



Naturvårdsverket
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YTTRANDE

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Synpunkter om innehåll i miljökonsekvensbeskrivning avseende byggande och drift av kärnkraftverk i Polen

Strålsäkerhetsmyndigheten (SSM) lämnar nedan synpunkter om innehåll i en kommande miljökonsekvensbeskrivning avseende ett projekt att bygga och ta i drift en kärnkraftsreaktor i Polen. Synpunkterna lämnas på engelska enligt önskemål från Naturvårdsverket.

Synpunkter

The Swedish Radiation Safety authority (SSM) would like to highlight some crucial issues that have to be properly described in the Environmental Impact Assessment (EIA) for the location, construction, building and operation of a new nuclear reactor in Poland.

SSM strongly recommends that the development of a nuclear power programme in Poland including the final disposal of radioactive waste and spent nuclear fuel is treated as an integrated system and that this is described in the EIA. It is also important that all stages of the plant life cycle are included in the EIA (location, construction, operation and decommissioning).

It must also be shown that the Best Available Technology (BAT) is used not only in order to minimize the discharges of radioactive substances from the reactor both in normal operation and in emergency situations.

Also the choice of reactor type has to include considerations on BAT, taking into account the discharges to the environment as well as discharges and the resulting doses to members of the public in neighboring countries. The Helsinki Convention (HELCOM) very clearly points out that BAT shall be used in relation to discharges of radionuclides in to the Baltic Sea.

It is of utter importance that the impact on the environment and the impact on the people of Sweden are fully described in the EIA. This includes normal operation as well as emergency situations, including accidents with very low probability (10^{-6} per year). The system for emergency preparedness should also be described.



For more details on the contents SSM strongly recommends to specifically follow the guides concerning EIA published and soon to be published by IAEA).

- NO NG-T-3.11 Managing environmental impact assessment for construction and operation in new nuclear power programs
- DS427 (soon to be published): A general framework for prospective radiological environmental impact assessment and protection of the public

Beslut i detta ärende har fattats av avdelningschefen Michael Knochenhauer efter föredragning av utredaren Ann-Christin Hägg.

STRÅLSÄKERHETSMYNDIGHETEN

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