

Dear Commissioners and ENSREG:

We sincerely welcome the EU's concern over the NPP safety issue in Taiwan. We believe that through rational discussion and open communication, learning from the EU's experiences, and advice from EU experts, NPP safety regulation can be advanced in Taiwan. However, we appeal for the EU's peer review of the "Stress Test" on Taiwan's NPPs planned for September be postponed, since the "Taiwan Stress Test—National Report for NPPs" written by the Taiwan Atomic Energy Commission (AEC) is not reliable in the current situation.

The "Taiwan Stress Test—National Report for NPPs", published by the AEC on May 31st, was only in English until that the Chinese version was publicised on July 1st, and does not include the names of the authors, reviewers, or auditors. We heard the presentation by the NGOs who were invited to the ENSREG Conference on Nuclear Safety 2013 in Brussels, and we note that the report lacks a large amount of vital information when compared to that collected by Jay Fang, the NGO representative in the Conference. Nevertheless, we have not been notified that any corrections will be made by AEC and the NPP operator--Taiwan Power Company (TPC). We consider this as ignoring the will of the Legislative Yuan and the violation of "principles for openness and transparency" as adopted by ENSREG.

The TPC, which built and currently operates NPP 1 to 3 (ChinShan, KuoSheng and MaAnShan NPP), and is constructing NPP 4 (LungMeng NPP), is still undergoing the geographical re-evaluation based on the decision made by Legislative Yuan. In public hearings in the Legislative Yuan, experts stated operating problems for current nuclear power plants (NPP 1 to 3) include location near to unstable faults and the failure to consider the issue of volcanic activities. Despite the fact that these plants fail to meet international standards for construction of NPPs, TPC has failed to respond to any of the criticisms. At the same time, the geographical evaluation is of the plant currently under construction—NPP 4 is yet to be completed. AEC admitted that the re-evaluation of NPP 1 to 3 will not be completed until December 2013.

In recent decades, TPC and AEC have become tied in a "business to customer" relationship. AEC and its subordinates have been seeking contractors for TPC projects, while also having oversight responsibilities, including preparation of the Stress Test Report. This relationship makes the report unconvincing. Also, we note the instances of illegal wrongdoing and maladministration by AEC and TPC. It is obvious that the Stress Test Report breaches the spirit of independence that is a key priority for EU regulators.

The AEC Stress Test Report was requested by the Legislative Yuan; however,

we believe that the coming peer review by invited OECD and EU representatives is designed to ensure the passage of the upcoming NPP4 referendum, since Taiwanese citizens may be convinced of the safety of NPP 4 through a misunderstanding the authoritative review by EU representatives.

Although we welcome the EU's concern surrounding the safety issue of NPPs in Taiwan, we maintain that the "Taiwan Stress Test—National Report for NPPs" must be reviewed by Legislative Yuan before it becomes a "National Report". Also, we are concerned that this report is prepared on the basis of the peer review made by EU Commission and ENSREG without clarifying its transparency and independence, and the completion of the geographical investigation demanded by Legislative Yuan. We strongly suggest that the EU's peer review of "Stress Test" on Taiwan's NPPs in near September be postponed. At the same time, we will suspend this peer review in the Legislative Yuan until TPC and AEC comply with our appeal.

Legislators

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