Letter to the IAEA Concerning Earthquake Damage at the Kashiwazaki-Kariwa Nuclear Power Station

| —The IA | EA Team | of Internation | al Experts | Investigati | ng the E | ffects of | f the (| Chuetsu | Oki |
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| Earthqu | ıake on th | e Kashiwazaki | -Kariwa N | uclear Pow | er Statio | on in Ni | igata, | Japan | |

—Director General Mohamed ElBaradei, International Atomic Energy Agency (IAEA)

From:

- —Citizens' Nuclear Information Center (Tokyo, Japan)
- —Greenpeace Japan (Tokyo)
- —Green Action (Kyoto)

6 August 2007

To Director General Mohamed ElBaradei and the IAEA Investigation Team:

We hereby respectfully make the following four requests:

- We request that you commission a truly independent international (including Japanese) investigation team with rigorous and objective expertise to look into the effects of the Chuetsu Oki Earthquake on the Kashiwazaki-Kariwa Nuclear Power Station. Given the shifting seismic cycle with a trend toward stronger earthquakes along the Ring of Fire in the Pacific, carrying out the most thorough and precise investigation as possible at this time is not only in the interest of the Japanese people but also in the critical interest of everyone who may come closely under the circles of influence of possible nuclear facilities to be built around the world in the coming years and decades.
- We request that before concluding a report on the post-earthquake safety-status of the Kashiwazaki-Kariwa nuclear power plant, the IAEA investigation team makes it a priority to investigate and report on the fundamental problems which caused this state of affairs, including an analysis into the causes of the lapses of judgment by TEPCO and the Japanese government in regard to the seismic survey, the design, and the approval for the plant.
- We request the IAEA report include details concerning
 - Ground deformation within the site
 - Radionuclides released according to isotope, including timeline of when and how much was released
 - Status of the reactor, including fuel, reactor control system, pipes, whether equipment is securely fixed, measurement equipment, and damage such as cracking, etc.
- We request that the IAEA investigation team not permit its report to be used by TEPCO,

the nuclear power industry, the Japanese government, or anyone else with a vested interest in promoting nuclear power to diminish the significance of the lapses of judgment that were highlighted by the Chuetsu-Oki Earthquake, or of the risks posed by earthquakes to nuclear power generation.

Under no circumstances should the IAEA investigation team's report lead people to believe that the Kashiwazaki-Kariwa nuclear power plant can ever be restarted.

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For over three decades since 1974, local residents organizations and scientific experts have been warning that there are active faults concentrated in the region where Tokyo Electric's Kashiwazaki-Kariwa Nuclear Power Station is sited, even active fault lines existing in very close proximity and directly underneath the nuclear power plants. They have also argued that the geology of the ground on which the plants are built is of very poor quality, and that this region has entered a seismically active period. They have continually warned, therefore, that the occurrence of an earthquake having serious, perhaps even devastating effects on the nuclear power station, is far from unlikely.

Tokyo Electric ignored these warnings, refusing to admit that there were active fault lines in close proximity or directly underneath the nuclear power station site. Instead, in their analysis, they broke up the fault lines and considered only sections, thereby enabling them to underestimate the effects of any potential earthquake, and as a result, make it appear that any seismic activity would be limited in scale. Moreover, they stated publicly that the nuclear power station was not located above an active fault. Tokyo Electric's home page continues to make these assertions even today.

Since the Chuetsu Oki Earthquake, Tokyo Electric has continually insisted that this earthquake was "unforeseen." That is certainly not the case. As indicated above, local resident organizations and scientific experts had been pointing out the seismic dangers at this nuclear power station site for decades. Tokyo Electric now says that it will undertake a reassessment of active fault lines in the area. However, any investigation undertaken by Tokyo Electric cannot be trusted. Any investigation it would undertake would lack any credibility whatsoever, especially to the concerned residents of this region.

It is of vital importance that before Tokyo Electric or the national government begins to undertake a reassessment of the seismic situation, a thorough investigation should be undertaken by an independent entity to find out why the seismic dangers of this area were not taken into consideration by Tokyo Electric. There needs to be a very clear explanation as to why Tokyo Electric ignored the arguments brought forward by local resident organizations and experts and why they sectionalized the fault lines and minimized their seismic potential.

The problems lie not only in underestimation of potential seismic movement. The effects of the Chuetsu Oki earthquake on the foundation and equipment of the plant site are suggestive of Tokyo Electric's underestimation of the effects of seismic movement on these foundations and equipment as well.

In their letter to Niigata Governor Izumida dated 25 July 2007, the local resident organization which had filed petitions consistently since 1974 detailing the seismic concerns of this site wrote, "Our view is that although theoretically a new license could be issued based on new standards, it is absolutely inconceivable to reuse the current facility that was constructed on the basis of an underestimation of seismic activity, and now moreover incorporates equipment and buildings that were damaged by the Chuetsu Oki Earthquake, due to which the possibility of ductile deformations cannot be denied." We entirely agree.

The Niigata Nippo, the newspaper of record in the region has provided day-by-day cover in huge articles since the earthquake, describing the appalling lack of emergency preparedness of Tokyo Electric and clearly illustrating serious systemic problems with Tokyo Electric management. The Niigata Nippo also addresses the serious lack of information disclosure to the region's public, including interviews with residents who state, "This is a long-standing problem with Tokyo Electric."

Governor Izumida of Niigata has officially lodged a complaint to the Nuclear Industrial Safety Agency (NISA) of the Japanese government based on the overt inadequacy on the part of the Japanese government of post-earthquake information regarding the plant site. The front page of the Niigata Nippo newspaper reports the governor's statement that the national government "did not evaluate for us whether we should evacuate (the citizens living in the area of the nuclear power plants)" and criticized the conduct of the Nuclear Industrial Safety Agency, stating that there is "room for improvement." "Along with the information released from Tokyo Electric, the interested party, the national government who is the administrating authority (in charge of nuclear power) should be expeditiously releasing information to the national citizenry." (Niigata Nippo newspaper, 21 July 2007).

The Social Democratic Party's earthquake investigation team has entered the plant site three times and its members have serious concerns about Tokyo Electric refusing to allow inspection of damaged areas they want to hide. Also, upon inspection of areas Tokyo Electric allowed them to see, there was clear evidence of Tokyo Electric rushing to cover up evidence of earthquake damage. These "repairs" are being undertaken before any independent investigation of the damage has been undertaken and are a serious case of suppression of evidence.

There are serious problems with the Japanese government's nuclear regulatory and licensing system as well, regarding assessment of seismic activity and assurance that nuclear power generation will be undertaken in full safety despite the seismically active nature of this

archipelago. Katsuhiko Ishibashi, who was a member of the government-appointed committee to reassess the seismic Guidelines and who resigned in protest at the last session of the committee's proceedings, pointed out serious problems with the selection of committee members and their lack of independence in a press conference at the Foreign Correspondents Club of Japan on 20 July, to a packed audience representing foreign media.

An independent investigation needs to be undertaken to investigate why the Japanese government could not and did not address the erroneous judgments of Tokyo Electric.

After the Chuetsu Oki Earthquake experts are pointing out the possibility of deformations or distortions of pipe joints and the footings of the reactor pressure vessel. However, Dr. Haruki Madarame, the government-appointed chair of the expert committee to investigate the effects of the earthquake on the Kashiwazaki-Kariwa Nuclear Power Station has publicly stated, in spite of the fact that an in-depth investigation has not even begun, "With the technology we have today, we can do anything if we have the will to do it." (3 August, Nikkei Newspaper.) Before vital evidence has been examined, he has repeatedly stated, "It's only natural that about this amount of oscillation (2000 gal) would be recorded. That possibility had already been incorporated into the seismic design." After being criticized for these remarks, he simply gave excuses, then stated, "I'll be more careful when making comments in the future."

Citizens' Nuclear Information Center has sent a petition to Yasuhisa Komoda, Director-General of NISA (fax dated 31 July 2007) demanding the replacement of Professor Haruki Madarame as committee chair. We stated, "Professor Madarame was quick to state that safety of [the Kashiwazaki-Kariwa nuclear power plant] was assured, saying that it is not a major problem if B and C class equipment breaks as a result of shaking in excess of expectations. He has also repeatedly stated that he predicts that the plant will be able to restart in one to two years. We question the academic ethics of someone who makes such a statement before the inside of the reactor containment vessel has even been looked at. When the Committee's chairperson makes such comments, it is not possible to avoid the criticism that the study and response of the Committee itself will only be perfunctory."

When inspecting the Kashiwazaki-Kariwa site, and referring to the damage from the earthquake, Kenzo Miya, head of one of the three working groups of the committee chaired by Madarame, stated repeatedly, "This is an opportune experiment," and, "This may well be a historic event" - a comment that created a great deal of antipathy in the Kashiwazaki and Kariwa area. He has since stepped down from the technical committee of Niigata prefecture but remains head of the working group of the government's committee.

The people of Japan, and especially the citizens in the Kashiwazaki and Kariwa area, do not trust this national government committee investigating the effects of the earthquake on the nuclear power station.

Since both Tokyo Electric and the Japanese government cannot be trusted to properly assess why the Kashiwazaki-Kariwa Nuclear Power Station was allowed to be sited in its present location in the first place, and cannot be trusted to accurately and fairly inspect the current situation at the nuclear power station, we cannot emphasize strongly enough the need for independent, objective investigation into these matters.

Yours sincerely,

BAN Hideyuki

Co-Director.

Citizens' Nuclear Information Center

(Tokyo, Japan)

HOSHIKAWA Jun

星川湾一

Executive Director

Greenpeace Japan

(Tokyo, Japan)

Aileen Mioko SMITH

アルン美緒子スシス

Director.

Green Action

(Kyoto, Japan)