mkg
Miljöorganisationernas kärnavfallsgranskning

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Opinion regarding the planned Fennovoima nuclear power plant

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

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 programme found very little information on how Fennovoima intends to manage spent nuclear fuel and other nuclear waste. This indicates that the company has made waste management a low priority. This is not acceptable. The environmentally safe management of nuclear waste is the biggest challenge when planning for the use of nuclear power. MKG has understood that the Radiation and Nuclear Safety Authority, STUK, in its comment on the Fennovoima EIA programme also has commented on the poor coverage of nuclear waste management in the EIA programme.

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

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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. 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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