

Documents pertaining to safety control of nuclear facilities

1	General	3
2	Submission of documents	3
3	Document structure and contents	3
3.1	Document structure	3
3.2	Document contents	4
4	Amendments to documents	5
5	Document materials	5
6	Publicity of documents	5
7	References	5

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Authorisation

By virtue of section 55, second paragraph, point 3 of the Nuclear Energy Act (990/87) and section 29 of the Council of State Decision (395/91) on General Regulations for the Safety of Nuclear Power Plants, the Finnish Radiation and Nuclear Safety Authority (STUK) issues detailed regulations concerning the safety of nuclear power plants.

YVL Guides are rules an individual licensee or any other organisation concerned shall comply with, unless STUK has been presented with some other acceptable procedure or solution by which the safety level set forth in the YVL Guides is achieved. This Guide does not alter STUK's decisions which were made before the entry into force of this Guide, unless otherwise stated by STUK.

1 General

The Finnish Radiation and Nuclear Safety Authority (STUK) controls the safety of nuclear facilities in Finland. This control encompasses on one hand the evaluation of plant safety on the basis of plans and analyses pertaining to the plant and on the other hand the inspection of plant structures, systems and components as well as of operational activity. STUK also monitors plant operational experience feedback and technical developments in the field, as well as the development of safety research and takes the necessary measures on their basis. Guide YVL 1.1 describes how STUK controls the design, construction and operation of nuclear power plants.

The documents to be submitted to STUK are prescribed in nuclear energy legislation and YVL Guides. This Guide presents the mode of delivery, quality, contents and number of documents to be submitted to STUK. For the purposes of this Guide, document means text or a picture on paper. This Guide does not restrict the use of other data transfer modes, but a document may be delivered also in e.g. electronic form, or it can be complemented electronically, if the mode of delivery is separately agreed upon with STUK.

2 Submission of documents

A document intended for official review shall be addressed to STUK. Documents addressed to individuals will not be registered or entered into STUK's archives.

Classified documents, as referred to in the Publicity of Official Documents Act, shall be submitted to STUK in a manner to be agreed upon separately.

If a deadline for the submission of a document has been established in YVL Guides or in a decision by STUK the document shall be submitted in such a manner that it reaches STUK not later than on the date of the deadline. A document or its part can be sent to STUK in advance, for example by telefax, if necessary. If,

for some reason, a licence-holder is unable to abide by the set deadline, the licence-holder shall present to STUK for approval a proposal for a new deadline and a reason for the delay before the expiry of the original deadline.

The document and the pictures, magnetic tapes, diskettes, radiographic pictures, etc attached to it shall be appropriately protected for shipping.

As a rule, all documents shall be submitted to STUK in writing. However, they may be submitted by telefax provided that this is stated in a decision of STUK or in a YVL Guide. For example, if a document is submitted by telefax due to the constraints of time, it shall be later officially submitted as a written document, too. Also documents submitted by telefax shall meet the requirements of this Guide and those of the licence-holder's quality assurance manual.

If there is need to transfer documentation in electrical or some other form for use by STUK, the mode of transfer shall be agreed upon with STUK in advance.

3 Document structure and contents

3.1 Document structure

A document is composed of the following

- covering letter
- covering letter and front sheet
- covering letter, front sheet and attachments
- covering letter and attachments

or some other presentation mentioned in section 6 of the Archives Act (831/94), about the sending of which STUK and the sender shall separately agree upon.

A document is to comprise a covering letter, a front sheet and the necessary attachments when a licence or approval is applied for, or when the submission of a document to STUK for information is presupposed in a YVL Guide, a decision of STUK or an inspection protocol. A separate front sheet is not necessary if the information to be marked on the front sheet, such as processing, inspection and approval, is given in the attachments of the covering letter. This applies for example to the submission of instructions. The front sheet is not needed if STUK has requested

the submission of general documentation that will not be used directly as the approval criteria for anything.

A covering letter shall include the following matters:

- date and sender's reference
- plant unit or object of licence application
- control measure to which the matter pertains
- information necessary to identify and define the matter, such as system and component identification symbols
- reference to other correspondence between STUK and the sender in the matter concerned
- reference to other essential documents and negotiations
- purpose of document (licence application, request for approval, for information)
- statement about the acceptability of the document and of the suggested measures
- signature of sender with clarification and his/her position within the organisation
- list of attachments.

The conclusions and statements presented in the covering letter shall be based on the factual contents of the attachments and they shall not be in disagreement with it.

The front sheet of the document shall include the following information:

- sender
- plant unit
- the matter dealt with in the document
- safety class if the document pertains to systems, structures or components
- author or handler of the document, inspectors and their scopes of inspection, who grants the approval as well as the dates of writing or handling, inspection and approval.
- name and signature.

The duties and responsibilities of those who draw up, process, review and approve documents to be submitted to STUK shall be defined in the licence-holder's quality system.

On the front sheet, space shall be reserved for STUK's inspection remarks.

The documents submitted to STUK shall be in Finnish or Swedish. However, attachments may also be in English. STUK accepts attachments in other languages as well. STUK may require, however, that a summary be provided in a domestic language about the contents of the attachments.

The attachments to a document shall be sent to STUK in two copies. STUK may separately require, however, that several documents or their attachments be submitted simultaneously. If an attachment to a document is to be returned with STUK's markings of approval, this shall be mentioned in the covering letter and an extra copy shall be enclosed for returning.

3.2 Document contents

The matters, conclusions and statements in a document shall represent the best knowledge of the licence-holder in the matter concerned. In so far as the licence-holder is aware of it any information that has significance to the solving of the matter, shall be presented in its entirety. For example, if the sender of a document has research data that is in disagreement with what is proposed, these shall be analysed in the application as well.

It shall explicitly appear from the document what regulations and guides pertaining to radiation and nuclear safety specifically apply to the matter in question and how possible deviations from their requirements are made. When the matter is prepared, the information available about the assurance of safety shall be taken into account. Compliance with official regulations and guides does not entitle anyone to ignore information that could yield better results safety-wise. If a requirement presented in a YVL Guide is not fulfilled, justification shall be given for a suggested procedure or solution by which a corresponding or higher safety level will be achieved.

Documents shall be explicitly written. For example, when the preliminary inspection document for a modification is drawn up, the meaning of the modification, its technical implementation, assessment of the modification's safety,

the analyses and calculations relating to it and the conclusions made on their basis shall be clearly separated from each other. If the document makes reference to literature or the results of research, the reference data shall be given. If not publicly available, the material referred to shall be made available to STUK.

If a document contains colour pictures the readability of which is based on the use of colours, all the document copies shall be in colour, or the pictures in the copies shall be provided with clarifying remarks to facilitate the interpretation of the pictures.

4 Amendments to documents

Amendments to documents shall be processed within the licence-holder's organisation and shall be sent to STUK in the same way as an original document.

If the information in a document that has been submitted to STUK for approval, essentially changes, STUK shall be notified without delay thereof and the application, which has been changed as necessary, shall be re-submitted to STUK. In case of minor amendments, the submission of supplements or amendments to the document can be separately agreed upon with STUK.

5 Document materials

When documents other than instructions sent for information are prepared, materials that endure long-term storage shall be used at least for one document series. The covering letter accompanying instructions sent for information shall meet the storage requirements, however. The National Archives lists such materials in the Official Gazette in February every year [1].

6 Publicity of documents

As a rule, a document that has been submitted to STUK becomes public after it has been registered at STUK.

If the sender of the document considers that a document to be sent to STUK contains information, which is to be considered classified on the basis of the Publicity of Official Documents Act, this shall be indicated in the covering letter of the document, or the matter shall be agreed upon with STUK in some other way.

STUK decides about the publicity of a document on the basis of the provisions of the relevant act and decrees.

7 References

- 1 Decision of Archives Administration on materials and methods suitable for archival purposes. Official Gazette 24 February 1995/23