

**RESPONSE OF THE HUNGARIAN COMPETENT AUTHORITY TO
THE MAIN FINDINGS OF THE PAKS NPP ART.35 VERIFICATION OF
NOVEMBER 2004.**

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(ref. DG TREN A/16576)**

Translated text:

**Hungary's comments
on the findings of the inspection of the Paks nuclear power station, its surroundings and
the competent authorities conducted by the European Commission's verification team
from 8 to 12 November 2004**

- I. Hungary appreciates the extremely careful and thorough inspection and the sound findings.
- II. The Hungarian parties concerned fundamentally accept the findings and will consider the proposals made by the inspection team, designate the bodies responsible for analysing them – and implementing them as necessary – and set deadlines. The Commission will be kept informed of the results.
- III. In some cases the Main Findings (MF) and the Technical Report (TR) are inaccurate, or do not incorporate the appropriate findings. On those and a number of other points that are not entirely clear we would offer the following comments by way of correction.

(1) MF 1.5

The operator is still convinced that the sampling in the central ventilation duct is representative. The competent authority will make further investigations as recommended.

(2) MF 2.4 and 4.3

Since the systems in question have been approved by the Hungarian National Accreditation Body, the authority may not propose an additional unscheduled audit or require the use of other software.

(3) MF 4.5

Whenever measurements are made, the person performing the measurement is identifiable. The reporting system has been approved by the Hungarian National Accreditation Body.

This comment also applies to TR 8.2.2.4.

(4) *MF 5.6*

The proposed validation takes place once a year.

This comment also applies to TR 8.5.2.1, third and fourth paragraphs, and to the proposal concerning the fourth paragraph.

(5) *MF 5.7*

The program currently in use is a user application developed to run on a commercial (SQL) database management software. It provides the basic functions specified by the Commission. There is no need for automated international reporting, since the National Environmental Radiation Monitoring System (NERMS/*OKSER*) centre is not the body responsible for data transmission (see comment 7).

(6) *MF 9.1*

TR (9.1) unfortunately gives no examples of the inconsistencies mentioned by the verification team. In general, therefore, it is not possible to take account of this objection and we are unable to comply with the proposal.

(7) *MF 9.2, third paragraph*

It does not fall to the National Research Institute for Radiobiology and Radiohygiene (NRIRR/*OSSKI*) to implement Article 36 of the Euratom Treaty, but to the Ministry of the Interior's National-Directorate General for Disaster Management (*BM OKF*), which uses the *OSSKI* databases to this end.

This mistake is also made in TR 9.3.
