

Joint Project – Nuclear Risk & Public Control: Webinar

EIA for the lifetime extension of NPP Loviisa 1&2/Finland (Scoping phase)

Oct 8, 2020, 10a.m.-12p.m. CET

Report

14 participants from 8 countries (AT, CZ, DK, IT, FI, PL, S, TR) took part in the webinar.

The three **presentations can be downloaded** from our website <http://www.joint-project.org/>.

Gabriele Mraz introduced the EIA scoping phase, based on EU EIA directive and on the ESPOO-Convention. The scoping serves to collect comments by various stakeholders on the scope and details required for the EIA Report to fulfil the legal requirements (e.g. alternative solutions, information level on several topics).

Patricia has asked the NGOs to demand notification which lies in the hand of the respective governments – ESPOO Contact Point. Finland notified not only its neighbours and the Baltic states but also included Austria. Some countries' ministries of the Environment refused to notify for the upcoming EIA procedure, among them the Czech Republic. However, a statement can be sent via FOE Austria/ Global 2000 which will forward it to the Finnish authorities via the Austrian ESPOO Contact Point.

In particular questions of alternatives, proof of disposal for the nuclear waste and impacts of a severe accident the scoping statement should cover. Especially important is to ask how Finland will prove the KBS method to be safe for final disposal (copper corrosion – Johan Swahn is working on this, see below); and to challenge the maximum source term of 100 TBq Cs-137 and the radius of 1,000 km as the basis for assessing the most severe accidents for Europe.

Oda Becker in her presentation provided an overview over the reactor type used in the Loviisa NPP:

Those two units are nicknamed “Eastinghouse” reactors due to the mix of Soviet and Westinghouse technology. They have a containment and an ice condenser (contrary to e.g. NPP Dukovany or Rivne). Loviisa is the oldest operating VVER-440/213 reactor: Physical aging set and accident likeliness increases. The original lifetime of 30 years was already reached at the end of the last decade now the second lifetime extension is up for an EIA procedure.

There are well-known safety deficits which need to be taken very seriously: Nuclear regulator STUK found embrittlement of the reactor pressure vessel, the IAEA saw insufficient maintenance during its OSART mission; however only a summary of this mission is available. For the experts, stakeholders and the general public it is necessary to receive access to the whole 2018 OSART report as well as the follow-up report from the mission in February 2020. Most of the recommendations of the 2018 mission were not fulfilled. STUK only points out the positive, not negative features.

A lot of upgrade took place compared to e.g. Dukovany, but design deficiencies remain, non-separated safety systems. E.g. assumptions that a fire would not take place in a nuclear NPP, thus not separated systems were built, this cannot be retrofitted now.

Seismic risk was not considered when Loviisa was built back then Finland was seen as earth-quake free. The safety systems are not designed to withstand earthquakes.

WENRA recommends that PLEX reaches the same safety objectives as new NPPs. But this is not possible; the public has the right to be informed on the remaining gaps in a risk report.

The Loviisa site is located directly at the Baltic Sea at the Gulf of Finland, therefore flooding and sea level rise are a risk. The height of the protective barrier was formerly designed to reach 3 meters, now 4.1 meters are foreseen.

Patricia Lorenz

Not only Loviisa has a lifetime extension, also Doel and Krsko are coming up – the EIA for Krsko will also be trans-boundary, not only national as some media reported earlier.

There is a long fight for EIA on PLEX procedures in the ESPOO Convention ongoing. The Espoo Implementation Committee (IC) clearly concluded that also NPP lifetime extension needs an EIA; but countries refused to accept this and started negotiating about it and came up with the compromise that only for the Rivne NPP/Ukraine an EIA would be needed with the argument that it was a specific reactor. Many PLEX cases were reported to the ESPOO Implementation Committee, which is stuck with over 20 unsolved cases. Already at the 2014 MOP an ad-hoc-working group was formed and was meanwhile joined by most countries of the ESPOO Convention. Now, six years later, a draft Guidance was presented, but in the background very conflicting debates are still being led.

Therefore it is important that many NGOs take part in this EIA and also in the upcoming ones!

Ulla Klötzer/Women Against Nuclear Power, and Tove Selin/Friends of the Earth, both from Finland:

It is a pity that no one from the big Finnish organizations took part in the webinar, but they reduced working on nuclear issues. Statements should also be sent to the EIA competent authorities, not only to the ESPOO contact point in Finland, and also to STUK.

Fortum, the operator of Loviisa, has lost a lot of its reputation due to the coal plant Uniper.

Finnish people respect their authorities highly therefore it would be helpful if authorities (e.g. the Austrian) take a stand.

Both NGO representatives will collect comments and inform on how many comments were made.

Johan Swahn (MKG, Sweden) offered up-to-date information on the KBS method that shall be used in Finland, but in Sweden is still under discussion: In Sweden, the Environmental Court and the regulator SSM are involved, the Env. Court said that they should not issue the license, but the regulator said the method was okay. Fact is: A 20 year old experiment in Oskarshamn with copper and clay showed that corrosion was on it, even though copper was believed to not corrode in an oxygen-free environment; recently SKB took up two more packages secretly, now SKB has promised to show all the results, and the regulator has promised to do quality control. MKG received the report last week. It is a very bad quality report, not even the worst corrosion pictures are shown.

Johan offered to write a paragraph together with Patricia for the scoping statement.

How to proceed

1. With Patricia's help, colleagues from Finland will **ask for the OSART Report**.
2. **Each organization's scoping statement should be sent in copy** not only to the national ESPOO contact points, but also to the Finnish authorities in charge – email see presentation of Gabriele Mraz. Copies should also be made to Patricia Lorenz, and also Ulla Klötzer and Tove Selin to keep the Finnish NGOs informed.
3. Patricia and Gabi will prepare such a **scoping statement for NGOs until 19 Oct 2020**. Then there will be **time until 22 Oct to sign** and send it. We do not need a lot of individual signatures now this might be useful in the next EIA phase. This statement will also be sent directly to the Finnish authorities and to the Austrian Espoo contact point.
4. Media work on the day of the deadline (2 Nov) could be made. Patricia is responsible for preparation.

More information on the Joint Project – Nuclear Risk & Public Control: <http://www.joint-project.org/>