



Mrs. Seija Rantakallio  
Ministry of the Environment  
Point of Contact of the Espoo Convention  
Kasarmikatu 25  
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FIN-00023 Government

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Dear Mrs. Seija Rantakallio,

In February 2008 Austria was informed by the Finnish Point of Contact of the Espoo Convention (Ministry of Environment) of a project plan to construct a new nuclear power plant in Finland. Austria expressed its interest to take part in the Espoo procedure for the new project plan. Consequently, Finland sent Austria a notification including the EIA programme. Further relevant documents as the statement by the contact authority regarding the Environmental Impact Assessment Programme for Fennovoima Ltd's nuclear power project and the final EIA Report were sent to Austria in July 2008, in October 2008 respectively.

Austria submitted an Expert Statement to the EIA Programme in March 2008 and an Expert Statement as Austrian comment to the EIA Report including comments received from the provinces, NGOs and citizens in January 2009.

Bilateral consultations according to Art. 5 Espoo Convention and Art. 7 EIA Directive were held on January 28, 2009, in Helsinki. The discussions during the consultations focused on procedural issues, reactor types, accident analysis as well as radioactive waste management.

It was agreed to send final recommendations on the basis of the results of the consultations until February 4, 2009.

From the Austrian point of view it is of foremost importance to assess the potential consequences of a severe accident for Austrian territory.

In this context, possible influences of the reactor types envisaged on potential source terms for severe accidents are of major interest. Also the methodology for risk assessment is of importance.



Therefore, taking into account the results of the consultations held in Helsinki on January 28, 2009, the Austrian side – according to Art. 6 Espoo Convention and Art. 8 EIA Directive - requests the following to be taken duly into account in the EIA procedure as well as in the next steps of decision making:

1. A conservative worst case release scenario should be included in the EIA, in addition to the limited release scenario according to Finnish regulations. Only results of a detailed safety assessment for the candidate reactor(s) would permit to exclude a larger source term - in case it can be proven beyond doubt that such a larger source term cannot occur.  
Such results, however, are not yet available. Therefore, a source term for e.g. an early containment failure or containment bypass scenario should be analyzed as part of the EIA - in particular because of its relevance for impacts at greater distances.
2. The potential differences between the reactor types under consideration should be duly considered in preparing the Decision in Principle, as far as they can be relevant for safety.  
In particular, this should include differences which can influence the source term for severe accidents, as well as the basic safety philosophy (active / passive safety concept) and the experience available for the reactor types under consideration.
3. In the framework of the Decision in Principle as well as during later stages of the decision making and licensing, information concerning accident analyses, severe accidents and PSA results should be made available to the Austrian side. It has to be emphasized that PSA results are of considerable value for the orientation of designers and regulators (for example, to identify weak points in a reactor design). On the other hand, the inherent limitations of PSA should not be forgotten - such analyses are beset with considerable uncertainties, and some risk factors are difficult to include in a PSA. Therefore, for rare events the probability of occurrence as calculated by a PSA should not be taken at face value, but as an indicative number only.

We request to take also the following recommendations into account, which are of considerable general importance, although not of direct relevance for Austria:

4. For the Decision in Principle, the overall Finnish energy situation should be taken into account.
5. Concerning the final disposal of spent fuel arising from (an) additional reactor(s), the decision on the site of the disposal facility should, first and foremost, take into account the safety point of view (in particular, regarding the question whether there should be one or two depositories in all).

Austria highly appreciates the announcement of the Finnish Ministry of Employment and the Economy (MEE) at the consultations in Helsinki that the following documents would be - According to Art. 6 Espoo Convention and Art. 9 EIA Directive - made available to the Austrian side as an important contribution to keeping the Austrian side well-informed:

- Decision in Principle application by Fennovoima Oy
- Statement of MEE on the EIA
- Decision in Principle including the STUK report on the feasibility study of the reactor types (for all Decision in Principle applications)

The full report on the consultations will follow in due course, as agreed.

Austria would like to express her thanks for the excellent cooperation during the last few months and is looking forward to further cooperation.

With kind regards,

On behalf of the Minister:  
Dr Christian Baumgartner

Electronically signed.