

Environmental Impact Assessment Report

for the Facility for Treatment and Conditioning of Radioactive Waste with a High Volume Reduction Factor at Kozloduy Nuclear Power Plant

CHAPTER 10

DESCRIPTION OF THE INFORMATION ACQUISITION PROBLEMS (TECHNICAL REASONS, INSUFFICIENCY OR LACK OF DATA) RELATED TO EIAR DEVELOPMENT

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10. DESCRIPTION OF THE INFORMATION ACQUISITION PROBLEMS (TECHNICAL REASONS, INSUFFICIENCY OR LACK OF DATA) RELATED TO EIAR DEVELOPMENT

10.1 Problems on the procedure

In the line of executing their Contract obligations, the team of experts developing EIAR presents to the Contracting authority several revisions of EIAR, which are subject to changes in time, by updating the information in them, including the comparative analyses according to the current normative base.

The difficulties in the development of the different revisions are various, and actions have been taken to overcome them.

Revision 1

For the quality assessment **a change in the EIAR text (Rev. 1)** is presented. The version (Rev.1) of the text is not final due to the following reasons:

- The final version of the ToR for determining the scope and content of IP EIAR approved by MEW is not available to the experts;
- At the time of development of the present EIAR the experts have not included the opinion, remarks and recommendations of the Competent Authority on the EIAR scope and content. At this stage, by Decision 26-PR/2010 of the Minister of Environment and Water regarding the need of EIAR for a Facility for Treatment and Conditioning of Radioactive Waste with High Volume Reduction Factor at Kozloduy Nuclear Power Plant, Ref. No 26-00-939/20.07.2010 it is prescribed to perform a Compatibility Assessment in regard to the subject and purposes of preservation of the protected areas within this EIAR procedure. However, due to the not approved ToR for EIAR scope and content, there are no clear instructions for its implementation.

Due to the above reason, the consultations on the ToR for EIAR scope and content with the local authorities, RIEW, BNRA and other stakeholders have not started. Therefore, their recommendations are not included in the text either.

There is a letter received by the MH, to which the Investor has sent for consultation a version of the ToR for EIAR scope and content, which is not approved by the Competent authority – MEW. This will probably require, upon receiving a letter from MEW for starting of the EIAR procedure, the revised ToR for EIAR scope and content to be sent again to the MH for approval.

The Competent authority has requested in written the Contracting authority to send information in the relevant official form to Romania, being the closest country to the IP location. Also, it became clear from the discussions, including with MEW experts,

at a meeting requested by the Investor, that such a procedure will be implemented. Therefore, if there are recommendations by the Romanian Ministry of Ecology, they should also be considered in the EIAR.

At this stage, the experts recommend the final version of EIAR, which will be submitted to MEW, to be supplemented with the ToR revised by the Contracting authority, which should correspond to the final EIAR, reflecting the opinions and statements of the government, municipality and other authorities and organizations that the EIAR ToR has been consulted with.

Revision 2

The current EIAR text, submitted to MEW, is **Rev. 2**. EIAR has been supplemented and revised, taking into account the recommendations, remarks and performed consultations after presenting the MEW letter for EIAR quality assessment (Attachment 6, MEW letter Ref. No OVOS-277/28.05.2013).

10.2 Technical problems

According to the requirements of the Project Contract and the ToR of the Client, KNPP is obliged to present the necessary information and data required for EIAR implementation.

During the first project meeting on 17.10.2011 the Contractor has presented to the Client – KNPP, a List with the input data necessary for implementation of EIAR of a Facility for Treatment and Conditioning of Radioactive Waste with High Volume Reduction Factor (PMF) at Kozloduy Nuclear Power Plant.

During development of EIAR **Revision 1** the protocols from the measurements of the work environment for the period 2009 – 2011 (dust, noise, vibrations, ionizing radiation) required by the Contractor have not been presented.

There are no copies of the letters from the Contracting authority to MEW and RIEW requesting the specification of other plans or projects, existing or in the process of development or approval, which in combination with the assessed IP may have an unfavorable impact on the protected areas, in order to develop the Compatibility Assessment Report for the IP. The answers to those letters are missing.

The Contracting authority communicates with the Competent authority (as per contract), but does not inform in a timely manner the work team of EIAR experts of the course and results from the communication process, which is needed for the expeditious and quality completion of the EIAR elaboration.

Both revisions of the EIAR (**Rev. 1 and Rev.2**) have been developed only on the basis of the data and information officially presented to us by the Client.

During the elaboration of the present EIAR text – revision (**Rev. 2**) KNPP has provided maximum assistance with:

- Additional information on the state of the environment,

- Elaboration of an “Analysis of the dose rate for the population in the monitored 30-km KNPP area from gaseous and liquid releases in the environment from the decommissioning process of Units 1-4 and the emissions from the Plasma melting facility (PMF, Project 5c)”. The reasons of the experts for this choice are related to work according to an approved model, under which KNPP performs its radiation monitoring, comparability of the results and accuracy of the quantitative assessment of cumulative effects. The model is based on information from 2010, as required by the experts, in order to assess the background state resulting from the Fukushima accident.
- Sending of letters for conducting consultations with the stakeholders in the EIAR ToR scope and content. All the sent and received letters, the considered recommendations and corrected remarks are indicated in a new table in EIAR chapter 7.
- Initiating meeting with the Competent Authority for clarification of the details in which the additional information in the EIAR should be presented.

Based on the measures and corrective actions taken by KNPP and the team of EIAR experts, the technical difficulties have been overcome.