

Warsaw, 1 July 2021

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**FPS Economy, SME's,
Self-Employed and Energy
Directorate-General Energy
Division Nuclear Applications**

Concerns: Transboundary environmental impact assessment procedure for the planned activity consisting in "Lifetime extension of Doel 1 and 2 nuclear reactors in Belgium"

In response to the electronic message of 2 April 2021 with attached documentation on the environmental impact assessment for the planned activity provided to the Polish Party, below please find the following information.

Immediately upon receiving this documentation, the General Director for Environmental Protection transferred it in compliance with the national legislation for consultation with the competent regional authorities for environmental protection, competent for the area of the likely transboundary environmental effects. In addition, the Director consulted the specialist authorities competent for nuclear energy and radiation safety at the territory of Poland.

In effect of consultation with these authorities, **I submit to comments to the content of the provided documents and the method of implementation of the planned activity.**

Although the provided document identifies no potential releases for emergencies, since it indicates only the likely effects in the area of nuclear power plant, the probability of major accident is low. In addition, this probability has been mitigated to an even greater extent by the planned modernisation of the safety systems.

According to data presented by the Belgian Party, no intervention levels for the immediate intervention measures i.e. evacuation, order to stay in closed premises and administration of preparations containing stable iodine, should be exceeded at the territory of Poland. The above is also confirmed by the results of analytical works performed by the National Atomic Energy Agency (NAEA) competent for radiation safety at the territory of Poland. Using the decision support system, the NAEA analysed the potential exposure in accident conditions for the Doel-1 and Doel-2 reactors. The results of analysis confirm that this installation poses no major threat in terms of potential exposure to ionising radiation at the territory of Poland.

In addition, the likelihood of radiological hazard for the analysed environmental components will be maintained at the level equivalent to the level estimated for the activity in the period preceding the planned activity.

In accordance with the provided documentation, radioactive waste to be produced during 10 years of extended lifetime will be entirely kept, processed and stored at the territory of Belgium. Due to the above, no transboundary impact is projected. Spent fuel from the decommissioned reactors will be entirely stored at the territory of Belgium, which means that neither export nor transport via the territories of the other states is planned.

The identified likely non-radiological effects of the planned activity on the individual environmental components, including health and safety of humans, were specified as negligible and not requiring any special corrective measures. The above is confirmed by the fact that the maximum range of any potential non-radiological incidents does not exceed the borders of nuclear facility.

Upon analysing the EIA documentation and considering the large distance from the Polish border and the fact that the planned modernisation of facilities will contribute to increasing their safety, **we submit no comments to the method of implementation of the planned activity. By doing so, we consider the presented EIA documentation sufficient** at the current stage and express our interest in receiving the activity-related materials in future.

Notwithstanding the above, **we kindly ask to provide a response in writing to the following questions:**

1. Whether the Belgian Party prepared the plans of long-term storage of spent fuel and components (i.e. e.g. steam generator or pressure tank of the reactor), that will be disassembled at decommissioning of the reactors in 2025?
2. Whether any emergency scenarios, in which despite the presence of the Filter Containment Vent (FCV) system it is possible to damage the containment, were identified? If so, whether the radiological effects for the adjoining countries were estimated?
3. Whether any emergency scenarios considering the interferences between both Doel blocks were analysed?
4. Whether any accidents at the Doel NPP took place within the last 5 years? If so, please describe the type of accident, type of implemented protection measures and effects for the environment resulting from these events, including in context of effective dose to the population inhabiting the areas located in the lowest distance from this nuclear power plant.

At the same time we inform that pursuant to the national legislation, the received documents were made available for the purposes of public participation for the period of 60 days i.e. between 24 April 2021 and 26 June 2021, with opportunity to submit comments and requests. No comments were submitted in this process.

To summarise and with regard to the above, the Polish Party **submits no comments** at the stage of EIA documentation. However, **please provide the responses in writing to the questions**

listed above and concerning the plans of long-term storage of spent fuel and components and emergency scenarios.

The Polish Party awaits submission of the final decision pursuant to Article 6(2) of the *Convention on Environmental Impact Assessment in a Transboundary Context*, so called *the Espoo Convention*.

Yours sincerely,

DOROTA TORYFTER-SZUMAŃSKA

Deputy Director

Department for Environmental Impact Assessment

/-signed electronically/

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