

GENERAL ENVIRONMENTAL POLICY

Department V



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Ms. Seija Rantakallio
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Espoo Convention's Point of contact in Finland

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Dear Mrs Seija Rantakallio,

In January 2008 Austria expressed its interest to take part in the Espoo procedure for the extension of the Olkiluoto Nuclear Power Plant (NPP) by a fourth unit.

Therefore, Finland sent Austria a notification including the relevant documents, the EIA Programme, the Statement by the Contact authority and the EIA Report in February 2008.

Austria submitted an expert statement to the EIA Programme (February 2008) and an Expert statement as Austrian comment to the EIA Report including comments received from the provinces, NGOs and citizens (June 2008).

Bilateral consultations according Art. 5 Espoo Convention and Art. 7 EIA Directive were held on the 26 of May in Helsinki. The discussions of the consultations focused on procedural issues, reactor types, spent fuel management, safety and accidents. It was agreed to send the final recommendations on the basis of the results of the consultations until 13 of June.

Austria kindly asks Finland according to Art. 6 Espoo Convention and Art. 8 EIA Directive to take into account the Austrian recommendations as follows:

1. For the different reactor types, the core damage frequency (and, as far as results are available, the large release frequency) of the different types should be reported and discussed in the further course of the procedures, as a relevant input for decisions. In spite of the fact that concrete, specific modifications can be implemented at the reactor constructed at Olkiluoto, reducing CDF (core damage frequency) and LRF (large release frequency), the generic values of those frequencies are relevant, since they



provide the starting point for improvements, and since the potential of improvements is limited by the basic features of a reactor type.

2. The exemplary source term considered in the EIA Report (corresponding to a mitigated accident with limited releases, according to Finnish regulations) clearly is non-conservative regarding the ratio of Cs-137 and I-131. In the further course of the procedures, it should be made more realistic by selecting a more appropriate, higher value for the amount of I-131 released.
3. In the further course of the procedures, a consequence calculation for a source term corresponding to a severe, unmitigated accident should be performed. The source term should be selected in accordance with the results of analyses performed for such accidents for comparable reactor types, since according to present knowledge, such an accident cannot be excluded for any of the reactor types listed.
4. Method and input data for the dose assessment based on the exemplary source term should, in the further course of the procedures, be documented in more detail than they are documented in the EIA Report, particularly regarding the dispersion model and the weather data. It should be ascertained that the dose assessment is based on a well documented, suitable program yielding meaningful results for distances up to 1,000 km, and going beyond mere extrapolation for large distances. For example, FLEXPART could be such a program.

According to Art. 6 Espoo Convention and Art. 9 EIA Directive Austria asks Finland – as agreed during the consultations - to submit the final decisions regarding the EIA, decision-in-principle, construction license and operating license.

Austria would like to express her thanks for the very good cooperation during the last few months.

Best regards,

On behalf of the Minister:
Dr Ursula Platzter-Schneider

Electronically signed.