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- Grundad 1988 -

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Ärendenummer NV-06662-20

Attention: Richard Kristoffersson

**On the request from the Finnish Ministry of the Environment for consultation under the Espoo Convention regarding plans to extend the operating time of the Loviisa nuclear power plant. Case number NV-06662-20**

The Swedish Environmental Protection Agency has sent a consultation referral in headlined matters. The non-profit association Environmentalists for Nuclear (Miljövänner för Kärnkraft, MFK), has been given the opportunity to comment and would like to emphasize the following views:

**Background.**

The Loviisa nuclear power plant consists of two pressurized reactors built in 1977 and 1981, respectively. In 1998 the original power 440 MWe was increased to 507 MWe. Both reactors are of Soviet VVER-type with containment designed by Westinghouse and Siemens instrumentation.

The power station was planned and built according to western world security standards and has been continuously kept and updated, all contributing to its uniquely good running and production data. In addition, the Finnish focus on educational training, research and development are essential parts of daily operation, security culture and future nuclear power design.

Fortum-owned Loviisa nuclear power plant represents fossil free and perpetual electric power production of some 10% of the domestic use, i.e. an essential contribution to the climate goal of Finland and EU.

**Matter for the referral.**

The size of the Loviisa reactors is particularly interesting because it lies between traditional large reactors of type Oskarshamn III or Olkilouto III and smaller so-called SMRs. The current operating condition of the reactors extends to the end of 2027 and 2030, respectively. Due to internationally recognized scientific and technologic experience, the operating time of well-designed and maintained nuclear reactors can be extended to at least 60 years. Finland has therefore, in good time, initiated a process to extend the plants' operation for another 20 years.

Finland is the first country to approve of a method for final disposal of so called nuclear fuel waste. Future SMRs could contribute to an even better utilization of the fuel and drastically reduce both the amount of waste and its storage time. An extension of the Loviisa reactors' operating time by 20 years could contribute to an evolution of new safe, environmentally friendly, small-scale, diversified and more local reactor technology. Development of SMR is well under way and two Russian SMRs are currently in operation.

**Opinion statement from Environmentalists for Nuclear (MFK) will thus be:**

With the support of documents referred to in the application, including Environmental Impact Assessment dated September 2021 and therein, from experience and knowledge of reactor operation, both Swedish and international, as well as from academic nuclear physics research, MFK finds that reported environmental impact assessment reliably shows that continued operation of Loviisa 1 and 2, as well as other activities in connection therewith, can take place without potential consequences or environmental impact on Swedish territory.

Carl Erik Magnusson  
Chairman

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