

29.08.2023 N 11-1-1/245-1/10

To the Head of Pollution
Prevention Policy Group of the
Ministry of Environment of the
Republic of Lithuania,
Mr. Vitalijus Auglys

On the receipt of the Notification

The Ministry of Natural Resources and Environmental Protection of the Republic of Belarus (hereinafter – the MNREP), referring to letter No. D8(E)-3718 dated 16 June 2023 of the Ministry of Environment of the Republic of Lithuania, which was received by the MNREP through diplomatic channels, has the honour to inform the following.

By the present letter, the MNREP confirms the receipt of the Notification in accordance with Article 3 of the Convention on Environmental Impact Assessment in a Transboundary Context regarding the decommissioning of the Ignalina Nuclear Power Plant (hereinafter – the Notification).

Taking into account the fact that the decommissioning of the Ignalina NPP facilities, in view of their location on the border with the Republic of Belarus, can cause harmful transboundary impact on the components of the environment of our country, the Republic of Belarus intends to participate in the procedure of environmental impact assessment (EIA) of the above activity as an affected party in full.

Please note that the information submitted with the Notification: "Summary of the Environmental Impact Assessment Programme. Decommissioning of the Ignalina Nuclear Power Plant" (hereinafter – the EIA Programme) raised a number of questions among Belarusian specialists (*attached*).

In this connection, the Belarusian side expects the Republic of Lithuania to provide additional information and reasoned answers to the above questions

before the submission of the full EIA Report on the proposed activity to the Belarusian side.

Attachment: the above-mentioned on 3 pages in 1 copy.

Deputy Minister

Ivan Prykhodzka

Questions and comments of interested state authorities of the Republic of Belarus on the results of consideration of information on the proposed activities at the Ignalina NPP

1. It is not clear from the text of the EIA Programme (*paragraph 3 p. 20*), under what conditions and to which representative person the estimation of exposure doses was carried out for the Ignalina NPP decommissioning projects.

In this regard, the following information should be reflected in the EIA Report: list of methodological recommendations or software tools used in the assessment of doses to the public of neighbouring countries; public exposure pathways considered in the estimation; criteria for the selection and characterisation of a representative person; radiological criteria used.

2. The EIA Programme lacks information on further management of waste generated during the dismantling of Unit 1 and 2 reactor cores (R3 zone) (graphite stacks, reactor metal structures, structures and cavity fillers (sand, serpentinite, water). Therefore, the EIA Report should clearly indicate the placement of the core structural components and, in particular, the reactor graphite stacks, and assess the impact of this facility on the environment and the public.

3. We believe that the EIA Report on the decommissioning of the Ignalina NPP should be prepared taking into account the general requirements and recommendations on the content and procedure of the prospective assessment of radiological impact on the public and the environment stated in the IAEA Safety Guide GSG-10 "Prospective Radiological Environmental Impact Assessment for Facilities and Activities" (Vienna, 2018).

The assessment of radiological impact on the public and the environment requires the assessment of: the impact of individual technological processes of the Ignalina NPP decommissioning (dismantling of equipment, decontamination, waste management, demolition of buildings and remediation of the site); the potential cumulative impact of the entire decommissioning process; radiological impact on the public and the environment in case of potential emergencies (potential exposure). In addition, the projected levels of environmental contamination, including Lake Drisvyaty, and doses to the public of the neighbouring countries shall be assessed in accordance with paragraph 3.124 of the IAEA General Safety Requirements – GSR Part 3 "Radiation Protection and Safety of Radiation Sources: International Basic Safety Standards" (Vienna, 2014).

4. We believe that the EIA Report shall include the assessment and consideration of risks related to the delay of construction of the B-20 and B-25 radioactive waste repositories, taking into account that tenders for the procurement of works on the construction of the B-25 radioactive waste

repository have been repeatedly held since 2018, and the performer of these works has not yet been identified.

5. Paragraph 2.2 of the EIA Programme (p. 8) provides for the dismantling of Unit 1 and 2 reactor cores, including the dismantling of graphite stacks, in 2028-2034. At the same time, according to the information obtained during the Joint Eighth and Ninth Review Meeting of the Contracting Parties to the Convention on Nuclear Safety (*held in March 2023*), at present, works on the decommissioning of the Ignalina NPP are carried out without: design documentation for the Ignalina NPP decommissioning; concept of reactor dismantling; technologies for the dismantling of graphite stacks and safety justification of the planned works.

Therefore, please provide relevant additional information on this issue.

6. The EIA Programme (p. 9) states that engineering structures contaminated with radionuclides, whose contamination exceeds the free release levels, will be demolished as the NF engineering structures. At the same time, the estimated volume of RW to be disposed, the estimated capacity of the proposed RW storage sites, as well as the categorisation of RW by activity and the options for the management of different categories are not specified in the EIA Programme.

Furthermore, the proposed form of RW storage (in buildings, as described in the EIA Programme) does not meet the requirements for RW storage facilities (*IAEA Safety Guide No. WS-G-6.1 "IAEA Safety Standards for protecting people and the environment. Storage of radioactive waste"*).

In view of the above, please provide further information on this matter.

7. The "Biodiversity" section of the EIA Programme (p. 22) states: "...The INPP ensures the monitoring of the level of radionuclides in the vegetation, vegetables and food samples selected in the INPP region...". In this regard, please provide answers to the following clarifying questions: are such data publicly available? What is the distance from the INPP at which samples are taken? Which radionuclides are assessed? Will such monitoring be continued at all stages of implementation of the INPP decommissioning projects?

8. The EIA Programme contains contradictory information, in particular: in paragraph 4 of the "Water" section (p. 22) "Decommissioning projects that have already been completed, as well as ongoing projects, have been organised in such a way as to avoid the generation of industrial wastewater. The same approach will be also used in the preparation of the technical documentation for future projects". Meanwhile, paragraph 11 of the same section (p. 22) states the following information: "Industrial wastewater will be treated as potentially radioactive wastewater to prevent spread of radionuclides into the environment".

In this regard, please provide answers to the following questions: What methods of industrial wastewater treatment will be used? Will all radionuclides be removed from the water to prevent releases to the environment?

9. Sub-paragraph 10 of the "Water" section of the EIA Programme (p. 22)

states: "...Under normal conditions of work performance uncontrolled wastewater discharges into the environment are prevented during PEA". Therefore, please provide information: how the risk of radionuclide transfer as a result of emergency situations in the course of works, as well as in case of fire and wind towards Belarus (the border is 5 km away) is assessed?

10. We propose to expand the content of the EIA Programme by including the following additional paragraphs (sections) with:

- information on the assessment of exposure doses to a representative person, obtained on the basis of actual parameters of radiation situation, measured values of radioactive releases to the environment during the implementation of the completed Ignalina NPP decommissioning projects;

- information on the results of comparison of an exposure dose to a representative person obtained on the basis of actual data with exposure doses that have been preliminarily estimated for already implemented Ignalina NPP decommissioning projects;

- assessment of the impact of potential radiation emergencies in the course of the dismantling of the reactor cores of Unit 1 and 2 of the Ignalina NPP and management of generated radioactive waste, taking into account their categories.

11. We consider it necessary to instrumentally confirm the information stated on page 22 of the EIA Programme: "based on the water quality Lake Drūkšiai can be assigned to the Class of a very good ecological condition".

In this regard, we propose to restart joint surface water sampling at Lake Drisvyaty (Drūkšiai) – in accordance with the Technical Protocol of the Ministry of Natural Resources and Environmental Protection of the Republic of Belarus and the Ministry of Environment of the Republic of Lithuania on cooperation in the field of monitoring and information exchange on the state of transboundary surface waters of 10 April 2008.