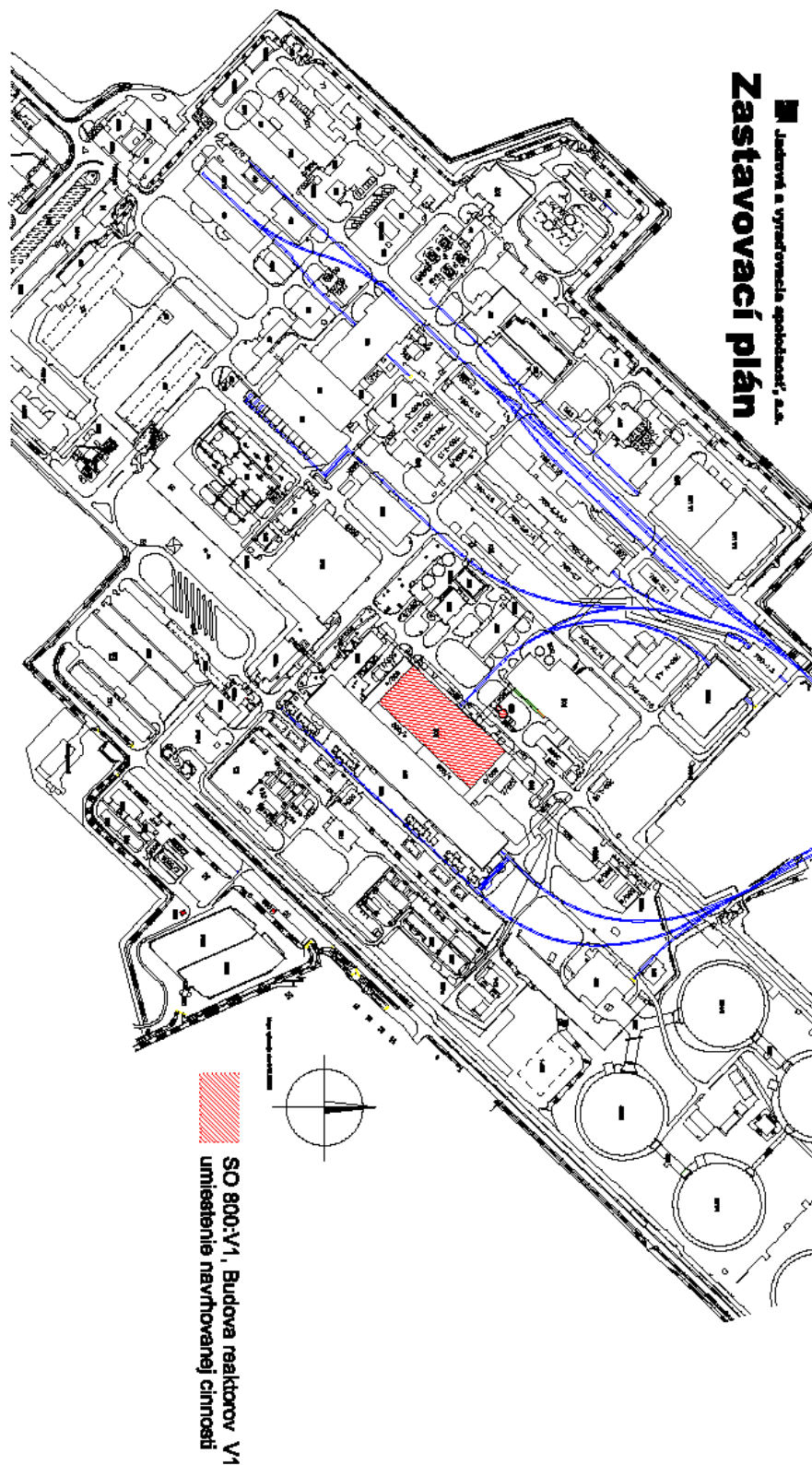


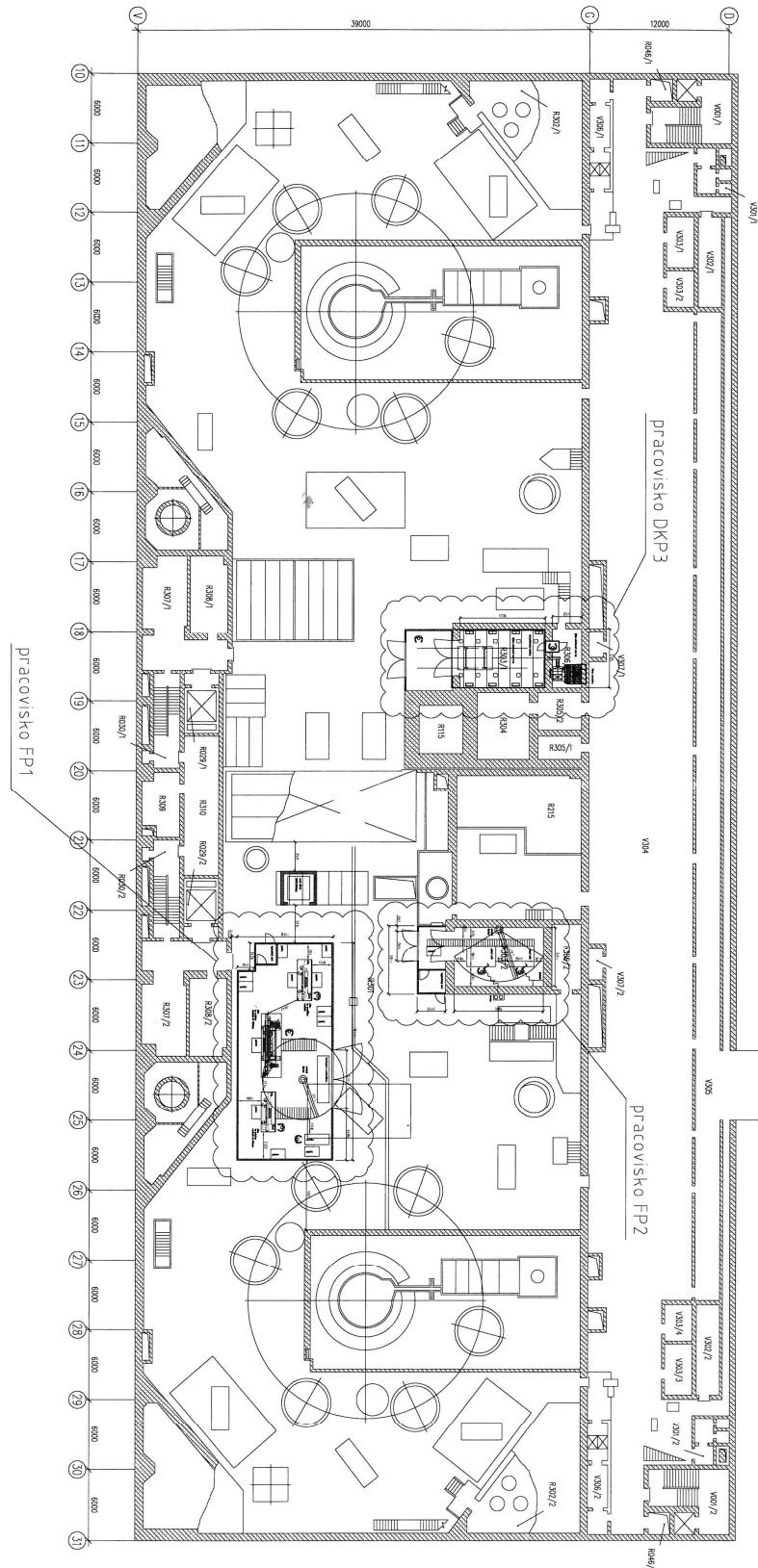
APPENDIX NO. 2

The overall situation of building (building plan) JAVYS, a.s.



APPENDIX NO.3

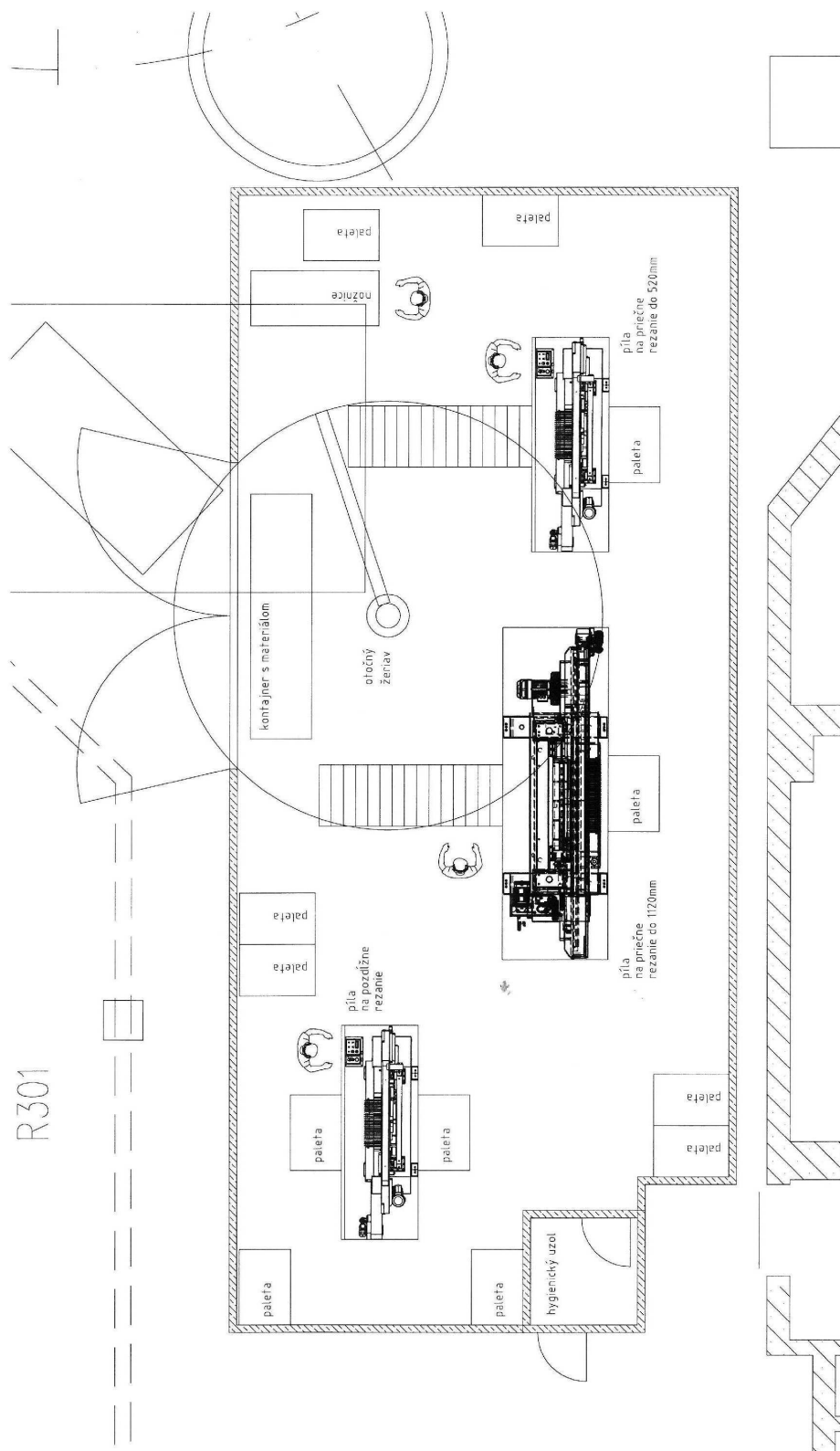
Disposition of workplaces SO800:V1 +10,5m, romm no. R301
General view



APPENDIX NO.4

Workplace FP1

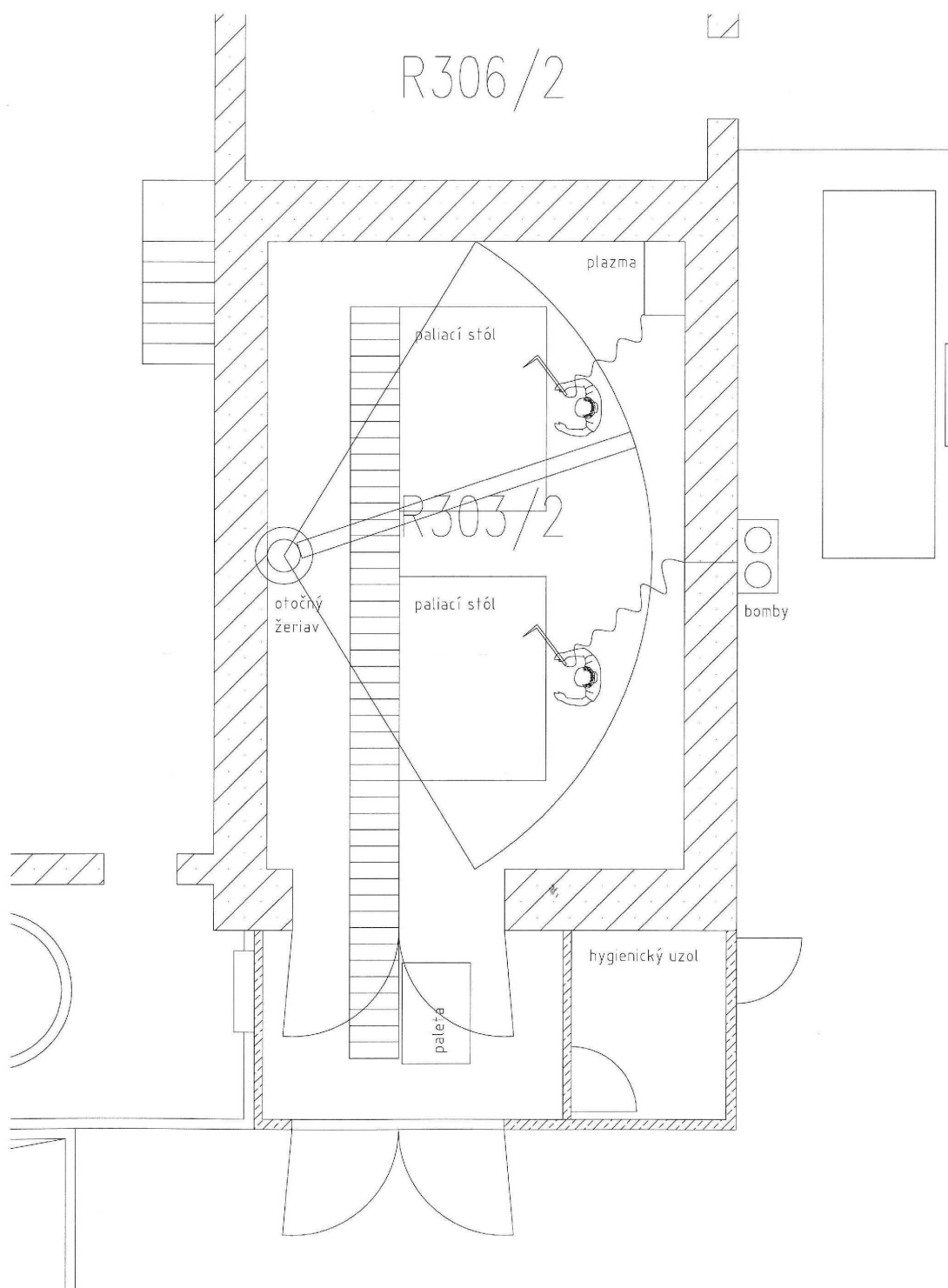
SO800:V1; +10,5m; romm no. R301/1



APPENDIX NO.5

Workplace FP2

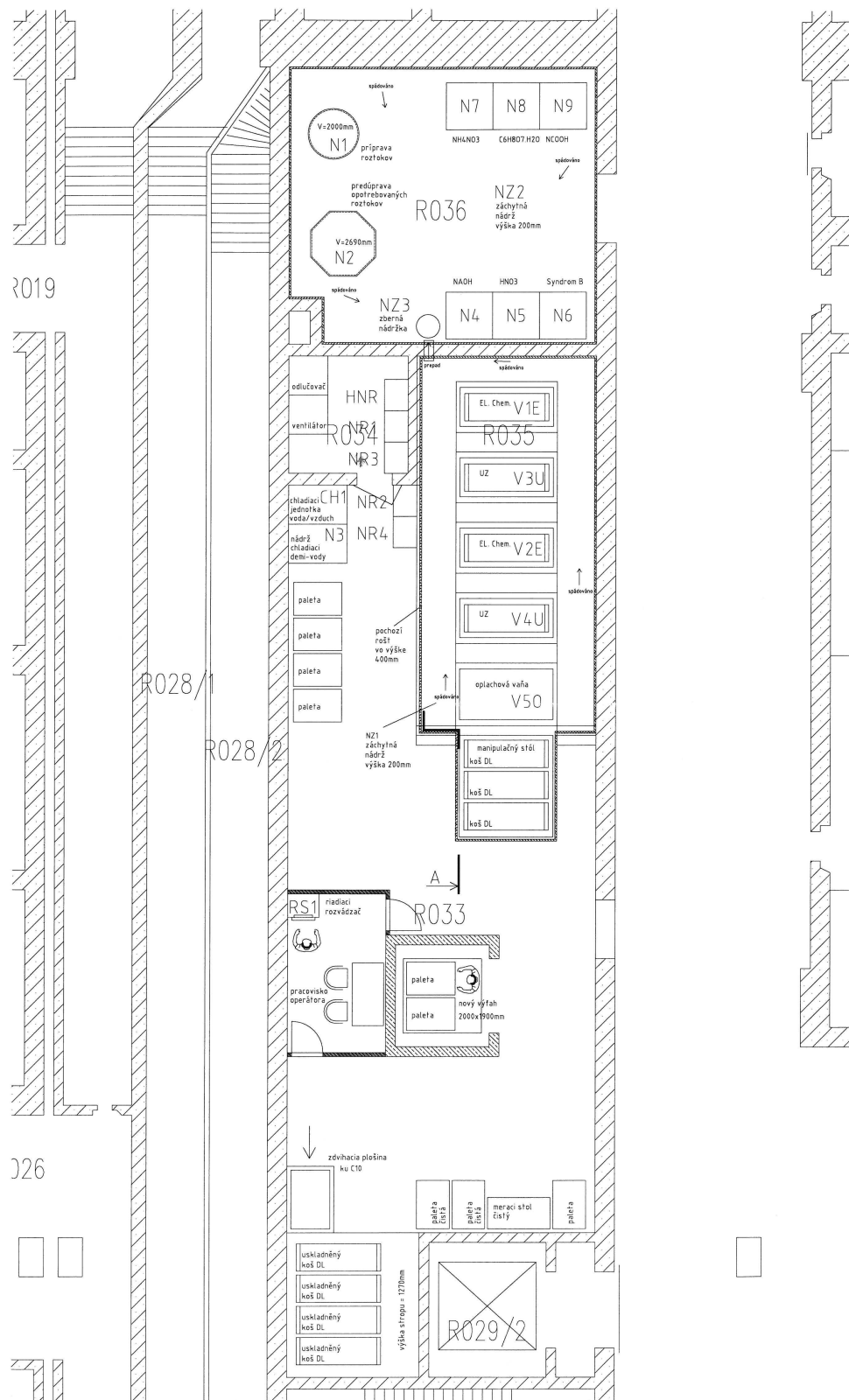
SO800:V1; +10,5m; romm no. R303/2



APPENDIX NO.6

Workplace DKP1

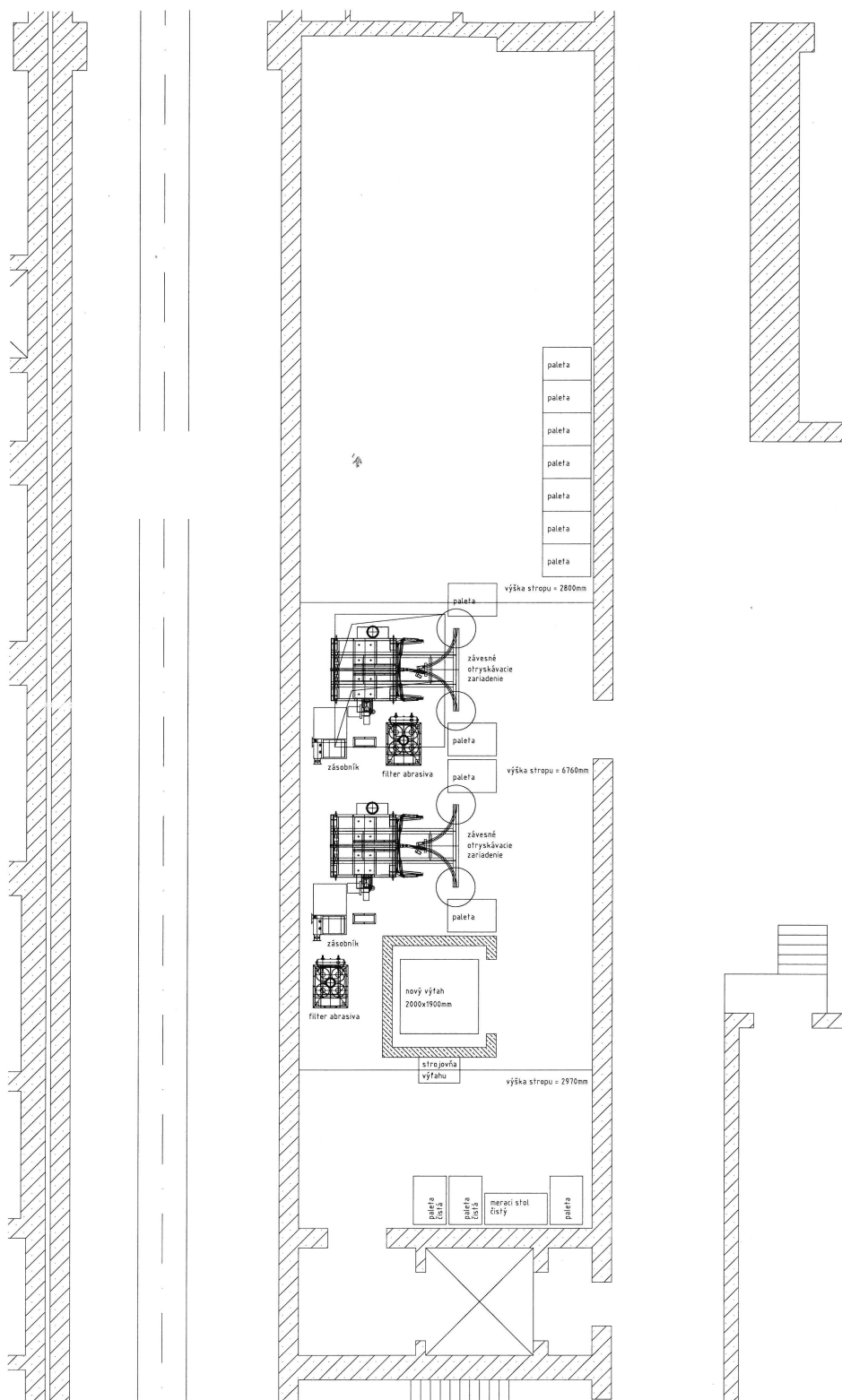
SO800:V1; -1,8m; romm no. R033, R034, R035, R036



APPENDIX NO.7

Workplace DKP2

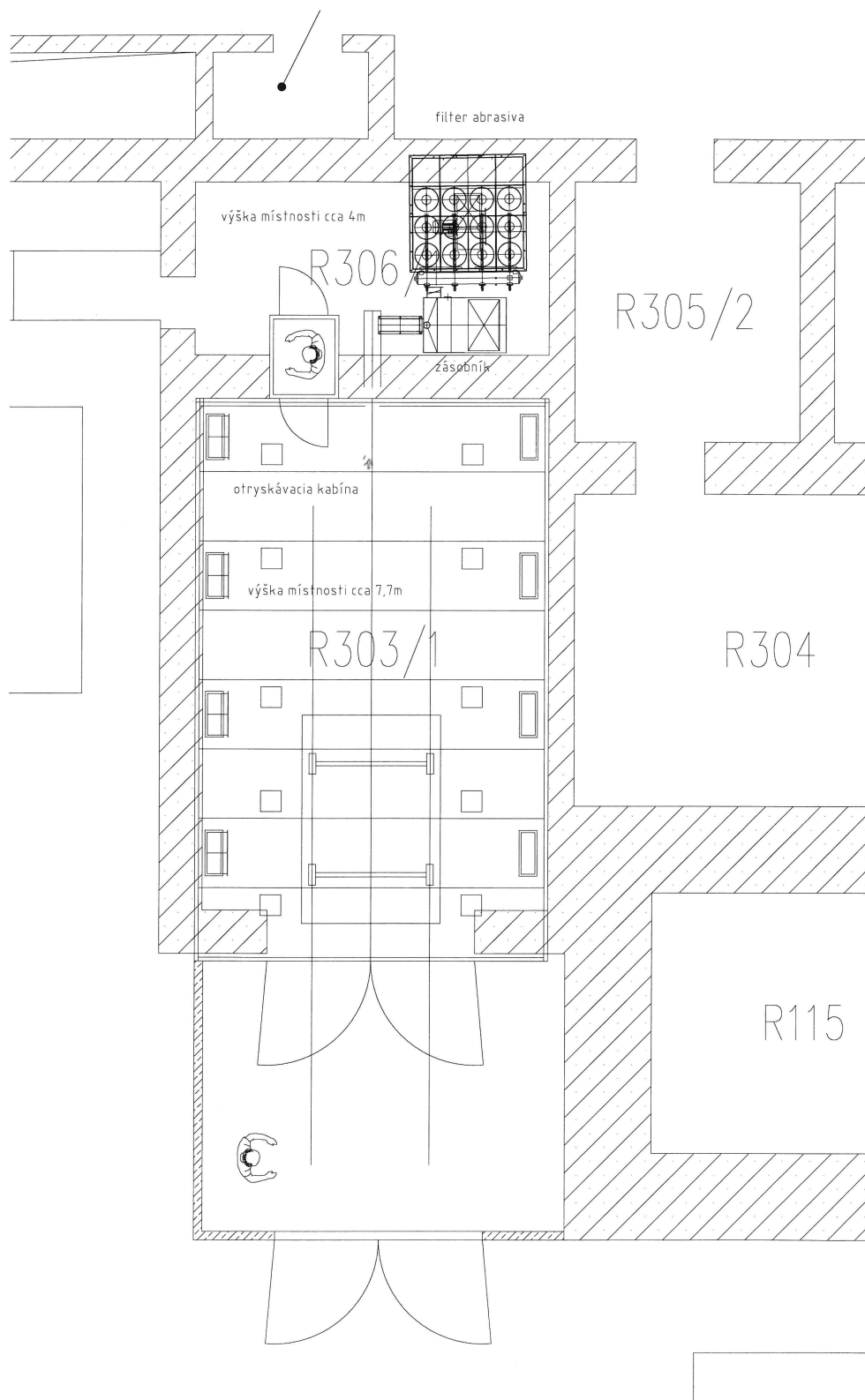
SO800:V1; +2,7m; romm no. R117/2



APPENDIX NO.8

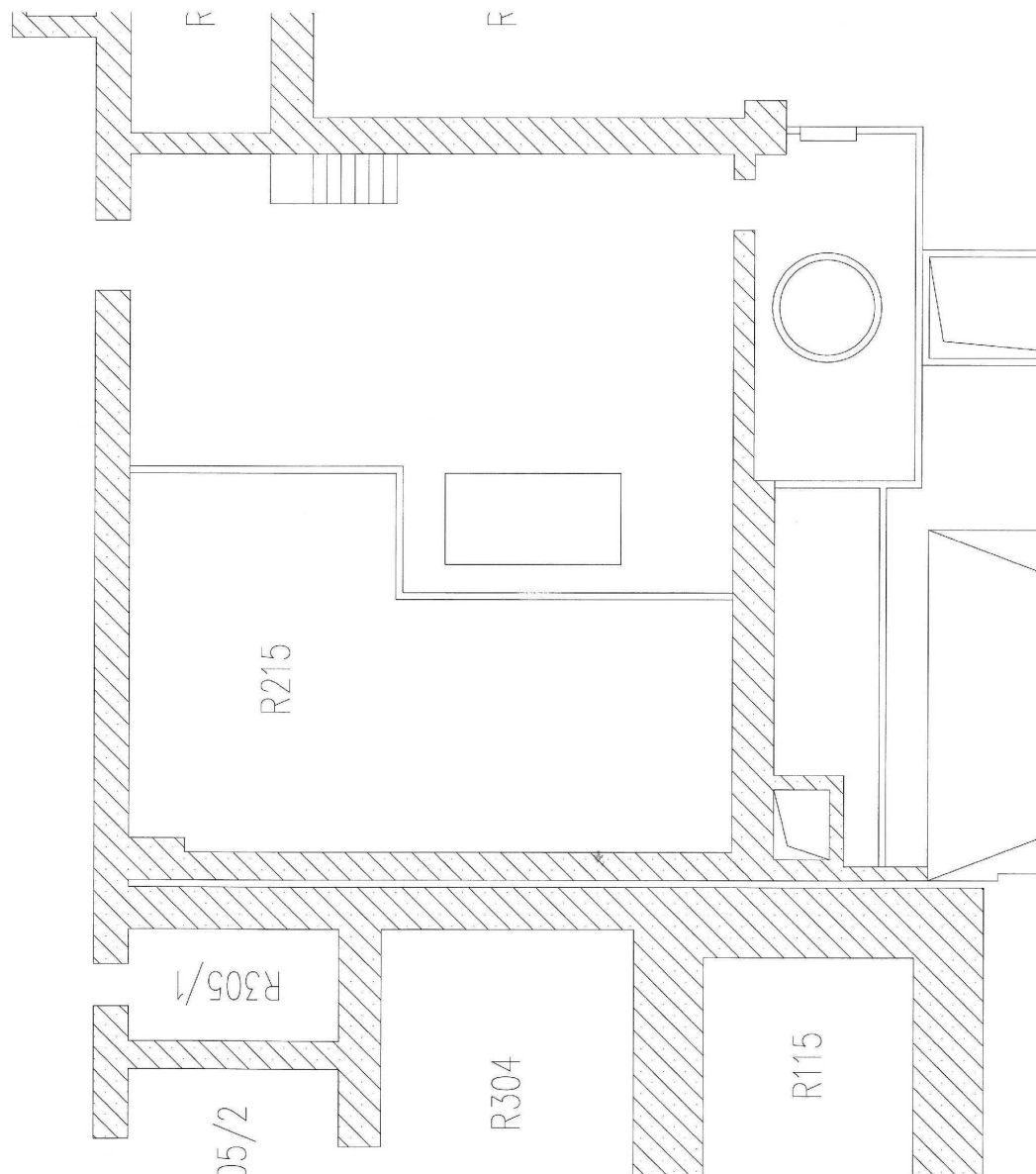
Workplace DKP3

SO800:V1; +10,5m; romm no. R303/1, R306/1



APPENDIX NO.9

Disposition of workplaces, SO800:V1, +6,3m, romm no. R215



APPENDIX NO. 10

A copy of the letter Ministry of the Environment SR č. 6236/2012-3.4/hp of 8.8.2012: „Abandonment from request of the alternative solution for the proposed action C7-A3 – Erection of the new large capacity F&D facility NPP V1“

MINISTRY OF ENVIRONMENT OF THE SLOVAK REPUBLIC

Division of Environmental Assessment and Management
Department of the environmental assessment
Námestie Ľudovíta Štúra 1, 812 35 Bratislava

Jadrová a vyradovacia spoločnosť, a.s.	
Tomášikova 22, 821 02 Bratislava 2	
Došlo:	16. 08. 2012
Počet príloh/listov príloh:	202/12556
Pridelené:	Č. spisu:



Nuclear and
Decommissioning
Company, a.s.
Tomášikova 22
821 02 Bratislava

Your letter from
2012/09107

Our mark
6236/20 12-3.4/hp

Handled by
Ing. H. Poncová
+421 905 682 024

Bratislava
08.08.2012

Subject:

ERECTION OF THE NEW LARGE CAPACITY F&D FACILITY NPP V1

- abandonment from request of the alternative solution for the proposed action

In your letter no. 1012/09107 dated 07.06.2012, received on 12.6 2012 you contacted us with a request to abandon alternative solution for the proposed action " ERECTION OF THE NEW LARGE CAPACITY F&D FACILITY NPP V1" in accordance with Law no. Act 24/2006 coll. Assessment of environmental impact and amending certain laws, as amended.

You justify your request especially, that decommissioning of the NPP V1 will create a significant amount of radioactive waste (hereinafter referred to as "RAW"), the majority will be formed by building metal radioactive waste. One of the most important objectives in waste management is to minimize the volume of waste from decommissioning as the main objective of the second stage. Achieving this goal will not be possible without the use of decontamination programs and methods of controlled disassembly.

In the request is stated that processing of RAW on F&D facilities, will be activity focused on the separation of radionuclides from metallic RAW, to change their composition and to reduce their capacity to improve the safety and economic efficiency of handling. Metal waste will be processed in order to separate useful substances and recovered for re-use and the amount of remaining radioactive waste to be reduced for further handling.

Handling of radioactive waste will be carried out only in controlled areas of nuclear power plant V1 and all new fragmentation and decontamination facilities will be installed in the controlled area SO 800, in the original building of reactors 1 and 2 NPP.

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V1 in locality Bohunice, cadastral area Bohunice site number: 701110. Regarding the purpose of the facility and regime and safety measures, these lines cannot be placed outside the controlled area and locality of the nuclear facility.

Using the proposed facility does not require construction of new buildings, there will be used spaces of nuclear facility only (building no. 800 – reactor building).

Abandonment from request of the alternative solution for the proposed action is requested on the base of position. The fact that the location of the facility is optimized between file of decommissioning devices and therefore project "C7-A3 Erection of a new large capacity F&D facility NPP V1", cannot be implemented on another location or in another building of JAVYS a.s. on c. a. Bohunice.

Possible variants of technological options that can be applied to ensure the purpose of the project and their comparison will be described in the plan of the proposed action.


The design and safety documentation, commissioning and operation of the new fragmentation and decontamination facilities will be subject to the approval of the supervisory authorities: the Nuclear Regulatory Authority of the Slovak Republic and the Public Health Authority of the Slovak Republic.

After considering the arguments in your request we inform you that, pursuant to § 22 par. 7 of Law no. 2412006 coll. Assessment of environmental impact and amending certain laws, as amended (the "Act"), we abandon from requirement of the alternative solution to the proposed action.

"Intention" developed under § 22 and Annex. 9 of the Act shall contain one variant of activities, including the zero option, namely variant of condition that would occur if S ~ proposed action will not be performed.

Also, please note that when, observations handed on the Intention reveals the need for a further variant of the real action, this fact will be accounted in determining the scope of the assessment and timetable.

Best regards



RNDr. Gabriel Nižňanský
riadiateľ odboru

APPENDIX NO. 11

A copy of the EUROPEAN COMMISSION OPINION 2011/C 210/05 of 15.7.2011 relating to the plan for the disposal of radioactive waste arising from the decommissioning of the Bohunice V-1 Nuclear Power Plant, located in the Slovak Republic, in accordance with Article 37 of the Euratom Treaty

C 210/16

EN

Official Journal of the European Union

16.7.2011

OPINIONS

EUROPEAN COMMISSION

COMMISSION OPINION

of 15 July 2011

relating to the plan for the disposal of radioactive waste arising from the decommissioning of the Bohunice V-1 Nuclear Power Plant, located in the Slovak Republic, in accordance with Article 37 of the Euratom Treaty

(Only the Slovak text is authentic)

(2011/C 210/05)

The assessment below is carried out under the provisions of the Euratom Treaty, without prejudice to any additional assessments to be carried out under the Treaty on the Functioning of the European Union and the obligations stemming from it and from secondary legislation.

On 21 January 2011, the European Commission received from the Slovak Government, in accordance with Article 37 of the Euratom Treaty, General Data relating to the plan for the disposal of radioactive waste arising from the decommissioning of the Bohunice V-1 Nuclear Power Plant.

On the basis of these data and additional information requested by the Commission on 18 February 2011 and provided by the Slovak authorities on 8 and 29 April 2011, and following consultation with the Group of Experts, the Commission has drawn up the following opinion:

1. The distance between the plant and the nearest point on the territory of another Member State, in this case the Czech Republic, is approximately 38 km. The Austrian and Hungarian borders are at distances of 55 km and 62 km respectively.
2. Under normal decommissioning operations, the discharges of liquid and gaseous effluents are not liable to affect the health of the population of another Member State.
3. Low- and intermediate-level solid radioactive waste will be temporarily stored on-site before transfer to the authorised National Waste Disposal Facility at Mochovce. High-level solid radioactive waste will be stored on-site until a deep repository becomes available.
4. Non-radioactive solid waste or residual materials in compliance with clearance levels will be released from regulatory control for disposal as conventional waste or for reuse or recycling. This should be done in compliance with the criteria laid down in the Basic Safety Standards (Directive 96/29/Euratom).
5. In the event of unplanned releases of radioactive effluents, which may follow an accident of the type and magnitude considered in the General Data, the doses likely to be received by the population in another Member State will not be liable to affect the health of the population.

16.7.2011

EN

Official Journal of the European Union

C 210/17

In conclusion, the Commission is of the opinion that the implementation of the plan for the disposal of radioactive waste in whatever form, arising from the decommissioning of the Bohunice V-1 Nuclear Power Plant in the Slovak Republic, both under normal operation and in the event of an accident of the type and magnitude considered in the General Data, is not liable to result in the radioactive contamination of the water, soil or airspace of another Member State.

Done at Brussels, 15 July 2011.

For the Commission
Günther OETTINGER
Member of the Commission

APPENDIX NO. 12

Description how the comments have been worked in

Statement of Polish Republic:
<p>Possibility of radioactivity leakage out from the Slovak Republic and transboundary impact on the environment of Polish border area are stated as entirely negligible.</p> <p>Based upon analysis of the submitted documentation, upon the statements of the regional directors for environmental protection and upon the statement of the president of the National Agency for Atomic Energy, no legitimacy to enter the proceedings concerning transboundary environmental impact of the mentioned project has been found.</p> <p>Since Polish Republic is involved in investments related to nuclear energy, the Polish party would like to apply for keeping informed about the main stages of the disposal process and also for provision of the final standpoint of environmental impact assessment.</p>
Statement of Austria:
<p>Referred to the statement of the specialised departments of the Ministry and those of 9 federal republic governments, Austria has no intent to take part in the transboundary proceedings according to the Espoo Convention. Reference to the statement of the Austrian contact point representative for Espoo during the 5th meeting of the Centre for Competence of the International e-mat Project in Hainburg organised on 27.-28.02.2013 can be also applied as reference to this matter.</p> <p>For further information concerning the proceedings progress in the projects, statements of the mentioned board are sufficient for Austria.</p>
Statement of Hungarian Republic:
<p>The zero variant is not sufficiently worked out. Stating that this incorporates only the variant that nothing happens in nonsense. Other zero variants include transport to other operators (Studsvik, Sweden, for instance), and this option would have environmental impacts that would need be compared to the ones in the variants 1 to 3.</p> <p>Another zero variant would consist of decommissioning without fragmentation and separation - basically leaving the material as it is and finding a temporary or final storage method for this.</p>
<p>The zero variant as described is sufficient.</p> <p>In accordance with §22, Point (3) of the Act No 24/2006 Coll. on Environmental impact assessment and on amendment and supplement of certain acts, the Plan shall contain at least two variant solutions of the proposed activity as well as a zero variant. Transportation of the contaminated materials can be performed only after their segmentation and fragmentation. This activity also requires workplaces being equipped with necessary technical means for segmentation and fragmentation, which are included into the subject of this EIA process. The zero variant is not in compliance with the concluding statement of the Ministry of the Environment of Slovak Republic No. 8935/06-3.5/hp dated on 7.3.2007 resulting from the assessment of the proposed activity "Decommissioning of the V1 Nuclear Power Plant", in which the implementation of the variant "immediate decommissioning of the V1 NPP" was recommended. For this reason no zero variant can be considered. Activities of fragmentation and decontamination are very essential for management with radioactive contaminated materials, where free releasable materials for further utilisation will be obtained by the decontamination. RAW processing abroad cannot be regarded as zero variant, because this approach requires the fragmentation of the primary circuit equipment as minimum, and fragmentation procedures are also subject of this EIA process.</p>
<p>The report states on page 51 and further: <i>"We can suppose that if we don't solve a problem with RAW disposal, together with time factor, the effect to the environment will be worse than effects to operation workplace F&D. [...] After the end of the activity, the impact to the environment will be very positive."</i></p> <p>I beg your pardon? An EIA is supposed to deliver the data on the basis of which exactly this question can be answered. Indeed, this EIA report does not deliver these data, but simply stating assumptions is not the task of the consultant making the EIA report. His or her task is to test assumptions and come to factual conclusions</p>

about the project's impact on the environment. On the basis of this report, I as member of the public will have to assume that the unprofessional way in which the promoter of the project (JAVYS) deals with this part of the EIA means that also the operation of the project will be insufficient. And that could well lead to larger impacts on the environment than a well worked out zero solution.

The information required has been supplemented to the Chapter II.4.2 Output data (II.4.2.1 – Atmosphere, II.4.2.2 – Sewage water, II.4.2.3 – Waste)

One of the conclusions on page 52 reads: *"Potential health hazard for inhabitants in affected villages and for workers too, is more depend on raw RAW amount as well as in used variant. By progressive RAW inventory decline, the permanent risk of the RAW effects, that are in location, will be less."*

Apart from the fact that the English is terrible, the content is complete nonsense, unless the resulting radioactive waste will be (temporarily or finally) stored in the storage facilities on site. In that case there is only a change in form and potentially volume of the radioactive material, but not in the total amount of radioactivity. Because the authors state that the largest risk for the surrounding villages and workers consists in the case of a large accident in which part of the radioactive inventory is spread, this hazard is not reduced in any way by the proposed activities.

The Chapter has been reedited and the comments have been worked in.

Transboundary impacts of the activity. The report lacks sufficient information to be able to judge what the potential transboundary impacts of the activity will be, as well as what the potential transboundary impacts of zero-variant options could be. The radioactive material from decommissioning is to be transformed, concentrated, put in other locations on the site and there is no assessment whatsoever of potential accidents that could lead to spreading of these materials through the air or water – factors important for potential transboundary impacts. What will happen in the case of a large fire with and without F&D? The EIA is therefore completely inadequate under the Espoo Convention.

Abnormal situations are analysed in details in the Chapter II.4.7 – Operational risks and their possible impact on the territory (Possibility of appearance of accidents)