



**LIETUVOS RESPUBLIKOS APLINKOS MINISTERIJA**  
**THE MINISTRY OF ENVIRONMENT OF THE REPUBLIC OF LITHUANIA**

A. Jakšto St 4/9, LT-01105 Vilnius, tel: (+370 5) 266 35 39, fax: (+370 5) 266 36 63, e-mail: info@am.lt http://www.am.lt

---

Ministry of Natural Resources and  
Environmental Protection of the Republic of  
Belarus  
10 Kollektornaya Street, Minsk  
Republic of Belarus

September 2024 No. (10)-D8(E)-

**REGARDING THE REPORT ON THE RESULTS OF RADIATION AND ENVIRONMENTAL MONITORING IN THE CONTROL AREA OF THE BELARUSIAN NUCLEAR POWER PLANT (FOR THE YEAR 2023)**

Referring to letter of the Ministry of Natural Resources and Environmental Protection of the Republic of Belarus of May 07, 2024 No. 11-1-5/110-ини-2, we are hereby sending our comments and proposals for The Report On The Results Of Radiation And Environmental Monitoring In The Control Area Of The Belarusian Nuclear Power Plant (for the year 2023) (hereinafter referred to as the Report):

1. The Report is missing a table, summarizing the results of chemical monitoring of ground-water in 2023 (similar to Table 8.3 of the Report for the year 2022).

2. Fig. 8.8 of the Report does not visually represent the amplitude and correlation of the changes in groundwater levels, because a single scale has been chosen to represent the levels of all boreholes, although the difference in the levels of individual boreholes is significant, up to 15 metres. In order to illustrate the results, the boreholes should be grouped according to the changes in the groundwater level and should be represented in separate graphs. Please take into consideration that this comment was also provided in 2023 and was not taken into account.

3. The statement in the Chapter 1 of the Report: “The design of the Belarusian NPP meets **the most modern**, so-called “post-Fukushima“ standards of reliability and safety” does not correspond to reality. From the very beginning of implementation of the Belarusian NPP project Lithuania has been raising a wide range of issues related to the safety of this nuclear facility on the Astravets site, but up to now we have not seen any practical efforts from the Belarusian side to resolve these issues (see Lithuanian State Nuclear Power Safety Inspectorate’s letter of 22 May 2024 to the Ministry of Emergency Situation of the Republic of Belarus).

4. It is stated in Chapter 1 of the Report, that “The safety of the Belarusian NPP project **has been repeatedly confirmed** by experts of the International Atomic Energy Agency (hereinafter - IAEA) and the World Association of Nuclear Operators (hereinafter - WANO)”. It shall be noted

that ensuring of safety of nuclear installation is a national responsibility. Neither external experts nor international review missions can “confirm” the safety of any installation. Review by external experts and missions usually results in formulation of recommendations and suggestions. National efforts should be concentrated on timely implementation of those recommendations and suggestions thus improving the real safety level of nuclear installations. Plans and results of their implementation should be communicated to the general public and the international community.

5. Chapter 3 of the Report states that „... carrying out activities on the use of atomic energy in accordance with the provisions in the field of radiation safety reflected in international contracts, agreements and conventions ratified by the Republic of Belarus, national legislation of the Republic of Belarus, local legal acts of the enterprise, **as well as IAEA recommendations**”. This statement is misleading since Belarus does not adhere to all recommendations of IAEA (see Lithuanian State Nuclear Power Safety Inspectorate’s letter of 22 May 2024 to the Ministry of Emergency Situation of the Republic of Belarus).

6. Chapter 6.9, Tables 8.3 and 8.4 of the Report refer to such indicators as PD (Permissible Discharge) and MPD (Maximum Permissible Discharge). It should be specified: 1) what is the difference between these two indicators and 2) how their values should be interpreted, especially taking into account that information about these indicators was not available to Lithuania before receiving this Report. We would also like to receive information about the basis of determination of the discharge limits set for Unit 1 and Unit 2 of the Belarusian NPP, both of which are already in commercial operation.

Vice-minister  
Justas Ruškys

**DETALŪS METADUOMENYS**

<b>Dokumento sudarytojas (-ai)</b>	Lietuvos Respublikos aplinkos ministerija 188602370, A. Jakšto g. 4, LT-01105 Vilnius
<b>Dokumento pavadinimas (antraštė)</b>	REGARDING THE REPORT ON THE RESULTS OF RADIATION AND ENVIRONMENTAL MONITORING IN THE CONTROL AREA OF THE BELARUSIAN NUCLEAR POWER PLANT (FOR THE YEAR 2023)
<b>Dokumento registracijos data ir numeris</b>	2024-09-09 Nr. D8(E)-4160
<b>Dokumento gavimo data ir dokumento gavimo registracijos numeris</b>	–
<b>Dokumento specifikacijos identifikavimo žymuo</b>	ADOC-V1.0
<b>Parašo paskirtis</b>	Pasirašymas
<b>Parašą sukūrusio asmens vardas, pavardė ir pareigos</b>	Justas Ruškys, Viceministras
<b>Sertifikatas išduotas</b>	JUSTAS RUŠKYS LT
<b>Parašo sukūrimo data ir laikas</b>	2024-09-06 15:53:58 (GMT+03:00)
<b>Parašo formatas</b>	XAdES-X-L
<b>Laiko žymoje nurodytas laikas</b>	2024-09-06 15:54:09 (GMT+03:00)
<b>Informacija apie sertifikavimo paslaugų teikėją</b>	EID-SK 2016, AS Sertifitseerimiskeskus EE
<b>Sertifikato galiojimo laikas</b>	2023-07-10 14:05:26 – 2028-07-08 23:59:59
<b>Informacija apie būdus, naudotus metaduomenų vientisumui užtikrinti</b>	"Registravimas" paskirties metaduomenų vientisumas užtikrintas naudojant "RCSC IssuingCA, VI Registru centras - i.k. 124110246 LT" išduotą sertifikatą "DBSIS, Informatikos ir ryšių departamentas prie Lietuvos Respublikos vidaus reikalų ministerijos, į.k.188774822 LT", sertifikatas galioja nuo 2022-05-19 16:48:06 iki 2025-05-18 16:48:06
<b>Pagrindinio dokumento priedų skaičius</b>	–
<b>Pagrindinio dokumento priedamų dokumentų skaičius</b>	–
<b>Priedamo dokumento sudarytojas (-ai)</b>	–
<b>Priedamo dokumento pavadinimas (antraštė)</b>	–
<b>Priedamo dokumento registracijos data ir numeris</b>	–
<b>Programinės įrangos, kuria naudojantis sudarytas elektroninis dokumentas, pavadinimas</b>	DBSIS, versija 3.5.77.2
<b>Informacija apie elektroninio dokumento ir elektroninio (-ių) parašo (-ų) tikrinimą (tikrinimo data)</b>	Atitinka specifikacijos keliamus reikalavimus. Visi dokumente esantys elektroniniai parašai galioja (2024-09-09 08:22:48)
<b>Paieškos nuoroda</b>	–
<b>Papildomi metaduomenys</b>	Nuorašą suformavo 2024-09-09 08:22:48 DBSIS