

NGO comment on the EIA procedure for the planned lifetime extension of NPPs Gravelines 2 and 4, France

Submitted via the Austrian Espoo Contact Point and the City of Vienna

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The signatories welcome this public participation procedure for the lifetime extension of NPP Gravelines 2 and 4. **In our understanding this lifetime extension is in the scope of the transboundary Environmental Impact Assessment (EIA) in the framework of the Espoo Convention** concerning a binding EIA for NPP lifetime extension projects.

The Gravelines reactors 2 and 4 are in operation since 1980 and 1981. French reactors have an unlimited operation license but have to undergo a periodic safety review (PSR) every ten years. The fourth PSR is especially important because the original design life of the French 900 MW reactors is 40 years.

Between 2018 and 2019, France has been conducting a voluntary public participation process for the generic phase of the fourth PSR. The scope of this participation process has been criticised for being heavily restricted to technical aspects. This is also true for the ongoing procedure, e.g. is the assessment of alternatives missing altogether.

Alternative electricity supply

The Espoo Convention and the EIA Directive require the assessment of alternatives of a project. In the documents, no alternatives were assessed.

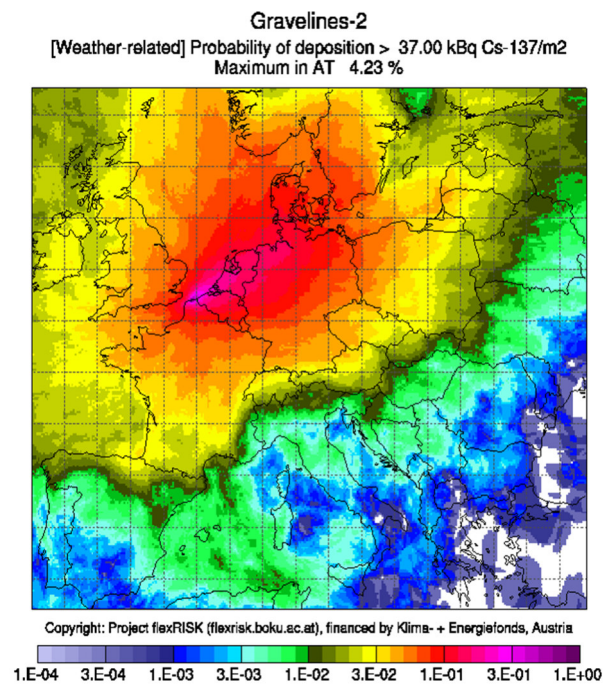
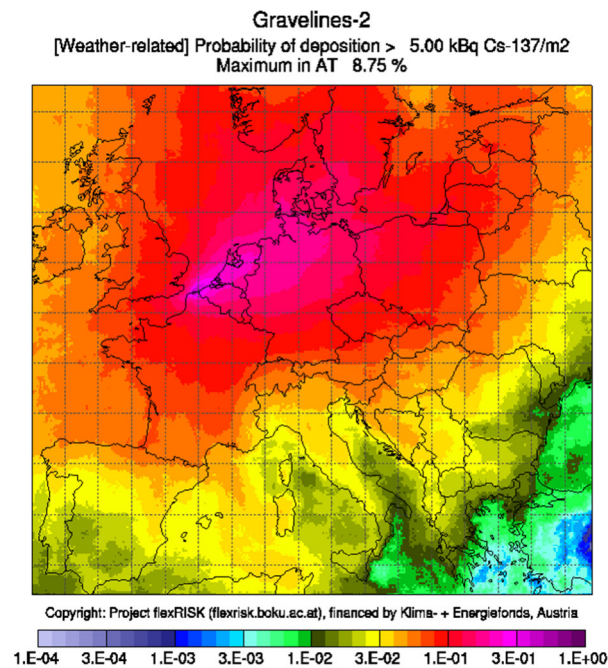
We demand that the ongoing participation procedure presents energy production alternatives to the lifetime extension. In response to the climate crisis, energy efficiency and energy saving measures have to be the most important options for an alternative scenario, new electricity production should be based on renewable energies with its steadily decreasing costs and faster availability. **A long-term prognosis of the French energy needs should be part of the procedure.**

Risk of severe accidents

The most important question is: Is it possible that the old NPPs suffer accidents with significant impacts on the surrounding areas and even abroad?

Even if a severe accident has a very low probability, the risk is not eliminated. The documents need to provide more data on the assessment of severe accident consequences; **no source term data were provided, and no calculations of doses and contamination.**

The research project flexRISK shows that a core disassembly with early containment failure in Gravelines 2 could release a large part of its radioactive inventory, assessed with 107.87 PetaBecquerel Cs-137. The following flexRISK figures shows the weather-related risk for Europe to be contaminated with Cs-137 above 5 and 37 KiloBecquerel Cs-137 per m² in case of such an accident happening.



Adverse weather conditions can lead to a high Caesium contamination of more than 37 kBq/m² in many European countries. e.g. for Austria, the weather-related risk is 4.23%.

In Austria, agricultural countermeasures will have to start when a contamination of 650 Bq Cs-137/m² is expected, this is far below 5 kBq Cs-137/m².

For the participation procedure, accident calculations with the highest source term for which the risk is not zero and dispersion calculations for all of Europe need to be made available.

We are looking forward to receiving information how our recommendations were integrated in the procedure.

Best regards