

July 29, 2015

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The Tokyo Electric Power Company

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Nuclear Reform Monitoring Committee

**Report on the Investigation and Examination into the Fukushima Daiichi NPS
Drainage K Information Disclosure Issue**

The Nuclear Reform Monitoring Committee established the Information Disclosure Subcommittee based on “Recommendations of the Nuclear Reform Monitoring Committee Regarding the Issues raised by Recent Disclosures related to Water Drainage”, March 6, 2015. The Committee would like to report to the board the results of the Subcommittee’s investigation and examination into the issue as attached.

(Attachment)

I. Background, composition and activities of the Information Disclosure Subcommittee

In response to the information disclosure issue related to drainage K at the Fukushima Daiichi Nuclear Power Station (hereinafter referred to as, “Fukushima Daiichi NPS”) that came to light in February 2015, the Nuclear Reform Monitoring Committee established the Information Disclosure Subcommittee (hereinafter referred to as “Subcommittee”) on March 6, 2015 comprised of the following external experts and led by Masafumi Sakurai as the chairperson in order to review The Tokyo Electric Power Company, Inc.’s (TEPCO) internal investigation into the background and facts of the issue, and to conduct its own investigation as necessary. TEPCO pledged to fully cooperate with the Subcommittee’s investigation and verification.

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The Subcommittee conducted its own investigation of the issue through the discussions and exchanges of opinions among its members as suitable while reviewing internal investigation reports into the issue (*), verifying corporate meeting minutes, distributed materials and other internal documents, interviewing related parties (approximately 29 hours with 14 interviews), and visiting Fukushima Daiichi NPS (twice). The interviews with related parties and discussions and the exchanges of opinions among the Subcommittee members were conducted solely by the Subcommittee members without attendance by TEPCO officials except those parties being interviewed. The Subcommittee concluded as follows.

(*) (1) “Report on the Background and Investigation into Fukushima Daiichi Nuclear Power Station Drainage K” dated March 6, 2015 (Fukushima Daiichi D & D Engineering Company (FDEC)) (hereinafter referred to as, “FDEC”)

(2) “Investigation Report” dated March 13, 2015 (Quality Assurance and Safety Auditing Department)

II. Investigation and review results by the Subcommittee

1 Introduction

The issue in question was the failure to timely disclose measurement data (hereinafter referred to as, “The Data”) that was collected from the waste water in drainage K at the Fukushima Daiichi NPS.

In the past, TEPCO took the position of disclosing measurement data from its nuclear power stations in the event of an accident/trouble or if abnormal readings were obtained. In the wake of the leakage of tritium into the port in 2013, TEPCO drastically revised its stance in regards to disclosing information from the Fukushima Daiichi NPS. The company adopted and published a new policy (hereinafter referred to as, “2013 Disclosure Policy”) stating that it would promptly disclose data obtained from the measurement as well as disclose information about the plan of the data measurement. In other words, the failure to disclose the drainage K measurement data violated the 2013 Disclosure Policy, which was a self-disciplinary rule and social commitment. It was this violation that laid at the very heart of the issue.

In the following report, the Subcommittee reviewed the actions and circumstances that resulted in the failure to disclose information and violation of 2013 Disclosure Policy.

2. Facts and background

(1) Setting target for effective dose at the site boundaries and adding the waste water in drainage channels to the radiation control

During the January 2014 Nuclear Regulation Authority’s meeting of the Commission on Supervision and Evaluation of the Specified Nuclear Facilities (hereinafter referred to as, “Commission on Supervision and Evaluation” including the Working Group on Contaminated Water Countermeasures), TEPCO was requested to reduce radiation levels at Fukushima Daiichi so that the effective dose at the site boundary would be less than 1mSv/year, the target established by the Nuclear Regulation Authority, no later than March 2016. It was also requested to add the waste water in drainage channels to the radiation control efforts and, until that was accomplished, to reduce the effective dose at site boundaries caused by the factors including the aforementioned waste water but other than contaminated water in tanks (hereinafter referred to as, “Doses not caused by Tanks”) to less than 1mSv/year.

In response to these requests, TEPCO reported the measurement data from the waste water in drainage channels including the drainage K (the details of which were disclosed through the Nuclear Regulation Authority website and later through the TEPCO website) at the Commission on Supervision and Evaluation in February 2014 attended by the Deputy General Manager of Nuclear Power and Plant Siting Division (position at the time. The same applies to positions of officials referred hereafter) and those in charge of

the measures for Fukushima Daiichi NPS from the same division. TEPCO also indicated its target to reduce the Doses not caused by Tanks to less than 1mSv/year by March 2015. In order to achieve the goal, TEPCO revised the change authorization application for the “Implementation Plan of the Measures for the Specified Reactor Facilities at Fukushima Daiichi Nuclear Power Station” on March 26, 2014 including the following measures.

- i. To sample the waste water in drainage channels once a week, to establish a method for calculating the three-month average concentration, and to perform an assessment of the calculation once the method is established.
- ii. To aim to reduce radiation doses by cleaning the drainage channels.

TEPCO published the revision through the company website and also reported to the Commission on Supervision and Evaluation on March 31.

(2) Commencement of periodic sampling and measurement, and handling of the measurement data

In conjunction with the establishment of the FDEC on April 1, 2014, the Project Planning Department within the FDEC was in charge of the development of policies and planning for the specific measures to reduce radiation doses mentioned above, and the Fukushima Daiichi NPS was responsible for the implementation.

The countermeasures, such as cleaning drainage channels, commenced at the Fukushima Daiichi NPS in April 2014 by the request from the Project Planning Department, and periodic sampling and recording of The Data from waste water in drainage channels started. Whereas The Data was shared at working level in the Project Planning Department and those in the section responsible for radiation measurements at the Fukushima Daiichi NPS, and some FDEC executives were informed of the fragments of The Data, these parties did not systematically examine whether The Data should be disclosed or not. Since FDEC executives had turned their attention to the more pressing issues and the drainage channels being periodically sampled slipped from the memory of the executives, they did not confirm the details of The Data with the person in charge or did not take action to have recognized the necessity for disclosing The Data.

Furthermore, there was no mechanism to enable the risk communicator (hereinafter referred to as, “RC”) stationed at the Fukushima Daiichi NPS to comprehensively understand what measurement data was obtained by the section in charge of radiation measurements, and therefore the RC did not know that The Data existed. The Social Communication Office (hereinafter referred to as, “SC Office”) was not aware that drainage channels were periodically sampled, did not confirm the details of The Data or did not take actions to confirm the need for its disclosure.

(3) Treatment of measurement data after it was shared within the FDEC

At the end of November 2014, when the collected data was compiled, it was discovered that the radioactive concentration of the waste water had hardly decreased compared to those prior to the implementation of countermeasures, such as the cleaning of drainage channels, and that the three-month average was 3.1-5.6 times higher than the regulatory concentration limit. This information was reported to the FDEC Steering Meeting on November 25, 2014, and shared among the FDEC executives at the meeting at the latest.

The FDEC executives, however, focused their attention on quickly identifying the unknown contamination sources and examining new countermeasures to replace the existing measures in order to achieve the aforementioned target of reducing Doses not caused by Tanks to less than 1mSv/year by the end of March 2015. Even at this stage, they did not examine whether The Data should be disclosed or not.

The RC stationed at the Fukushima Daiichi NPS did not regularly attend at the FDEC Steering Meetings and only had fragmented knowledge of the existence of The Data and its contents even after the above FDEC Steering Meeting. Therefore, the RC did not think of examining the need to disclose The Data and did not inform the SC Office of the existence nor the details of The Data.

Around the same time, there was a company executive who was concerned about the impact that The Data would have on the negotiations with the local fishery associations. This executive was concerned of the impact of The Data, under the assumption that the target of reducing Doses not caused by Tanks to below 1mSv/year would not be achieved. He did not even think of the need to disclose The Data. Since the executive did not have the authority to disclose The Data, he was only concerned the impact of The Data on the tasks he was responsible. Therefore, being premised on the existence of the concerned executive as mentioned above, there was no evidence to suggest that there had been a purposeful decision to delay disclosure of The Data in relation to the potential impact The Data would have on the negotiations with local fishery associations.

(4) Section summary

The Data was later disclosed in February 2015 after it was discovered that a high dose contamination source existed on top of the Unit 2 R/B, but until that time, none of the executives that were aware of the existence and details of The Data did not give significant deliberation to whether or not The Data should be disclosed.

3. Cause analysis and the further considerations

(1) Introduction

As examined in Section 2 above, while having been aware that drainage K was

periodically sampled since April 2014, and of the existence and details of The Data, TEPCO did not give significant deliberation to whether or not the information should be disclosed. As a result, The Data was not disclosed until February 2015 and TEPCO thereby violated its 2013 Disclosure Policy.

In examining the factors behind the event, the Subcommittee found that regardless of the discrepancies between which executives and officials were aware of the existence and details of The Data, and when and to what extent they were aware of The Data, there was common recognition from executives to the field workers in regards to the significance and positioning of The Data:

- i. Waste water in drainage channels had not been subject to radiation control, but became included in radiation control at the request of regulatory agencies.
- ii. Waste water in drainage channels was generated by rainfall and it was natural that a certain level of contamination be detected as a result of fallout.
- iii. The level of contamination indicated in The Data was not very high, compared with highly contaminated water in tanks or trenches, and therefore The Data was relatively less important.
- iv. The measurement data was obtained by sampling a small portion of the waste water as it flowed past the measurement point, and even if the level were high at that particular moment The Data itself would not be necessarily scientifically significant.
- v. The objective of sampling of The Data was primarily to confirm the efficacy of countermeasures such as the cleaning of drainage channels, and to establish a method for calculating three-month average concentrations based on the request from the regulatory agencies, and was merely a part of the process of achieving the target of reducing Doses not caused by Tanks to less than 1mSv/year by the end of March 2015. Therefore, the nature and purpose of these measurements were different from the measurements taken by TEPCO in the wake of a malfunction or accident, or measurements used for periodic environmental monitoring.
- vi. The measurement data for waste water in drainage channels had already been partially disclosed either directly or via the regulatory agencies before the Commission on Supervision and Evaluation on March 31 mentioned above.

This attitude on the part of related executives and officials was inconsistent with the 2013 Disclosure Policy and was not in line with public expectation regarding information disclosure. There were largely two reasons why these executives and officials had not been able to change their mindset regardless of the existence of the 2013 Disclosure Policy. These reasons were: (1) organizational issues that prevented the 2013 Disclosure Policy from being appropriately implemented, and (2) the spirit to satisfy the expectation of general public concerning information disclosure had not permeated throughout the company.

(2) Organizational issues that prevented the 2013 Disclosure Policy from being appropriately implemented

a. Background behind the development and publication of the 2013 Disclosure Policy

On June 19, 2013, TEPCO announced that it detected the presence of highly concentrated tritium from the groundwater in the Fukushima Daiichi Unit 1 and 2 Turbine Buildings. In response to this announcement, the media pointed out the possibility of leakage into the port. Even though the leakage was likely from the circumstantial evidence, TEPCO took the position that it would make an announcement after definitive data was collected and assessed. It came to admit to the possibility of leakage into the port for the first time at the press conference held on July 22, 2013. As a result, TEPCO was strongly criticized by external stakeholders for its attitude on information disclosure.

In an effort to restore public trust, TEPCO drastically revised its policy on information disclosure about the Fukushima Daiichi NPS, announced to take the following actions (hereinafter referred to as, “2013 Recurrence Prevention Measures”) via the press release dated July 26, 2013 and made the social commitment for their implementation.

- (1) Risk communication during press conferences and briefings to officials should be strengthened. The disclosure of facts and risks should be prioritized even if there were fear of causing anxiety or worry because countermeasures had yet to be formulated. The risk and impact associated with radioactive materials and contaminated water should be mentioned openly. (snip)
- (2) When measuring the concentration of radioactive materials and radiation dose, such measurements should be announced during the planning stages and the measurement results should be immediately disclosed.
- (3) Action levels should be stipulated in advance during the planning stages of measurements of radioactive material concentration and radioactive dose, and a radiation/radioactivity measurement manager should be designated at the Fukushima Daiichi NPS and at the Headquarters. (snip)

The 2013 Disclosure Policy mentioned in (2) immediately above and the spirit of information disclosure behind the policy were not shared as common perceptions within TEPCO. No executive involved in the event conceived that the action of not disclosing The Data was in violation of the 2013 Disclosure Policy or the spirit of information disclosure behind the policy.

b. Lack of efforts to permeate the plans developed and published as the organization

The 2013 Disclosure Policy significantly transformed the TEPCO's stance for information disclosure on the Fukushima Daiichi NPS. Based on the contents of the policy, it was clear that the considerable amount of preparation and workload would be required for implementation of the policy, especially for workers in the field. Therefore, it was necessary for the Nuclear Power & Plant Siting Division, FDEC and SC Office executives involved in measuring and disclosing the data (hereinafter referred to as, "Related Executives") to ensure that the 2013 Disclosure Policy and the company's new stance on information disclosure behind it would be widely permeated to all levels of each organization, and to create an environment to implement the 2013 Disclosure Policy across the organization. The 2013 Disclosure Policy was developed, under the circumstances at the time requiring countermeasures to be formulated immediately. The 2013 Disclosure Policy was discussed and drafted in a short period centering around a selected group of people in the Secretariat of the Nuclear Reform Special Task Force, SC Office, and Corporate Communications Department, including the Related Executives. The opinion of field workers at the Fukushima Daiichi NPS, etc. was not taken fully into consideration. It was therefore necessary that the Related Executives should have enhanced the sense of ownership throughout the organization including the fields and fully heartedly committed to create an enabling environment for the implementation of the 2013 Disclosure Policy persistently via the dialogues and briefings especially with the field workers.

The Related Executives, including those who involved in drafting the policy, lacked awareness that the 2013 Disclosure Policy was the published social commitment and TEPCO should fulfill this commitment as the entire organization, and as a result they did not engage in proactive efforts to fully disseminate and permeate the 2013 Disclosure Policy as well as the company's new stance towards information disclosure behind it, to the workers in the field. As a result, many of the workers directly engaged in the nuclear power were not aware of the contents of the 2013 Disclosure Policy, and even if they were aware of the policy at one point, it was faded from their minds.

c. Unclear responsibility for the implementation of the 2013 Disclosure Policy

Under aforementioned circumstances, the 2013 Disclosure Policy was left unexplored by the Nuclear Power & Plant Siting Division (later FDEC) and SC Office, which were concerned in measuring and disclosing the data, without systematically examining the responsibility, concrete process and assignment for the implementation.

Immediately after the publication of 2013 Recurrence Prevention Measures, the Nuclear Power & Plant Siting Division appointed a managing official as stipulated in Clause (3) of the 2013 Recurrence Prevention Measures and made the official responsible

for the planning of data measurement and measurement results. The roles and the authority of the managing official were, however, not clarified in regards to the 2013 Disclosure Policy and the Nuclear Power & Plant Siting Division did not systematically or comprehensively examine the responsibility for the planning of measurement and disclosure of results, or the detailed methods for disclosure. For example, at the Fukushima Daiichi NPS, whereas so-called “routine” measurements, classified as the measurements periodically taken for environmental monitoring and in the aftermath of problems, were planned and disclosed by the section in charge of radiation measurement, a detailed workflow for planning and disclosing the results of other measurements was not made clear.

On the other hand, when the 2013 Recurrence Prevention Measures were drafted the SC Office was in the process of creating the “Notification Guidelines/Disclosure Methods” (hereinafter referred to as, “Notification Guidelines”) providing rules for disclosing information and notifying regulatory authorities conventionally at the discretion of the Site Superintendent. The Notification Guidelines mainly served for the events in conjunction with the incidents and troubles. The detailed rules related to the 2013 Disclosure Policy were not incorporated into the Notification Guidelines, nor were any new rules created thereafter. Whereas the RC at the Fukushima Daiichi NPS checked the status of planning of measurement and measurements results related to the aforementioned “routine” taken by the section in charge of radiation measurements, no effort was made to create a framework that would allow the RC to comprehensively assess all other data measured by the section in charge of radiation measurements.

A part of the reason why this situation occurred was not only the Related Executives and parties at the Fukushima Daiichi NPS, but all executives and officials involved in nuclear power, were caught up with managing a series of serious events, such as the leakage of contaminated water from the H4 Area tanks. It was largely a result of the lack of awareness among the Related Executives, supposed to take a leading role in the efforts for the implementation of the 2013 Disclosure Policy, that the aforementioned policy was an important social commitment and a crucial measure to regain the public trust.

d. Insufficient cross checks and follow-ups resulting from a lack of sense of ownership

Furthermore, Related Executives were not clearly aware of roles and responsibilities of their own as well as the roles and responsibilities of their departments in the implementation of the 2013 Disclosure Policy. There was no common perception formed among the Related Executives in regards to the responsibility for implementation of the policy, cross checks and assignment.

Therefore, there was a widespread lack of sense of ownership both between and

within departments such as “the Nuclear Power Division is in charge of handling data,” “the Corporate Communications Department or SC Office should be consulted for the disclosure matters,” “the decision for the handling of data should be appropriately made by the practical level workers, as experts, in charge of measurement,” and “the decision to disclose data should be appropriately made by the RC who knew the field conditions.” As a result, the 2013 Disclosure Policy was left unimplemented in a concrete and appropriate manner without significant cross checks or internal follow-up.

e. TEPCO’s corporate climate behind the issues

Needless to say, the continuation of the PDCA (Plan-Do-Check-Action) cycle, by which an organization develops a plan, implements it, examines the progress and outcomes, identifies the problems and develops new plans for the improvements and then further implements it, is one of the most fundamental methods for the business operation. However, TEPCO, which designed the 2013 Disclosure Policy, was unable to implement the policy in an appropriate and concrete manner. It is necessary to point out as a reason for this malfunction that there is a corporate climate to avoid defining responsibility for the implementation of plans in TEPCO.

Since the disaster in 2011, TEPCO had been overwhelmed with work to contain the accident at the Fukushima Daiichi NPS and various incidents and troubles that occurred with the work toward decommissioning of the reactors, and had received harsh criticism from the society. Under those circumstances, there was a tendency that TEPCO made great effort to rapidly develop countermeasures against the incidents and troubles but their implementation gradually stagnated as the organization extricated the crisis situation and faced another incidents or troubles needed to be addressed. It was hard to deny that this situation was the result of chronic lack of human and material resources that forced a limited number of executives and officials to take on multiple duties and work within a framework that depended on the capacity and perseverance of individuals in terms of responsiveness and assessment of the situation. This environment caused each executive or official to have misgiving about taking a new task adequately, such as the implementation of a new plan. It was desirable that the upper management and executives should create the enabling environment for the steady implementation of the plans and further fulfill their roles of checking and following up the status of implementation.

TEPCO’s upper management and executives, however, prioritized the rapid formulation and announcement of countermeasures to the external parties, such as stake holders, regulatory agencies, and the media, in order to quickly avert crisis as the organization in the continuing harsh criticism from society over frequent incidents and troubles. Managing the implementation of those countermeasures was deemed secondary. Driven by the concerns that the new troubles or accidents might occur in the course of

implementing the countermeasures which made the company to receive further criticism from the society, a tendency or behavioral pattern was enhanced within the organization to avoid efforts to clarify the responsibility, and it became the corporate climate. Not only was this corporate climate an important factor behind the event but also might greatly hinder TEPCO's efforts to regain public trust if left untouched.

(3) Issues surrounding the spirit of information disclosure

As repeatedly mentioned, the 2013 Disclosure Policy directly required the company to disclose all plans for measurement and measurement data. The 2013 Disclosure Policy was created based on TEPCO's strong determination on the spirit of information disclosure to disclose all information that society wanted to know from its perspective, in other words, the perspectives from victims of the accident, local residents, fishermen, other stakeholders or further general public. The policy significantly altered the company's past approach to information disclosure only on incidents and troubles, and reaffirmed that the key to regaining public trust was improving transparency with reflection on the tritium leakage incident.

If the spirit to satisfy the public expectation concerning information disclosure had sufficiently permeated throughout the organization, the Related Executives, who were aware of the existence and contents of The Data, would have realized that it was a serious concern especially for fishermen and a kind of information that the general public desired to know. In other words, this was information that was required to be disclosed and the Related Executives would have taken actions to disclose the information, even in the absence of definitive guidelines implementing the 2013 Disclosure Policy. The Related Executives that were aware of the existence and contents of The Data, and even the field workers and upper management, did not conduct any significant deliberation whether the information should be disclosed. This was inconsistent with the societal expectations on the significance and positioning of The Data, as mentioned above in Section 3(1). It should be concluded that the spirit to satisfy the expectation of general public concerning information disclosure, behind the 2013 Disclosure Policy, had not sufficiently permeated throughout the company.

Since its establishment, the SC Office had continuously strived to permeate the spirit to satisfy the expectation of general public concerning information disclosure through training and the RCs staffed in the company sections. Such efforts were not successful at alleviating the discrepancy that exists between society and the company in regards to the scientific meaning of data, reactor materials or radiation doses, nor were they successful in changing the attitude that all one needs to do is to comply with laws and the instructions of regulatory authorities. There also was a discrepancy between the Nuclear Power Division and the SC Office in the perception of their functions, thereby fostering a

tendency in some parts to leave responsibility of information disclosure to the SC Office and RC and also leave the decision to those organizations without making the own decision from the social perspective.

During the four some years since the disaster in 2011, the major focus at the Fukushima Daiichi NPS shifted from emergency handling of the accident, to contaminated water management and further to the efforts toward the long-term decommissioning of the reactors. In accordance with the progress, the concerns of the stakeholders, such as the victims of the accident, local residents and fishermen and further general public, also appear to be changed. Striving to disclose information by accurately assessing the constantly changing concerns of society was at the heart of the spirit to satisfy the expectation of general public concerning information disclosure. It was necessary to reaffirm that such an attitude was crucial condition for TEPCO to provide a sense of security to the society and to regain social trust.

III. Assessment of TEPCO's management of the issue

In response to the issue, the Board of Directors gave instruction on March 25, 2015 that all radiation data from the Fukushima Daiichi NPS should be disclosed, and on March 30, 2015, TEPCO published the “New Mechanism and Organizational Approach to Information Disclosure”. The mechanism called for (1) the disclosure of all radiation data measured at the Fukushima Daiichi NPS, (2) the disclosure of data widely on websites and holding press conferences to explain the issues of particular concerns of the society, and (3) the periodic monitoring and assessment of the rules for data disclosure and performance by external parties.

In response to this, the FDEC announced its “efforts aimed at achieving full disclosure of all radiation data” on April 22, 2015 and on April 30, 2015, announced the detailed methods by which this shall be achieved after approval by the FDEC Steering Meeting upon explaining the disclosure of all policy at internal meetings and briefings at all levels, and gathering opinions on the matter. The disclosure of radiation data based on the policy started there on. From April 30, 2015 through June 25, 2015 approximately 6,300 pieces of information were disclosed and the company provided explanations twice via the website in regard to the data of particularly high concerns to the society. Meanwhile, the company eagerly gathered opinions from and gave briefings to various external organizations, such as Local Coordination Meeting of Decommission and Measures for Contaminated Water, Fukushima Council on Decommission and Measures for Contaminated Water, and the Fukushima Prefectural Federation of Fisheries Co-operative Associations.

These efforts steadily continued to this day while the company still struggles with

many other issues and tasks such as decommissioning of reactors, and the management of contaminated water. The Subcommittee confirmed that TEPCO has been appropriately disclosing radiation data.

Furthermore, TEPCO continually reported its efforts for information disclosure to various external organizations and the Nuclear Reform Monitoring Committee was periodically reported of those results. The Nuclear Reform Monitoring Committee would designate an “assessment team” if necessary and would deliver an observation on the disclosure of the data.

IV. Conclusion

All of the executives and officials the Subcommittee interviewed were sincerely engaged in the issues they faced. The efforts and perseverance of these individuals were not, however, organically integrated within TEPCO, thereby preventing the organization from sufficiently functioning. There were many issues that were pointed out, such as the lack of the information sharing due to sectionalism and discrepancies in recognition. Taking this event as an opportunity, it is necessary for TEPCO to seriously reflect on the attributes and tendencies of its organization, as well as the various issues brought up in this report (in particular, the establishment of a process to implement the plans, the clarification of responsibility in implementation, follow-ups, the importance of social commitments and further permeation of the spirit to satisfy the expectation of general public concerning information disclosure) and make further improvements.

As mentioned in III above, TEPCO had already launched and engaged in the measures to address many of these problems, and it is the Subcommittee's expectation that it will steadily continue to implement while making further improvements to address the other issues. The Subcommittee wishes that this report would assist TEPCO with its efforts to improve information disclosure.