



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

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

---

Dorota Toryfter-Szumańska  
General Directorate for Environmental Protection  
of Poland  
E-mail: [dorota.toryfter-szumanska@gdos.gov.pl](mailto:dorota.toryfter-szumanska@gdos.gov.pl)  
Cc: [marta.truszevska@gdos.gov.pl](mailto:marta.truszevska@gdos.gov.pl)  
Cc: [sekretariat.doos@gdos.gov.pl](mailto:sekretariat.doos@gdos.gov.pl)

**REGARDING THE SCOPE OF THE EIA REPORT FOR PROJECT “CONSTRUCTION AND OPERATION OF A SMALL MODULAR NUCLEAR POWER PLANT WITH A TOTAL CAPACITY OF UP TO 1300 MWE USING BWRX-300 TECHNOLOGY IN OSTROŁĘKA, OSTROŁĘKA MUNICIPALITY”**

This is a formal reply to the letter of the General Directorate for Environmental Protection of Poland of 22 January 2024 regarding the EIA scoping for project “Construction and operation of a small modular nuclear power plant with a total capacity of up to 1300 MWe using BWRX-300 technology in Ostrołęka, Ostrołęka Municipality” (hereinafter referred to as the Project).

Ministry of Environment of the Republic of Lithuania, acting as an authority responsible for coordination of the transboundary EIA process, has completed the procedures of consulting relevant Lithuanian institutions and general public. Our comments and remarks concerning the scope of the Environmental Impact Assessment Report are provided below.

1. The Project Information Sheet (section 4.1) indicates that the Investor has not yet decided on the type of spent fuel storage facility (wet or dry storage) to be built on the site of the nuclear power plant. Therefore, the EIA Report should describe and assess both types of repository and potential negative impacts in case of the “beyond design basis” accidents and related releases of radionuclides from a reactor or spent nuclear fuel into the environment.
2. The Project Information Sheet (section 12.2) states that the Investor will provide an analysis of the impact of radionuclide releases in the EIA Report under a hypothetical accident scenario. We believe that more information should be provided on the hypothetical accident scenario that will be assessed in the EIA Report. Will the accident scenario be limited to the reactor or will the hypothetical accident scenarios be applied to the spent fuel storage facility (wet and dry type)?
3. According to the Nuclear Safety Requirements BSR-1.8.10-2021 “Analysis of the consequences of possible nuclear and radiological accidents at a nuclear power facility” in Lithuania, as well as international recommendations, the list of postulated events must in-

clude a crash of a civilian aircraft and a seismic event. How such events will be assessed in the context of the Project?

4. We suggest that the EIA Report should indicate whether the design of the nuclear power plant will be guided (if so, by which) documents of the Western European Nuclear Regulators Association (WENRA).
5. In our opinion, the Environmental Impact Assessment should include assessment of potential impacts related to other industrial facilities in the vicinity of the Project site.
6. We believe that the EIA Report should provide information about the plans to conduct stress tests and establishment of the zones and distances for emergency preparedness around the Project site.
7. The EIA Report should include information about the measures foreseen to mitigate consequences of a nuclear accident and methods of exchanging information with international organisations and neighbouring countries in the event of a nuclear or radiological accident or incident.
8. In our view, the EIA should employ radiation exposure assessment models generally accepted worldwide and the EIA Report should indicate the doses of selected representative persons due to radionuclide discharges and relevant determinant factors (pathways, routes and quantities of releases of radioactive substances into the environment).
9. The letter of the General Directorate for Environmental Protection of Poland states that “there are no prerequisites to carry out the proceedings on the assessment of environmental impact in a transboundary context, as the range of the impact will not extend beyond the Polish territory.” We believe that such a statement is premature and can be made only after the EIA Report is prepared and potential transboundary impacts fully assessed.

We are looking forward to further cooperation and would like to thank you for providing opportunities to participate in an open and transparent transboundary EIA.

Yours sincerely,

Vice-minister  
Raminta Radavičienė

**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 SCOPE OF THE EIA REPORT FOR PROJECT "CONSTRUCTION AND OPERATION OF A SMALL MODULAR NUCLEAR POWER PLANT WITH A TOTAL CAPACITY OF UP TO 1300 MWE USING BWRX-300 TECHNOLOGY IN OSTROŁĘKA, OSTROŁĘKA MUNICIPALITY"
<b>Dokumento registracijos data ir numeris</b>	2024-03-01 Nr. D8(E)-1181
<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>	Raminta Radavičienė, Viceministras
<b>Sertifikatas išduotas</b>	RAMINTA RADA VIČIENĖ, Lietuvos Respublikos aplinkos ministerija LT
<b>Parašo sukūrimo data ir laikas</b>	2024-03-01 14:26:44 (GMT+02:00)
<b>Parašo formatas</b>	XAdES-T
<b>Laiko žymoje nurodytas laikas</b>	2024-03-01 14:26:51 (GMT+02:00)
<b>Informacija apie sertifikavimo paslaugų teikėją</b>	ADIC CA-B, Asmens dokumentu israsymo centras prie LR VRM LT
<b>Sertifikato galiojimo laikas</b>	2023-05-12 09:34:45 – 2026-05-11 09:34:45
<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 pridedamų 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 3.5.75.8.1
<b>Informacija apie elektroninio dokumento ir elektroninio (-ių) parašo (-ų) tikrinimą (tikrinimo data)</b>	Atitinka specifikacijos keliamus reikalavimus. Visi dokumente esantys elektroniniai parašai galioja (2024-03-01 14:28:09)
<b>Paieškos nuoroda</b>	–
<b>Papildomi metaduomenys</b>	Nuorašą suformavo 2024-03-01 14:28:10 DBSIS