

EVALUATION OF THE COMMENTS FROM THE DELIVERED OPINIONS ON THE PLAN

| <i>Institution</i> | <i>Opinion</i> | <i>Evaluation / Reference to the Report</i> |
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| SLOVAK REPUBLIC | | |
| Ministry of Environment of the SR, Air Protection Section <i>(Letter No. 3987/2013 of 31/02/2013)</i> | - <i>Has no comments</i> on the submitted plan, since the technologies will not constitute a source of air pollution under the Act on Air | - |
| Ministry of Environment of the SR, Waters Section <i>(Letter No. 3244/2013, 3552/2013-6.1 of 04/02/2013)</i> | The following opinion has been presented on the Plan within the competence of the Waters Section: - Waste waters and waters from the surface water draining system produced within the site are discharged to the Horný Dudváh and Váh rivers in line with the Decision No. KUŽP-1/2006/00273/Fr of 13 July 2006, including further amendments to the decision. In case the activity results in changes in the conditions laid down in the decision, the competent state water administration authority must be asked to review the permit for special water use, and the water course administrator must be asked for presenting its opinion on such change. - The activity must not deteriorate the quality of ground and surface waters. It is therefore necessary to observe the provisions of Act No. 364/2004 Coll. on Waters (Water Act) and Government Regulation No. 269/2010 Coll. on laying down the requirements on ensuring good water conditions. | - It can be stated on both points of the opinion that the innovations of the assessed activity will not lead to any changes in the volumes and character of the pollution of discharged waste waters with an impact on the relevant decision, and the activity will continue observing all relevant provisions of Act No. 364/2004 Coll. on Waters (Water Act) and Government Regulation No. 269/2010 Coll. on laying down the requirements for ensuring good water conditions. |

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| Ministry of Environment of the SR, Department of Environmental Risks and Biological Safety <i>(Letter No. 4655/2013 of 29/01/2013)</i> | - Further to its scope of competences, it has no comments on the submitted Plan. | - |
| Nuclear Regulatory Authority of the SR <i>(Letter No. 461/2013 of 23/01/2013)</i> | - Having assessed the Plan, the NRA SR has endorsed the proposed option 1 and notes that the assessed activity complies with the safety documentation which was presented as a reference document for issuing a permit for the operation of the technological equipment and operation units for the processing and treatment of radioactive waste at the Jaslovské Bohunice site. | - |
| Public Healthcare Authority of the SR <i>(Letter No.OOZPŽ/101/2013 of 22/01/2013)</i> | - Having assessed the submitted Plan, it has no comments on the assessed activity in terms of health protection against ionising radiation; | - |
| Regional Public Healthcare Office in Trnava <i>(Letter No. RÚVZ/2013/01029 of 31/01/2013)</i> | - Has not issued any opinion given the fact that state health supervision is conducted and permits for activities causing irradiation within the area of the Trnava Region are issued by the Public Healthcare Authority of the SR under the relevant legislation. <i>(For the relevant opinion, see above.)</i> | - |
| Area Environmental Office in Trnava – Department of the Protection of Nature, Selected Parts of the | - With regard to water protection (Opinion No. 2013/488/GI) - affirms that it is an existing activity which does not require an implementation state and that it is expected to have no negative impacts | - |

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| <p>Environment and Regional Appeal Procedures (Letter No. 2013/381/Pu of 28/0/2013)</p> | <p>on the consumption of drinking, non-drinking and technological waters, and will not increase the volume of sewage waste waters.</p> <ul style="list-style-type: none"> - it is also affirmed that given its design and location, the assessed activity represents a source of negative environmental impacts of minor relevance, and all induced adverse impacts can be mitigated by suitably designed restrictive and protective measures; - With regard to air protection (Opinion No. 2013/490/KI) - notes that with respect to the purpose and nature of the activity, it is not a competent authority with regard to air protection due to the fact that Act of the NC SR No. 137/2010 Coll. on Air (as amended) does not address the discharge of radioactive substances to the air. - With regard to waste management (Opinion No. 2013/444/Šd) <p>The opinion summarises the basic information on waste production and notes that Act of the NC SR No. 223/2001 Coll. on Waste (as amended) does not refer to RAW treatment, and concludes that it <i>has no comments</i> on the submitted Plan.</p> <ul style="list-style-type: none"> - With regard to nature and landscape protection (Opinion No. 2013/443-Pt) <p>The opinion summarises the state of territorial protection (level I) within the assessed area, the absence of protected areas of national importance, and the proximity of SKCHVU054 Špa insko-nižnianske polia, concluding that this protected bird area will</p> | <p>-</p> <p>-</p> <p>-</p> |
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| | <p>not be affected by the implementation of the activity; accepts the Plan and <i>has no</i> substantial <i>comments</i>.</p> <p>Summary opinion:</p> <ul style="list-style-type: none"> - requests providing more detailed answers to the aforementioned comments in the Assessment Report | <ul style="list-style-type: none"> - With regard to these facts, no specific requirements for the preparation of the Assessment Report have been raised. |
| <p>Area Environmental Office in – Department of Environment Protection of the Area (<i>Letter No. 2013/163/PB of 23/01/2013</i>)</p> | <ul style="list-style-type: none"> - State Water Management Authority (Opinion No. 2013/379/St) <ul style="list-style-type: none"> - requests observing the provisions of Act No. 364/2004 Coll. on Waters and on changes and amendments to Act of the SNC No. 372/1990 Coll. on Offences (Water Act). and ensuring the protection of ground and surface waters and avoiding undesired leakage of hazardous substances to the earth, ground and surface waters. - State Waste Management Authority (Opinion No. 2013/398/Hu) <ul style="list-style-type: none"> - has no objections, provided that the generally binding legal regulations on water management are complied with; - State Air Protection Authority (Opinion No. 2013/392/Kra) <ul style="list-style-type: none"> - has not provided an opinion due to the fact that Act No. of the NC SR No.137/2010 Coll. on Air (as amended) does not refer to discharges of radioactive substances to the air; - State Nature and Landscape Protection Authority (Opinion No. 2013/371/Bo) <ul style="list-style-type: none"> - the opinion summarises the information on the level of protection within the area, on the occurrence of protected areas and other protection elements, and on the proximity of | <ul style="list-style-type: none"> - The operation of the facility will continue observing all relevant legislative provisions, and all required measures for the protection of surface and ground waters will be implemented. - All relevant legislative provisions will continue to be observed during the operation of the assessed activity. - - See respective chapters C.III.7., C.III.9., C.III.10. |

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| | <p>the protected bird area Špa insko-nižnianske polia.</p> <p>- requests assessing the impacts of this investment on the nearby protected areas and on the subject of protection – protected trees and elements of the ecological stability territorial system, important landscape elements, protected species, biotopes of national importance, and biotopes of European importance – also during the construction of the facility;</p> <p>Summary opinion:</p> <p>- <i>agrees</i> with the submitted Plan, provided that the aforementioned requirements are observed.</p> | <p>- As mentioned above, the Assessment Report deals with this requirement in chapters C.III.7, C.III.9, and C.III.10.</p> |
| <p>Area Environmental Office in Piešťany (Letter No. 2013/00132-Kv of 04/02/2013)</p> | <p>- State Water Administration Authority Requests the following:</p> <ul style="list-style-type: none"> • to observe the general provisions of Act No. 364/2004 Coll. on Waters and on changes of Act of the SNR No. 372/1990 Coll. on Offences as amended (Water Act); • to ensure the protection of ground and surface waters and avoid undesired leakage of hazardous substances to the earth, ground and surface waters; • to comply with Art. 39 of the Water Act which lays down the general conditions for the treatment of noxious substances and Decree of the MoE SR No. 100/2005 Coll. laying down the details of hazardous substances treatment, on the requirements for emergency plans, and on the procedures of dealing with extreme water pollution; | <p>- All required permits and decisions have been issued for the assessed activity which will not need to be changed as a result of technology innovations; the assessed activity will continue to be operated in compliance with all relevant legislative provisions, and all required measures for the protection of surface and ground waters will be implemented.</p> |

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| | <ul style="list-style-type: none"> - State Air Protection Authority - has not provided any opinion since Act No. 137/2010 Coll. on Air (as amended) does not refer to the discharge of radioactive substances to the air; - State Waste Management Authority - notes that Act No. 223/2001 Coll. (as amended) does not refer to RAW treatment; - State Nature and Landscape Protection Authority - has no comments on the submitted Plan. | <ul style="list-style-type: none"> - - - |
| <p>Area Environmental Office in Trnava – Hlohovec Branch – Department of Environment Protection of the Area (Letter No. B2013/519/Fr of 24/01/2013)</p> | <ul style="list-style-type: none"> - Notes that no new source of air pollution in the category of medium or large sources has been created with respect to air protection, and <i>has no comments.</i> | <ul style="list-style-type: none"> - |
| <p>Area Environmental Office in Trnava – Hlohovec Branch – Department of Nature Protection and Selected Parts of the Environment of the Area (Letter No. 2013/542/PB of</p> | <ul style="list-style-type: none"> - Confirms the 1st level of area protection within the locality and absence of protected areas and protected trees within the affected area. Requests an impacts assessment within the next stage of environmental impacts assessment of the investment on the nearby protected areas and on their subjects of protection, protected trees, as well as elements of the ecological stability territorial system, important landscape elements, protected | <ul style="list-style-type: none"> - See respective chapters C.III.7, C.III.9., and C.III.10. |

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| 06/02/2013) | species, biotopes of national importance and biotopes of European importance during construction and operation. | |
| Area Environmental Office in Trnava – Hlohovec Branch – Department of Nature Protection and Selected Parts of the Environment of the Area (Letter No. 2013/526/AU of 31/01/2013) | Notes that from the point of view of water conditions, the Plan can be implemented under the following conditions: - ensure compliance with all legal regulations concerning the protection of surface and ground waters; - ensure reduction of waste waters contamination at the place of their occurrence, and use the possibility of repeated use of waste waters; - the treatment of noxious substances and particularly noxious substances must comply with Art 39 of the Water Act and Decree 100/2005 Coll. laying down the details of hazardous substances treatment, on the requirements for emergency plans, and on the procedures of dealing with extreme water pollution. | The assessed activity will continue to be operated in compliance with all relevant legislative provisions, and all required measures for the protection of surface and ground waters and for the reduction waste waters contamination and volumes will be implemented at the places of their occurrence. |
| Area Office in Trnava, Department of Construction and Housing Policy (Letter No. C/ObU-TT-OVBP1-2013/00168/Ti of 28/01/2013) | The opinion notes that all equipment will be installed and operated in the existing buildings within the Bohunice power plant site, and the activity is not contrary to the land use planning documentation of the Municipality of Jaslovské Bohunice. It is therefore not required to assess the activity . | - |
| Area Office in Trnava, Department of Civil Protection and Crisis Management (Letter No. ObÚ-TT-CO1-2013/02425 of | - Has no comments or requirements with regard to civil protection needs. | - |

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| 25/01/2013) | | |
| Area Office for Road Transport and Roads in Trnava (Letter No. A/13/01114/Jm of 21/01/2012) | Has no comments or objections against the submitted Plan. | - |
| Regional Directorate of the Fire and Rescue Corps in Trnava (Letter No. KRHZ-TT-OPP-73-001/2013 of 22/01/2013) | Has no comments on the submitted Plan with regard to fire safety. | - |
| Area Land Office in Trnava (Letter No. OPR-K/2013/00476 of 21/01/2013) | Given the fact the Plan does not require permanent occupation of agricultural land, it has no comments on the Plan; | - |
| Office of the Trnava Self-Governing Region, Economic Strategy Section (Letter No. 04279/2013/OUPZP-002/Ta of 23/01/2013) | - Notes that the activity complies with the Land Use Plan of the Trnava Self-Governing Region, and has no comments on the Plan; | - |
| Municipality of Dolné Dubové (Letter No. OcÚ/11/2013 of 30/01/2013) | - Agrees with the Plan, and recommends adding to following information (quoted): - if possible, provide the intensity of transport of processed waste to the National RAW Repository in Mochovce; - the possibility of major use of components storage in 200dm ³ barrels, their treatment by | - See Chapter B.I.5. - RAW incineration is a kind of RAW processing technology aimed to reduce the RAW volume (in line with the legislative requirements) and to |

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| | <p>the high-pressure equipment and subsequent cementation, which would mean minor extent of components processing in the RAW incinerator;</p> | <p>increase the safety of RAW disposal (the latter mainly relates to combustible liquid RAW). The objective is to ensure final processing and treatment of RAW into a form enabling its deposition at the NRAWR which only disposes of a limited storing capacity. The incineration process outputs discharged to the air observe the guide values specified by the PHA SR, and even the sum of the outputs from other Proponent's facilities within the Jaslovské Bohunice NPP site has long been far below the set limits. Hence, preference of combustible RAW treatment by other methods of processing (e.g. pressing of solid RAW or fixation of liquid LRAW) would result in unjustified and non-efficient overloading of the limited deposition capacities of the Slovak Republic.</p> |
| <p>Municipality of Jaslovské Bohunice (Letter No. OcU-2013/00362-00507 of 04/02/2013)</p> | <p>Informs that the public has not raised any objections as of the given date, and conditions its approval with the following:</p> <ul style="list-style-type: none"> - to observe the safety rules so as to prevent damage to the health of workers and the leakage of any hazardous or contaminated substances to the environment. - Reduce the radiation burden of the area and the related traffic burden and emissions of common pollutants from the RAW incineration facility to prevent the limit values set by the law; | <ul style="list-style-type: none"> - The assessed technologies are operated in compliance with the work procedures defined in internal operating rules which observe the current legislation approved by the supervisory authority (NRA SR). The radiation burden of workers observes the conditions of the Government Regulation No. 345/2006 on basic safety requirements for the protection of health of workers and the population against ionising radiation. The approved internal operating rules also include procedures in the case of extraordinary events to prevent the leakage of pollutants to the environment. - The assessment of the radiation burden, traffic burden and burden by emissions of common pollutants within the affected area is described in detail in the respective chapters of the Assessment Report. The assessed facility does not constitute unacceptable negative impacts in any of these cases (the assessed activity meets the set limits for the health protection of the population /radiation burden – Government Regulation of the SR No. 345/2006 on basic safety requirements for the protection of health of |

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| | <p>- Ensure optimal worksite quality, and place emphasis on noise, vibrations, radiation, and odour to meet the hygienic standards and requirements for worksites in line with work safety rules;</p> | <p>workers and the population against ionising radiation, relevant decision of the PHA SR; immission burden by common pollutants – Decree of the MoAERR SR No. 360/2010 Coll. on Air Quality/).</p> <p>- All required approvals and decisions have been issued for the assessed activity, which assumes that all the conditions to ensure optimal quality of the working environment have been met. The conditions set with respect to the assessed activity to ensure the health protection of workers are checked under state healthcare supervision and by means of the work health service MEDICHEM s.r.o., Bratislava.</p> |
| <p>Municipality of Malženice (Letter No. 28/2013 of 04/02/2013)</p> | <p>- Gives a positive opinion and has no objections;</p> | - |
| <p>Municipality of Pe e ady (Letter No. 57/01/2013 of 28/01/2013)</p> | <p>- Agrees with the assessed activity and has not objections or comments;</p> | - |
| <p>Municipality of Radošovce (Letter No. 14/2013 of 04/02/2013)</p> | <p>- Gives a positive opinion and has no objections;</p> | - |
| <p>Municipality of Ve ké Kostovaný (Letter No. 26/2013 of 06/02/2013)</p> | <p>- Agrees with the activity under the condition that it has no negative impacts on the environment and on the health of people living in the vicinity of the RAW processing and treatment technology; - Draws special attention to the negative impacts in the event of explosion, fire or other events caused by negligent operation or</p> | <p>The assessment of the different impacts of the activity is discussed in the respective sub-chapters of Chapter C.III of the Assessment Report. The risks in the case of extraordinary operation events and accidents are detailed in Chapter C.III.19, and the health aspects are discussed in the health risks analysis prepared by a qualified person, forming Annex 5 to this document. A comparison of the discharge activity and effective dose to the set limits observing the conditions of people's health protection under the</p> |

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| | <p>external circumstances potentially resulting in air contamination or leakage of contaminants into ground waters;</p> <ul style="list-style-type: none"> - Considers potential failure of the incineration equipment and filters at the vent chimney as the most dangerous event resulting in RAW leakage to the environment. - The municipality therefore requests that the Proponent observes to the maximum extent possible the relevant procedures of RAW processing, and bears liability for damages to the health and property of people living in the vicinity of the facility in the event of an accident. - It also notes that after the equipment capacities increase, the amounts of gas and liquid discharges of RAW substances will also increase; it therefore requests that the amount of RAW discharges does not exceed the limits set by the law to prevent negative impacts on human health and that the radiation burden from any outputs does not constitute increased risks for the health of the affected population. | <p>legislation and decision of the PHA SR form part of Chapters B.II.1, B.II/02/, and B.II.5.</p> <p>The increased capacity of some processing nodes was dealt by under a separate (already completed) assessment process, and is taken into account in the evaluation of the assessed activity in this document.</p> <p>A detailed assessment supported by the results of the assessed activity monitoring suggest that the assessed activity meets all legislative requirements for the protection of the environment and the health of people living in the surroundings.</p> |
| <p>Technical Inspection (Letter of 30/01/2013)</p> | <ul style="list-style-type: none"> - Notes that the Technical Inspection is <u>not competent to assess</u> documents needed for the Plan under <u>Art. 23, par. 4 of Act of the NC SR No. 24/2006 Coll.</u> as amended. The Technical Inspection only <u>assesses the project documentation of the construction for the purposes of the building procedure</u> under Art. 18, par. 5 of Act No. 124/2006 Coll. as | <p>-</p> |

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| | <p>amended. The full project documentation must be presented under Art. 9 of Decree 453/2000 Coll.</p> | |
| <p>Slovak Environmental Agency (Letter No. CZA 200/2003 of 28/01/2013)</p> | <p>- Raised the following comments, requests and recommendations: - The data provided in Chapter II – Basic information on the current state of the environment, Part 1.4 Climate Conditions, Tables II/01/4/01, II/01/4/02, and III/01/4/03 is not up-to-date. The same refers to Hydrological conditions – Table III/01/5/01.</p> <p>- The Tables III.4.1/04 and III.4.2/02 in Chapter 4 Current quality of the environment are not readable.</p> <p>- Recommends indicating the codes of waste in Chapter 2.3 as six-digit codes (also when starting with a zero) in line with the Waste</p> | <p>- Chapter II provides basic information on the proposed activity. Basic information on the current state of the environment is presented in Chapter III. Further to this fact, our comment will consider the data provided in the respective tables, since tables with numbers II/01/4/01 and II/01/4/02 do not exist.</p> <p>With regard to meteorological conditions, the tables present data of the earlier period of 30 years which was completed with additional information in the text below the tables on average characteristics of the past (more-or-less consecutive) 35 years, which appears to be sufficient due to the higher informative value of long-term average data. For the purposes of the Assessment Report, this data has been extended by specific characteristics of some of the recent years which, however, rather have an illustrative nature since (as already mentioned) the average values of a longer period of time have a higher informative value.</p> <p>As far as the hydrological conditions are concerned, the long-term average figures used in the Plan for the purposes of the Assessment Report were extended by other average characteristics of the water conditions of the watercourses within the affected river basin, which provides more relevant information on the hydrological conditions within the area compared to specific characteristics of the past few years.</p> <p>- Accepted, see Chapter C.II.15;</p> <p>- Accepted, see Chapter B.II.3;</p> |

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| | <p>Catalogue under Decree of the MoE SR No. 284/2001 Coll. as amended;</p> <ul style="list-style-type: none"> - The names of waste types should be stated in the same way as in the Waste Catalogue, and the waste amounts should be indicated in tonnes; - To distinguish waste from electrical and electronic equipment, it is recommended to use the categories according to Annex No. 1 to Decree No. 315/2010 Coll. as amended. - It is recommended to detail the reconstruction/innovation of the Bohunice Processing Centre in the Assessment Report, evaluate the impacts of proposed technology changes on the environment and human health, describe the monitoring in respect of the different parts of the environment, and the measures to be implemented to prevent such impacts in the event of adverse conditions. | <ul style="list-style-type: none"> - Accepted, see Chapter B.II.3 - Accepted, see Chapter B.II.3 - The aims of the BRAWPC reconstruction/innovation are described in the respective part of Chapter A.II.8. If relevant, the impacts of proposed changes on the different parts of the environment and on the population are described in the respective sub-chapters of Chapter C.III. The monitoring of the outputs of the activity is described in the respective sub-chapter of Chapter B.II., and the monitoring of their impacts, including results, is described in the respective sub-chapters of Chapter C.II. The measures aimed to restrict the activity outputs and subsequent impacts are described in the sub-chapters of Chapter B.II and in Chapter A.II.8. The NRA SR issued decisions concerning all described and used technologies, and all these technologies have approved operating rules at place. Further to this information it can be stated that the assessed activity, with respect to its impacts, observes the requirements for environment quality and protection of human health (e.g. limit values for discharge activity, dose rates for the population, immission concentrations of common substances discharged to the air, limit concentrations for contamination by common pollutants in discharged waste waters, etc.). |
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It is necessary to specifically describe the impacts of the incinerator on the environment and human health, describe the type and amounts of incinerated waste (not only RAW), the type of the incineration process, the dispersion conditions, and the measures to prevent the release of pollutants to the air, as well as an assessment of the cumulative impacts of the incinerator and of other sources of pollutants to the air – not only spot sources, but also pollutants from traffic which have an impact on air and on human health.

- The table Processing capacities and the function of technologies and worksites for RAW processing and treatment on page 39 states that the BRAWPC incinerator is currently undergoing reconstruction; please, describe the reconstruction and consider

The Plan and the Assessment Report assessed the RAW incinerator from two perspectives, analysing the impacts of emissions of common pollutants and of radionuclide emissions to the air. Both are detailed in Chapter B.II/01. An immission and transmission opinion was prepared by a qualified person to assess the impacts of emissions of common pollutants on the air quality and subsequently on human health (see Annex 6). This opinion formed the basis for preparing the assessment of health risks (again elaborated by a qualified person, see Annex 5). For the purposes of assessment of the activity of emitted flue gases which constitute part of gas discharges to the air, the effective doses to the population are calculated on the basis of an annually approved programme corresponding to the summary activity of discharges (total, including discharges to the hydrosphere).

All the values suggest that the limits for the protection of human health and protection of the quality of affected parts of the environment have been observed.

The other details mentioned in the comment, such as description of the incineration process and the amounts of incinerated waste, the dispersion conditions, measures to limit the emissions of pollutants, information on diffuse and line sources of air pollutants, and other information is provided in the respective parts of Chapters A.II.8., B.II.1, C.III/01/, C.III.4., C.III.17., etc. For details see the text of the Assessment Report.

It should be mentioned with regard to the requirement raised by the Slovak Environmental Agency that the waste incinerator serves solely for the incineration of radioactive waste.

- The extent of the reconstruction/innovation of PS 06 Incinerator of the BRAWPC was described in Chapter II.8. of the Plan (Chapter A.II.8. of the Assessment Report). The MoE SR issued an opinion on the reconstruction of the incinerator No. 5237/2010-3.4/hp of 24 August 2010 which notes that the proposed changes will not have a substantial negative impact on the environment. This fact was presented in Chapter VII.3. of

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| | <p>whether such change is subject to assessment under Act No. 24/2006 Coll. on Environmental Impacts Assessment as amended.</p> <ul style="list-style-type: none"> - It is recommended to add information on health risks for various exposure scenarios (common standard operating conditions, situation in the event of operating failures and leakages of radioactive substances to the environment (water, air, and soil) in various forms. - It is recommended to provide more details on potential chemical, toxicological and radiological properties of active substances in the waste to be treated. - Indicate what happens with treated radioactive waste in the National Repository and in the interim storage facility in Jaslovské Bohunice, what is the regime of its monitoring and further disposal. - Describe the way of monitoring of the impacts of the nuclear facility on the | <p>the plan, on page 159.</p> <ul style="list-style-type: none"> - See Annex 5 The inputs for assessment, i.e. the released activity in different exposure scenarios, are detailed in the respective chapters of the Assessment Report (for example, B.II.5. or C.III.19.). - See Chapter B.I.3. - The process of take-over, deposition and control of fibre-concrete containers with fixed RAW at the NRAWR Mochovce is governed by the operating rules of the NRAWR Mochovce. This nuclear facility does not constitute the subject of this assessment process, as it underwent a separate assessment process and disposes of all required approvals and decisions for its operation. The interim storage premises in Jaslovské Bohunice form part of the controlled zone of the nuclear facility, and the monitoring of stored RAW is performed in compliance with the existing operating rules approved by the NRA SR. These rules contain all details and serve to ensure the radiation protection of workers also in the surroundings (some of them served as a basis for preparing the Assessment Report). - This requirement is addressed in detail in Chapter C.II. No newer studies on this field are available at present. |
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| | <p>environment and on human health; indicate whether there are newer studies on the health condition of the population in the vicinity of nuclear power plants in Slovakia than the study by M. and H. Letkovi ová, 2001, and what is their results.</p> <p>- It is recommended to describe how Act No. 124/2006 on safety and protection of health at work and on changes and amendments to some acts, Act No. 355/2007 Coll. on the protection, promotion and development of public health and on changes and amendments to some acts, and other generally binding legal regulations ensuring the conditions of workers' safety at work and health protection against the effects of negative work factors are applied.</p> | <p>- All works and activities performed within the assessed facility are performed in compliance with the valid documentation of the Integrated Management System (IMS) and operating documentation of the Proponent – JAVYS, a.s.</p> <p>Work orders, R-orders and safeguarding orders are issued for repairs and maintenance works related to the NF equipment, as well as fire permits if needed. Workers dispose of protective tools for the performance of works in the KP.</p> <p>In order to ensure safety and protection of health at work, the Proponent JAVYS, a.s. provides preventative and protective services for all workers fulfilling expert tasks to secure safety and protection of health at work, especially in the prevention of and protection against risks. JAVYS, a.s. has ensured the performance of security and technical services (STS) by means of its own qualified workers, taking into account the size of the organisation, the headcount, the work conditions, hazards and related risks.</p> <p>The tasks of the safety and technical services are performed in accordance with the requirements of Act No. 124/2006 Coll. and internal regulations of JAVYS a.s.</p> <p>The work healthcare service (WHS) is ensured by the provider MEDICHEM, s. r. o. on the basis of a framework contract.</p> <p>The WHS tasks are fulfilled for JAVYS, a. s. by professional healthcare workers qualified to provide work healthcare services.</p> <p>JAVYS, a. s. monitors the work environment factors and the condition of</p> |
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| | | <p>work conditions under Act No. 355/2007 Coll.</p> <p>Further to the decisions of the Regional Public Health Office, operating orders and risk assessments were elaborated for the NF operation (in line with Art. 11 of Government decree No. 355/2006 Coll.).</p> |
| CZECH REPUBLIC | | |
| <p>Regional Public Health Station of the South Moravia Region in Brno (Letter KHSJM 03967/2013/BM/HOK of 11/02/2013)</p> | <p>- Considers it desirable that the Czech Republic joins the transnational assessment of the given activity's impacts.</p> <p>For the purposes of a complex assessment in the potentially affected South-Moravian Region, it requests conducting a detailed assessment of the following issues within the next stages of the documentation:</p> <ul style="list-style-type: none"> - Impacts of the technologies operation described in the Plan on the immission burden of the air, including burden caused by radioactive particles (contaminated dust aerosols) within the affected area of the South-Moravian Region of the Czech Republic under the "remote transmission of pollution" (i.e. contribution of the Plan to the immission burden of the air); - Concurrent impacts of all operated units within the nuclear facilities site in Jaslovské Bohunice (i.e. the process of A1 NPP decommissioning, operation and | <ul style="list-style-type: none"> - The impacts of the assessed activity on air quality both with regard to emissions of common pollutants and emission of radionuclides was discussed in detailed and assessed in the respective chapters of the Assessment Report (Chapter B.II/01/ and C.III.4.). Their conclusions suggest that the immission contribution of the assessed activity is acceptable from the point of view of all general limits for the protection of human health in the immediate vicinity of the assessed facility and in the closest residential area of the affected area (approx. 2km, the municipalities of the South-Moravian region are at a flight distance of min. 40km from the site), and the outputs of the assessed activity attain values which are far below the special limits for the activity of discharges and generated dose rate set for this activity by the PHA SR. - For more details on the concurrent impacts of all nuclear facilities at Jaslovské Bohunice site see Chapter C.III.17. <p>With regard to the impacts of all nuclear facilities within the Jaslovské</p> |

decommissioning of the V1 and V2 NPPs, operation of the integral storage facility for radioactive waste, operation of the interim storage facility of spent fuel and technological units for the processing of radioactive waste) on the immission burden of the air, including burden caused by radioactive particles (contaminated dust aerosol) within the affected area of the South-Moravian Region under the “remote transmission of contamination” (i.e. cumulative impact of all operation units);

- Health risk assessment from the point of view of the impacts of the assessed Plan (or impacts of the operation of other nuclear facilities within the site) under common standard conditions, under operation failures, and upon accidental leakage of radioactive substances in various forms to the environment (soil, water, and air in particular) related not only to the local exposure of inhabitants living within the affected area, but also exposure of inhabitants living within the potentially affected area of the South-Moravian Region in the Czech Republic; an expert estimate suggests that exposure by inhalation will be the most important type of exposure accompanied by remote transmission of air

Bohunice site (i.e. all Proponent’s facilities, including V2 NPP operated by SE, a.s.) on the population of the neighbouring countries, it can be stated that the calculated maximum individual effective doses of ionising radiation to representative persons in the neighbouring countries in 2012 reached the following values:

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| Austria (part of sector 167) | 4.09x10 ⁻⁹ Sv/year |
| Czech Republic (part of sector 178) | 8.74x10 ⁻⁹ Sv/ year |
| Hungary (part of sector 96) | 5.77x10 ⁻⁹ Sv/ year |

The limit value of the total individual effective dose per person from the critical group jointly for all routes of exposure from all nuclear facilities within the site is up to 250,000x10⁻⁹ Sv/year under the Government Regulation No. 345/2006 Coll. on basic safety requirements for the protection of health of workers and inhabitants against ionising radiation.

- The health risks assessment conducted by a qualified person forms Annex No. 5 to the Assessment Report. The values of effective dose to an individual from the population form the basis of calculation, corresponding to standard operating conditions (for the reference years 2011 and 2012), as well as the values corresponding to limit discharges of the RAWPTT (the actual values of discharge activity are far below the set limits) and values corresponding to representative extraordinary events (i.e. postulated initiation event with the highest activity discharge). For more details on these individual effective doses (IED) see the respective chapters, such as B.II.5. or C.III.19.

The IED calculations also include information on the corresponding sector and critical group of the population. In the case of a representative extraordinary event with highest activity discharges to the air, the IED values are at the level of the SE-EBO protection zone (the SE-EBO protection zone /approx. 3km/ is wider than the protection zone of the given technologies – in the latter case, the hazard zone (including ISSF)

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| | <p>pollutants.</p> <p>It is recommended to complete the documentation with data on chemical, toxicological and radiological properties of active substances in processed and treated waste, including data on their half-life.</p> <p>The opinion also notes that the assessment of cross-border impacts of the operation of ionising radiation sources falls under the competence of the State Institute for Nuclear and Chemical Safety in Prague under Act No. 18/1997 Coll. on Peaceful Utilisation of Nuclear Energy and Ionising Radiation (the Atomic Act) as amended.</p> | <p>was specified by NRA SR Decision No. 97/2006 as a territory bound by the area of the neighbouring V1 NPP nuclear facility defined by the barrier of the guarded area of this NF) is <u>~3 orders of magnitude lower</u> than the set acceptability criteria under the given legislation. For the South-Moravian Region which is at a flight distance of about 40km, the assessed activity does not represent any risk not even from the point of view of a long-distance transmission of pollutants, including in the case of extraordinary operating events.</p> <p>With regard to other NFs within the site which are not the subject of this assessment, it can be concluded in general that their design must prevent the exposure of the affected population to risks higher than acceptable under common operating conditions in the case of extraordinary operating events. The cumulative impacts of the operation of all NFs within the Jaslovské Bohunice site are detailed in Chapter C.III.17.</p> <p>- See Chapter B.I.3.</p> <p>- The State Institute for Nuclear and Chemical Safety in Prague did not give an opinion on the documentation.</p> |
| Regional Office of South-Moravian | - Notes that though it is not possible to fully evaluate the impacts on the future development | - |

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| Region, Department of Environment (No. JMK 10954/2013, Letter of 08/02/2013) | of the South-Moravian Region, it does not consider it necessary for the Czech Republic to join the transnational assessment of the Plan. | |
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| Ministry of Environment and Water Management of the Republic of Hungary (<i>Ref. no. KmF/61-17/2013, KmF/71-15/2013</i>) | <p>The presented opinion raises requirements and comments on two projects – “radioactive waste processing” and the “new facility for radioactive waste storage”. For the sake of completeness, all requirements and comments in their full wording are provided below:</p> <p>With regard to water protection</p> <p>The waste repository is planned to be situated in the Danube river basin. The water from the repository will be discharged through Telinský potô ik. This stream joins the Žitava river which then flows into the Nitra river. North of Komárno, the Nitra river joins the Váh river just at the point it is drained to the Danube.</p> <p>1. Radioactive waste with low and medium degree of radiation and radioactive waste with very low radiation must be disposed in such way as to ensure the separation of radioactive isotopes – representing potential hazard for people and the environment – from the</p> | <p>- The text of the opinion suggests that the raised comments concern the NRAWR nuclear facility in Mochovce which is situated in the basin of Telinský potok and is not the subject of this documentation</p> <p>In general, however, it can be stated on this topic with regard to the assessed activity that all waste waters from the premises of the affected buildings are discharged to the recipients in compliance with the set conditions and limits which are described in detail in the respective chapter of the Assessment Report B.II/02/, including the characteristics of pollution of such waste waters,</p> |

biosphere and from surface and ground waters. Such protection must be ensured throughout the entire period until the radiation level decreases beyond a level which is not harmful to human health and the environment, and protects the present and the future generations and the environment.

2. The planned radioactive waste repository is a surface facility. Its shortest (flight) distance from the borders (Bohunice-Dunakiliti) is 60km. As far as subsurface waters are concerned, this distance is large enough to ensure sufficient protection also in case the isolation layers start to degrade. This question can be reliably answered by means of hydrodynamic modelling. We assume that such modelling should form part of the EIA investment project.

3. It is necessary to make all efforts to prevent the penetration of radioactive water from decontamination or any other water with potential radioactive pollution to the surface waters within the Danube river basin.

4. Water with potential radioactive contamination drained to the sewer system must be continuously monitored to ensure detection and early localisation of any contamination.

Preparation for incidents/accidents

The wells within the Hungarian part of the Danube are based on coastal filtration. In the

The text again suggests that the comments concern the waste repository, though the subject of this documentation is the technologies for RAW processing and treatment.

event of a radiation accident, the contamination can affect the wells very fast, which constitutes a risk for the drinking water basis and, hence, for public water supply. As far as surface waters are concerned, the contamination released from the waste repository in Bohunice in the event of an accident may reach the Danube after passing around 93km in the Váh river. After reaching the Danube, it can be a risk for the coastal sources of filtered water nearby Dunaalmás, Tát, Esztergom and Dömös.

5. A regeneration plan must be available for professional restoration of the conditions after a possible accident affecting the surface waters in the Danube river basin during the construction and operation of the waste repository.
6. The regeneration plan after the accident must include provisions on official notification of the Hungarian authorities so that the operators of coastal sources of filtered water along the Danube and in the geologically sensitive areas have the time to prepare measures in case the contamination reaches the Danube.
7. In the event of an accident, the emergency information list should also include the Environmental Safety Supervision Office of the National General Directorate for Accidents of the Ministry of Interior.
8. Regular exchange of data obtained through

With regard to this subject, it can be concluded in general that it is an existing facility with technologies and worksites that dispose of all required emergency regulations and systems based on safety analyses, and are approved by the respective supervision bodies (conclusions of the safety analysis, including effective doses for representative initiation events, forming part of Chapter C.III.19. of the Assessment Report).

The obligation to provide information on accidents is laid down in the Danube River Protection Convention under which, in the event of emergency situations, the operator is obliged to inform the supervisory authorities about the accident (NRA SR, PHA SR, Slovak Environmental Inspection, Watercourse Administration Authority, and Regional Environmental Office replacing the Area Environmental Office). All other actions are in the competence of the state administration authorities of the SR.

The elements of the Danube river basin are interconnected through the emergency system, i.e. information is distributed to foreign partners. The Commission for Foreign Water Management ensures that the information channels on safety in the case of emergencies are linked to the Slovak partners.

the measurement at points of monitoring (on an annual basis in the case of normal operation, and immediately in the case of an accident).

9. What will be the way of informing the relevant Hungarian authorities in the event of radioactive contamination of surface waters?

Monitoring Plan

10. The following radionuclides are considered toxic and to have a long half-life: ^{90}Sr , ^{129}I , ^{239}Pu , ^{137}Cs . In the event of an accident, these substances may penetrate the water ecosystem where their impact would multiply and would survive for a long period of time.
11. Besides perfect compliance of the isolation layers of the radioactive waste repository with the relevant requirements, the monitoring activity must meet the EU standards and regulations to provide for sufficient time for implementing effective measures in the event of contamination.
12. It is proposed that the aforementioned monitoring data is sent to Hungary under a well-functioning programme of radiological data exchange.
13. Establishing surface border monitoring control stations given the sensitive character of the hydrological Danube river basin.

- In this case, again, it is assumed that the text refers to the NRAWR in Mochovce; with regard to the assessed activity, it can be stated in general that the system of monitoring of discharges and discharge impacts on the environment is approved by the NRA SR and that this system has been working for many years; the monitoring results concerning the monitored parts of the environment show minimum impacts of the assessed activity in concurrence with other NFs within the site. For more details see, for example, chapters B.II/01/ and B.II/02/ – operation monitoring, or sub-chapter of Chapter C.II. – monitoring of the radiation burden in the surroundings.

The results of the radiation burden monitoring in the surrounding of the Jaslovské Bohunice site are regularly evaluated and published, for example, on the website of the operator SE-EBO – SE, a.s., and the evaluation of the contribution of the Proponent's facilities is also published on the Proponent's website (JAVYS, a.s.).

The Radiation Control Reports concerning the NFs site of Jaslovské Bohunice aimed to provide an overview of the overall results and obtained data on radioactivity in the environment are also sent by the SE, a. s. to the following organisations - on a quarterly basis: PHA SR Bratislava, Slovak Head Office of the Radiation Monitoring Network of the SR Bratislava, District Office Trnava, and NRA SR Trnava; and on an annual basis to PHA SR Bratislava, Slovak Head Office of the Radiation Monitoring Network of the SR Bratislava, District Office Trnava, NRA

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| | <p>The opinion concludes that besides the issues mentioned above, the Slovak-Hungarian Committee for Cross-Border Waters should discuss at its meeting the question whether it is necessary to extend the existing radioactivity monitoring system because of the Bohunice projects.</p> <p>The opinion also notes that the planned projects can have significant cross-border effects on the Hungarian territory given the proximity of the state borders. Hungary as the affected party is therefore willing to participate in both Slovak processes of approval.</p> | <p>SR Trnava, PHA SR Bratislava, JAVYS, a.s., Bratislava, ETE Temelín and EDU Dukovany.</p> <p>- This does not fall under the Proponent's competence, yet we would like to emphasise that the technologies and worksites detailed in the documentation do exist within the site and do not represent a new activity that the existing monitoring system would not take into account.</p> <p>-</p> |
| <p>Jan Haverkamp (special consultant for Greenpeace) <i>(Letter of 22/03/2013, Annex to the Opinion of Hungary)</i></p> | <p>The opinion deals with two projects in parallel. Only the comments dealing with the activity which is discussed in this document are presented herein.</p> <ol style="list-style-type: none"> 1. The EIA procedure runs at a time when all the facilities have already been installed. This is contrary to Art. 6(4) of the Aarhus Convention which orders all parties to provide for early public participation when all options are open. It seems that this has not happened. Since the public did not participate in the process before the | <p>With regard to the submitted activity, it is not an additional EIA procedure, but compliance with the requirement of the Ministry of Environment of the SR to ensure complex assessment of several technologies and worksites created as a tool for the decommissioning of the crashed A1 NPP from the 1970s (the accident occurred in 1977, and the decommissioning works started in 1979). Since the start of their operation, the given technologies and worksites (in the form existing at that time) have undergone, after the Slovak Act on</p> |

permits for the installed facilities were issued, the facilities seem to be illegal. It is hard to find a solution now. It is evident, though, that the Proponent should stop the on-going activity until a full and legal EIA procedure has been conducted. Such EIA should include a full set of options, and in the event that the current project design is not justified compared to reasonable options, the project must change to include such options irrespective of the costs. The Proponent JAVYS must be considered acquainted with the law, and must be fully legally liable for any costs that may arise from the new process and related changes.

Environmental Impacts Assessment entered into force (in 1994; the Aarhus Convention is from 1998 and entered into force in 2001; the SR acceded the convention in 2005), two EIA processes; the first one (retroactively in this case, as the activity was launched before the adoption of the law) concerned Stage I of the A1 NPP decommissioning, and the second one with the process of A1 NPP decommissioning after the completion of Stage I. The outcome of the second process was a recommendation of Option 3 – “continuous decommissioning of the A1 NPP after the completion of Stage I”. (For a more detailed chronology see introduction to the Assessment Report).

As the requirements for gradually created worksites and installed technologies changed over time, the Proponent asked with regard to all relevant changes the MoE SR for an opinion whether such changes needed assessment under the relevant legislation of the SR. With the exception of changes concerning the unit for the processing of metallic RAW and the large-capacity decontamination line which were assessed under a separate assessment process (this is also indicated in the reviewed text of the Plan), opinions were issued on all changes. According to these opinions, the changes do not require an assessment procedure given, for example, the nature or the extent of such changes (again, briefly described in the text of the Plan); the opinions, however, recommended on each occasion to conduct a complex assessment procedure for these technologies/worksites as they were interlinked in terms of operation and space, and several partial changes of the activity have been recently submitted for opinion. Since the Proponent is currently planning only minor adjustments to the technologies and worksites by installing new equipment with no impact on the nature, extent or capacity of the works performed (e.g. equipment for the fragmentation of large-sized metallic RAW in the main production block for the purpose of their further processing by the RAWPTT, for a description see the respective chapter of the Plan or of the Assessment Report /A.II.8./), in line with the recommendation it did not ask for an opinion on the change of the activity

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| | <p>2. The overall problem of the assessment is the fact that the processing methods are dealt with separately from subsequent storage. It is therefore impossible to have a complex picture to answer the question whether the waste processing described in the Plan leads to actual reduction of environmental impacts or rather to its increase. It is therefore advised to extend the EIA to also include the related storage facilities and to assess the risk of the overall impacts.</p> | <p>under the legislation, but directly started to fulfil the recommendation of the competent authority and submitted the Plan which deals with the given technologies in a complex manner (under the existing circumstances and with the final set and design).</p> <p>We do not agree with this statement, as this activity has no impact on the operation of the NRAWR, and its purposes is to process and treat radioactive waste into a form that enables its release to the environment (through processing, the radionuclide content is reduced beyond a level where the material must be under administrative control) or to meet all requirements for taking over the RAW for deposition at the NRAWR; the construction and operation of the NRAWR, including safeguarding measures, monitoring and the conditions for accepting fixed RAW underwent a separate assessment process. This process, as well as the facility as such complied with all the conditions for being issued a decision on permitting its operation.</p> <p>We therefore assume that there is no unexamined risk arising from the deposition of processed RAW and subsequent increased risk from works with the RAW, and therefore there is no reason for repeatedly including in the assessment process the existing facility which also serves for the operation of the facilities within the Mochovce site in connection with the assessed technologies.</p> |
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| | <p>3. The radioactivity limits and classes of the stored materials used in certain processes are mentioned in several cases. It is not described, however, what are the potential impacts in case such limits or criteria are exceeded and materials with higher radioactivity are processed. Though it should be believed that the (future) operator will always meet the prescribed limits, it cannot be excluded that the limits can be sometimes exceeded as a result of insufficient experience, missing instructions or safety culture and economic pressure or as a result of mischievousness. To get a complex picture of the potential environmental impacts, the realistic scenarios with exceeding the limits should be assessed.</p> <p>4. Chapter II.10 – The total costs are in fact missing. The fact that the equipment is already installed does not mean that it cost nothing or that the operation and final decommissioning after the expiry of its life-cycle requires no costs. These economic factors have a principal role in assessing the limits of the operation and the potential risks as a result of economic pressures. Moreover, the participation of the public is expected always when all options are open. The report cannot be accepted without providing this</p> | <p>- The work processes in the Proponent’s facility are governed by the operating rules which undergo a multi-level process of approval completed by approval of the supervisory body – the Nuclear Regulatory Authority of the SR. The work processes also include multi-level supervision always comprising automatic control which reduces the risk of failure of the human factor.</p> <p>Hypothetically, the processing of RAW with an activity higher than expected can be considered an extraordinary operating condition for the purposes of the assessment; such activity, logically, cannot exceed the level considered for postulated initiation events where a leakage of the entire volume of stored and processed waste is assumed (such as explosion, earthquake, etc.). The assessment of the representative initiation events and their evaluation is presented in Chapter C.III.19. of the Assessment Report, and none of the discussed cases showed the need to declare a hazard zone for the technologies outside of their site.</p> <p>- See Chapter A.II.10.</p> |
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| | <p>information.</p> <p>5. The shutdown of processes after expiry of their life-cycle is not included in the report.</p> <p>6. The CO₂ balance of the proposed activities is missing in Part IV. This information should normally be part of the EIA process. The notes on this matter provided under point 3.3. are irrelevant. The balance of greenhouse gas emissions from these activities constitute part of the overall balance of greenhouse gas emissions from the nuclear operation chain, and this data is therefore relevant.</p> <p>7. An overview of potential health risks for workers is missing, including potential health risks for incident and accident scenarios.</p> | <p>- For the purposes of the reviewed documentation, the impacts of the decommissioning of the RAWPTT nuclear facility were briefly described in Chapter III.6. The “greenfield” decommissioning option has been recommended. A more detailed description is provided in Chapter C.III.18 of the Assessment Report (including estimated collective dose, waste volumes, etc.).</p> <p>- The activity is not a power facility. Most heat for the operation is supplied from the V2 NPP. The only equipment operated by the Proponent for the purposes of heat energy supply for the given technologies is the LOOS boiler (steam production for building 809, specifically for bituminisation lines. Its annual natural gas consumption in the reference year 2011 was 1,593 m³, which corresponds to around 3 tonnes of CO₂. The annual consumption of natural gas as auxiliary fuel (year 2012, after reconstruction; oil was used formerly) for RAW incineration was around 97,193m³, which means that approx. 187 tonnes of CO₂ was released from the incineration of fossil fuels. With regard to total CO₂ emissions in the SR which reach tens of millions of tonnes of CO₂ together with traffic and agriculture, such emission constitutes ten-thousandth of a percent. Further to this justification, we consider the statement in the documentation which underwent the comment procedure sufficient for the purposes of the Plan,</p> <p>- This issue is discussed under Chapter C.III.19 of the Assessment Report.</p> |
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| | <p>8. It is not clear to me why tritium emissions to the air have not been measured, and why no limit value is provided.</p> <p>9. Incidents and accidents are not considered in the Plan. All descriptions of potential impacts only refer to normal operation. It is noted that incidents and accidents were assessed under more general assessments of emergency conditions. If it is so, the authors should provide a reference to these assessments and draw transparent conclusions from this data. This did not happen, however, and given the fact that significant scenarios would lead to considerable emissions of radioactive and/or toxic substances to the environment, it is a clear defect of this report.</p> <p>Another problem is that the stress tests after the Fukushima accident clearly showed that combined accidents and incidents (parallel accidents in more than one nuclear facility at one place – with</p> | <p>- The nuclear facility is not a nuclear power plant in operation, discharging tritium during nuclear processes. Hence, according to the relevant PHA SR decision (since November 2011), tritium is only monitored for the purposes of balancing and evaluation of the dose burden, and no guide value has been specified for this purposes due to the reasons indicated above (the monitoring conditions in line with the decision were indicated in the reviewed document). Under the original decision of the PHA SR, the operator did not have this obligation.</p> <p>- The commented detail and the extent of details of the text are based on the stage of the documentation for the EIA process (it was only a Plan of the activity which was anyway unusually extensive for this purpose given the number of technological nodes/worksites). This issue is detailed in Chapter C.III.19 of the Assessment Report, including opinions on combined initiation events (the combination of fire in the BPC and explosion/earthquake of 8° /plane crash) seems to be representative), while the maximum individual effective dose for a critical group of inhabitants in this combined event reaches less than a third of the dose specified as an exposure limit for an individual from artificial sources of ionising radiation (1 mSv/year).</p> <p>With regard to the impacts of the event common for all NFs within the site, it should be mentioned that all technologies discussed in this document serve primarily for the processing and treatment of waste arising from the decommissioning and operation of the existing equipment, i.e. as such they do not constitute a significant contribution to the radionuclide inventory present within the area. The very purpose of the assessed technologies is the processing of RAW into a form enabling its release to the environment or deposition at the NRAWR, which means that the operation of these technologies reduces the risks arising from the</p> |
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a single cause or without it) were not assessed. The proposed project takes into account emergency scenarios that could lead to higher emissions of radioactive substances to the air, water or soil. These scenarios can have natural causes (including extreme weather and earthquakes), or can be caused by human or technical failures, terrorist attacks, sabotage or war events or a combination thereof.

In general, the authors take too little account of incidents and accidents.

See, for example, page 66: *“The potential risk of water contamination as a result of non-standard operating conditions is prevented by the design of the operating premises (sealed joints between floors and walls, water-proof floors and walls up to a reasonable height, sloped areas conducting to the active sewer system) and by procedures forming part of the approved emergency plan.”*

This suggests that the authors consider the leakage of liquids in an undamaged building as the only possible incident or accident potentially resulting in emissions to watercourses. This is ridiculous, indeed. There are many other possible scenarios which include damages to buildings from which the liquids can leak. It would be

presence of unprocessed RAW from the decommissioned A1 and V1 NPPs and from the operation of the V2 NPP, i.e. absence of such equipment would result in the persistence and accumulation of risks related to various emergency scenarios.

- See the comment in the introduction to the previous section.

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| | <p>reasonable to get prepared for the amounts of substances that would get to the respective water systems.</p> <p>Other example, page 72: <i>“The chapters above imply that the contribution of RAWPTT and A1 NPP decommissioning technology to the radiation burden both under normal operating conditions and non-standard operating conditions is minimal.”</i></p> <p>Considering the fact that the previous chapters do not contain any information on the assessment of incidents and accidents, the conclusion according to which the impacts in emergency conditions are minimal are unsubstantiated. In our opinion, several possible scenarios exist with significant emissions of radioactive substances, including cross-border impacts.</p> <p>We ask for conducting a complex analysis of the impacts of incidents and accidents and its submission to the public before being incorporated in the final report.</p> <p>10. Chapters IV.13 and V. give the impression that it is not the final EIA documentation. It is not clear from the documentation to which stage of the EIA process this report belongs to – whether it is the initial stage or the final assessment</p> | <p>- ditto</p> <p>- As the author notes in the report, the reviewed document was the Plan of the assessed activity, i.e. it was the initial stage of the process which formed the basis of many of the facts commented upon above. The stage of the documentation and its structure follows the provisions of Act of the NC SR No. 24/2006 Coll. on Environmental Impacts Assessment (as amended), whereas the reviewed version of the documentation was</p> |
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| | <p>stage. This does not change anything in the general conclusions that the EIA process is conducted too late and contrary to Art. 6(4) of the Aarhus Convention.</p> <p>11. English: Congratulations – the translation of this report is excellent.</p> <p>12. As often common, the references to sources (data) in this EIA report are absolutely insufficient, due to which the report is very non-transparent. The sources – if possible, sources available to the public – should be indicated in footnotes. There is not even an website link to such publications as the Commission’s decisions under Art. 37 of the Euroatom Treaty of 09 June 2009, though it should be publicly available given the fact that decisions under Art. 37 are not confidential. To state that the sources are available at request does not help creating the public opinion – internet links are more effective in this regard.</p> | <p>indicated in the cover page. For the other part of the comment, see comment on point 1.</p> <p>-</p> <p>- The full text of the document (the translations for the purposes of transnational assessment represent a short extract of these documents) provides space for listing the most important reference documents which formed the basis of used information and websites. Information on the activity as such is provided on the basis of the Proponent’s operation records where no reference to a specific background document can be made in most cases.</p> <p>Given the fact that the documentation is not a scientific work, but a document the aim of which is to present sufficient information to the expert public and the general public in an understandable way and to reasonable extent, we are of the opinion that the listing of information with required details would bring less transparency to this complex document for the general public. The accuracy of the data provided and used in the document is guaranteed by the proponent of the activity and by the author of the documentation, and the accuracy is also verified in the next stage by an independent expert assessor appointed by the MoE SR who is bound to prepare an expert opinion on the activity for the purposes of issuing the Final Opinion of the MoE SR.</p> <p>Moreover, the relevant Act of the NC SR No. 24/2006 Coll. on Environmental Impacts Assessment (as amended) does not define the precise requirements for the details, method and extent of information on used sources.</p> <p>With regard to the Commission’s decision, it should be noted that only a part of the document is published in such cases (the link was provided in</p> |
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| | <p>13. I would like to receive a copy of the decisions of the European Commission of 09 June 2009, Article 37 of Euratom – to be sent to the address jan.haverkamp@greenpeace.org.</p> | <p>the Assessment Report); the Proponent therefore responded in the respective manner.</p> <p>- The Assessment Report (Chapter A.II.16) provides the website on which the Commission’s decision is available.</p> |
| REPUBLIC OF AUSTRIA | | |
| <p>Ministry of Environment of the Republic of Austria (List No. BMLFUW-UW/01/4.2/0012-V/1/2013 of 06/03/2013)</p> | <p>- Informed that after the expert departments of the ministry and the nine federal land governments of Austria discussed the document, it did not intend to participate in the cross-border procedure under the ESPOO convention.</p> | <p>-</p> |