



MINISTERUL MEDIULUI,
APELOR ȘI PĂDURILOR

MINISTER'S CABINET

No. DGEICPSC/22629/ *MF/16* .07.2024

To: MINISTRY OF ENVIRONMENTAL PROTECTION AND NATURAL RESOURCES OF UKRAINE

In att: Mr. Ruslan Strilets, Minister

Dear Minister Strilets,

The Ministry of Environment, Waters and Forests of Romania sends cordial greetings to the Ministry of Environmental Protection and Natural Resources of Ukraine and particularly appreciates the bilateral cooperation in the field of environmental protection.

I hereby acknowledge your letter no. 25/5-21/4341-24/02.04.2024 regarding the notification for the proposed project *«Construction of power units No. 5 and No. 6 at the site of the Khmelnytsky NPP using technical characteristics of the Westinghouse Electric Company AP1000 reactor for further operation and electricity generation»*, developer JSC National Nuclear Energy Generating Company Energoatom, received by electronic means on the 12th of June 2024. A copy of the Note Verbale from 13th June 2024 accompanying the letter was also received on the 14th of June 2024 by electronic means.

After careful consideration of the information provided in the notification, I would like to inform you that, in accordance to the provisions of the Espoo Convention, we wish to take part in the environmental impact assessment procedure in a transboundary context for the project «Construction of power units No. 5 and No. 6 at the site of the Khmelnytsky NPP using technical characteristics of the Westinghouse Electric Company AP1000 reactor for further operation and electricity generation» and I have the pleasure to forward several comments and proposals from our side related to the contents of the submitted notification.

The Khmelnytsky Nuclear Power Plant (KhNPP) is located in the central part of the Western Ukraine, on the border of three oblasts/counties, namely: Khmelnytsky, Rivne and Ternopil in the vicinity of Netishin city, Khmelnytsky region. The site of the Khmelnytsky nuclear power plant is located to the north of the Romanian national territory, the distance from the northern border of Romania being approximately 227 km and approximately 655 km from Bucharest. Construction of the power plant started in 1981 in Soviet times, being designed as a power plant

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with four VVER-1000 type nuclear reactors. At this time, two VVER-1000 reactors are operational, Units 1 and 2 each generating 1000 MW (net) of electricity. The other two VVER-1000 reactors, Units 3 and 4 are under construction. The proposed project will increase the power generated at the nuclear facility with the power of two AP1000 reactors.

The nuclear power plant Khmelnytsky is taken into consideration in the Romanian National Nuclear Emergency Response Plan. The potential direct radiological impact in the event of a severe accident is identified in the north and east of Romania, the areas that include the territory of Romania from the 300 km circle around the plant.

The notification contains very general information on the project and a sum of declarations, part of them predicting the negligible impact on public and environment of the project. Below are presented several aspects that were not included in the notification and we believe that the EIA report should detail.

In the absence of actual technical specifications data from the nuclear facility (confinement, steam management structure, active systems of restraint/reduction of radioactivity losses from the control volumes of the energy block, etc.) as well as a source term confirmed by the nuclear facility operator, the hypothetical scenarios developed by our experts are purely informative, serving the purpose of rapid identification (screening) of potential hazards to Romania's national territory.

We are interested in receiving detailed information on radiological impact studies and assessment of transboundary radiological consequences, as well as source term calculation data for design basis accidents and severe accidents, as soon as they become available. At this stage of the consultations, in the absence of results on the radiological impact assessment, including the consequences of a severe accident, we cannot make any requirements regarding the content of the safety analysis.

The EIA should include information that describes alternative 0 (no project), and, since the notification mentions that no other technological alternatives have been considered, the arguments for the chosen technology. The notification mentions that territorial alternatives (Rivne NPP and South Ukraine NPP) have been taken into account. Please provide arguments for choosing the Khmelnytsky site.

The notification includes a statement regarding the minimization of the negative impact on the environment, through key technological solutions and through protective measures that guarantee environmental protection during construction. The EIA report should include information on the key technological solutions and protective measures, during operation of the NPP (as well as information on aspects of decommissioning). We believe that the EIA report should include such information for all phases of the project.

As mentioned in the notification, the environmental and other restrictions on the planned activities are established pursuant to the legislation of Ukraine in compliance with the maximum permissible levels of anthropogenic impact on the environment, sanitary standards, radiation regulations, etc. The EIA report should include information on the maximum permissible levels required by Ukrainian legislation, the results of analyses performed for the project and their conformity with national legislation, but also in accordance with safety and environmental

standards, reference levels, etc. used at international level. It should be presented if the national nuclear regulatory framework was or will be updated to cover the technology proposed for the two new units.

The EIA report should include information on the accident analysis that would be performed for all type of scenarios required by national but also international safety standards and their results clearly supporting the declaration/prediction of negligible impact on public and environment should be presented.

Aspects related to the management of radioactive waste and spent nuclear fuel resulting from the operation of the nuclear power plant and from the decommissioning process are of interest.

The EIA report should include information on aspects of impact on climate change and biodiversity as well as detailing the potential significant negative effects on the environment, determined by the project's vulnerability to climate change and to all risks (major accidents, war, natural disasters) as well as cumulative impact taking into account the effect of the proposed project and that of other similar existing or planned projects that are located in the area of the proposed project.

Please accept, Mr. Minister, the expression of my high consideration and esteem.

Mircea FECHET
Minister of environment, waters and forests

