

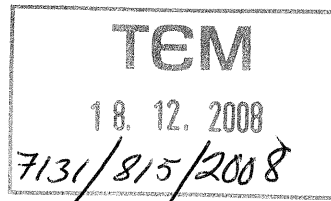
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Miljöorganisationernas
kärnavfallsgranskning

December 18th, 2008

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Dnr: 7131/815/2008

Opinion regarding the environment impact statement, EIS, for the planned Fennovoima nuclear power plant

The Swedish NGO Office for Nuclear Waste Review, MKG, would like to make the following comments regarding the published environmental impact assessment (EIA) for a nuclear power plant at Simo, Pyhäjoki, or Strömfors as presented by the company Fennovoima:

1. Before a decision to build a new nuclear reactor is taken there has to be an assurance that the nuclear waste from the reactor can be managed in an environmentally acceptable and a sustainable way in the long term. Special care has to be taken in the assessment of the plans to manage the spent nuclear fuel from the reactor. The decision to build a new reactor should not be taken before there is an assurance that there is an acceptable method and site available for final disposal of the spent nuclear fuel.

MKG has in the presented EIA found very little information on how Fennovoima intends to manage spent nuclear fuel and other nuclear waste. The environmentally safe management of nuclear waste is the biggest challenge when planning for the use of nuclear power.

As far as MKG understands the situation Fennovoima has not even been able to get an agreement to be allowed to join the ongoing spent fuel disposal project in Olkiluoto.

MKG has, however, understood that it is may be possible in Finland, according to the Finnish Nuclear Energy Law, to get permission to build a nuclear power plant without having any plan for final disposal of spent nuclear fuel. This may explain

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the lack of information in the EIA. That this should be possible in the 21st century in a highly developed country is very surprising.

2. The Finnish plan for final disposal of spent nuclear fuel is a copy of the Swedish plans developed by the Swedish nuclear industry. The KBS-3 method is still under development in Sweden and the review of the latest long-term safety analysis, SR-Can, by the Swedish nuclear regulators has recently been presented. The regulators are critical in their review on a number of points, foremost on the question of risks of clay buffer erosion. In addition there are strong indications that the copper in the canisters could be corroded at a much faster rate than previously believed.

There are therefore still difficult questions to answer regarding the long-term environmental safety of the method. It is seen as especially difficult to show that a repository of the KBS type can withstand the forces of the repeated glaciation cycles that will take place during the time that the waste will still be environmentally hazardous. It has also been found much more difficult than expected to show that the specific sites in Östhammar and Oskarshamn communities can provide bedrock and groundwater conditions that are necessary to make the sites acceptable for a repository of the KBS type.

3. The Finnish program for disposal of spent nuclear fuel is totally dependent on a positive development of the Swedish programme for spent fuel management. The uncertainties in the development of the Swedish nuclear waste programme need to be taken into account in an environmental impact assessment.

Best regards,

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