has been found to be beneficial in giving potential applicants an understanding of the regulator's role and what it would be like to work in the NRO.

In Korea, the NRO is using kiosks in the lobby of a local government building at each site, to provide nuclear safety information more easily and accessibly. The touch-screen display gives information on: power rates and status of safety performance indicators (SPIs) of local nuclear power plants, environmental radiation rates, information of the latest nuclear events, nuclear safety news, information notices, safety information meeting schedules and action plans in the event of radiological emergencies.

5.   MEDIA AS A COMMUNICATIONS CHANNEL TO ACCESS THE WIDER PUBLIC

This section of the document looks at how NROs establish relationships with and effectively use the media as a way to engage with the wider general public.

The summary findings are:

- All NROs consider that proactive, transparent communication is an important way to gain public confidence
- Media are an important tool to inform and the population at any time, preferably at a time when it is not of their concern on different aspects of the nuclear and ionising radiation matters
- All countries try to be proactive with the media – most contact is handled by telephone
- Most NROs have one or more appointed spokespeople
- Some countries have guidelines for communicating with the press
- Most NROs organise media training but how this is done varies
- Most media activity is reactive and it is generally considered more difficult to attract media interest in good practice

5.1   Interacting with the media

All NROs consider that proactive, transparent communication is an important and positive way to gain the confidence of the media. This is very important, as the media are an influential channel of communication to the general public. Also, via the media the NRO can communicate pro-active with population on all aspects of nuclear installations and radiation safety matters. Media are a channel through which the whole of the population can be reached with whatever subject, but where there is no real control of the way a given messages is in the end diffused. Websites are mostly looked at by this part of the population that, one way or another, is concerned in the nuclear, but they leave much more possibilities to communicate more extensively on all subjects desired. Therefore communication via the media and via websites is complementary.

The latest 'European Barometer on Nuclear Safety' (March 2010) confirmed once again that EU citizens consider the media to be their main source of information on issues relating to the nuclear industry. The Barometer also confirmed that many thought that media reports contained sufficient information on which to form an opinion on nuclear issues. This latest report further reinforces the impact that the media can have on the public, politicians and other stakeholders and why therefore it is important for NROs to engage with the media.

Long before a crisis situation arises, an NRO needs to be known to the media as a reliable, independent and trustworthy source of information.

This can be achieved by regularly issuing information proactively – not waiting until the NRO is specifically asked. NRO can listen and learn about the topics of concern in your communities, and address those concerns before they become bigger problems. For example, NROs can give out information openly relating to regulatory matters in advance of plans for new facilities and major modifications.

By being open with information about activities at the earliest of opportunities, NROs can earn the trust of the media if a crisis situation presents itself.

All countries that responded to the survey try to be proactive in their interaction with the media, and all NROs communicate reactively on more urgent enquiries. They use press releases and actively nurture relationships with media contacts, inviting them to press conferences and issuing invitations to public consultation events. However, only some countries have clearly defined communications policies or guidelines on interacting with the media.

Contact with the press is mostly handled by telephone, while some countries use their websites and written documents/articles to communicate proactively with the media.

In Norway, the NRO is proactive in issuing press releases, publishing news on its website and publishing the results of inspections. It also offers individual journalists 'exclusive' stories that will be of interest – nurturing relationships that will reap benefits when it is necessary to be reactive.

In two countries (Slovakia and Switzerland), the NRO organises annual press conferences to inform the media about activities and measures taken regarding the safety of nuclear facilities.

For most countries, when there are activities the NRO considers could be of interest to the public, it issues press releases or writes articles for newspapers and journals. The NRO website and corporate magazine also serve as proactive sources of information.

In several countries (for instance Belgium, Korea and Spain), the NRO wants to be a first 24h/day point-of-reference for the media and therefore tries to build a good network of contacts, based on trust, confidence and knowledge about the competences and activities of the NRO.

5.2 Media coverage and relationships with the media

The amount of media coverage experienced in each country varies considerably. This can be affected by whether or not the NRO has been proactively seeking to disclose information or interest the public in the nuclear industry – if there have been any nuclear safety issues, emergency incidents or plans for new nuclear facilities or if the competence of the NRO includes other aspects aside the nuclear industry, for example radon, medical use, environmental surveillance,….

All NROs aim to communicate with the media proactively however emergency incidents remain a main trigger for media attention. It is much more difficult to interest the media and the general public in general issues, such as examples of good practice.

All countries agreed that, although not always easy, actively communicating with the media is worth the effort it demands. It strengthens the image of the NRO as a valuable and reliable source of information, it helps to create a better understanding of the subject and the role of the regulator among a variety of audiences, and results in more balanced reporting.

Investing resources in familiarising journalists in nuclear technology and regulatory matters appears to be beneficial to the overall perception that the general public has about the industry and NRO. Most NROs organise training visits and briefings for journalists and some invite journalism students. Despite this proactivity, often NROs say they are not yet automatically contacted by the media when the media are looking for information.

6.   CREATING A CULTURE OF AND EVALUATING TRANSPARENCY

This section of the document looks at how NROs can promote a culture of transparency within their organisations to build the confidence of the general public in their role and whether or not it is possible to measure transparency.

The summary findings are:

- Most NROs have policies that support a culture of openness and transparency – some have specific codes of practice- since for a majority of countries, transparency represents a main concern.
- Most NROs believe that their values and behaviours support a culture of openness and transparency
- The implementation of transparency practices in each country differs depending on legal and/or cultural contexts, or on availability/lack of the necessary resources.
- Most NROs carry out annual surveys to look at internal communications.
- Most NROs issue information as soon as possible after notification of an incident
- The majority of responders have no special procedures for monitoring and reviewing openness and transparency

6.1   Promoting a culture of transparency

All countries want their nuclear regulators and operators to be more open and transparent. Most NROs are keen to make as much useful information available to the public as possible – that is, to be open about what they do and encourage licensees to be equally open.

Most regulators are also striving to give their stakeholders, in particular the public and the media, as much digestible information about their role and their decision-making processes as possible, without compromising safety and security – that is, be transparent about their work and underline their independence from the operators.

Most have policies that support a culture of openness and transparency, and some have specific codes of practice or charters that promote such a culture. A future that is more open and transparent also features in strategic plans or goals. NROs understand that enhancing the openness and transparency of their organisation serves to give the public and other stakeholders confidence in their role of protecting public health and the environment and ensuring public safety and security.

Several countries refer to explicit laws that drive this approach, some of which are nuclear specific, but others are across government/ministries. Several NROs state that they wish to be as open and transparent as possible without requiring individuals having to call on FOI requests.

Two countries (Spain and USA) have simply stated principles of disclosure. In the USA nuclear regulation is viewed as the public's business and has the following openness strategies:

- Enhance awareness of the NRC's independent role in protecting public health and safety, the environment, and the common defence and security.

- Provide accurate and timely information to the public about the NRO's mission, regulatory activities, and performance and about the uses of, and risks associated with, radioactive materials.

- Provide for fair, timely, and meaningful stakeholder involvement in NRC decision-making without disclosing classified, safeguards, proprietary, and sensitive unclassified information.

- Communicate about the NRO's role, processes, activities, and decisions in plain language that is clear and understandable to the public.

- Initiate early communication with stakeholders on issues of substantial interest.

Several countries openly promote a 'communication culture' among staff at various stages of development, and have goals or visions relating to openness and transparency.

In Spain, a programme of plant operation oversight was established by the NRO in 2007 aimed at informing the public about the safety performances at the nuclear power plants. Based on the USA Reactor Oversight Programme, this encourages staff to be aware that documents will be published on the performance of the plant, prompting accountability and the intelligibility of information. The programme is promoted as a good example of how to keep the public informed on the continuous oversight process at nuclear power plants.

In some countries (e.g. Korea, Slovakia) the NRO has set-up a vision to become 'a world class regulatory expert trusted by the general public'. To accomplish the vision, they have established mid to long-term strategic objectives in which 'transparency trusted by the public' is given a high priority.

In Canada, the NRO states that the way they operate promotes operational transparency. They have 'outreach' activities such as town hall meetings and information sessions and workshops; invitations to comment on draft regulatory documents; webcasts on commission tribunal proceedings with complete documentation and details reasons for licensing decisions; wide distribution of the NROs annual report which discusses the organisation's performance over the past year; and processes to respond to public and media queries.

In Japan, the NRO is holding meetings to the residents of areas around nuclear power plants to explain matters, such as the implementation of the plutonium-thermal program and surveys conducted and measures taken for plants damaged by earthquakes.

6.2   NRO internal communications and cultures

NROs understand that by promoting a culture of openness within their organisations and raising awareness of their competence externally, they can enhance public confidence in their organisation.

Most NROs believe their values and behaviours support a culture of openness and transparency and many also think their rewards and pay structures promote such a culture. In most countries, staff are supported in their efforts to communicate with the public through specific training on writing for the public and speaking at public meetings. Training in these areas is usually limited to senior officials but often, anyone who might need support in communicating with the public is provided with the relevant opportunities.

In Canada, more than 130 members of CNSC staff were trained in 2008 in a variety of communications courses, including: applied risk communications skills; business writing and grammar; communicating risk to the public; how to communicate with diplomacy, tact and credibility; and writing technical information effectively.

In Spain, the NRO has increased the training period for new employees to five months to include workshops on social abilities with an emphasis on communication skills and knowledge of the organisation's style guide.

In some countries, there are opportunities for professionals to share and discuss differences of view and find resolution, perhaps through management meetings or peer review.

Within one NRO (Spain), differences of opinion are shared proactively. The internal procedure establishing both the responsibility regarding information production and commenting process take into account the expertise of the area of communication, the solidity and skills of the technical directions and the liability of the Council Board.

In another country's NRO (Poland), experienced professionals share their knowledge and skills with their younger colleagues and special meetings are organised to support this.

Another NRO (Slovakia) organises meetings between management and directors to share information, find solutions and unify the approach. Any staff can submit proposals for improvements to policy, strategy or plans and the NRO has implemented a policy for commenting on and reviewing internal documents.

In USA, there is a policy, with procedures, for dealing with Differing Professional Views. There is also an Open Door Policy and a Non-Concurrence Process.

Another NRO (Canada) has an extensive intranet site and provides web-based bulletin boards for specific topics so that staff can express their views or pose questions.

Eight NROs report that they carry out internal surveys, either annually, bi-annually or every three years, to look at internal communications and the effectiveness of transparency policies. Results are usually discussed and evaluated internally and later posted on intranet sites. A few NROs instigate staff workshops, bringing in experts to improve communications internally. Some have intranet notice boards and mailboxes to allow staff to post matters of concern.

One NRO (Belgium) has recently conducted an internal survey on 'culture' and is about to use the findings to improve how the organisation is run, with a focus on more and better internal communications.

6.3   Timely informing the public during crisis situations

NROs need to be prepared to respond to the media instantly in crisis situations, providing information in a timely manner and in understandable jargon-free language that makes the information accessible to all. NROs' spokespeople should be well trained and able to communicate the facts easily and accurately.

The best way to avoid loss of that well-earned confidence is to proactively investigate potential safety concerns before they lead to increased risk and keep the public informed along the way. Being open demonstrates that risk is not being underestimated.

In most countries, websites explain INES and demonstrate how individuals can register for news updates directly. Type of information provided to the Public in case of event is described in Chapter 3.4.

Most NROs issue information as soon as possible after notification of an incident and use the International Nuclear and Radiological Event Scale (INES) to help understanding of the safety significance of the events, if any, of an event. Some have legislation that places duties on NROs and licensees to proactively disclose information within a certain timescale after an event. Others have written guidelines to help them in times of emergency. But in other countries, there are no laws, codes or guidelines.

Several NROs (e.g. Canada, Korea, Slovakia, USA) have provisions in their Nuclear Emergency Plan for the timely release of information to the public. The NRO issues an initial news bulletin within an hour of notification of a significant emergency situation. The NRO ensures the information is consistent with that disseminated by the licensee. In Slovakia, basic duties concerning the dissemination of information to the public in case of an emergency are laid down in law, placing responsibility on the NRO and the licensee for informing the public. NRO created an "Emergency website" which replaces the regular NRO website in case of an emergency. In the USA the NRO has a special page that goes up on its website should there be a site area or general emergency at one of the facilities it regulates.

In Japan since July 2008, the NRO has been sending quickly and successfully such information as the status of nuclear facilities and monitoring data directly to mobile phone email addresses registered at the NRO's web site, whenever an earthquake of "intensity 5 lower" or greater occurs in municipalities hosting nuclear power stations ("Mobile NISA" service).

Some NROs (Spain and Belgium) post news releases on their website whenever there is a reclassification of the INES level of a relevant event. In Belgium operators are obliged to communicate about non-nuclear events on their sites in order to avoid undue disquietude for the local population or false rumours in general (Examples are a false fire alarm in one of the office buildings with a prominent deployment of firemen forces, a asthmatic member of personnel who is taken away in an ambulance after an acute attack,…).

6.4   Evaluating Transparency

Measuring transparency is considered by responders to be difficult but not impossible. Generally, it is fair to say that anything that is measured and made public is done well.

The majority of NROs have no special procedures for monitoring and reviewing their regulatory processes to ensure that they remain open and transparent. Some mentioned self-assessment as a tool for reviewing their transparency, or they conduct public surveys to obtain feedback on the success or otherwise of their organisation's transparency policies.

One NRO (Korea) has special committees that review its regulatory process and transparency. Held twice a year, the Customer Satisfaction Committee consists of internal and external representatives including media, professors and NGOs. During the meetings, committee members review the achievements for improving public confidence and upgrading satisfaction level. The Information Disclosure Monitoring Committee consists of NRO staff members and 23 external representatives, including local residents, media, NGOs, and nuclear-related organisations. The meetings aim to find out what people think about the NRO, in terms of openness and transparency, and how it can be improved. The Internal Transparency Committee is a very practical meeting, held once a month, to discuss what is currently going on. It is divided into three sub-groups: an activity leading group, an internal culture cultivating group and a monitoring group, which implements feedback activities to the other two groups. The committee activities are reported to the NROs chief officer.

Korea has also conducted a research project on the enhancement of public understanding toward nuclear safety activities (2002-2006) and is currently carrying out a further study on the establishment of an implementation system for risk communication based on nuclear issues (2007-2010)

In two countries (Spain and Belgium), the NROs report to parliament in accordance with legislation that states the scope of the NROs duties concerning transparency.

In another country (Slovakia), there are government decrees that impose obligations on the NRO to inform the public about its activities. Fulfilment of these obligations is regularly evaluated and the government informed of the results.

7. CONCLUSION

This WGPC survey of NEA member countries performed in early 2009 on their transparency practices provided a set of useful practices drawn on their own expert knowledge and regulatory experience. The analysis of the results of the survey which is the purpose of this guidance document has provided the key findings and illustrations of the practices of Nuclear Regulatory Organisations (NRO) in the area of transparency. The document, in particular, draws out those areas of common practice amongst different countries.

Overall the survey and resulting report has provided a useful insight into the common and often innovative communications practices in place to ensure openness and transparency. NROs have made significant improvements in how they communicate with the public since the WGPC was originally formed and it is clear that for many plans are in place to further expand their practices as technology continues to advance and as the public's expectations continue to rise. This document will certainly be a useful source of inspiration in this process. This presents both an opportunity and a challenge for all NROs.

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APPENDICES

Appendix 1 - Questionnaire on the Transparency Practices of NROs

January 2009

Objective: *To establish good practice guidance for Nuclear Regulatory Organisations (NRO) on implementation of lessons learned from the 2007 WGPC Workshop on Transparency, taking account of subsequent developments and including advising on the balance between openness and necessary confidentiality restrictions, in order to promote public confidence and consistency of practice across Regulators, where appropriate.*

A: NROs' OPERATING CONTEXT

A1   What are the main challenges associated with openness and transparency?

A2   What organisation does the NRO report to?

A3   Does the organisation mentioned at A2 lead on energy policy?

A4   Does government have any part in the licensing / authorisation process? (eg. Phase 1 Decision in Principle on new nuclear power stations, as in Finland)

A5   If yes to A4, does that part involve parliamentary voting, or other democratic input?

A6   Does the NRO have sole authority to make public information and documents it deems appropriate?

B: LEGAL POSITION ON INFORMATION DISCLOSURE AND/OR TRANSPARENCY

B1   Does your country have any laws, codes of practice, guidelines or other requirements for the disclosure of information which apply to the NRO? Please provide references. Please specify if **nuclear-specific** or more general?

B2   Do any such requirements/laws require public organisations to release information only **on request** (e.g. Freedom of Information acts) or **proactively,** part of normal practice?

B3   Do any such requirements/laws place duties to disclose information **on the industry**? Please provide a reference if different from B1.

B4   Do the requirements/laws require the disclosure of information in a **certain format** eg. in specific languages or using simple language (equivalent to 'Plain English') and/or to **be released in a particular timeframe?** If so, please provide key details.

B5   Do the documents for disclosure have to be agreed in advance with any other organisation e.g. industry, other government agency? If yes, please explain.

B6   What is the NRO's policy on disclosing information and making documents available?

B7   Do the following exclusions or exemptions apply in your country? (please mark as Yes/No)
      (a)   Intellectual property… **Yes/No**
      (b)   Commercial confidentiality… **Yes/No**
      (c)   Security-related… **Yes/No**

B8   Do any other laws/codes/guidelines help define what **specifically must be exempted/excluded** from release e.g. security-specific? Please supply references.

B9   If you have any information **summarising** what cannot be released, please share it?

B10   Typically, are parts/sections of documents withheld/redacted, rather than withholding the whole document?

B11   What explanations are given to the public on the rationale for what information must be withheld e.g. aspects of site security plans, threat information, commercial interests? Please provide general statements.

B12   At what stage are documents **submitted by industry** assessed by the NRO regarding their Classification i.e. restrictive/protective marking? (please mark as Yes/No)
      (a)   on receipt from industry **Yes/No**
      (b)   when a disclosure request is received **Yes/No**
      (c)   Other (please explain)

B13   At what stage are documents determined to be releasable in whole or in part by the NRO? (e.g. would regulators' initial assessments be released, prior to the final report being agreed).

B14   How often might there be differences of opinion between the industry and NRO e.g. on particular sections? For instance, where the NRO thinks it is in the public interest to disclose more.
      Who makes the **final determination** whether or not to release the information?

B15   Does the NRO normally provide the requestor with paper or electronic copies of the information/documents requested?

B16   Are there any restrictions on how much time/other resources the NRO should spend to address a specific request for disclosure?
      How many days is the NRO permitted to gather and release the requested information (e.g. in UK 20 working days)?

B17   Are the released documents routinely placed on the NRO's website? Has the NRO had any problems doing this? e.g. poor quality of older documents

B18   In your country have there been any legal-type judgements regarding the balance between the public's right to know and commercial/intellectual property or security restrictions? Any lessons learnt?

B19   Typically, **how many** of the following does the NRO respond to each year?
      (a)   formal 'disclose' requests eg. under FOI laws.
      (b)   queries to enquiries points (telephone, letters, email).
      (c)   queries from democratically elected officials (congress/parliaments).

B20   Have you any evidence of information proactively shared, or released under Freedom of Information laws, being mis-used, mis-quoted e.g. by the press?

B21   Do you routinely attempt to correct erroneous coverage? Or only on occasions? What action is taken? e.g. statements on NRO website 'For the record', letters to editors etc

C: ROUTINE ACCESS TO INFORMATION

C1   Please indicate in Table 1 what type of documents/services are routinely on your NRO's website, or can be accessed via your website? Please comment as necessary

Table 1 – Documents/facilities accessed from NRO's website			
It is assumed that commercial/security exclusions/exemptions of some data will apply as in Section B			
Please use the columns to indicate Yes (or ✓) or No			
New Plant Applications		Licence renewals and amendments.	
Safety cases		Correspondence (any form including emails) eg. between industry and inspectors.	
Are these safety cases the full documents or designed for public access?		between inspectors and regulatory management.	
		between regulatory body and political decision makers.	
Are these safety cases for all facilities or only certain categories? eg. in UK new build generic designs. Please state.		Please comment on any qualifications exemptions/exclusions to these categories.	
		Any other correspondence/comments?	
Security Reviews		Consultations eg. 3 months to comment on specific assessments/proposals and/or where Public Meetings/Hearings are held.	
Safety Reviews (periodic and others)		Internal guidance documents on regulatory matters, aiding decision-making, eg. assessment principles	
Routine site visit/inspection reports		Internal reviews/lessons learnt. *Please give egs.*	
Special inspection reports.		Operating Experience Feedback – results/analysis	
Technical / assessment reports		Organisation charts – are individuals <u>named</u>?	
		Are individual <u>contact details</u> given for NRO staff? If yes: - down to what level/grade/rank? - approximately how many staff are named?	
Incident Notifications		Expertise of NRO eg. number of staff with specialist skills/knowledge.	
Accident Reports (involving harm to individuals)		Internal staff survey results	
Notifications of matters being investigated (site). *How? As part of overview reports or individually?*		NRO Plan of Work/Strategy	
		NRO Annual Report	
		Other	
Topics being pursued due to regulatory concern (generic)		NRO management/governance board agendas, records, papers. *Please be specific*	
Specific explanations/ rationale for regulatory decisions. *If so,*		Other internal boards/groups. *Please give egs.*	

how presented? Please give details at C5.			
Policy documents eg. decision-making, enforcement		Guidance on "licensing"/"authorisation" requirements (aimed at what audience(s)?)	
Enforcement action. *Please explain what is provided in this category eg. prosecutions, other formal action/interventions*		Guidance on regulatory decision-making (aimed at what audience(s)?)	
Cases completed			
Cases ongoing/pending			
Enforcement statistics			
International reports eg. Convention for Nuclear Safety national report. Do you include **Questions** posed to you by Contracting Parties and your **Answers**?		Guidance on overall regulatory process (aimed at what audience(s)?)	
International bilateral agreements		About Us – role and responsibilities of the NRO	
International peer review/audit e.g. IRRS Mission report		Reports for local or regional stakeholders (e.g. site groups)	
Plant status reports?		Frequently asked questions	
Media – press releases		E-mail alerts/e-bulletins (audience reached?)	
Media - articles in press		Webcam/webstreaming? (what type of events?)	
Joint protocols, memoranda of understanding, other agreements		Research reports	
Any other comments or other categories?			

C2   Approximately what proportion of the NRO's regulatory documents are made available to the public? (e.g. all correspondence/email with licensees, congress /parliament/other governing body, safety and environmental evaluations, technical reports, policy documents, and all documents relating to licensing decisions, inspection activities, and regulation).
%. Any comments?

C3   Regarding security matters, what type of information is shared with the public regarding site assessments or other intelligence? Please explain the type of information provided and how eg. reports to site/local meetings on website.

C4   **Other than during formal consultations**, to what extent is the NRO's internal 'thinking' shared **prior to** a position on a topic or assessment decision being finalised?
(a)   Only when finalised.
(b)   Only following Freedom of Information request.
(c)   Early 'thinking' actively placed on website
Comments

C5   Is the basis for **specific, individual** regulatory decisions made available to the public? How is this done in practice?

C6   If answer to C5 is yes, how is it decided which decisions justify specific explanations?

C7   In order to make the regulatory processes clearer, do you provide explanations/ context e.g. that old plant subject to (periodic) safety review may remain 'safe', despite not meeting modern standards? If so, please give examples of what topics covered.

C8   Do you promote the NRO's work and publications? If yes, how? (eg. promotional stands, adverts, e-bulletins, press releases).

C9   Does the NRO have a policy on producing information in a way that is accessible to specific audiences e.g. nuclear technology specialists, industry, media, members of the public? What is the policy?

D: PUBLIC ENGAGEMENT - CREATING MUTUAL UNDERSTANDING

D1   Please indicate in Table 2 what methods/channels your NRO routinely uses to **proactively share/exchange information and views with public/stakeholders** (in addition to the website covered in Table 1).

Table 2 Methods/channels used to exchange information and views (Please mark as applicable and where practical, please try to illustrate the indicative scale e.g. 10 or 100 public meetings, numbers attending)	Indicative volumes / scale	Chances to influence decisions (see D3)
Public meetings hosted by NRO e.g. annual meeting on site reviewing performance		
Public meetings hosted by industry		
Public meetings hosted by others e.g. municipal administration, local communities, pressure groups/NGOs		
Public Hearings (as part of certain licensing decisions)		
Routine site meetings with local communities - Does your NRO attend or host?		
Local (regional?) Information Committees (what is role)		
Informal or drop-in meetings in vicinity of the site eg. 1:1 meetings with public.		
Formal consultations (see D3, D4, D5 below)		
Enquiries email account or otherwise writing in		
Telephone enquiry point		
Website - assumed documents shared as in Table 1 Please explain any additional services e.g. e-mail alerts/bulletins (audience reached?)		
Webcams / webstreaming (eg. facilitates remote audience participation or observation. *Please add what type of events.*		
Advertising – general press or trade, information giving and seeking involvement with regulatory process		
Editorials or articles (information giving and seeking involvement with regulatory process?)		
Media – awareness raising meetings, to inform context etc		
Media – Press Conferences		
Media – News Releases		
Blogs (please give some info)		
Other		

D2   Are you piloting or thinking of using new methods? What are they?

D3   Describe briefly how the public/stakeholders have opportunities to **influence the decision-making process of your NRO**? If helpful, please use the 3rd column in Table 2, to show the **main ways** the public can influence the NRO, in your opinion.

D4   Please illustrate with a couple of examples, the number of contributions received and what sort of influence these had on decisions made by the NRO?

D5   What aspects of your NRO's activities (e.g. licensing a new facility, extending a licensed nuclear site) require **formal, 'statutory' consultation** and **what does this involve?** *(please summarise briefly key features and give a reference)*.

D6   How does the NRO respond to an individual's comments on regulatory matters subject to a formal hearing or consultation? eg. individual replies, compiled into an overall response covering all replies and posted to website, other

D7   To what extent do you consult with the public/stakeholders on your regulatory processes/arrangements?

E: PUBLIC AND MEDIA CONFIDENCE IN NRO

E1   Is the NRO proactive or reactive regarding media interactions? If proactive, *what are the key features?*

E2   What is the NRO's policy on staff speaking to the media?

E3   What is your policy on media training for regulatory staff? Approximately what percentage are trained in media handling?

E4   Are any given additional training to become **spokespersons**? How many? Where are they located in NRO organisation (HQ/regions/sites) and what are their backgrounds? (Regulators or communication professionals?).

E5   Typically, how many of your staff **act as spokespersons with the media** each year? Do you favour a single representative?

E6   How much media coverage would <u>they</u> typically be involved with annually?
    (a)   For newspapers/written word
    (b)   Radio interviews
    (c)   TV interviews
    (d)   Other

E7   Is there significant coverage of the NRO in the media, including where the NRO is **not** contacted? Please try to estimate the volume.

E8   Do you invest in familiarising journalists in nuclear technology and regulatory matters? What does this involve and how frequently?

E9   How have you found it to be beneficial? Typically, what sort of contact do these individuals then have with the NRO?

F: INDUSTRY TRANSPARENCY AND EMERGENCY INCIDENT HANDLING

F1   What role, if any, does the NRO have in promoting /encouraging the transparency of the industry?

F2   Is it agreed between NRO and industry who should lead on providing what types of information in routine business? Please reference any guidelines/agreements in place. *[note any required disclosure by industry covered by B3]*

F3   In emergency/incident situations, **how quickly** are incidents notified to public/ media? Are there any **guidelines/agreements in place defining NRO and industry roles** in information-giving? *Please reference any such documents*.

F4   Does your website explain the International Nuclear Event Scale (INES) for events, and how individuals can register for updates directly from the scheme?

G: CULTURE OF TRANSPARENCY

G1   What is the NRO's policy on openness and transparency?

G2   Has your NRO adopted any particular ways of working or initiatives to promote the value senior management ascribe to openness and transparency, in both internal and external dealings? e.g. the US NRC's "safety-first focus" on internal safety culture?

G3   (a) Do you think the NRO's 'values and behaviours' support openness/ transparency? Yes/No Any comment:
(b) Do you think the NRO's rewards/pay policies support openness & transparency? Yes/No Any comment:
(c) Do relevant staff receive specific training on writing for the public?………. **Yes/No**
(d) Do relevant staff receive specific training on speaking at public meetings?….. **Yes/No**
(e) What are 'relevant staff'?
(f) About how many staff are trained annually?......Writing……..……..Speaking..........

G4   How are differences of professional view within the NRO dealt with? Are they shared proactively? How?

G5   Are regular surveys of NRO staff carried out, looking at internal communications and the culture? How far is the information shared (internally, or externally e.g. via internet?)

H: EVALUATING TRANSPARENCY / SHARING LEARNING

H1   Do you monitor and review your regulatory processes to ensure they remain open and transparent? If so, how is it measured? Briefly describe how these are done.

H2   Are any committees/governing bodies responsible for oversight of your transparency? Please describe how they operate to achieve this.

H3   We think it is really important to share good practice or analysis. Are you aware of any useful research, other studies or projects that focus on **transparency** or the **disclosure of information**? If so, could you provide copies or references and where possible contact details for authors (e.g. if staff in NRO)?

Appendix 2 – Information on NRO websites

This table shows the types of information posted on NRO websites (compiled February 2010) associated with the frequency of use amongst the surveyed countries.

Key for ranking:
  H = High (most of the countries)
  M = Medium (around half of the countries)
  L = Low (very few countries)
  0 = None

1.	General	
	List of all Nuclear Installations regulated (e.g. power station, fuel cycle, whether operating or decommissioning etc	H

2.	Operator originated docs/info – proactive	
	New nuclear power plants (NPP) application	
	- summary/basic details	M
	- full application safety case/report technical justification/in-depth safety analysis	L
	Other new nuclear installation application e.g. repository	
	- summary/basic details	M
	- full application safety case/report technical justification/in-depth safety analysis	L
	Licence renewals/lifetime extensions applications	
	- summary/basic details	L
	- full application safety case/report technical justification/in-depth safety analysis	0
	Periodic Safety Reviews (PSR) e.g. 10 yearly in some countries	
	- summary/basic details	M
	- full application safety case/report technical justification/in-depth safety analysis	L
	Power up rate application	
	- summary/basic details	L
	- full application safety case/report technical justification/in-depth safety analysis	0
	Plant status reports	
	- provided by operator/licensee	L
	- other source e.g. WANO, trade association	L

3.	Legal	
	Nuclear safety legislation/legal framework (laws, legal guides/codes	H
	Nuclear materials control legal framework (laws, legal guides/codes)	H
	Safeguards legal framework (laws, legal guides/codes) e.g. link to EU/IAEA	H
	Security legal framework (laws, legal guides/codes)	H
	Environmental protection legal framework (laws, legal guides/codes)	H

4.	**Site-specific, routine regulatory information produced by NRO (specific, not as part of overviews, annual reports, newsletters)**	
Individual inspection reports (e.g. visit to site 'x' 06/03/2009)		
	- safety matters	L
	- security matters	L
	- environmental matters	L
	- combined report	L
	*Visit follow-up letters	L
Annual site-specific reviews/reports – (indicate in 'comments' if other period)		
	- safety matters	M
	- security matters	L
	- environmental matters	L
	- combined report	L
	*Follow-up letter to annual review?	L
	Regular reports for local community stakeholders (near to nuclear sites or in region)	L
	Anything else routinely?	L

5.	**Other regulatory documents/information produced by NRO (specific, not as part of reviews, annual reports, newsletters)**	
Research reports produced/commissioned by NRO e.g. graphite core technology		
	- summary/basic information	M
	- full report	L
Technical reports produced/commissioned by e.g. boiler closure unit performance		
	- summary/basic information	L
	- full report	L
	Other updates/reports e.g. topics of concern or relevance Please give examples in 'Comments'	L

6.	**Event information (specific information, not as part of overviews, annual reports or newsletters)**	
Incident notification (INES definition – incidents are events less severe than accidents. The term incident applies to events rated at level 1 to 3)		
	- Preliminary notification	M
	- Confirmed rating/report	M
Accident notification (INES definition – accident is an event that has led to significant consequences to people, the environment or the facility. The term accident is used for events at Level 4 or above)		
	- Preliminary notification	M
	- Confirmed rating/report	L
	Anomalies or events with no safety significance	L
	Other event information? Please explain in "Comments"	L
Operator experience feedback		
	- trending	L
	- other analysis	L
	- sharing experience	L
	INES Scale explanation e.g. link to IAEA site	H
	Routine monitoring radiological situation in proximity of sites (e.g. to give public reassurance)	H

7.	**Enforcement – examples of applying specific regulatory powers used by NRO to ensure compliance with laws/licence conditions**	
	- specifically reported on web	L
	- only as part of other reports	L
Prosecutions e.g. formally taking action to bring licensee/operators before the Courts		
Summary information before case completed		
	- specifically reported on web	L
	- only as part of other reports	L
Summary information after Court has ruled		
	- specifically reported on web	L
	- only as part of other reports	0
	press releases on prosecutions	M
	summary information about cases historically (e.g. database/list recording cases, outcomes, fines imposed by Court)	L

8.	**Policies and Guidance**	
	NRO Policy documents on regulatory matters	H
	NRO Enforcement Policy	M
	NRO Guidance documents on decision-making (for NRO staff)	L
	NRO Technical Guidance documents (for NRO staff)	M
	NRO Quality Management System (for use by NRO staff)	M
	Guidance for those applying to run nuclear installations	M
	NRO Policy on Transparency/Openness	H

9.	**Agreements and International**	
	National agreements/joint protocols/memoranda of understanding e.g. with other organisations/regulators	M
	- full text	L
	- list of agreements	M
	International Agreements (bi- or multi-lateral)/joint protocols/memoranda of understanding e.g. with other regulators	M
	- full text	M
	- list of agreements	H
	National report as a Contracting Party (most recent)	M
	- Convention on Nuclear Safety	H
	- Joint Convention of Spent fuel and radioactive waste	H
	- Other?	L
	Questions and Answers to/from own nation: Convention on Nuclear Safety	M
	Questions and Answers to/from own nation: Joint Convention	M
	International peer reviews e.g. most recent IRRS Mission	M
	National response to most recent IRRS Mission report	L

10.	**Miscellaneous**	
Emergency Arrangements site specific		
	Programme of Emergency Exercises at sites	L
	Specific report on outcome of emergency exercise – safety	L
	*Specific report on outcome of emergency exercise – security	L
	As part of other reports	M
	Advice on action for public in nuclear emergencies	H
Other correspondence between NRO and operators (not covered in section 4)		
	To the operators from NRO	L
	To NRO from operators	L

11.	**NRO Corporate information**	
	Press releases	H
	On the record (correcting errors in media e.g. letter to editor)	M
	Articles in journals	M
	NRO role and responsibilities	H
	Job vacancies	H
	Frequently asked questions	M
	NRO organisational chart	H
	NRO strategy (strategic plan)	H
	NRO plan of work	M
	NRO annual report	H
	Security matters: are these reported on annually in: - NRO annual report (above)	L
	- separately	L
	Safeguards matters: are these reported on annually in: - NRO annual report (above)	L
	- separately i.e. IAEA/EU reports	L
	Agendas of senior/decision-making Board of NRO	L
	Papers/Minutes of senior/decision-making Board of NRO	L
	Internal reviews/lessons learned	L
	Newsletter/overviews	M
	Publications (not covered elsewhere)	M
	Conferences, symposia	H
	Photo and Video gallery	M
	Special educational section for public/children/teachers	M
	Special section for media	L
	Special section for medical specialists	L
	How to contact NRO (email/telephone)	H
	E-mail alerts	M
	Webcams (Please give example in "comments")	L
	Blogs	L
	Interactive Map, showing radiation levels for localities	M
	Any other significant websites accessed via NRO site if not mentioned above?	M
	Other interesting matters 1	L
	Other interesting matters 2	L
	Other interesting matters 3	L

Appendix 3 – Specific transparency practices

In addition to the NROs' routine use of their websites, the following table summarises the methods or channels used by NROs to proactively share and exchange information with the public/stakeholders.

Key for ranking:

    H = High (most of the countries)
    M = Medium (around half of the countries)
    L = Low (very few countries)
    0 = none

Methods/channels used to exchange information and views	No. of NROs	List of NRO or Country
1. Public meetings hosted by NRO e.g. annual meeting on site reviewing performance	M	ESP/IRL/SUI/SLOV/KOR/RUS/ USA/JAP
2. Public meetings hosted by industry	L	UK/SLOV/KOR/USA/CAN/BEL/HU JAP
3. Public meetings hosted by others e.g. municipal administration, local communities, pressure groups/NGOs	M	IRL/POL/SUI/BEL/UK/SLOV/ KOR/RUS/NOR/JAP/CAN/HU/FIN
4. Public Hearings (as part of certain licensing decisions)	M	BEL/SLOV/KOR/RUSS/USA/ NOR/JAP/CAN/SUI/HU
5. Routine site meetings with local communities (some hosted by NRO, others they attend)	L	ESP/UK/RUS/NOR/JAP/IRL/HU
6. *Local (regional) Information Committees	L	ESP/BEL/SLOV/KOR/RUS/FRA/HU
7. Informal or drop-in meetings in vicinity of the site eg. 1:1 meetings with public.	L	KOR/RUS/USA
8. Formal consultations	L	SUI/BEL/UK/RUS/NOR/CAN/FRA/HU JAP
9. Enquiries email account or otherwise writing in for response by NRO	H	ESP/IRL/POL/SUI/BEL/UK/ SLOV/RUS/USA/NOR/JAP/ CAN/HU
10. Telephone enquiry point of NRO	M	IRL/POL/SUI/BEL/UK/SLOV/ RUS/USA/NOR/JAP/CAN/HU
11. E-mail alerts/e-bulletins	M	ESP/IRL/SUI/BEL/UK/KOR/ RUS/USA/NOR/JAP/HU
12. Advertising – general press or trade, information giving and seeking involvement with regulatory process	M	IRL/POL/SUI/BEL/UK/RUS/ USA/NOR/JAP/CAN
13. Editorials or articles (information giving and seeking involvement with regulatory process?)	M	ESP/IRL/POL/SUI/BEL/UK/ SLOV/RUS/USA/NOR/FRA
14. Media – awareness raising meetings, to inform context etc	M	ESP/IRL/POL/BEL/UK/FRA/ RUSS/USA/NOR/HU/FIN
15. Media – Press Conferences	H	ESP/IRL/POL/SUI/BEL/UK/FIN SLOV/FRA/RUS/USA/NOR/JAP/HU
16. Other: Information Centre available Interviews, Speeches	L	ESP/USA/FRA/SLOV

Appendix 4 – Sharing information on specific applications/regulatory decisions

The table shows how many NROs (out of 18 having answered the questionnaire – See after the table) have confirmed they share information about specific applications/regulatory decisions on their websites (listed in the first row), the level of information provided and at what stage (listed in the first column)

<u>**Pre-decision**</u> = information about the decision being **considered** by NRO, <u>**including consultation**</u> (e.g. including commission Hearings as appropriate)
<u>**Decision**</u> = **outcome** of the deliberations / assessment by NRO etc
<u>**Reasons**</u> = any **explanation/justification** of the basis for the decision

Stage information shared on the website	New nuclear power installation applications	Other new nuclear installation applications	Licence renewals/ lifetime extension applications	Power uprate/ upgrade applications	Significant but less major changes to operating licence conditions	Changes to site boundaries or use	Changes to ownership of operating companies (licensees)	Other i.e. regulatory decisions such as revising guidance
Specific, **Pre-decision** document	3	1	0	0	0	0	0	2
Specific, **Decision** outcome.	8	8	8	5	4	5	3	6
Specific, document with **Reasons**	8	5	6	5	3	3	3	4
Are points raised by public/ consultees responded to **on the web?**	5	4	1	3	4	3	2	3
Are points raised by public/consultees responded to **individually eg. letter (Yes/No)**	7	6	6	4	3	4	3	5
Press release after decision	10	8	11	8	3	3	3	5
As part of general public report	7	8	9	5	3	3	4	9

Countries and NROs that participated in the survey

Belgium	FANC
Canada	CNSC
Finland	STUK
France	ASN
Hungary	HAEA
Ireland	RPII
Japan	NISA + JNES
Korea	KINS
Norway	NRPA
Poland	NAEA
Romania	CNCAN
Russian federation	Goznadzor
Slovakia	UJD
Spain	CSN
Sweden	SSM
Switzerland	ENSI
UK	HSE/ND
USA	NRC