Comments to the EIA report of new Nuclear Power Plant in Lithuania

Estonian Green Movement-FoE
October 8, 2008

Nuclear safety and risk analysis (page 30)

It's stated that only data from 2001 and 2002 were used for meteorological simulations. As climate and weather conditions vary a lot across the years, we propose to use much longer data set for simulations.

4. Alternatives (page 67)

Ultimate aim of the proposed economic activity is to generate electricity for Lithuania. There aren't any reasons for exclusion of other ways of generating the electricity as alternatives. Project promoter Lietuvos Energija AB has in its possession results of a 2006 calculation of the feasibility of different renewable and non-renewable energy sources in Lithuania. Such analysis of alternatives shall be part of the EIA. The alternatives currently presented can't be considered as alternatives in light of EIA good practice or legislation.

Current EIA states that the new NPP will consist of 1-5 reactors. One can't seriously assess all potential impacts of the planned economic activity once the level of uncertainty is so big. First a technological choice has to made by project promoter, otherwise the technological detail of the EIA report remains as poor as it currently is.

5.3.4 Implementation of the safety requirements for a new NPP (page 109)

The risk of accidents that are briefly covered in chapter 5.3.4 shall be also reflected in the section of alternatives.

It's currently foreseen that full safety analysis will be carried out in a later stage of the process. We demand a full safety analysis to be part of the current EIA report and presented to the public discussion. Results of the full safety analysis shall be reflected in the section of alternatives.

6.1 Construction of the nuclear power plant (page 116)

Report states that the volume of waste can't be estimated as it depends on the reactor type. Such level of uncertainty is not tolerable. The section shall be seriously re-written to include detailed information on different waste volumes vis-à-vis technical choices of the new NPP.

Also, the estimated construction time of 4–7 years is unrealistic. Thus the impacts of longer-lasting construction period should also be assessed.

6.2.2.4 Spent nuclear fuel (page 128)

Report states that long-term storage and disposal of spent nuclear fuel will be a subject of a separate EIA in the future. We would like to stress that the management of spent nuclear fuel is part of nuclear cycle and shall be included to current EIA report.

The table 6.2-5 indicates that the annual production of high-level nuclear is in range from 47 to 370 tons. Uncertainty in such a scale can't stay in the EIA report. The report shall include detailed assessment of the spent nuclear fuel differently for all proposed technical solutions of the NPP. After all the spent fuel could be a most serious environmental impact of the proposed economic development.

7.1.2.6 **Impacts of thermal load** (page 192)

The report gives impression that without a functioning NPP the ecological situation of the lake Druksiai will worsen due to colder waters and presence of ice cover. Let us remind that such ecological conditions are natural to the lake and can't be considered as negative impacts in any way.

7.12.2.6 Comparison of non-implementation of the project (page 441)

Report looks narrowly at Visaginas region and suggests that non-implementation of the project would have negative socio-economic impact. First of all, the EIA report shall have much larger geographical scope. Secondly, the non-implementation would probably have in contrary a positive impact as Lithuanian energy sector will than be based on de-centralised production pattern, creating potentially more jobs and lowering the risk of a serious accident.

10.2.1 Operational states and accidental conditions at NPP (page 477)

The evaluation of nuclear accident in the EIA report calculates that the total radioactivity of the evaluated emissions would amount to less than 10PBq. It's a major underestimation of the scale of potential worst case scenario. Just for illustration - total radioactive emission of the Chernobyl disaster was roughly 12 000 PBq. 10PBq constitutes to less than 1/10 000 of the radioactivity contained in a modern reactor.

Proposal of Estonian Green Movement-FoE
to overcome shortages underlined above

We propose that the development of current EIA should be frozen until key decisions are taken by project promoter vis-à-vis technology (type of reactor; number of units) and planned capacity. Only after such decisions a meaningful EIA can be carried out and further debated in public. In its current composition the EIA report is too general and poor to be publicly discussed or approved.

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