

To: Implementation Committee

Convention on Environmental Impact Assessment in a Transboundary Context

Dear Members of Implementation Committee,

We're writing to you with regards to Committee's initiative on planned extensions of lifetime operations of two nuclear reactors at the Rivne nuclear power plant in Ukraine, which is to be discussed during next Committee's session on September 9-10, 2013.

In the official correspondence from the Committee<sup>1</sup>, Ukraine was asked to provide written reply to the list of questions with regards to these extensions and procedures undertaken to comply with Espoo requirements. In June 2013 Ecoclub Rivne requested Ministry of Environmental Protection to provide a copy of above mentioned written reply to the Committee. From Ministry's response<sup>2</sup> we see that Ukraine answered to question no. 1 only. With this letter, we would like to provide the Committee with additional information on topics raised in above mentioned correspondence between Committee and Ukraine.

1. Extension of the lifetime of the Rivne NPP units 1 and 2 have not been subject to transboundary EIA procedure in line with the Convention.
2. The only known report covering environmental issues prepared prior to decision on possibility of lifetime extensions was: *Periodic safety review. Safety factor # 14. Impacts on environment from NPP operation*. This document was not subject to public participation. Moreover, it was not disclosed to public upon direct request. However, objectives and outline of such document (prepared for other unit, South Ukrainian unit-1) are available<sup>3</sup> and they do not correspond with the objectives, and therefore requirement, of an EIA report:  
Objectives of *Safety factor # 14* are: - description of current radiation control system of NPP's impacts on environment, it's modernization measures, provision of information on actual impacts of NPP on environment. – comparative analysis of this actual impacts with established limits; - provision of information about activities to decrease radiation impact on environment and about absence of preconditions for exceeding limits during over-design lifetime operation.

<sup>1</sup> Letter from 25.03.2013

<sup>2</sup> Attachment 1 to this letter

<sup>3</sup> Informational and analytical review of EIA materials for lifetime extension of SUNPP-1, 2012;

This implies that objectives of this safety report are different from objectives of an EIA report. The outline of report content does not meet the requirement of the Appendix 2 of the Convention. For example, neither reasonable alternative to the proposed activity, no description of all other impacts besides radioactive releases from normal operation, were not analyzed in the scope of the report.

3. Parties that could be possibly affected are Belarus and Poland, the closest ones to Rivne NPP site. However, Chernobyl and Fukushima accidents proved that possible impacts of accident at nuclear power plant could reach far beyond closest neighboring states, thus potentially all European countries could be affected by planned nuclear power plant operation beyond design lifetime.
4. At this stage it is too late to properly meet Convention's requirements with regards to extensions of lifetime operations of two nuclear reactors at the Rivne NPP as the final decision was taken.
5. The decision by the State Nuclear Regulatory Inspectorate to allow continuing operation of Rivne NPP units 1 and 2 was taken on 10 December 2010<sup>4</sup>;

Respectfully,



Andriy Martynyuk,  
NGO Ecoclub  
Chair of the Board



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<sup>4</sup> SNRIU's resolution published at SNRIU official web page: <http://www.snrc.gov.ua/nuclear/uk/publish/article/139708>