

No	Name/Organisation	Question	Answer of the Bulgarian representation
1.	Albena Simeonova	<p>Statement:</p> <p>After the extremely useful meetings, at least for me, held in Dabuleni and Craiova and especially the questions put forward by the scientists and representatives of NGOs, including ProDemocratia in Craiova, I would like to say that the comments of the Bulgarian and Romanian organisations are not very different.</p> <p>After the meeting in Dabuleni, I managed to meet colleagues of mine, farmers, living in the region of Dabuleni and Bechet. Apart from the main concerns that their business is currently suffering and will suffer in the future, it turned out that the people are not at all informed about a potential evacuation plan in case something happens at the KNPP. In this sense, I do not know how exactly you have done your job, but it is insufficient and you have the obligation to do as your western colleagues and communicate the information in the place through institutions, organisations and media.</p> <p>Regarding the EIA: In Dabuleni, the hall was full (within the 10-km area). In Craiova – the hall was half-full and</p>	<p>1. Reply to Mrs Simeonova:</p> <p>I appreciate your highly active concern on the issues of environment. For yet another day I am listening to your speeches, but unfortunately, I have noticed that you are not well informed. I will take side on some aspects of your statement, as it was sufficiently long. I suppose that these public hearings give you information that, in case you have the interest to do so, you could use it. I mentioned in my presentation, albeit shortly, the agricultural production. For so many years of operation of KNPP, we have not established any impact on the agricultural production. If you would like to learn more, please be invited to the open doors day, where I would be your personal host.</p> <p>The human-induced activity has always been below the minimum detectable level. There was a similar question in Dabuleni and I mentioned that all of the activity in the fauna and environment is due to natural isotope K-40, so you can be completely safe and please do not imply your personal opinion on your Romanian colleagues.</p> <p>Regarding the level of information. The last slide I showed focused on the methods we use to inform the public. We are first obliged by law to inform the competent authorities in the country, and they are duly informed. Additionally, we inform the public through a number of visits and I can say that for the time I have been a head of radiology monitoring, more than 10,000 people have visited my departments to see such presentations. The people find this interesting and they seek for information and we have always been open to this.</p> <p>Regarding a comparison that you threw into your statement – about how close Chernobyl was to Kozloduy, I would not like to</p>

here, there are 5, 6 or 7 people from Bucharest. At the discussion on the Belene EIA in Sofia, there were 8 people from Sofia present. They probably think that Kozloduy is very far away, like we thought that Chernobyl is too far away.

You said that the population in Bulgaria supports the nuclear unit. After the referendum that was held on 27 January in Bulgaria, 20% of the population voted. Of them, 60% voted "for", which makes about 12% of the total population. Well, if so many support the NPP so much, why did they not support the construction of a new unit?

There was also a referendum in Kozloduy, where the larger part of the population voted in favour of a nuclear unit, but for the question if they agree with a RAW Storage facility, the population as a whole said no. I am also sure that the local authorities had concerns and I will quote a letter from the mayor of Kozloduy, Rumen Manoev, with questions related to the gamma dose rate measurement:

There is a lack of analysis for the discharged radioactive particles from the ventilation stacks (VTs) in the atmosphere. These are aerosols, I-131 and gases. On 11 April 2013, the mayor of Kozloduy in a softer

go into much detail, but please read the widely accessible information on the internet, on the differences between the two types of reactors. Had you read that, you would not be saying these things. But let us not go into detail.

Regarding discharges, seeing as you mentioned them, you cannot state that there are no control limits for discharge emissions. Any NPP in the world is obliged to have such limits. These are requirements of the national regulator, in accordance with the International Atomic Energy Agency (IAEA) and Euratom. These limits consider all those conditions and as you saw in the presentation, there was a slide showing the real discharges compared to these limits. You were able to see that they are below 1%.

Regarding your statement that admissible limits may not exist – this is not normal. I cannot understand who says that.

Also, for the conclusion on billions and millions of years, please do not underestimate the intellect of the academic society that is present in this hall and works here.

Thank you and I suppose I have given some responses to your statements.

2. Reply:

Apart for Mrs Albena Simeonova, we also attended all three debates. So when statements are made, these rather represent implications than statements. Since I also attended these hearings, I can make a difference between the type of comments of the Bulgarian and Romanian NGOs and I am disputing the implication that the opinions of the Bulgarian and Romanian NGOs are not very different.

When there are questions, this means there is interest, when there are answers this means there is a dialogue. When only

		<p>formulation asked a question “Can the monthly and yearly admissible limits be determined for the aerosol gas discharges from the vent stacks for radioactive noble gases Iodine-131 and long-living aerosols.”</p> <p>I would like to clarify that there cannot be admissible level of pollution with radioactive particles discharged into the atmosphere, as each such particle is of fatal danger for the human organism.</p> <p>From the above data on environmental impact, from the generated in the operation of KNPP, including new nuclear unit 7, radioactive discharges in the atmosphere and in the Danube River, together with the Spent Nuclear fuel to be buried somewhere in the territory of Bulgaria, we cannot accept the incorrect conclusion of the authors of the EIA-R.</p> <p>Pages 50 to 171 of Folder 3, Part 4.7.2 Radioactive Particles and Conclusion 4.2.7.4 Conclusion on the impact say: “The expected radioactive impact from radioactive particles will be only at the site of the NPP.”</p> <p>I would like to quote a conclusion of the EIA-R authors. This concerns parameters for environmental impact for the radioactive discharges</p>	<p>statements are made, without factual basis, these are implications.</p> <p>I will allow myself to go the level of facts that were presented by Mrs Albena Simeonova, and I will say that only 8% of the people in Bulgaria were against in the referendum that was held.</p> <p>If 12% of all voters voted “for” and the others did not vote, then by the same logic, only 8% were against, so these are naïvely thrown facts.</p> <p>Mrs Tsibranski presented very well in the presentation and the slide is shown – there is no reasonable person who thinks you can express a percent of a limit, without having a limit. The x-axis shows the years and the y-axis shows the percent of the control limits.</p> <p>With regards to these discharges, you are constantly quoting Mr Manoiev’s letter. Mr Manoiev asked questions and we answered those questions. When you are giving part of the information, please give all the information. This is called a dialogue – a question is asked, an answer given and this is analysed. Someone may agree or disagree, but there is a dialogue. Unfortunately in all 3 public debate the NGOs from Bulgaria did not show a desire for dialogues.</p> <p>The head of Emergency planning can talk about the types of emergency trainings organised between Bulgaria and Romania.</p> <p>Information that says “I talked to someone”, such as the first day when Mrs Simeonova talked about getting certification for bio-products. Of course, then we did not know the facts, but we made a verification and there is no requirement for being at a certain distance away from an NPP. Of course, if someone had any requirements to Mrs Simeonova, she should be careful in order to avoid being drawn into a corrupt scheme.</p>
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		<p>generated from the operation of the KNPP:</p> <p>“Probability of existing of the event: expected; Type of impact – negative, direct, primary; Characteristics of the impact – radiological; Duration – long-term; Cumulative – yes; “</p> <p>Now is the time, in this public hearing, based on the facts admitted by the authors of the EIA-R, when we should underline to the widest possible circle of the Bulgarian and Romanian public, the unspoken and for years hidden truths that the atmosphere does not have thresholds for radioactive discharge of cancer-inducing particles from the vent stacks of the units and that the waters of the Danube river cannot be isolated from the discharged radioactive waters from the waste waters of the NPP. At the same time the burying of the SNF as RAW will destroy the territory of the two countries for billions of years with a risk of harming the population for million years.</p> <p>I really liked the idea of our colleagues from Craiova, ProDemocratia NGO, to organise a local referendum whether you want or you do not want a 7th unit of the KNPP and you have that right.</p>	<p>3. Reply: Each country is obliged to have a national emergency planning to be activated in case of an emergency, the same was that every municipality and should have.</p> <p>There was an international drill organised in April 2011 – NAUTILUS 2011, with the participation of the IAEA as well. At this time activities were performed in the towns of Oryahovo and Bechet. In Oryahovo, the national high officials of the Republic of Romania was also there. In the city of Bechet, evacuation of part of the population was carried out and protective measures were given to the population. The scenario was discharge of radioactivity in the environment, during transport of SNF through the Danube river, under a terrorist attack. All those necessary protective activities for the towns of Oryahovo and Bechet were performed at this time. Also at this time the people from both towns showed good knowledge of these plans. So I do not believe that they do not know these plans and would like to also include that the KNPP website contains information, in the form a brochure, in Bulgarian, Romanian and English, for first activities in case of radiological emergency, which indicates the most important things that anyone should do in case of such emergency. Anyone who wants can visit the site and educate themselves.</p> <p>4. Reply: A few more words on the accusations made by Mrs Albena Simeonova. She accused us that the operating NPP does not have limits for discharges. The presentation by Mr. Tsibranski showed a slide of the yearly discharges compared to normally admissible levels. We do not only have yearly, but also monthly, daily, and hourly-based discharge limits. We have equipment that monitors the discharges constantly and in case of any increase, it is registered and the necessary measures are taken. Additionally, per safety requirements, this monitoring equipment have double or 3 times redundancy. So that the discharge is monitored by multiple units of equipment and the accuracy of the measures is</p>
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We cannot say that there will be no negative impact from the construction of one such unit 7. I will quote one more part of the EIA-R, Folder 1, Chapter 1, p.44-97:

“The existence of such quantity of SNF on the site of KNPP represents a long-term problem, as it is a deferred solution that transfers responsibility to future generations.”

As I said last time, in Bulgaria, same as Romania, it depends who is in power – when the pro-Russian governors come, they want a Russian reactor; when the pro-westerns come, as now, they want an American reactor. We should all know that it does not matter from what plant the reactor is – Russian, American, or Canadian. I also say this for Cernavoda, our opinion is the same. This unit is similarly harmful for the person and their health for millions of years.

We have a proverb in Bulgaria – whoever pays, he orders the music. Of course, there is no seismic problem and that the site is extremely stable. This is probably true. Let us not forget that 10-km away from the former planned plant Belene, 122 people from Svishtov lost

periodically checked through laboratory methods. In this sense, we make monthly reports for the discharges in the environment and at the end of each year present detailed annual reports. They contain a detailed analysis of what and why was discharged, as well as the impacts on the environment and population.

I can say with pleasure that these discharges are much lower than the admissible levels, as you may see, and as already said in the presentations, the impact on the population is negligibly small, i.e. below the established value determined by the International Commission on Radiation Protection (ICRP) of 10 µSv per year.

their lives on 4 March 1977 after an earthquake.

Reply by Mrs Simeonova: I can see that the highly waged experts jumped on me. We have made excellent round tables together, and will continue to do so, as there should be discussion in society. When the word was given for questions, it said questions, comments, statements. I only quoted the report that you wrote. You can write it in any language, but the people in Dabuleni do not know about evacuation plans – I spoke to farmers and this is recorded. You may have evacuated Bechet, but the people in Dabuleni did not know about it. I probably seem like a redneck bio-producer from a deserted village. I graduated in ecology from the Sofia University and specialised in Environmental Management at Berkley University. I have come here, because I am sure that society must decide whether to have this additional unit or no. The Romanians probably do not know that we are spending less than half of the installed capacity in Bulgaria.

In Germany, there are 4,500 bio-gas installations from agricultural facilities. 96,000 working places have been created. Bulgaria and Romania are agricultural countries. God

		<p>created this heaven for tourism and agriculture and with these installations, there is no need for evacuation plans, to have dose-meters and for people to worry whether it will explode or not.</p>	
<p>2.</p>	<p>Lucian Stirb, Terra Millennium III NGO</p>	<p>Also as a conclusion of the three public debates so far, I would like to know from the comments made by the public and the Romanian NGOs which have been noted as important by the Bulgarian party? Which of them the Bulgarian party would consider important, so that they would have consequences in the future?</p>	<p>This question allows us to say that the EIA procedure is different in Bulgaria and Romania. The difference is that in the Bulgarian EIA procedure, the decision on the EIA is a first decision in the realisation of a given investment project or proposal. This is the first and necessary condition. In Romania, as far as I know, this is a continuous process and the EIA is one of the last steps. In the light of this, I want to assure that all public debate held in Bulgaria and Romania will be looked at, on the same basis, from our competent authority in Bulgaria, which would be the Bulgarian Ministry of Environment and Water (MOEW). That means that the MOEW will review and consider both the comments from the population in Bulgaria and Romania. As a conclusion, these hearings will be included accordingly in the EIA decision – as a basis for it, or as measures, which will in turn undergo a further control by the competent authority. This will be a process that will continue for as long as this project and activity exists. I do not know whether your Bulgarian colleagues informed you that all EIA decisions in Bulgaria go through a strict control that follows them –whether their basis and measures are respected. So I can assure you that the Bulgarian party will take into consideration your opinions and observations in an appropriate way.</p> <p>As noted in the first presentation, if a decision is taken to construct the unit in Kozloduy, a long licensing process will have to be done. It will have to meet all requirements related to selection of site location, certain design requirements, review by the competent body – the Bulgarian Nuclear Regulatory Agency (BNRA), as to whether it meets the legislative requirements. Before these requirements are met, there is no project. In case it is approved, an approval to construct is given – the unit will be constructed and entered into operation. The final step is the</p>

			<p>license for operation. This license is also subject to conditions, which are controlled by the BNRA. So during all this time, we are under independent strict control.</p> <p>The answers were considered satisfactory.</p>
	Plamen Vassilev		<p>We are not against ecologists; on the contrary, we work hard with them, including those working in our NPP. But when you say that not more than half of the electricity is used in the country, do you trust yourself? You can see on the internet how much is generated.</p> <p>We are against manipulations. We are for Ecology and the slide shows it. If you have a look at how many emission we have saved compared to lignite coal. If you have an ecological approach, you will be in favour of NPP. I have never spoken against bio agriculture, or your education, only against manipulations.</p>