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Warsaw, 23.11.2016

Courtesy translation

Ms. Seija Rantakallio
Contact point for
Espoo Convention
Ministry of Environment of Finland

In response your notification regarding the procedure of cross-border environmental impact assessment for the planned project: **construction of the encapsulation and final disposal of spent nuclear fuel plant** by Fennovoima Oy's in the town of Pyhäjoki, Finland, I would like to inform as follows.

In accordance with the declaration sent by email on 15.10.2016, the Polish side commenced the cross-border EIA procedure for the project in question. The provided scoping documentation was published in Polish for public consultations in following voivodeships: Zachodniopomorskie, Pomorskie and Warmińsko-Mazurskie for the period of 8 weeks. The general public could also present their comments and remarks regarding the documentation in question. Citizens have also been informed of the possibility to take part in informational meetings regarding the planned investment. Within the framework of the procedure involving the general public and authorities, positions and opinions of the following entities have been filed in relation to the scoping documentation in question (see Annexes):

- Regional Directorate for Environmental Protection in Szczecin
- Regional Directorate for Environmental Protection in Gdańsk
- National Atomic Energy Agency
- Radioactive Waste Management Plant

Below you will find a summary of the comments and remarks regarding the scope of the EIA report as presented in those positions:

Regional Directorate for Environmental Protection in Szczecin commented on the following issues:

1. Identification of the manner of protection against cross-border effects of accidents and failures of both the installation and security measures, as well as ways to reduce the environmental effects of the accident and recovery. In particular this pertains to the water and resources of the Baltic Sea.
2. Presentation of information on the ways of repairing and maintenance of the installation. Therefore types and volume of radioactive waste need to be determined also in relation to worn parts of machines and equipment that was subject to radiation during operation and indicate the ways of handling of this type of waste.
3. Determination of the expected cumulative impacts on the environment due to the proximity of nuclear power company Fennovoima Hanhikivi, and in the case of variant locations in the municipality of Eurajoki - also due to the planned final disposal of Finnish nuclear fuel plant by Posiva OY.
4. Presentation of risk analysis relating to:
 - the introduction of waste into the environment as a result of an accident during transport,
 - the damage to the rock mass as a result of e.g. mining operations,
 - the possibility of saltwater reaching the waste storage sites,

- the possibility of unsealing of the containers for highly active waste and the migration of radioactive materials

complete with the indication of the assumed range of those phenomena, environmental impacts thereof and potential recovery measures.

5. Presentation of the ways and scope of monitoring the storage of highly active waste and review of the reliability of deep storage, in actual geological conditions.
6. Presentation of the ways and procedure of notifying stakeholder countries (Baltic Sea countries) regarding any irregularities in the operation (of failures and disasters as well as their scope and effects) and of measures taken in relation thereto.

Regional Directorate for Environmental Protection in Gdańsk is interested in including the following information in the environmental impact report:

1. Technical description of the storage site
2. Securing the storage site against failures and accidents
3. Scope and manner of monitoring the storage site
4. Scope and range of any radioactivity in the case when the storage site/containers become unsealed
5. Manner of transporting the waste to the encapsulation plant and from the plant to the storage site, complete with securing against any accidents and failures and rules of handling the waste in the case of the occurrence of such failure or accident, which could lead to unsealing the waste containers.

National Atomic Energy Agency provided no comments to the documentation in question and declares its will to take part in subsequent stages of documentation review - by analyzing and assessing the EIA report

Radioactive Waste Management Plant is interested in the evaluation of the cross-border environmental impact assessment of the undertaking, where the EIA report should contain an analysis of potential emergencies, failures or accidents.

We would like to ask you to provide us with the EIA report as soon as it is drawn up, in an electronic form and in at least 3 paper copies. If possible, we would also like to request a translation into Polish of those parts of the documentation, which pertain to the analysis of the potential cross-border impact, as well as to the issues raised by the Polish institutions. This will considerably accelerate the process of assessment and issuing opinions on the documentation by the general public and by Polish authorities. In accordance with Polish legislation, documentation published within the framework of public consultations must be available in Polish, also in the paper form.

Katarzyna Twardowska

Deputy Director of the EIA Department

Annexes:

1. Position of the Regional Directorate for Environmental Protection in Szczecin
2. Position of the Regional Directorate for Environmental Protection in Gdańsk
3. Position of the National Atomic Energy Agency
4. Position of the Radioactive Waste Management Plant

CC:

1. Regional Director for Environmental Protection in Szczecin
2. Regional Director for Environmental Protection in Gdańsk
3. President of the National Atomic Energy Agency
4. Deputy Director of the Radioactive Waste Management Plant