

*EVALUATION OF INCORPORATION OF SPECIFIC REQUIREMENTS SUBMITTED TO THE NOTICE OF CHANGE*

<i>Institution</i>	<i>Opinion</i>	<i>Evaluation/ Reference to the Report</i>
<b><i>SLOVAK REPUBLIC</i></b>		
Ministry of Environment of the Slovak Republic, Department of Air Protection	No comments	
Ministry of Environment of the Slovak Republic, Department of State Geological Administration	No comments	
Ministry of Environment of the Slovak Republic, Department of Nature Protection	Variants No. 2 and 3 are considered optimal.	
Ministry of Environment of the Slovak Republic, Department of Environmental Hazards and Biosafety	No comments	
Ministry of Interior of the Slovak Republic, Presidium of the Fire and Rescue Corps, Bratislava	No comments	

<p>Ministry of Economy of the Slovak Republic, Bratislava</p>	<p>We cannot accept the zero variant because it is not in compliance with the new energy policy of the Slovak Republic and in certain aspects, it does not meet the requirements of Council Directive 2011/70/Euratom, establishing a Community framework for the responsible and safe management of spent fuel and radioactive waste.</p> <p>It agrees with the change within the framework of Variants No. 2 or No.3, i.e. dry storage of SF. Dry storage has unambiguous advantages in the area of both capital and operating costs. At the same time, in case of catastrophic events, it contributes to nuclear safety improvement.</p>	
<p>Ministry of Transport, Construction and Regional Development of the Slovak Republic, Division of Railway Transport and Tracks, Department of Railway Building Office</p>	<ol style="list-style-type: none"> <li>1. If a building or a part of it is situated in the railway zone of protection or in the railway area and does not serve for railway operation or railway transport, pursuant to Article 102 (1) (ab), a consent is necessary to activity performance within the railway zone of protection</li> <li>2. If the building or a part of it is situated in the railway zone of protection or in the railway area, <b>we do not agree</b> with the issuance of the building permit prior to the issuance of a binding opinion by the Ministry of Transport, Construction and Regional Development of the Slovak Republic.</li> <li>3. Such consent (issued in the form of a binding opinion) in accordance with</li> </ol>	

	Article 140b (1) of the Building Act is binding on the administrative body in the procedure according to the Building Act.	
Nuclear Regulatory Authority of the Slovak Republic	It recommends to work out an assessment in the whole scope of Annex No. 11 and Annex No. 15 to Act No. 24/2006 Coll. in consideration of the nature of the activity.	
Public Health Authority of the Slovak Republic	<p>For the assessment of the respective activity in terms of health protection against ionising radiation effects it is necessary that the Proposer evaluates the expected radiation dose load of the personnel and inhabitants for individual variants of the proposed activity and assesses the operating risks for individual variants of the activity in terms of radiation protection.</p> <p>The Notice of Change of the Proposed Activity does not mention the decisions from the Public Health Authority of the Slovak Republic permitting the actual operation of the Interim Spent Fuel Storage Facility (ISFS) at Jaslovské Bohunice and release of radioactive substances into the air and of waste waters from the ISFS.</p> <p>We draw attention to the fact that in accordance with Act No. 355/2007 Coll. on public health protection, support and development and on the amendment to certain acts, the Public Health Authority of the Slovak Republic also issues decisions on the siting, construction and operation of nuclear installations.</p>	<p>Included in Part B, Chapter II.5. The evaluation of expected radiation load on the personnel will be solved in the particular documentation submitted to the Public Health Authority of the Slovak Republic for siting and construction in accordance with Article 13 (5) (a) of the first item of Act on the National Council of the Slovak Republic No.355/2007 Coll., and the project will contain effective solutions of personnel protection against ionising radiation effects in order to observe the condition of optimisation in terms of radiation protection.</p> <p>The assessment of impacts on the population is included in Part C, Chap.III.1 and it will be included in the particular safety documentation submitted to the Public Health Authority of the Slovak Republic in accordance with the valid legislation.</p> <p>The decisions and limits for releasing radioactive substances into the air and the waste waters from the ISFS are included in Part B Chap. II.1.1, the discharges into the air and waters from the current operation of the ISFS are included in Chap. II.15</p> <p>The decisions that will be necessary for the expansion of the storage capacity are included in Part A, Chap. II.16.</p>
Slovenský	No comments	

vodohospodársky podnik, Piešťany		
District Office Trnava – Land and Forest Department	No comments	
District Office Trnava – Department of Environmental Care, Unit of State Administration of Waters and Selected Regional Environmental Components	No comments	
District Office Piešťany – Department of Environmental Care	<p>Section of State Water Administration:</p> <ul style="list-style-type: none"> <li>• to observe the general provisions of Act No. 364/2004 Coll. on waters and on the amendment to Act of the Slovak National Council No. 372/1990 Coll. on offences as amended (Water Act)</li> <li>• to be mindful of protection of surface and ground waters and to prevent undesirable leakage of harmful substances into the soil, ground and surface waters,</li> <li>• to observe the provisions of Article 39 of the Water Act laying down the general conditions for harmful substances treatment and subsequently, of Regulation of the Ministry of Environment of the Slovak Republic No. 100/2005 Coll. laying down the details of hazardous substances treatment, of emergency plan details and of the procedure in solving an</li> </ul>	

	<p>extraordinary water deterioration.  Section of Air Protection – does not provide any opinion  Section of Waste Management – no comments  Section of Nature and Landscape Protection – no comments</p>	
<p>District Office  Hlohovec, Department  of Environmental Care</p>	<p>State Administration of Air Protection – no comments  State Administration of Waste Management – in executing the respective intention, to observe the respective provisions of the Act on Wastes and the provisions of Regulation of the Ministry of Environment of the Slovak Republic No. 310/2013 Coll. on implementing certain provisions of the Act on Wastes as amended  State Water Administration –</p> <ul style="list-style-type: none"> <li>• to ensure the observance of all legal provisions for the protection of surface and ground waters</li> <li>• in executing the intention, to be mindful of protection of surface and ground waters and to prevent any undesirable leakage of harmful substances and especially harmful substances into the soil, ground and surface waters,</li> <li>• harmful and especially harmful substances must be treated in compliance with the provisions of Article 39 of Act No. 364/2004 Coll. on waters and on the amendment to Act of the Slovak National Council No. 372/1990 Coll. on offences as</li> </ul>	

	<p>amended (Water Act) and Regulation of the Ministry of Environment of the Slovak Republic No. 100/2005 Coll. laying down the details of hazardous substances treatment, of emergency plan details and of the procedure in solving an extraordinary water deterioration.</p> <p>State Administration of Nature and Landscape Protection – no comments on condition of the observance of all legislative requirements and conditions</p>	
District Office Trnava, Department of Crisis Management	No comments or requirements	
District Office Trnava, Department of Road Transportation and Roads	No objections or comments	
Nitra Labour Inspectorate	None of the variants in the submitted document contains the part and requirement for providing an opinion of an authorised legal entity for the assessment of technical safety (hereinafter the "ALE") for the technical documentation of the construction for the building permit in accordance with Article 18 (5) of Act No. 124/2006 Coll. on occupational health and safety as amended and also ALE's opinion on the project, design technical documentation of selected technical equipment in accordance with Article 14 (1) of Act No. 124/2006 Coll. and Article 5 of Regulation of	Included in Part C, Chapter IV.4.

	the Ministry of Labour, Social Affairs and Family of the Slovak Republic No. 508/2009 Coll.	
Regional Fire and Rescue Corps Directorate Trnava	No comments	
Trnava Self-Governing Region, Economic Strategy Section	No comments on the notice	
Dolné Dubové municipality	No opinion has been sent	
Jaslovské Bohunice municipality	Only a notice of publishing the Notice of Change, without the municipality's opinion	
Malženice municipality	It submits a concurring opinion without comments	
Pečeňady municipality	No objections or comments	
Žlkovce municipality	No opinion has been sent	
Radošovce municipality	It agrees with the proposed intention.	
Ratkovce municipality	No opinion has been sent	
Nižná municipality	No opinion has been sent	
Veľké Kostolany municipality	<p>It agrees with the expansion provided that the following conditions are met:</p> <ul style="list-style-type: none"> <li>• to observe all the safety aspects during the construction and operation of the installation</li> <li>• survey of the sub-soil for expected seismic phenomena</li> <li>• to monitor regularly the presence of RA substances in the soil, surface and ground water</li> <li>• to provide for the environmental</li> </ul>	The requirements will be included in the project and safety documentation.

	<p>protection in the surroundings</p> <ul style="list-style-type: none"> <li>• to protect the population against RA radiation by regular monitoring</li> <li>• in case of an event on the installation to prevent the leaking RA substances from getting out of the facility, which would contaminate the surrounding environment</li> <li>• taking into account the future construction and extension of SF storage facility, to put the operator under an obligation to cooperate in the co-funding of the municipality's environmental projects</li> </ul>	<p>It will be provided for in compliance with the valid legislation of the Slovak Republic.</p>
Slovak Environmental Agency	<p>In the assessment report, we recommend a detailed evaluation of the variants of the proposed activity for the selection of an optimum variant; in creating a set of criteria and determining their importance we recommend to prefer the environmental impacts, impacts on human health and radiation safety</p>	<p>The set of criteria for the selection of an optimum variant contains all the required criteria – Chap. V.</p>
	<p>We recommend to list the strategic documents, with which the proposed activity is in compliance.</p>	<p>Included in Chap. C II.19</p>
	<p>Since the proposed activity means an extension of the activity that has been executed for decades (since 1988), we propose to include into the Assessment Report a comparison of the technological solution of the proposed activity with the latest trends of SF storage technological solutions in the world (selection of structural materials, selection of storage</p>	<p>It is included in Annex No. 4 to the Assessment Report.</p>



	technology, provision of SF subcriticality, electric energy supplies (existence of backup sources), maintenance, monitoring systems etc.).	
	The notice states the following: "the expansion of SF storage capacities for the receipt of an expected quantity of spent fuel, which is defined as additional 18,600 fuel assemblies based on the expected SF production from the Slovakia's nuclear power plants in operation", please, specify, whether the storage of SF from the Mochovce NPP is considered because at present, the proposed activity "Spent fuel storage facility Mochovce" is also under environmental impact assessment. It would be also suitable to include the balance of SF and logistics of SF division between the two storage facilities if they are executed.	The proposed expansion of the storage capacity allows for SF storage from all NPPs currently in operation (two units of the V2 NPP, two units of the EMO NPP) and also for SF from the completed EMO NPP Units 3 and 4. This fact is mentioned in Chap. II.2 (Purpose) and C III.16.1 (transport impacts).
	We also recommend to discuss the suitability of placing the planned quantity of SF in one place in terms of safety and environmental impacts during normal operation as well as in non-standard situations.	Included in Part A, Chapter II.6.
	We recommend to include a time schedule of expected construction commencement, storage facility construction duration, storage facility operation duration and its removal.	Included in Part A, Chapter II.7.
	We recommend to include the whole process of SF management along with the time horizon of gradual transfer to a permanent repository.	The procedure of SF management is included in the description of individual variants under assessment in Part A, Chap. II.9 and in Part B, Chap.II.8.

	We recommend to define how the handling and storage areas for spent fuel are protected against access of unauthorised people and unauthorised spent fuel handling or possible terrorism and also during possible external events such as earthquake, tornado, storage facility flooding etc.	Physical protection of the nuclear installation is provided in compliance with the legislation of the Slovak Republic. The way of protection is subject to Act No. 215/2004 Coll. on protection of classified information
	We recommend to include the elimination measures preventing water, inorganic solutions and organic material etc. from entering the storage spaces so that they cannot affect SF subcriticality, worsen residual heat removal or increase corrosion and degradation of storage facilities in a way preventing the performance of inspections or repairs.	All the measures for the elimination of undesirable effects will be solved within the framework of the project documentation.
	We recommend to include the elimination measures for the limitation of radioactive discharges and radioactive irradiation of employees and inhabitants during normal operation and possible operating events, in compliance with the philosophy of limitation of radiation doses.	All the measures for the elimination of undesirable effects will be solved within the framework of the project documentation.
<b>CZECH REPUBLIC</b>		
<b><i>Institution</i></b>	<b><i>Opinion</i></b>	<b><i>Evaluation/ Reference to the Report</i></b>
<b><i>They have forwarded the Report to individual affected territorial self-governing units and affected authorities and asked for an extension of deadline for providing an opinion on the Notice on the basis of individual opinions delivered</i></b>		
<b>REPUBLIC OF POLAND</b>		
<b><i>Institution</i></b>	<b><i>Opinion</i></b>	<b><i>Evaluation/ Reference to the Report</i></b>
<b><i>They asked for an extension of deadline for sending their opinion till 15 December 2014</i></b>		

<i>HUNGARY</i>		
<i>Institution</i>	<i>Opinion</i>	<i>Evaluation/ Reference to the Report</i>
<i>They asked for an extension of deadline for sending their opinion till 19 December 2014</i>		
<i>REPUBLIC OF AUSTRIA</i>		
<i>Institution</i>	<i>Opinion</i>	<i>Evaluation/ Reference to the Report</i>
<i>They asked for an extension of deadline for sending their opinion in Week 51, i.e. till 19 December 2014</i>		
<i>UKRAINE</i>		
<i>Institution</i>	<i>Opinion</i>	<i>Evaluation/ Reference to the Report</i>
	<i>The response has not been delivered yet</i>	