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Ministry of the Environment
PO Box 35
FIN-00023 Government
FINLAND

07 January 2009 No.13-3-1/47271- 5

Ref.: Environmental impact assessment in a
Transboundary Context for a project plan to construct
a new nuclear power plant in Finland

The Ministry of the Environment of Estonia has received the environmental impact assessment (EIA) report in a Transboundary Context for a project plan to construct a new nuclear power plant in Finland submitted to Estonia by the Ministry of the Environment of Finland in accordance with the Convention on Environmental Impact Assessment in a Transboundary Context (Espoo Convention) for statements and comments and for evaluation of the need for possible consultations.

Estonia organised a public display and hearing of the above EIA documentation. The EIA report was available at the Ministry of the Environment and on the Internet. The public hearing was held on 10 December 2008 in Tallinn. The public had an opportunity to make comments and proposals on the materials until 18 December 2008. The written comments were received from the Ministry of Foreign Affairs of Estonia and the Health Protection Inspectorate.

Based on the comments received, and reflecting its own views, the Ministry of the Environment would like to state the following:

Impact assessment of the proposed project:

The conduction of the cooling water used at the power plant to the sea will increase the water temperature and thereby proliferation of aquatic vegetation and phytoplankton in the impact area of cooling waters. We would like to note that it may cause algal bloom of *Cyanobacteria*, which may in turn influence bathing places in the North Estonia (especially if cooling water will be directed to the shallow sea east of Kampuslandet). We would like to see an estimation in the EIA which demonstrates the probability for such impact.

Also, the loading and unloading station and the navigation channel (incl. harbour quay) will be constructed during the project. Unfortunately the EIA report does not describe the impacts resulting from marine transport. Therefore we kindly ask you to amend the EIA report with that issue.

Risk analysis and assessment:

The impacts of a serious nuclear power plant accident have been estimated in the EIA report. The EIA experts have found that evacuation, iodine prophylaxis and restrictions on the use of foodstuffs and milk are relevant in that case. Some restrictions could be needed for areas up to 1,000 km from the new power plant. Herewith we kindly ask you to take into account in the risk assessment (in the conclusions etc) that two towns in North-Estonia use surface water as drinking water (Tallinn and Narva with the population of over 470,000) and in case of exceptional situations alternative water supply could be needed.

Chapter 10 provides the measures to prevent or minimise the adverse impacts of the project. Herewith the Ministry of the Environment of Estonia is in the position that the proposed measures are relevant and therefore should be realised. Unfortunately the report does not give the information about how the public and the neighbouring countries will be informed of exceptional situations and accidents. The overall purpose of the EIA is to provide information to the public on the proposed activity, possible impacts of the activity and its reasonable alternatives, and the possibilities to prevent or minimise negative environmental impact. Taking into account high public interest in such projects, we would kindly ask you to specify in the EIA report which legislation and articles have to be followed when informing about accident situations and how this activity is planned to be carried out.

Also, the EIA report states the following: "Without any protective measures aimed at livestock or food production, there may be a need for short-term usage restrictions of no more than a few weeks in areas within a radius of as much as 1,000 km. /.../ In unfavorable wather conditions, restrictions on the use of agricultural products ranging from a few months to a few years may be required up to a distance of approximately 10 km". It means that the possible accidents may cause economical loss for agricultural companies in case the harvest will be affected and cannot be sold due to the accident. Taking into account the objective of the EIA, we kindly ask you to clarify who is responsible for the evaluation of this economical loss and on which legislation it is based, incl. international agreements, this loss will be covered.

Spent nuclear fuel and its disposal:

Nuclear power companies are responsible for the safe implementation of the management of radioactive waste until the waste has been disposed in a manner approved by the Radiation and Nuclear Safety Authority.

Based on the EIA report preparations for the final disposal of spent nuclear fuel have already been progress in Finland for 30 years. Posiva Oy started building an underground research facility, "ONKALO", in the bedrock of Olkiluoto in 2004, and the company would like to start the disposal of spent nuclear fuel in 2020.

We would like to draw your attention on the EIA report of the expansion of the repository for spent nuclear fuel (2008, developer Posiva Oy). Following this material the project only covers Posiva's owners Teollisuuden Voima Oy and Fortum Power and Heat Oy needs – only the spent nuclear fuel from Loviisa and Olkiluoto nuclear power plants will be disposed in the planned repository.

Herewith we would kindly ask you to check the information given in the EIA report of the new nuclear power plant – does Fennovoima Oy have the possibility to dispose spent nuclear fuel of the new nuclear power plant in the planned repository (in the bedrock of Olkiluoto) or not.

In case the EIA report will be amended after the publication of the documentation, we would kindly ask you to send us the final version.

Yours sincerely,



Harry Liiv
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Enclosures: Received statements (2)

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Teie 04. november 2008.a. nr. 13-3-1/47271-2
Meie 16. detsember 2008.a. nr. 7.6/11097

**Soome uue tuumaelektrijaama rajamise keskkonnamõju hindamise (KMH)
aruande avalikustamine**

Vastuseks Keskkonnaministeeriumi kirjale 4. novembrist 2008. a. nr. 13-3-1/47271-2 leiab Välisministeerium, et Fennovoima OY plaanitava Soome uue tuumajaama rajamise keskkonnamõjude hindamise aruandes oleks soovitatav kajastada lähemalt tuumajaama rajamise, opereerimise ning kasutuselt kõrvaldamise käigus toimuva võimaliku meretranspordiga seotud mõjusid Läänemere merekeskkonnale arvestades laevaliikluse tihenemist Läänemeresel.

Lisaks ei ole plaanitava tuumajaama rajamise KMH aruandes kajastatud küsimust rahvusvahelisest teavitamisest tuumaintsidentide või -õnnetuste puhul. Avalikust huvist lähtuvalt oleks soovitatav kirjeldada ka keskkonnamõjude hindamise aruandes, millised rahvusvahelise õiguse sätted kuuluvad kohaldamisele tuumaõnnetustest ja -intsidentidest teavitamisel ja kuidas on seda kavas korraldada arvestades võimalikke piiriüleseid mõjusid.

Lugupidamisega,

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Teie 04.11.2008.a nr 13-3-1/47271-2
Meie^{ld} 12.2008.a. nr 1-8.5/3241-1

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Tähelepanekud Soome uue tuumaelektriijaama
rajamise keskkonnamõju hindamise aruande kohta

Tervisekaitseinspeksiioonil on Soome uue tuumaelektriijaama rajamise keskkonnamõju hindamise aruande kohta järgmised tähelepanekud:

1) Aruandest selgub, et tavapärase töö ajal uues tuumaelektriijaamas kiirguslikke piiriüleseid mõjusid ei esine, kuid raske õnnetuse korral võib Eesti olla mõjutatud.

Aruandes vaadatakse läbi projekteeritava tuumaelektriijaama kolm asukohta. Juhul kui tuumaelektriijaam ehitatakse põhjapoole (Pyhäjoki või Simo) jääb Eesti 500 km mõjutsooni. Juhul kui tuumajaam ehitatakse lõuna poole (Ruotsinpyhtää) jääb Eesti põhjapoole osa 100 km mõju tsooni.

Pöörame tähelepanu, et Eestis on kaks suurt linna, kus joogiveega varustamiseks kasutatakse pinnavett:

- a. Tallinn (405000 tarbijat) -suurem osa veest saadakse Ülemiste järvest
- b. Narva (67497 tarbijat) -kasutatakse ainult Narva jõe pinnavett

Raske õnnetuse puhul on vaja Tallinna ja Narva linna elanikkonnale tagada alternatiivne veevarustus. Seega raskete õnnetuste likvideerimise plaanides on vaja ette näha nende linnade kaitstud joogivee allikate (põhjavesi) osatähtsuse suurendamine.

- 2) Aruandest selgub, et jahutusvee mõjualas suureneb veetaimestiku ja taimse planktoni kasv. Merealal toitainerikkuse tõttu võib sinivetikate õitsemine lokaalselt üldistuda, eriti, kui väljavoolukohaks valitakse Kampuslandeti idapoolne madal mereala. Pöörame tähelepanu, et sinivetikad Soome lahes võivad avaldada mõju Eesti põhjapoolisel rannikul asuvatele supluskohtadele

Lugupidamisega

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