January 5, 2026
Chubu Electric Power Co., Inc.
Code No.: 9502
Representative: Kingo Hayashi, President & Director
Contact: Takao Kawase, Compliance Division, Manager of Legal Dept.
Tel: 052-951-8211

Inappropriate Matters in the Formulation of Standard Seismic Motion for the New Regulatory Requirements Compliance Review of the Hamaoka Nuclear Power Station

Chubu Electric Power Co., Inc. (the "Company") is currently undergoing a new regulatory requirements compliance review by the Nuclear Regulation Authority for Units 3 and 4 of the Hamaoka Nuclear Power Station.

Since May of last year, the Company has been responding to an investigation by the Nuclear Regulation Authority concerning the Company's formulation of standard seismic motion. It has been confirmed that there is a suspicion that the selection of representative ground motion in the ground motion evaluation for the Hamaoka Nuclear Power Station was conducted using methods different from those explained by the Company during the review meetings, or through intentional methods (the "Matter").

The Company takes the Matter extremely seriously, as it could significantly impact the review process and potentially undermine the trust in the Company's nuclear power business held by stakeholders, including local residents, thereby threatening the foundation of the business.

The Company, at the Board of Directors meeting held today, resolved to establish an independent committee composed solely of external experts ("Third-Party Committee") to ensure transparency and fairness in investigating the facts and causes of the Matter, and considering measures to prevent recurrence. The Company will fully cooperate with the Third-Party Committee's investigation going forward.

Furthermore, the Company will respond appropriately based on the instructions and guidance of the regulatory authorities and the Nuclear Regulation Authority.

At this time, the impact of the Matter on future consolidated performance remains undetermined. Furthermore, the impact on consolidated profit and loss for the fiscal year ending March 2026 is expected to be limited. The Company will promptly disclose any matters requiring disclosure when such matters arise in the future.

The Company sincerely apologizes for the occurrence of the Matter.

1. Overview of the Matter

(1) Explanation at the review meeting (see Appendix Page1)

At the review meeting in January 2019, the Company explained that in formulation of standard seismic motion, it would calculate “20 ground motions” using different calculation conditions for evaluating ground motion using the Stochastic Green's Function Method※, and select the ground motion closest to the average as the representative ground motion.

※ The Stochastic Green's Function Method is a method for calculating the ground motion of a large earthquake using the ground motions of small earthquakes. It calculates the ground motion based on the characteristics of earthquakes stochastically determined from numerous seismic observation records of small earthquakes.
When calculating the ground motion of a large earthquake using the ground motions of small earthquakes, the ground motion that cannot actually occur may be calculated under specific calculation conditions. Therefore, a method is used to calculate multiple ground motions with different calculation conditions and select one as the representative ground motion.

(2) Method Actually Implemented (see Appendix Page2)

Since before 2018, the Company created multiple sets of "20 ground motions and their representative ground motion" rather than just one set, and selected "the representative ground motion for one set" from among them (Method ①).

Additionally, since around 2018, the Company intentionally selected "the ground motion that is not the closest to the average" as representative ground motion. The Company then selected the remaining 19 ground motions such that the representative ground motion is the closest to the average of the 20 ground motions, thereby creating a set of “20 ground motions and their representative ground motion”(Method ②).

2. Establishment of the Third-Party Committee

(1) Committee Composition

Chairperson	Norimitsu Takashima	Attorney at law (T&K Partners)
Committee Member	Naoki Kadotani	Attorney at law (T&K Partners)
Committee Member	Hisanori Morikawa	Attorney at law (TMI Associates)

None of the above committee members have any conflicts of interest with the Company, and there are no factors that would impede the independence or neutrality of the Third-Party Committee. The Company will fully cooperate with the investigation to ensure that the independence, neutrality, and effectiveness of the Third-Party Committee's investigation are firmly guaranteed.

Furthermore, the Third-Party Committee plans to appoint experts and knowledgeable individuals in ground motion as advisors.

(2) Overview of the Commission's Mandate

- Investigation and determination of the facts related to the Matter, evaluation and root cause analysis based on those facts, and proposals for measures to prevent recurrence
- Other matters deemed necessary for investigation

Appendix: Overview of the Matter, etc.

Attachement.

Explanation at the Review Meeting(From January 18, 2019 Review Meeting Materials)

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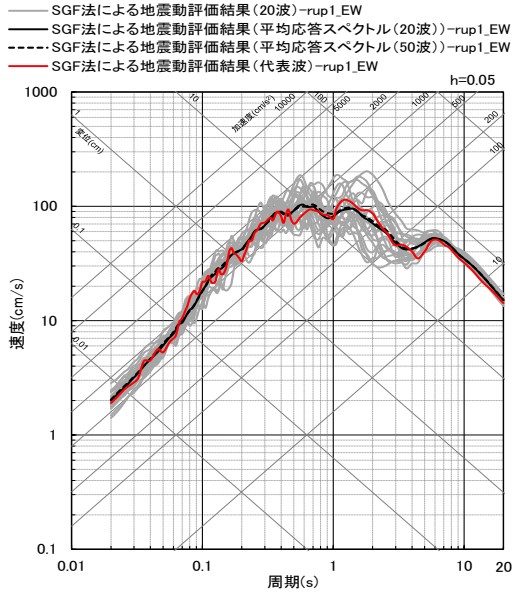
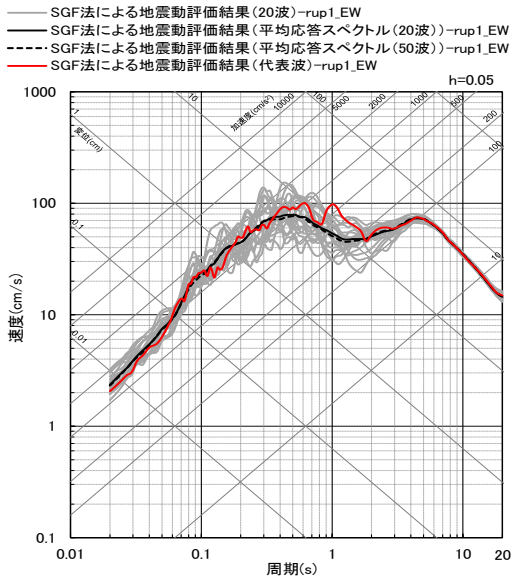
○In ground motion evaluation using the Stochastic Green's Function Method, waveform synthesis is performed for 20 ground motions※ using random numbers, and the representative ground motion is selected as the one with the minimum residual (sum of NS, EW and UD) from the average of 20 ground motions of 5%-damped pseudo velocity response spectrum.

○As an example, the selection of the representative ground motion for the earthquakes caused by the Omaezakikaikyakuseibu fault zone (basic source model) and the A-17 fault (basic source model) is shown in the figure below.

※ Confirmed that the average response spectrum is similar when using 20 ground motions using random numbers and when using 50 ground motions using random numbers.



(Earthquakes caused by the Omaezakikaikyakuseibu fault zone (basic source model))



(Earthquakes caused by the A-17 fault (basic source model))

The representative ground motion (red line) is selected as the one with the minimum residual from the average (black line) of 20 ground motions randomly and mechanically generated waveform synthesis (19 gray lines + 1 red line).

<Example of selection of representative ground motion by using stochastic green's function method >

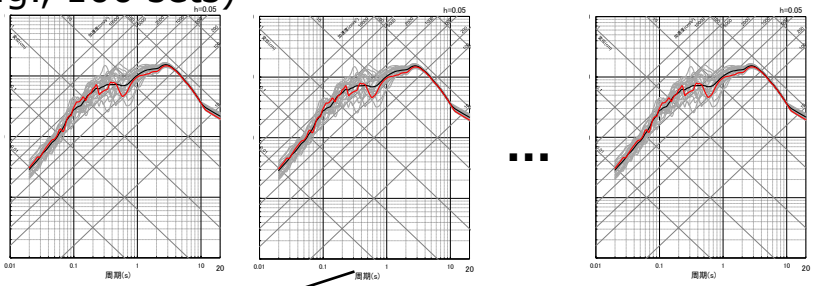
Actual Methods (Overview)

<Method①> The Company created multiple sets of “20 ground motions and their representative ground motion” rather than just one set, and selected “the representative ground motion for one set” from among them.

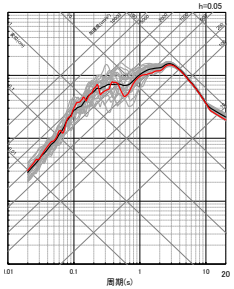
<Method②> The Company intentionally selected “the ground motions that is not the closest to the average” as representative ground motion. The Company then selected the remaining 19 ground motions such that the representative ground motion is the closest to the average of the 20 ground motions, thereby creating a set of “20 ground motions and their representative ground motion”

<Method ① (Schematic Diagram)>

⑴ Create multiple sets of 20 ground motions data (e.g., 100 sets)



⑵ From the above multiple sets, select one set and choice the ground motion with the minimum residual from the average in that set as the representative ground motion

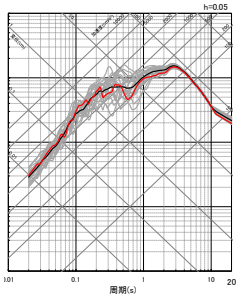


⇨ Present the representative ground motion at the review meeting

<Method ② (Schematic Diagram)>

⑴ Create numerous ground motions (e.g., several thousand ground motions) and intentionally select a representative ground motion (red line in the figure below) from them

⑵ Then select the remaining 19 ground motions (gray lines in the figure below) to create a set of 20 ground motions, ensuring the representative ground motion the Company selected is the closest to the average of these 20 ground motions.



⇨ Present the representative ground motion at the review meeting

The Course of Events Leading to the Discovery

Timeline	Event and the Company's Response
Since before 2018 (Date unknown)	The Company created multiple sets of "20 ground motions and their representative ground motion" rather than just one set, and selected "the representative ground motion for one set" from among them [Method ①]
Around 2018 and later	The Company intentionally selected "the ground motion that is not the closest to the average" as representative ground motion. The Company then selected the remaining 19 ground motions such that the representative ground motion is closest to the average of the 20 ground motions, thereby creating a set of "20 ground motions and their representative ground motion" [Method ②]
January 2019	At the NRA review meeting, the Company explained that in formulation of standard seismic motion, it would calculate "20 ground motions" using different calculation conditions for evaluating ground motion using the Stochastic Green's Function Method, and select the ground motion closest to the average as the representative ground motion. However, in reality, [Methods ① and ②] were used.
September 2023	NRA review meeting (standard seismic motions were confirmed)
May to October 2025	Received a request from NRA for information regarding the Company's formulation of standard seismic motion. Explained the calculation method based on the fault model method for the standard seismic motion during meetings with NRA. In October, NRA requested submission of evidence materials, including reports prepared by the Company's contractor.
December 2025	The implementation of [Methods ① and ②] were discovered. The Company initiated an internal investigation and reported the findings to NRA.

<Reference> Flowchart for Establishing Standard Seismic Motion at Hamaoka Nuclear Power Station

○ The earthquakes significantly affecting the ground motion at the site are interplate earthquakes. The ground motion evaluation was conducted by considering the fault model for the largest-class interplate earthquake in the Nankai Trough as proposed by the Cabinet Office (2012), and the standard seismic motion was established.
○ A standard seismic motion was also established considering the significant amplification of ground motion observed around Unit 5 during the 2009 Suruga Bay earthquake.

Ground motion formulated by specifying the epicenter for each site

Design Earthquake

Interplate earthquake
○ Maximum-class earthquake (Mw9.0) assumed in the Nankai Trough by the Cabinet Office (2012)

No amplification: 63 cases
With amplification: 24 cases

Inland crustal earthquake
○Earthquake (M7.4) from the Omaezakikaikyakuseibu fault zone
○Earthquake caused by the A-17 Fault (M7.2)

No amplification: 41 cases
With amplification: 20 cases

Intraplate Earthquakes
○Hypothesis slab-internal earthquake beneath the subduction zone (M7.0)
○Hypothetical subduction zone earthquake off the coast of Omaezaki

No amplification: 58 cases
With amplification: 19 cases

Total: 225 cases

Ground Motion Evaluation (including ground motion evaluation considering significant amplification)

Response Spectrum-Based Method

Method Using Fault Models

Ground motion formulated without specifying a specific epicenter

○Standard response spectrum
○Ground motion of the 2004 Hokkaido Southern Rumoi District Earthquake

Standard Seismic Motion

(Standard seismic motion considering significant amplification has also been established※)

※ The standard seismic motion used around Units 1 to 4, where no significant amplification of ground motion is observed, is designated as Ss1. The standard seismic motion used around Unit 5, where significant amplification of ground motion is observed, is designated as Ss2.

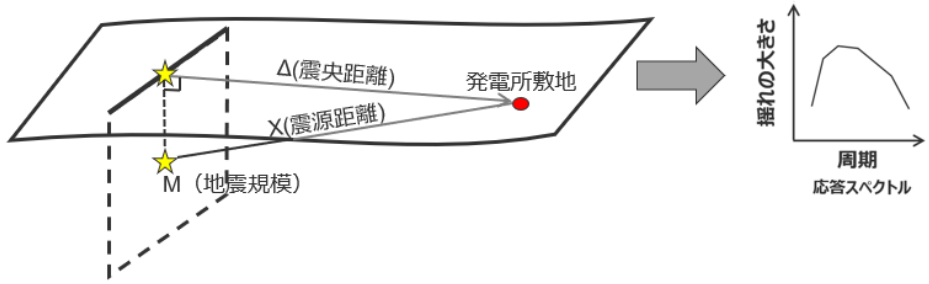
<Reference> Ground Motion Evaluation Methods

Response Spectrum-Based Method

○ Using empirical formulas based on seismic observation records, evaluate the seismic response spectrum at the evaluation site from the earthquake magnitude and hypocenter distance.

○ For the ground motion evaluation of the Hamaoka Nuclear Power Station, the method proposed by Noda et al. (2002) was adopted. This method enables the evaluation of the response spectra for horizontal and vertical ground motions at the exposed foundation surface using formulas based on observed records in bedrock.

<Ground Motion Evaluation Using Response Spectrum-Based Method>

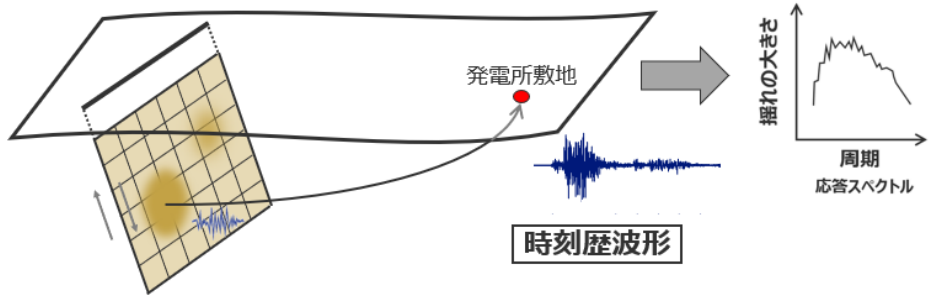


Method Using Fault Models

○Using the source fault model, the time-history waveform of ground motion at the evaluation site is assessed, considering the fault rupture process. The response spectrum is calculated from the time-history waveform.

○ For the ground motion evaluation of the Hamaoka Nuclear Power Station, a hybrid synthesis method was adopted using the Stochastic Green's Function Method(short-period domain) and the Wavenumber Integration Method(long-period domain) to confirm the validity of the underground structure model.

<Ground Motion Evaluation Using Fault Model>



＜Reference＞Chairperson Takashima's Career

Mar. 1986	Graduated from the Faculty of Economics, the University of Tokyo
1989	Public Prosecutor, Tokyo District Public Prosecutors Office
2014	Director, Trial Division, Tokyo District Public Prosecutors Office
2015	Deputy Director-General, Minister's Secretariat, Ministry of Justice
2017	Chief Prosecutor, Matsuyama District Public Prosecutors Office
Sep. 2018	Director-General, Human Rights Bureau, Ministry of Justice
2019	Deputy Director-General, Immigration Services Agency
2020	Deputy Vice-Minister of Justice
2021	Vice-Minister of Justice
2023	Superintending Prosecutor, Nagoya High Public Prosecutors Office
2024	Registered with the Dai-Ichi Tokyo Bar Association
Oct. 2024–Present	T&K Partners

＜Reference＞Committee Member Kadotani's Career

Mar. 2002	Graduated from the Department of Electric, Electronic and Information Engineering, School of Science and Engineering, Waseda University
Mar. 2004	Completed the master's degree program at the Interdisciplinary Graduate School of Science and Engineering, Tokyo Institute of Technology (currently, Institute of Science Tokyo) (M.S. in engineering)
2005	Registered with the Dai-Ichi Tokyo Bar Association
Oct. 2005 – Oct. 2016	Nagashima, Ohno & Tsunematsu
May. 2011	Graduated from Duke University School of Law (LL.M.)
Jan. 2012 – Mar. 2015	Zhong Lun Law Firm, Beijing and Shanghai
Jan. 2014–Present	Appointment as an arbitrator at the Qingdao Arbitration Center
November 2016	Established T&K Partners
Apr. 2019–Mar. 2023	Member, Committee on Proper Attorney Services (a Committee of Dai-Ichi Tokyo Bar Association)
Jul. 2019–Mar. 2023	Member, Committee on Regulation of Legal Services by Non-Attorneys (a joint Committee of the three bar associations in Tokyo)
Aug. 2020–Present	Appointment as an arbitrator and a mediator at the Japan Commercial Arbitration Association
Jun. 2021–May. 2022	Member of the Disciplinary Enforcement Committee, Dai-Ichi Tokyo Bar Association

＜Reference＞Committee Member Morikawa's Career

Mar. 2002	Graduated from the Faculty of Law, Kyoto University
Apr. 2002	Legal Training and Research Institute of the Supreme Court of Japan
Oct. 2003	Public Prosecutors; subsequently served at the Tokyo District Public Prosecutors Office, etc.
2015	Registered with the Tokyo Bar Association
Apr. 2015 – Oct. 2017	TMI Associates
Nov. 2017	Worked at The Secretariat of the Nuclear Regulation Authority
Nov. 2020–Present	TMI Associates
Jan. 2022	Counsel
Jan. 2023	Partner