Requirements and opinions on the project proposal "Optimization of processing capacities of RAW processing and treatment technologies of JAVYS a.s. in Jaslovské Bohunice site"

Association of towns and communities, NPP Jaslovské Bohunice region and the common opinion of affected communities ((J. Bohunice, Pečeňady, V. Kostoľany, Ratkovce, Žlkovce, Malženice, Radošovce, Dolné Dubové) – the same requirements		
	Requirement	***Alternative***
1.1	The project proponent JAVYS a.s. provides three alternatives in the project proposal. Each of them should satisfy the conditions and criteria of supervisory authorities and minimize an impact on surrounding environment and its population. With respect to the volume of processed RAW Alternative 1 and Alternative 2 differ from Alternative 0 as the volume of processed RAW in some items is much higher. Alternative 0 states that the volume of waste processed by melting and recasting metal RAW is 1.000 t, however the volume in Alternative 1 and 2 is 4.500 t. The volume of RAW processed by incineration in Alternative 0 is 240 t and in Alternative 1 and 2 it is 500 t. Similarly, the higher volumes of RAW are envisaged also in the further items regarding optimization of processing capacities. The current volume indicated in Alternative 0 has been accepted by the communities provided that the project proponent would process RAW solely from Jaslovské Bohunice site.	JAVYS a.s. cannot undertake to process only the waste from J. Bohunice site in the nuclear facility RAW processing and treatment technologies, since it is a company ensuring requirements under Section 10, subsection 3 of Act No. 541/2004 Coll. as a company established by the Ministry of Economy of the Slovak Republic pursuant to Section 3, subsection 11 of Act No. 541/2004 Coll. Section 10, subsection 3: "In order to ensure nuclear safety and to prevent unjustified accumulation of radioactive waste and spent nuclear fuel, the licence holder shall in the course of nuclear facility commissioning and throughout its operation deliver the radioactive waste and spent nuclear fuel to the legal person in accordance with Section 3, subsection 11 for its further disposal. The radioactive waste shall be delivered within 12 months from its generation at latest and the spent nuclear fuel shall be delivered after the requirements for its safe, economical and effective transport to the nuclear facility with the licence issued to the legal person under Section 3, subsection 11 have been satisfied. This obligation does not apply to the temporary radioactive waste and radioactive waste stored in the nuclear facility where it was generated and which due to its content of radioactive nuclides cannot be disposed of in the National Radioactive Waste Repository in Mochovce." In addition to the waste generated during the operation and decommissioning of nuclear facility, it ensures disposal of institutional RAW and radioactive materials of unknown origin in the territory of Slovak Republic. The Assessment Report considers utilization of nuclear facility RAW processing and treatment technologies also for providing RAW processing services to external foreign producers.
1.2	The project proponent states that the change of proposed activity in Alternative 1 and 2 refers to the installation of new technology aimed at	The statement identical to paragraph 1.1

	reducing RAW in volume and mass by incineration. The existing technology for waste processing has not been used to its full capacity in Slovakia and therefore the proponent proposes to process RAW imported from abroad. We do not see the reason for installing new technology if existing technology for RAW processing is sufficient in terms of capacity. JAVYS a. s. was established due to the need to process RAW from decommissioning of NPP J. Bohunice units A1 and V1. Therefore it would be convenient if the company aimed its operation only at processing waste from the relevant site or Mochovce site. The priority of Association is the quality of environment and health of people living in the vicinity of nuclear power plant and the region where it is located.	
1.3	The greatest worry of the communities in the Association is the radiation exposure and emissions of contaminants from incineration of waste with regard to the proposed activity. The region has been characterized by NPP operation accepted by an older generation. The change of society contributed to the change of attitude of mainly younger generation that is not willing to accept the newly proposed activities, in particular RAW incineration in the region where it lives.	Incineration is the best technology ensuring waste reduction in volume. The results of dispersion study and assessment of public health impacts indicate that the emissions produced by incineration technology do not have a significant impact on the quality of air in the affected area and they do not pose an increased health risk to the population of affected communities.
1.4	The Association of towns and communities, NPP J. Bohunice region accepts the Alternative 0 stated in the project proposal that does not set out an increased volume of processed RAW and at the same time it requires that only RAW from Slovakia is processed.	The statement identical to paragraph 1.1
Nuclear Regulatory Authority of the Slovak Republic		
	Requirement	***Solution***
2.1	It is stated on several pages of the project proposal that the proposed technologies will be inter alia used for RAW disposal in relation to the nuclear services provided for external RAW producers. It needs to be specified whether an external RAW producer means only an external RAW producer from Slovakia or also from abroad. If it means also a foreign	The optimized RAW processing technologies should be used also for the purpose of processing RAW from external producers in relation to the permits issued by the Nuclear Regulatory Authority of the Slovak Republic and the contract. An intended use is described in part A, chapter II.2 Purpose, chapter II.10 Alternatives of proposed activity.

	external RAW producer, an increase in RAW inventory at the site and higher emissions to the environment should be included in the scope of assessment.	An increase in inventory is not included in the Report since each foreign RAW import will be evaluated and approved individually by the Nuclear Regulatory Authority of the Slovak Republic. An estimated increase in emissions of air pollutants related to the operation of optimized technologies is given in the Dispersion Study (Annex 4 to the Assessment Report), part B, Chapter II. Emission data, paragraph II.1.1 Point sources and evaluation is given in part C, Chapter III.1 Impacts on population, Chapter III.4 Atmospheric impacts.
2.2	***Page 12, chapter II.1*** The title of proposed activity "Optimization of JAVYS a.s. processing capacities of RAW processing and treatment technologies in J. Bohunice site" does not include the fact that the activity is also associated with the erection of several new technology lines even though they were subject to an individual environmental impact assessment. An optimization of newly built lines that have not been erected yet evokes the idea of commercial intentions of the company not specified in the document itself.	The proposed optimization of processing capacities of nuclear facility RAW processing and treatment technologies also assumes an intention to provide services to external RAW producers set out in part A, chapter II.2 Purpose and chapter II.10 Alternatives of proposed activity.
2.3	***Page 12, chapter II.2*** A term "alternative packing set" is used in the chapter "Purpose" and in the paragraph 8.1.1 Bohunice RAW Treatment Centre (civil structure 808), page 20 in the description of technology for high-pressure RAW pressing (PS 08). The Authority requires to explain what an alternative packing set means.	A term "alternative packing set" is explained and described in the chapter "Used abbreviations and certain terms".
2.4	***Page 16, paragraph II.8*** Alternative 0 states that RAW processing, treatment and storage in the technology buildings of nuclear facility RAW processing and treatment technologies is within the evaluated scope of environmental impact pursuant to Act No. 24/2006 Coll. Alternative 0 includes also the line for pre-treatment of fixed RAW in the civil structure 44/20. Since the above line in the civil structure 44/20 is not within already evaluated scope of environmental impact and the enquiry procedure is still under way, we propose to consider its transfer from Alternative 0 to Alternative 1.	The line for fixed RAW pre-treatment in the civil structure 44/20 was evaluated through the enquiry procedure regarding the notification on the change of proposed activity "Installation and operation of solid RAW pre-treatment technology in the civil structure 44/20". The decision of the Ministry of Environment of the Slovak Republic No. 483/2018-1.7/hp-R of 1 August 2018 issued within the enquiry procedure states that this change should not be evaluated in accordance with Act No. 24/2006 Coll., the Nuclear Regulatory Authority of the Slovak Republic issued the decision No. 361/2018 for line commissioning on 19 December 2018 and therefore this line was

		included in the zero alternative.
2.5	***Page 16, chapter II.8 Description of technical and technological design*** The Authority requires a more detailed description of processing capacities and assumed annual volume of processed RAW for both alternatives under assessment.	The processing capacities of relevant technology are set out in part A, chapter II.9 Description of technical and technological design and in chapter II.10 Alternatives of proposed activity, in tables A.II.10./04 and 05 and graphs – image A.II.10./03 and 04 for zero alternative and for alternative 1 to be evaluated according to the scope of assessment.
2.6	***Page 29, chapter II.8, paragraph 5, structure 641*** The place of origin of waste stored in the relevant structure is not mentioned anywhere. No EIA process was carried out for the civil structure 641, it was covered by submitting the final position of the Ministry of Environment of the Slovak Republic on the Environmental Impact Assessment of RAW treatment and processing technologies in J. Bohunice site and position of the Ministry of Environment of the Slovak Republic on the Environmental Impact Assessment of stage III and IV of NPP A1 decommissioning. Therefore we propose to consider its transfer from Alternative 0 to Alternative 1.	With regard to the fact that a consent (the decision of Nuclear Regulatory Authority of the Slovak Republic of 14 March 2017) was issued for the civil structure 641 regarding the changes affecting nuclear safety during the operation of nuclear facility RAW processing and treatment technologies under **commissioning of the civil structure 641 – solid RAW storage** according to the "RAW commissioning programme for civil structure 641, issue 1 of 2 March 2017" and after the building approval procedure the change regarding the purpose of civil structure 641 Nuclear facility RAW processing and treatment technologies storage was permitted by the decision No. 117/2017, this activity was permitted and it was included in Alternative 0.
2.7	***Page 31, Table II.8/01 "Processing capacities and purpose of individual RAW processing and treatment lines and workplaces of the nuclear facility RAW processing and treatment technologies"*** The column "Operation or other processing technology" by which the processed RAW was generated" shall indicate the place of origin of processed RAW including the indication whether the annual processing capacity includes also foreign RAW.	The processing capacities of relevant technology are set out in part A, chapter II.9 Description of technical and technological design and in chapter II.10 Alternatives of proposed activity, in tables A.II.10./04 and 05 and graphs – image A.II.10./03 and 04 for zero alternative and for alternative 1 to be evaluated according to the scope of assessment. The annual processing capacity is specified for individual technologies and does not differentiate where RAW was generated, i. e. it comprises also RAW from the foreign producers.
2.8	***Page 34, Table II.8/01 "Processing capacities and purpose of individual RAW processing and treatment lines and workplaces of the nuclear facility RAW processing and treatment technologies"*** Amend the text in the column activity of processed RAW in the civil	The activity of processed filters for ventilation system processing workplace is not defined in the Limits and Conditions. The average activities of filters to be processed are Σ beta, gamma activity 6,069E+05 Bq/filter, Σ alpha activity 5,074E+03 Bq/ filter.

	structure 32 ventilation system filters processing in such way to take into account the activity of actually processed filters.	
2.9	***Page 36, chapter II.8 Alternative 1*** With regard to the various means of RAW disposal Alternative 1 should not be narrowed down only to the system of civil structures of nuclear facility RAW processing and treatment technologies but it should also consider the system of civil structures of nuclear facility NPP V1 RAW IS to ensure that such opinion can be used also in further licensing steps related to these facilities.	The system of civil structures of nuclear facility RAW processing and treatment technologies was considered as a location for optimized technologies due to decommissioning of NPP V1 structures (the extent of demolition of NPP V1 buildings is set out under project B6.7).
2.10	***Page 36, chapter II.8 Alternative 1*** The description of fragmentation and decontaminating workplaces is missing. A corresponding table contains 6 pieces technologies but only 5 of them are described in the document.	The description of fragmentation and decontaminating technology to be transferred to the civil structure 760-II.3,4,5 is given in part A.II.9, in the description of Alternative 1 (page 32).
2.11	***Page 37, Chapter II.8, paragraph 8.2.2 Optimization of incineration capacities*** There is only the description of technology. It is necessary to demonstrate that the set limit values for maximum output values of effluents will be maintained during the continuous operation of both incinerators.	The incinerator limits for Bohunice RAW Treatment Centre in the civil structure 809 are set out in part B, chapter II. Output data, paragraphs II.1.1 Point sources (Table B.II.1/05, Table B.II.1./07), evaluated during parallel operation in the dispersion study - Annex 4 to the Assessment Report.
2.12	***Page 41, Chapter II.8 - Table "Alternative 1 – Optimized processing and storage capacities to be used for RAW processing and treatment within the system of civil structures of NPP V1 nuclear facility RAW processing and treatment technologies".*** It is necessary to indicate whether it is an external producer from Slovakia or from abroad in the column "Operation or other processing technology by which the processed RAW was generated". The values limiting an impact on environment should be quantified in the column "Activity of processed / stored RAW". The same applies to the table for alternative 2 on page 43. The Authority will need the above data for authorization of licence changes.	The requirement is set out in Part A.II.10 Alternatives of proposed activity where Table A.II.10/04, column "operation or other processing technology by which the processed RAW was generated" indicates what is going to be processed and the column "Activity of processed RAW/stored RAW" indicates the expected activity of RAW entering technology or storage.
2.13	***Page 44, chapter II.9 Statement of reasons for proposed activity at the site*** It is not clear why the main reason for optimization of processing capacities is the generation of RAW due to NPP V1 decommissioning when the whole	The processing and storage capacities to be provided by optimization with respect to RAW processing plans for 2020-2030 stated in part A.II.10, Tables A.II.10/02 and 05 and generation of radioactive

	license documentation for 2nd stage of V1 decommissioning declares that the processing and storage capacities are adequate in the way as they are described by the documentation.	materials from the decommissioning of nuclear facility and ensuring required logistics of their processing, treatment and storage. The purpose of optimization is to ensure the use of technology for processing RAW from the foreign producers.
2.14	***Page 47, Chapter II.17 Statement of expected impacts of proposed activity in transboundary context*** With regard to import and processing of foreign RAW it cannot be categorically stated that the activity in question should not be subject to international assessment procedure (Annex 13, paragraph 3 of Act No. 24/2006 Coll.).	The activity is subject to transboundary assessment but transboundary impacts are not expected – Chapter A II.18
2.15	***Page 106, Chapter IV.1.5 Transportation and other infrastructure needs*** The intensity of foreign transports that are not mentioned at all is not considered.	The intensity of foreign transports is included in Chapter B I.5.
2.16	***Page 135, Chapter IV.3.4 Atmospheric impacts*** A detailed description of non-radiation releases, in particular due to the processing of RAW from an external producer the nuclide composition and chemical and physical properties of which can differ from RAW already located at the site is missing, or provide more detailed information about disposal of such RAW.	An impact of non-radiation releases in the stage of implementation of proposed alternative (includes also processing of RAW from an external producer) is described in detail in part C, Chapter III.4. Atmospheric impacts and also in the dispersion study - Annex 4 to Report of Assessment of Public Health Impacts - Annex 5 to Assessment Report. RAW from an external producer will be re-examined prior to its processing (its composition and properties) and its transport for processing will be subject to the Nuclear Regulatory Authority of the Slovak Republic permit.
2.17	***Page 129, the last paragraph*** The stated effective dose for employees of 6 mSv per year in the controlled area is not correct. Pursuant to Section 21, subsection 1 of the Decree of the Slovak Government 345/2006 Coll. the above value should be considered as a criterion based on which the controlled area equipment is defined. In our opinion the data indicated in the Report should be based on the new Radiation Protection Act (No. 87/2018 Coll.).	The comment included in Chapter B II.5 and C III. 1 of Assessment Report.
Public Health Authority of the Slovak Republic		

	Requirement	***Solution***
3.1	In the event of free commercialisation of RAW disposal in the nuclear facility of JAVYS a. s. in J. Bohunice site the further commitments towards other producers with regard to RAW processing and treatment can increase and this can have an adverse effect on the level of radioactivity in the environment and exposure of employees to radiation. Subject to the above the Public Health Authority of the Slovak Republic does not recommend concluding the process of proposed activity assessment in the stage of enquiry procedure and requests preparation of Report of Proposed Activity Assessment and its mandatory evaluation.	The requirement fulfilled by preparing an assessment report and submitting it to the assessment process.
Ministry of Interior of the Slovak Republic, Crisis Management Section		
Ministry of Interior of the Slovak Republic, Crisis Management Section does not have any comments and supplements to the project proposal.		
Ministry of Interior of the Slovak Republic, Presidium of Fire and Rescue Corps		
Ministry of Interior of the Slovak Republic, Presidium of Fire and Rescue Corps within the limits of its powers and interests does not have any comments to the proposed activity.		
Trnava Self-governing Region, Regional Development Section		
	Requirement	***Solution***
4.1	For operation of all processing facilities set out in Alternative 2, it will be necessary to ask for the change of existing decision regarding the release of radioactive substances into the environment with respect to a new source and determination of a new limit for the release of radioactive substances into the atmosphere and hydrosphere. It will be necessary to provide the software licensing for calculation and assessment of impact of JAVYS a. s. J. Bohunice site including a new source. With regard to the above we do not have any comments to the project proposal and we prefer Alternative 2.	The recommended Alternative is Alternative 1 that is also within the scope of assessment meant for further and more detailed assessment of proposed activity, therefore Alternative 2 is no longer evaluated in the Assessment Report.

Slovak Water Management Company, state-owned enterprise, Piešťany branch		
	Requirement	***Solution***
5.1	We recommend "Alternative 1" – optimal alternative“. The proposed activity in Alternative 1 will not result in the change of volume of discharged waste water into the surface recipients Dudváh and Váh and threat to the quality of surface and ground water.	Alternative 1 described in the Assessment Report is within the scope of assessment meant for further and more detailed assessment of proposed activity.
5.2	The proposed activity may not endanger the quality of surface and ground water. With regard to the above, the provisions of Act of the National Council of the Slovak Republic No. 364/2004 Coll. on Water and Decree of the Slovak Government No. 269/2010 Coll. laying down the requirements for achieving good status of water shall be in relation to the activity complied with.	The requirements of Water Act and its implementing regulations are elaborated in the internal integrated management system documentation - Policy BZ/OŽ/SM-01 "Water protection, handling of hazardous substances and work in MCHL application" and they must be complied with during the preparation of project documentation and subsequent implementation of individual optimized technologies or change of purpose of civil structure 760-II.3,4,5.
5.3	Any activity that can affect the watercourse managed by our organization has to be approved by our organization in advance in writing.	The requirement is incorporated in the Policy BZ/OŽ/SM-01 "Water protection, handling of hazardous substances and work in MCHL application" and in the Rules for waste water release.
Pursuant to Act No. 24/2006 Coll. SVP does not have any comments on the submitted project proposal.		
District Office of Trnava, Environmental Division, Department of Nature and Selected Environmental Components Protection		
	Requirement	***Solution***
6.1	**State Administration Authority for Waste Management:** When carrying out the proposed activity the provisions of Waste Act and related waste management regulations should be complied with.	The requirements of Waste Act and its implementing regulations are elaborated in the internal integrated management system documentation - Policy BZ/OŽ/SM-01 "Waste management" and they must by complied with during the preparation of project documentation and subsequent implementation of individual optimized technologies or change of purpose of civil structure 760-II.3,4,5.
6.2	**State Water Management:** - Protect surface and ground water and prevent an undesirable release of	The requirements of State Water Management are elaborated in the internal integrated management system documentation - Policy

	hazardous substances into ground, surface and ground water. - Comply with the provisions of the Decree No. 200/2018 Coll. - Full compliance with the requirements of issued decisions and consents and also internal rules representing the measures against adverse environmental effects of activity. -	BZ/OŽ/SM-01 "Water protection, handling of hazardous substances and work in MCHL application" and they must by complied with during the preparation of project documentation and subsequent implementation of individual optimized technologies or change of purpose of civil structure 760-II.3,4,5. The above conditions are also described in "JAVYS a. s. safety and technical conditions" that are the part of contract with the service and job contractor.
6.3	**State Administration Authority for Air Protection:** Pursuant to Act No. 137/2010 Coll. on Air, this law does not apply to the release of radioactive substances to the atmosphere.	No need for explanation.
6.4	**State Administration Authority for Nature and Landscape Protection:** - 1st level of territorial nature and landscape protection applies to the site in question in accordance with Section 12 of Act No. 543/2002 Coll. on Nature and Landscape Protection and the site was not declared a protected territory and there is no protected tree at this site. - We require to evaluate a cumulative effect of this investment on the surrounding protected territory and subject matter of its protection, protected trees and elements of territorial system of ecological stability, significant landscape components, protected species, habitats of national importance and habitats of European importance. It is also necessary to include adequate compensation measures, post-project analysis and monitoring of selected protected parts of nature and landscape in the Assessment Report.	The part C, Chapter III.7-11 contains an assessment of impacts on the protected territories and landscape and with regard to the proposed location of optimized technologies within the existing premises of demarcated site of JAVYS a. s., Jaslovské Bohunice site (built-up area) the impacts on fauna, flora, habitats of national and European importance, protected territories in the vicinity are ruled out. Due to the above reason the assessment report does not contain any compensation measures in the field of nature and landscape protection.
District Office of Trnava, Environmental Care Department agrees with the submitted project proposal provided that the above requirements are satisfied.		
District Office of Trnava, Building and Housing Policy Division		
District Office of Trnava, Building and Housing Policy Division does not have any comments on the proposed activity with regard to land use planning.		
District Office of Trnava, Road Traffic and Road Infrastructure Division		

District Office of Trnava, Road Traffic and Road Infrastructure Division does not have with regard to an expected increase in freight transport related to the proposed activity (considered as insignificant) any comments.		
District Office of Piešťany, Environmental Division		
	Requirement	***Solution***
7.1	**State Water Management Section** For implementation of proposed activity in terms of water management the following is required: - Comply with the general provisions of Water Act No. 364/2004 Coll. - Protect surface and ground water and prevent an undesirable release of hazardous substances into ground, surface and ground water. - Comply with the provisions of Section 39 of Water Act and Decree No. 200/2018 Coll. - Do not upset existing drainage conditions in the territory.	The requirements of Water Act and its implementing regulations are elaborated in the internal integrated management system documentation - Policy BZ/OŽ/SM-01 "Water protection, handling of hazardous substances and work in MCHL application" and they must be complied with during the preparation of project documentation and subsequent implementation of individual optimized technologies or change of purpose of civil structure 760-II.3,4,5. The above conditions are also described in "JAVYS a. s. safety and technical conditions" that are the part of contract with the service and job contractor.
Air Protection Section, Waste Management Section and Nature and Landscape Protection Section do not have any comment to the proposed activity.		
District Office of Piešťany, Environmental Division		
	Requirement	***Solution***
8.1	**State Administration Authority for Nature and Landscape Protection:** The provisions of Act No. 543/2002 Coll. on Nature and Landscape Protection must be complied with.	The requirements of Act No. 543/2002 Coll. on Nature and Landscape Protection are elaborated in the internal integrated management system documentation - Policy BZ/OŽ/SM-02 "Air, nature and landscape protection" and they must be complied with during the preparation of project documentation and subsequent implementation of individual optimized technologies or change of purpose of civil structure 760-II.3,4,5.
8.2	**State Administration Authority for Waste Management:** The provisions of Act No. 79/2015 Coll. on Waste must be complied with.	The requirements of Waste Act and its implementing regulations are elaborated in the internal integrated management system documentation - Policy BZ/OŽ/SM-01 "Waste management" and they

		must be complied with during the preparation of project documentation and subsequent implementation of individual optimized technologies or change of purpose of civil structure 760-II.3,4,5. The waste disposal terms and conditions are also described in "JAVYS a. s. safety and technical conditions" that are the part of contract with the service and job contractor.
District Office of Hlohovec, Environmental Care Department agrees with the submitted project proposal provided that the above requirements are satisfied.		
Ministry of Transport and Construction of the Slovak Republic		
	Requirement	***Solution***
	In case of locating the building in the protected lane zone or in the perimeter of lane not intended for the lane purposes, it can be erected only with the prior consent and under the conditions defined by the Ministry of Transport of the Slovak Republic.	This requirement will be complied with during the preparation of project documentation and subsequent implementation of individual optimized technologies or change of purpose of civil structure 760-II.3,4,5
Regional Directorate of Fire and Rescue Corps of Trnava		
	Requirement	***Solution***
	With regard to the changes concerning fire safety we require to submit the project documentation for approval. The requirements concerning content and extent or project documentation submitted for building permit procedure are set out in Article 9 of the Decree of the Ministry of Environment of the Slovak Republic No. 453/2000 Coll. implementing certain provisions of Building Act.	This requirement will be complied with during the preparation of project documentation and subsequent implementation of individual optimized technologies or change of purpose of civil structure 760-II.3,4,5.
District Office of Trnava, Environmental Division, Department of Water State Management and Selected Environmental Components Protection		
	Requirement	***Solution***

	If the measures concerning prevention, elimination, minimization and compensation of environmental impacts are implemented, then the construction is considered acceptable in terms of environmental impacts.	This requirement will be complied with during the preparation of project documentation and subsequent implementation of individual optimized technologies or change of purpose of civil structure 760-II.3,4,5.
Ministry of Economy of the Slovak Republic – no comments		
Nižná – no comments, prefers Alternative 1		
Regional Monuments Board of Trnava agrees without comments		
Labour Inspectorate of Nitra does not have any comments or questions		
District Office of Hlohovec, Crisis Management Section does not have any comments or requirements		
District Office of Piešťany, Crisis Management Section does not have any comments or requirements		
District Office of Trnava, Crisis Management Section does not have any comments or requirements		

Requirements and opinions on the project proposal "Optimization of processing capacities of RAW processing and treatment technologies of JAVYS a.s. in Jaslovské Bohunice site"

Hungary		
	Requirement	***Solution***
1.1	***After the evaluation of delivered Report of Environmental Impact Assessment, Hungary concluded that under the standard operation conditions there are no significant changes concerning the aspects of radiation protection against transboundary environmental impacts of project proposal "Optimization of processing capacities of RAW processing and treatment technologies of JAVYS a.s. in Jaslovské Bohunice" in the territory of Hungary.*** ***Despite that Hungary would like to ask for further explanation concerning the following questions.*** ***1. Page 56, Chapter III. 4.1 Air pollution - English version (page 78 – Slovak version)*** - under the standard and specific operation conditions, here the effects of gas releases of existing technology are described: "Impacts of operation of nuclear facilities are monitored through the liquid and gas releases for which the annual limits are set. The aim of limit values of releases is to ensure that the summary releases of radioactive substances into the environment from all sources on the site under standard and specific operation conditions are maintained at such level that despite operation of nuclear facilities including planned decommissioning activities, the annual radiation exposure limit for an individual from the critical group of the public as a result of radioactive releases into the atmosphere and hydrosphere will not exceed 0,25 mSv per year (Decree of the Slovak Government No. 345/2006 Coll. on the basic safety requirements concerning protection of health of employees and population against ionizing radiation). " ***The part IV. 3.4, page 108 - English version (page 135 – Slovak version)*** does not make it clear whether the effects of air releases (described in part III. 4.1) will be changed after the technology alteration, in particular in the	The effects of air releases under exceptional or emergency conditions are described in part C, Chapter III.19 Operational risks and their possible impact on the territory. The description of technologies after alteration is given in part A, Chapter II.9 Description of technical and technological design, Alternative 1.

	event of exceptional or emergency conditions.	
1.2	***Page 109, part IV. 3.5 Impacts on Water Conditions - English version (Page 136 – Slovak version)*** – the following is set out: "The potential risk of water contamination due to the non-standard operation states is avoided either by the design of operating premises (sealed joints between the floors and walls, water resistant floors and walls up to adequate height, cambered area to active drainage system) or by applied procedures that are the part of approved emergency plans. " This part and part IV. 3.4 does not make it clear which risk category applies to the altered facility (from emergency planning viewpoint) and how the radiation exposure effects due to the accident differ from the newly introduced reference levels.	The effects of water releases in the event of exceptional or emergency conditions are described in part C, Chapter III.19 Operational risks and their possible impact on the territory. The description of technologies after the alteration - optimization is given in part A, Chapter II.9 Description of technical and technological design, Alternative 1.
Poland		
	Requirement *(requirements are numbered according to the Slovak version of project proposal)*	***Solution***
2.1	***Page 19, part II.8, paragraph 4 - Incinerator of solid RAW and liquid organic waste (PS06)*** How are the flue gases from the facility controlled? It is said that the particles are captured by HEPA filters with 99,9 efficiency. Is the control directly through the stack or is the measurement carried out through the common stack? What are the recorded values of released radioactive isotopes into atmosphere? What acceptable limits were set out by the competent authority /nuclear regulatory authority for this facility?	Releases from the incineration facility are monitored according to the operating procedure 10-TPP-806 "Incineration facility of Bohunice RAW treatment centre". Aerosol HEPA filters are the part of incineration technology as the part of flue gas cleaning system (DPS 50 Fine filtration), located in the room 204, civil structure 808. Control of releases from the vent stack of the civil structure 808 is carried out in accordance with the regulation 15-INŠ-716 and it comprises control of investigative level of volume activities of aerosols by continuous monitoring and control of weekly, monthly and quarterly releases by means of isokinetic equipment with a large filter. The results of measurements are given in the Radiation Protection Reports provided by the Regulatory

		Authority. The gas release limits are determined by the decision No. OOZPŽ/7119/2011 of the Public Health Authority of the Slovak Republic of 21 October 2011 indicated in part B II.1.1 of Assessment Report.
2.2	***Page 20, part II.8, paragraph 8.1.2 - Bitumenation lines (civil structure 809)*** Do the Slovak regulations allow waste disposal after bitumenation?	Only the packaged RAW described in 12-LAP-001 "Limits and conditions of safe operation of National RAW Repository Nuclear Facility" can be disposed of in Mochovce low activity waste repository consisting in the fibre-reinforced concrete containers in which the various packing sets are inserted, i. e. also metal barrels with bitumen product and covered by a cement mixture.
2.3	***Page 22, part II.8 – conditions for accepting RAW to the civil structure 723 – temporary RAW storage*** "The facility can accept only those packages whose surface dose does not exceed 4 mGy per hour and the overall activity of package does not exceed 1,9 TBq." Are these values based on some regulations applied in Slovakia or were they set out in the specific permit granted by the competent authority?	The radiation value on the surface of package and the total activity of package for packing set stored in the civil structures 809 and 723 were set out in an internal operation procedure 10-LAP-001 Limits and conditions of safe operation of National RAW Repository Nuclear Facility approved by the decision of the Nuclear Regulatory Authority of the Slovak Republic.
2.4	***Page 22, part II.8, paragraph 8.1.3 - Waste water treatment plant (civil structure 41)*** What are the limits of activities or concentration of activities for waste water released into the environment through SOCOMAN system?	**Benchmark values** of activity of radionuclides released in waste water from the nuclear facility RAW processing and treatment technologies into the surface water through the piping system SOCOMAN per year are set out in the decision of the Public Health Authority of the Slovak Republic as follows: Tritium.....1,0.10^{13} Bq per year Other corrosion and fission products.....1,2.10^{10} Bq per year **Concentration limits** for volume activity of radionuclides: Tritium.....1,95.10^{8} Bq/m^3 Other corrosion and fission products.....3,7.10^{4} Bq/m^3
2.5	***Page 23, part II.8, paragraph 8.1.4 – Metal RAW processing workplace***	The control system of air releases from the metal RAW

	(civil structure 34) How is the air from the metal radioactive waste processing workplace controlled? Is the measurement carried out directly behind 3-stage aerosol filtration or is it carried out in the central stack through which the air from the workplace is exhausted? What are the release limits? Are the release limits specified for the metal waste treatment workplace or are they generally defined for all waste treatment plants?	processing is described in part A, Chapter II.9 Description of technical and technological design, Alternative 1, part Optimization of processing capacities for melting and recasting metal RAW. It is also described in part B, Chapter I.1.1 Point sources, Alternative 0, Chapter C) Waste gases from melting and recasting metal RAW and Alternative 1 - Metal RAW melting and recasting plant, chapter A) Active air mass.
2.6	***Page 28, part II.8, paragraph 8.1.9 – Storage system of processed RAW, part 4 Civil structure 723*** "Overall activity of all stored packing sets with solid or fixed RAW in the structure cannot exceed 1,9 TBq. The maximum dose on the surface of stored packing set cannot exceed 4 mSv per hour. At the same time all packages must have non-fixed surface contamination ≤ 0,03 Bq per cm2 for toxic alpha RN, and ≤ 0,3 Bq per cm2 for beta, gamma and low toxic alpha RN." Are these values based on the conditions of permit granted by the competent authority or on by-laws or legislation applicable in Slovakia?	The radiation value on the surface of package and the total activity of package for packing set stored in the civil structures 809 and 723 were set out in an internal operation procedure 10-LAP-001 Limits and conditions of safe operation of National RAW Repository Nuclear Facility approved by the decision of the Nuclear Regulatory Authority of the Slovak Republic.
2.7	***Page 37, part II.8, paragraph 8.2.2 Optimization of RAW incineration capacities*** How are the flue gases from the facility controlled? Is the control carried out with absolute filter or is the system installed on the stack? A scheme of incineration facility is missing.	The method of control of air releases is described in part C, Chapter VI. Proposal for monitoring and post-project analysis. The incinerator scheme is described and given in the Report in Chapter A.II.9 "Description of technical and technological design", paragraph 4 "Incineration of solid and liquid RAW (PS06)".
Czech Republic		
The Ministry of Environment of the Czech Republic asked the Ministry of Environment of the Slovak Republic by a letter dated 27 April 2018 to extend the deadline for making a statement on the Notice. The letter reads that they would inform the Ministry of Environment of the Slovak Republic of the period necessary for all affected authorities and territorial self-governing units to express their		We do not have any further background documents from the Ministry of Environment of the Slovak Republic or any information from the Czech Republic.

opinions and to define the Czech Republic attitude.	
Austria	
The Federal Ministry for Sustainability and Tourism of Austria informed the Ministry of Environment of the Slovak Republic via email sent 4 June 2018 that Austria would not participate in environmental impact assessment pursuant to Act No. 24/2006 for Optimization of RAW processing and treatment technologies.	