

Paleoseismological assessment of the siting documents focused on the potential of surface displacement by active geological faults. Such displacement may occur during strong earthquakes ("capable faults").

Hungarian Governmental Decree No. 118 of 2011 (VII.11.) on nuclear safety requirements:

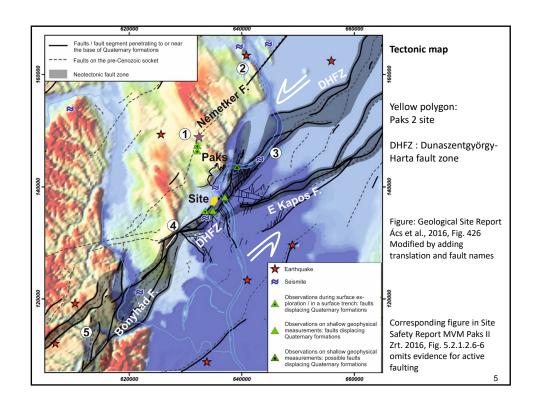
7.3.1.0800. "The potential occurrence of a permanent surface displacement on the site shall be analysed and evaluated. The examination must be sufficiently detailed to enable a substantive decision to be taken on the question of the possibility of discarding the site by the occurrence of permanent surface displacement."

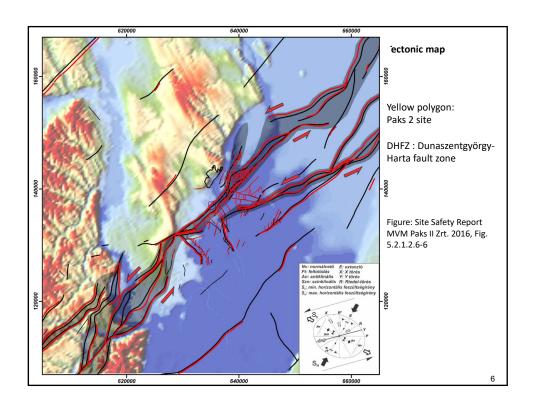
7.3.1.1100. "If the potential of occurrence of a permanent surface displacement on the site cannot be reliably excluded by scientific evidences, and the displacement may affect the nuclear facility, the site shall be qualified as unsuitable."

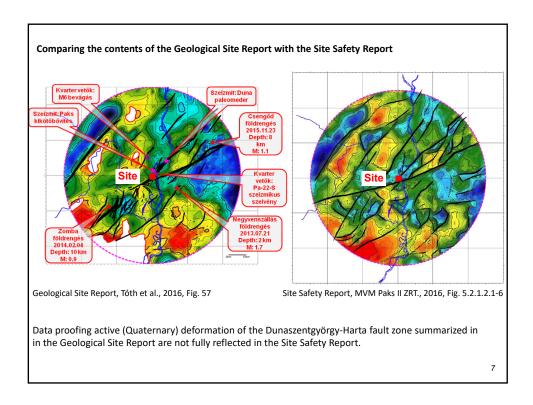
Can potential occurrences of permanent surface displacements (capable faults) be reliably excluded?

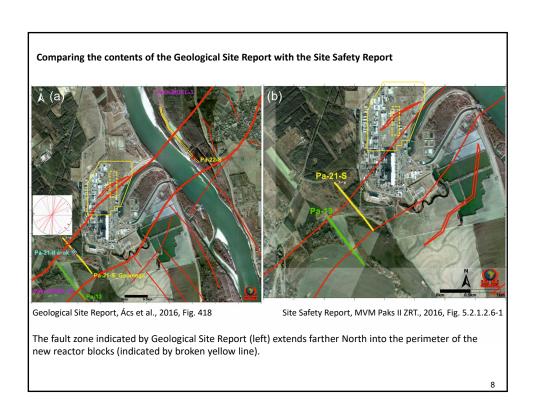
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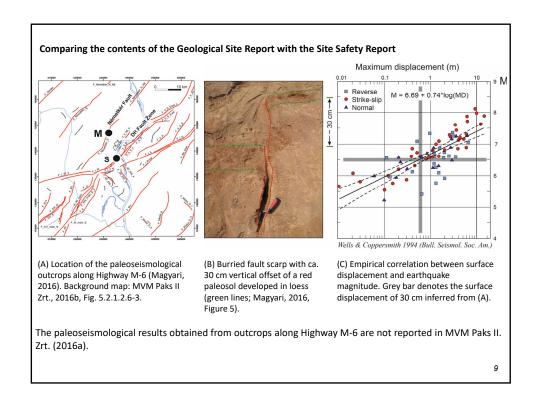
Comparing the contents of the Geological Site Report and the Site Safety Report

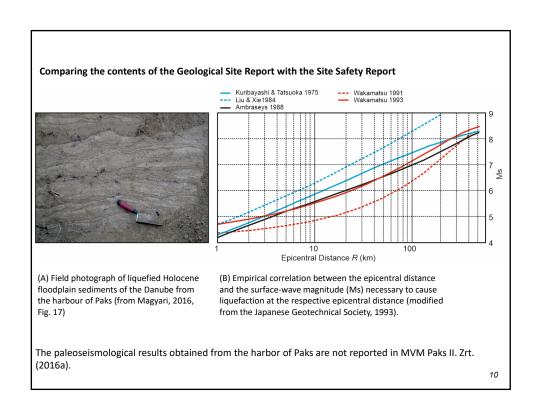


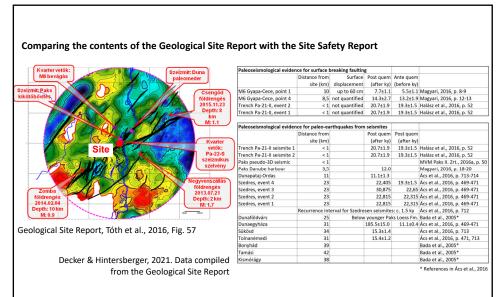




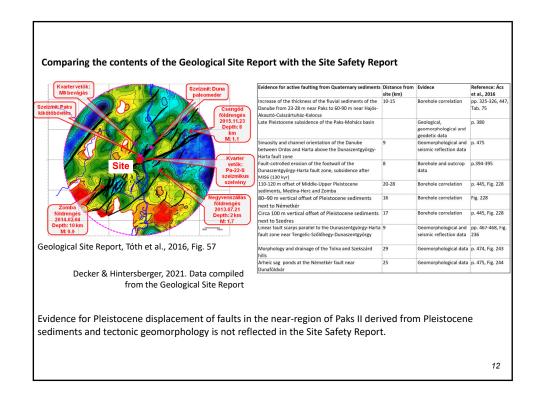




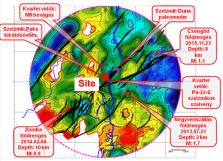




A summary of evidence for the past occurrence of strong earthquakes inferred from data compiled from Ács et al. (2016) reveals a significant number of strong earthquakes that occurred in the last ca. 30.000 years. Such data is not reflected in the Site Safety Report.



Comparing the contents of the Geological Site Report with the Site Safety Report



Geological Site Report, Tóth et al., 2016, Fig. 57

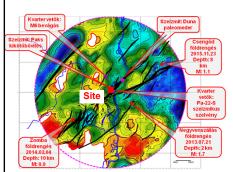
MVM Paks II. Zrt., 2016a, conclusion on active faults, chapter 5.8.2 p. 186):

"... The now extremely detailed data from the Paks area suggest that the Dunaszentgyörgy - Harta fault zone is a young and active tectonic element of the area. ... At the same time, it should be emphasized that even in this zone, which can be classified as tectonically active, no significant displacement has developed, that is, no impact on quaternary formations on site that are less than 100,000 years old in the form of a significant displacement."

The statement is not supported by data from the Geological Site Report. Data prove vertical offsets of Quaternary strata reaching up to several tens and even 100 m in the near-region of the site. The explicitly stated number of 100,000 years for the age of formations is not substantiated by data.

13

Comparing the contents of the Geological Site Report with the Site Safety Report



HAEA (G. Fichtinger), 2017 Para. 1.12, justification, paragraph 3 ("A rendelkezö Rész 1.12 pontjához", pp. 23–27):

"The complex investigations confirm that at the investigated site and within at least 10 km of its surroundings, no fault segment exists that led to surface displacement by faulting in the last 100,000 years."

Geological Site Report, Tóth et al., 2016, Fig. 57

The statement is factually wrong. Data in the Geological Site Report prove four surface-breaking earthquakes within a distance of 10 km from the site. Two events with M>6 with ages between 14,000 and 5,000 years were documented in outcrops along Highway M-6 (Magyari, 2016). Two other paleoearthquake ruptures with ages between ca. 19,000 and 20,000 years were documented in trench Pa-21-II next to the site.

Comparing the contents of the Geological Site Report with the Site Safety Report

The evidence of active faulting in the site vicinity of Paks II and the evidence of capable faulting at the Dunaszentgyörgy-Harta fault zone next to the Paks II site is not fully and not correctly reflected in the Site Safety Report compiled by MVM Paks II Zrt.

The Site Safety Report omits relevant data of the Geological Site Report such as virtually all paleoseismological data obtained from the near region of the site.

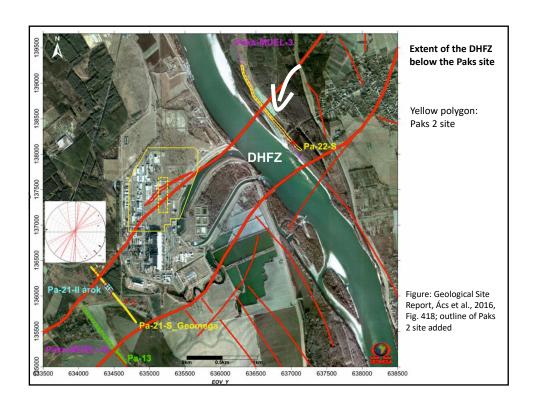
The Site Safety Report shows a location and width of the Dunaszentgyörgy-Harta fault zone at the site that differs from the data in the Geological Site Report.

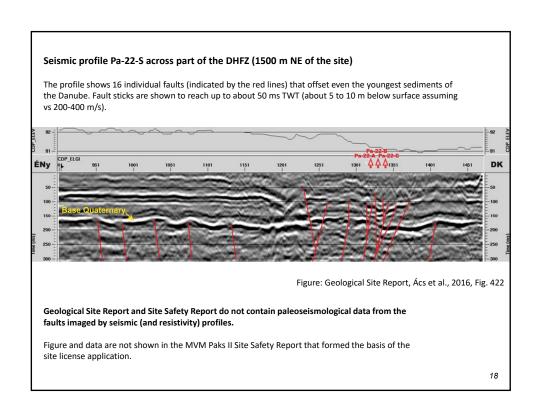
The contradictions between the Site Safety Report on the one hand, and the geological observations and the conclusions in the Geological Site Report, on the other hand, is contrary to the principles of good scientific practice.

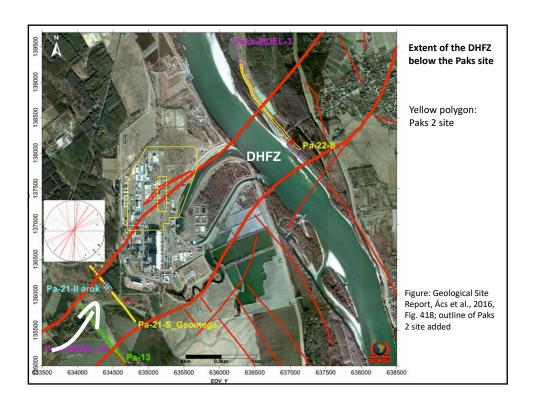
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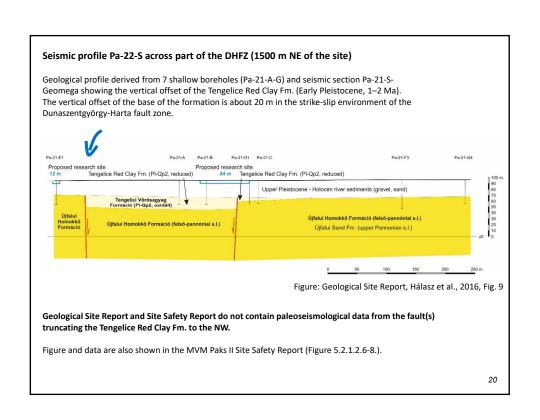
Detail and completeness of investigations of the DHFZ on the Paks II site

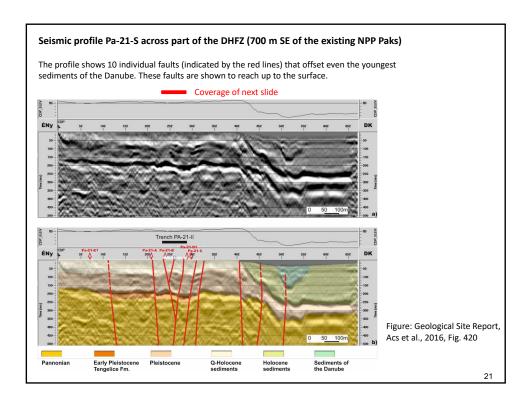
7.3.1.0800. ".... The examination must be **sufficiently detailed** to enable a substantive decision to be taken on the question of the possibility of discarding the site by the occurrence of permanent surface displacement."











Detail and completeness of investigations of the DHFZ on the Paks II site

7.3.1.0800. ".... The examination must be **sufficiently detailed** to enable a substantive decision to be taken on the question of the possibility of discarding the site by the occurrence of permanent surface displacement."

Geological and geophysical data documented in the Geological Site Report and the Site Safety Report are not sufficient to reliably exclude the potential of a permanent surface displacement.

The 85 m long paleoseismological trench is regarded insufficient for a comprehensive assessment of the 1 km wide active fault zone that extends in the subsurface of the existing NPP as well as large parts of the Paks II site.

Evidence from the paleoseismological trench Pa-21-II

7.3.1.1100. "If the potential of occurrence of a permanent surface displacement on the site **cannot** be **reliably excluded by scientific evidences**, and the displacement may affect the nuclear facility, the site shall be qualified as unsuitable."

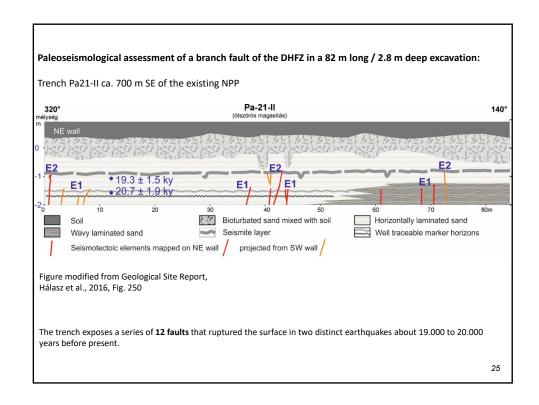
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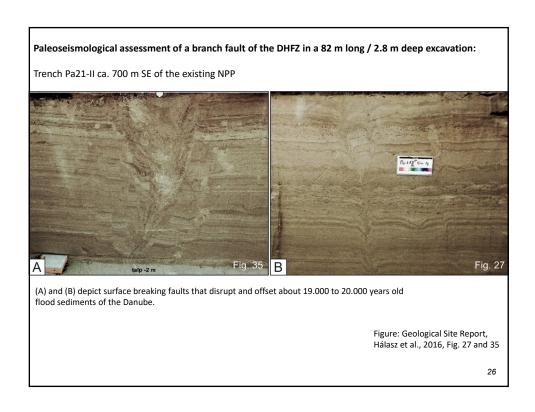
Paleoseismological assessment of a branch fault of the DHFZ in a 82 m long / 2.8 m deep excavation:

Trench Pa21-II ca. 700 m SE of the existing NPP



Figure: Geological Site Report, Hálasz et al., 2016, Fig. 11 and 12





Paleoseismological assessment of a branch fault of the DHFZ in a 82 m long / 2.8 m deep excavation:

Trench Pa21-II ca. 700 m SE of the existing NPP



(A) depicts a surface breaking fault that disrupts and offsets about 19.000 to 20.000 years old flood sediments of the

Figure: Geological Site Report, Hálasz et al., 2016, Fig. 27 and 35 Link to photographs:

Surface ruptures caused by the 2010 Darfield Earthquake (New Zealand)

Modern structures are look-alikes of the structure recovered by the trench Pa-21-II (figure left)

https://sciblogs.co.nz/app/uploads/2020/09/New-Zealand-earthquake-rips-a-new-fault-line-across-the-world...-moving-one-side-of-the-earth-11ft-to-the-right-1.jpg

(B) Surface rupture of the 2010 Darfield Earthquake (New Zealand)

27

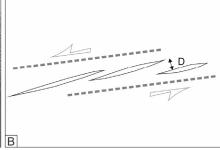
Paleoseismological assessment of a branch fault of the DHFZ in a 82 m long / 2.8 m deep excavation:

Trench Pa21-II ca. 700 m SE of the existing NPP



(A) Sediment filled en-échelon tension gashes erroneously interpreted to record sinistral slip and 2.5 cm horizontal displacement (from Halász et al., 2016, Fig. 32; Frank Horvath for scale).

Figure: Geological Site Report, Hálasz et al., 2016, Fig. 32



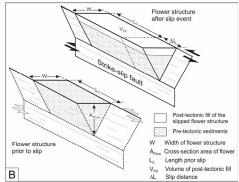
(B) schematic sketch of a sinistral shear zone with enéchelon tension gashes showing that the measurement in (A) measures the horizontal spacing of the sedimentfilled tension gashes. The amount of sinistral displacement remains undetermined and may exceed the stated value significantly.

Figure: Decker & Hintersberger, 2021, Fig. 24

Paleoseismological assessment of a branch fault of the DHFZ in a 82 m long / 2.8 m deep excavation:

Trench Pa21-II ca. 700 m SE of the existing NPP





(A) Negative flower structure at 43.7 m of the trench Pa-21-II, interpretation by Decker & Hintersberger, 2021. The continuous white line indicates the boundary faults of the flower structure; the broken line delimits sediments of the post-tectonic fill.

(B) Schematic shoebox model illustrating the geometry of a negative flower structure. A **slip distance of 0.3-0.4** \mathbf{m} is calculated from the dimension of the trenched structure (cross-section area 0.03 to 0.035 m^2 ; minimum length 1.3 m; minimum volume of sediment fill 0.039 to 0.046 m^3).

Background photo: Halász et al., 2016, Fig. 35

Figure: Decker & Hintersberger, 2021, Fig. 24

29

Evidence from the paleoseismological trench Pa-21-II

7.3.1.1100. "If the potential of occurrence of a permanent surface displacement on the site cannot be reliably excluded by scientific evidences, and the displacement may affect the nuclear facility, the site shall be qualified as unsuitable."

MVM Paks II Zrt. 2016, Site Safety Report: "Seismic events occurring in the research area ... are not able to significantly displace the surface, i.e., the fault planes cannot be considered capable."

The statement by MVM Paks II Zrt. is not in line with geological evidence described in the Geological Site Report. Interpreting the structures excavated in trench Pa-21-II as proofs of repetitive strong earthquakes with significant surface displacement is, at least, in the range of reasonable and scientifically defendable interpretations.

The occurrence of a permanent surface displacement can therefore not be reliably excluded by scientific evidences.



Links to photographs:

Evidence of surface ruptures caused by the 2010 Darfield Earthquake (New Zealand)

Modern structures are look-alikes of the fractures recovered by the paleoseismological trench Pa-21-II next to the Paks site

https://static.dw.com/image/36379768_303.jpg

https://sciblogs.co.nz/app/uploads/2020/09/New-Zealandearthquake-rips-a-new-fault-line-across-the-world...-moving-oneside-of-the-earth-11ft-to-the-right-1.jpg