ÚJD SR
Bajkalská 27
P.O.Box 24
820 07 Bratislava

Contact: Mag. Agnes Zauner
GLOBAL 2000 – Friends of the Earth Austria
Neustiftgasse 36
1070 Wien

via Email to Imrich.Smrtnik@ujd.gov.sk

May 28nd 2021

GLOBAL 2000 Appeal Against the First Degree Decision ÚJD 156/2021 Authorizing the Commissioning of Mochovce Nuclear Plant Unit 3

Dear Sir or Madam,

thank you for transmitting the decision No. 156/2021 in the administrative procedure in the matter of commissioning of Mochovce unit 3. Three documents were published[1].

We appeal the decision No. 156/2021[2] on the following grounds and demand that it and all related authorizations shall be suspended.

The basis for the decision in administrative proceedings no. 2.1, 2.2 and 2.3 concerning the application of Slovenské elektrárne, a.s. for the issuance of a permit (i.e., PSR of MO3&4 on 2 November 2020 and the Draft Decision on the Application of Slovenské elektrárne, as for the issuance of a permit in administrative proceedings No. 2.1, No. 2.2 and No. 2.3 on 22 January 2021) was presented to the public for comments.

GLOBAL 2000 submitted a statement on February 23rd 2021 and commented that the documents and reports available to us do not prove that the Mochovce unit 3 would be in line with current safety demands and highest safety culture, therefore we demanded that the NPP Mochovce 3 is not granted a license and not operated.

Several points were raised in our statement that have not been answered in the ÚJD "reaction" to our statements:

"Ad 4" Drilling works for seismic reinforcement of Mochovce Units 3 and 4

A large number of drilling works have been undertaken by contractor Inžinierské stavby Košice (ISKE) in both units 3 and 4 for the seismic reinforcement program. Severe doubts on the actual execution of the drilling works and its documentation were raised by a former statics engineer of the project who got into contact with GLOBAL 2000 and provided detailed information and photography.

1 https://www.ujd.gov.sk/ujd/www1.nsf/5445d0bff8676fcac1256f1c002c4740/fabc46cbcd898778c12586650024e979?OpenDocument

2 https://www.ujd.gov.sk/ujd/www1.nsf/0/FABC46CBCD898778C12586650024E979/$FILE/R156_2021_Smlm.pdf

ÚJD states under "Ad 4" on page 61 that it "has performed inspections of drilling works [...] from the very beginning."[3] This is contrary to the witness statement – a large number of uncontrolled drillings and faked documentations were witnessed, and photographs of this taken and published by GLOBAL 2000[4]. This is also contrary to statements by the company MBL who confirmed that the company Solesi, S.p.A. from Syracusa / Sicily in charge of the documentation of the drillings did not have expertise in this field and that the description of the execution of the drillings was so inaccurate that works had to be repeated.[5]

ÚJD states that "To address cases of potentially unreliable ISKE documentation, a detailed analysis was prepared in 2018 by the author of the basic design". It is unclear from this statement who the author of the basic design is – presumably the Russian company Vniiaes that is not the successor of the original designer and thus does not have the original designs from Soviet time.

ÚJD claims that this analysis by the author of the basic design "demonstrates the static strength and seismic resistance of individual load-bearing structures that could be potentially weakened by reinforcement failure during ISKE work." It is unclear a) what assumptions were taken for this engineering estimate, and also b) what criteria were defined for the potential weakening of the load-bearing structure, for example if a cut of every tenth or every fifth or every third rebar was calculated. As the calculations are not submitted in a transparent manner, this statement is simply an unproven claim and cannot be accepted.

This is furthermore underlined in light of numerous forged documentations in many parts of the Mochovce 3 project, i. e. the metallurgical / piping components, but also in light of the track record of this contractor Inžinierské stavby Košice and the investigations by the National Criminal Agency (NAKA) against it, including a raid already on 20.7.2016 in its offices in Mochovce and Košice, related to poor quality construction work at the Mochovce nuclear project site.

ÚJD claims that "in 2021 ÚJD SR ordered a re-evaluation of the ISKE documentation in question and the related addition of the analysis of the resistance of load-bearing structures to all cases in which it is not possible to rule out reinforcement failure with complete certainty". Whilst it is positive that ÚJD takes this matter seriously, again the parameters of the "extended analysis" by the designer are not laid open, and the "correctness of the methodology" confirmed by an "independent expert organization" is supposed to be taken at face value, despite having no information on the assumptions and criteria for this assessment.

Finally, ÚJD claims that "sufficient strength" of the hermetic zone was also proven by a tightness test and overpressurizing to 150 kPa against the atmosphere – this is insufficient for an accident scenario of a VVER 440/213 primary circuit pipe rupture and ensuing steam blast in the hermetic chambers, as calculations discussed in the framework of the IAEA showed that, depending on the accompanying conditions, the design basis parameters for pressure and temperature of the

[3] for easy reference, quotes from the ÚJD decision No.156/2021 are taken from the English working translation at https://www.ujd.gov.sk/ujd/WebStore.nsf/viewKey/Decision_156_2021/$FILE/Decision%20156_2021.pdf; however, the official Slovak original decision text has been analysed for the GLOBAL 2000 submission.

[4] https://www.flickr.com/photos/global2000/50959474636/in/album-72157717066446637/

[5] https://www.rtvs.sk/televizia/archiv/16952/248996#762

hermetic zone (245 kPa, 127°C) were reached, and possibly slightly exceeded during the design basis accident (break of the main coolant pipe 500 dy) under several accompanying conditions.[6]

To summarize, ÚJD should provide a) the assumptions that were taken for the engineering estimate, b) the criteria that were defined for the potential weakening of the load-bearing structure and c) the calculations should be published in order to be able to assess their consistency.

"Ad 5" ÚJD responses regarding Airplane Crash, Climate Change Effects

In relation to the Fulfillment of the Final Opinion No. 395/2010 –3.4/hp Nuclear Power Plant Mochovce VVER 4x440 MW, project 3, issued by Ministry of Environment of Slovak Republic SR, GLOBAL 2000 raised several points regarding, among others, the ability of the Mochovce unit 3 structure to withstand the impact of a large airplane and regarding the availability of cooling water due to the progressing climate crisis, already in our statement of April 15th 2020.

As the reaction of ÚJD to our submission did not give adequate answers, GLOBAL 2000 again raised these issues in its statement of February 23rd 2021.

ÚJD in "Ad 5" on page 61 simply states that

> "ÚJD SR´s responses to the statement of GLOBAL 2000 are given in points Ad c), Ad d.1), Ad d.2, ad e), Ad f), Ad g), Ad h.1 to h.5 , Ad h.6, Ad i) and Ad j) of the ÚJD SR response to the statement of GLOBAL 2000 on the draft Decision, which was published on 15 February 2020"

i. e. **no further information is given at all**.

ÚJD response to the GLOBAL 2000 submission of 2020 states under "Ad d.2, ad e" on page 49 that "in case of a threat to a power plant by an airliner, pursuant to Section 12 par. 1 (e) of Act No. 575/2001 Coll., under the competency of the Ministry of Defense of the Slovak Republic, quote: 'Ensuring the inviolability of the airspace of the Slovak Republic'. Further action by the armed forces related to airspace disturbance is set out in Section 4 of Act No. 321/2002 Coll.", i. e. that military action would be taken to protect the Slovak airspace and nuclear plant.

This is obviously no adequate response to our 2020 submission:

"Again we have to recall that this EIA condition No. 1 („Zmeny vybraných zariadení ovplyvňujúcich jadrovú bezpečnosť sa žiadateľ rozhodol vykonať na základe zmenených legislatívnych požiadaviek platných v dobe plánovanej dostavby 3. a 4. bloku jadrovej elektrárne Mochovce." (Rozhodnutí 266/2008)) demands fulfillment of legal provisions valid at the time the plant will be

[6] https://www.banktrack.org/download/safety_issues_for_mochovce_3_4_nuclear_units/070401_gp_safety.pdf

completed; this is not the case, as explained earlier, because this would e.g. envolve the robustness against impact of large commercial airliners."

As ÚJD fails to address this question also under "Ad f", we must conclude that ÚJD simply has no answer to the scenario of a large airplane crash at the Mochovce 3 site. We strongly recommend to reinforce the structure of the Mochovce unit in question to withstand airplane impact of the types of airplanes currently traversing the plant and, if this is not technically possible, not to issue a license for this unit as it is unfit to enter operations.

Similarly, in the GLOBAL 2000 submission in 2020 and in our 2018 statement, we raised the issue that the scenario concerning the Hron water temperatures as demanded by the EIA conclusions is missing and the data provided are only up to 1982 (!) instead of providing an outlook for the next at least 60 years. Again, ÚJD fails to answer this question in "Ad 5" on page 61, but also in "Ad g" on page 49 that this refers to – the reduced "relatively low" cooling water consumption is no response to the question raised.

Again, we must conclude that obviously ÚJD has no answer to the question raised, the nuclear plant is proposed to be operated for 60 years, i. e. a time span up to 100 years from the data provided, in a massively changing climate without any scenarios for this provided, which is in breach of the EIA conditions.

Piping materials / metallurgical components and methodology of verifying compliance

In the paragraph on page 62 summarizing the results of the "Final Report on the evaluation of materials/metallurgical components used in Unit 3" by SE, ÚJD claims:

> "This Report states that the methodology accepted by ÚJD SR was followed in verifying the quality of metallurgical components."

and a total of 3410 checks with 61 cases of material exchange, 293 cases of deviations from the standard and 12 replacements are summarized.

The fact that this methodology did not involve a complete check of all metallurgical components, but just a randomized sample check, is not mentioned at all in the decision. No explanation is given for this proceeding, and the decision gives the impression of a complete test.

The information that just a randomized sample check was decided upon as the method is only provided in a separate document "Súhrnná správa – Overovanie kvality vybraných dodávok potrubných dielov pouzitých na vybranćh zariadeniach na 3. bloku Mochoviec" not related to

the decision documents, and is not included at all in the decision[7] – this raises serious questions about the reliability of the entire decision text and the statements made in it by ÚJD.

The additional document states under 15) that the risk cannot be excluded that qualitatively inadequate pipes have not been detected, that therefore an assessment of probabilities of material exchange has been conducted. This probabilistic approach is highly irregular for the central part of a nuclear power plant with known deficiencies.

This methodology clearly condones the fact that at least some inadequate pipes in, amongst others, the primary circuit are overlooked, with potential catastrophic consequences during the proposed operation.

GLOBAL 2000 demands that all measurements and data on the materials / metallurgical component evaluation program are published in full, that detailed assessments of which parts were and which parts were not checked are published.

Legal provisions regarding documentation of the drillings in the hermetic zone

In its statement of February 20th 2021 to the proceedings, the company MBL stated that part of the documentation related to the seismic resistance of Units 3 and 4 of MO34 is subject to the retention right applied by MBL to it, and therefore this documentation cannot be disposed of by the applicant for issuance of a permit - Slovenské elektrárne, as.

ÚJD confirms this in its answer in the decision on page 59 – its

> "inspection confirmed that part of the documentation on the drillings performed by MBL, which is kept on the premises of Slovenské elektrárne, a.s., is only in copies confirmed by the author's supervision. For the drilling protocols carried out by MBL at Unit 3, for which MBL exercises a retention right, the attached statement from Solesi, S.p.A. states that the originals were created by a subcontractor - MBL and those that are not part of the accompanying technical documentation, Solesi, S.p.A. does not have at its disposal because MBL retained them."

However, ÚJD still claims that these copies are adequate for assessing the seismic resistance of the structures "thereby fulfilling the legal requirements".

This is an example for the very relaxed approach to safety culture of ÚJD, since the ÚJD chairwoman M. Žiaková already announced that this procedure was not correct and would not be accepted for commissioning of unit 4.[8]

---

[7] https://www.ujd.gov.sk/ujd/WebStore.nsf/viewKey/Suhrnna_sprava_kontrola_materialov/$FILE/Suhrnna%20sprava_kontrola%20materialov.pdf

[8] https://www.rtvs.sk/televizia/archiv/16952/248996#498 at minute 9 54.

General considerations on the ÚJD statements in the decision

In addition we would like to comment on the following statements ÚJD made in its decision 156/2021 and which we consider of importance. ÚJD has been answering our statements, but in the same manner as the entire communication with the public during this ongoing administrative procedure has taken place. The goal was not to provide open and transparent information about the actual status of the project and the applied rules and regulations, but rather the contrary in an attempt to obscure the simple fact of an outdated nuclear power plant built in line with the 2008 decision to be put into operation in 2021 or later.

> "In carrying out the construction, the general technical requirements for construction were respected. The project is implemented according to the design documentation verified in the building procedure for the modification of the building before completion for Mochovce Nuclear Power Plant WWER **4x440 MW, Project 3, in which ÚJD SR Decision No. 246/2008 of 14 August 2008 was issued and confirmed by the second instance ÚJD SR Decision No. 291/2014 of 23 May 2014.** It can be concluded that the early use of the building will not endanger the life and health of persons, nor the interests of society and the environment, therefore ÚJD SR decided as stated in the operative part of this Decision." (Page 33) [emphasis added]

Obviously, the final legally binding modifications to the plant design were made in 2008, confirmed in 2014. Therefore we again question the safety level of the units 3,4 which ÚJD publicly claims to be of highest current standards, while as we see in the following analyses, careful reading reveals that of course Mochovce 3 and 4 are far from reaching current safety standards for new plants (*WENRA Safety Objectives for New Reactors) or Generation III reactors which .* We would therefore ask ÚJD to inform the public correctly.

> "Ad a) As for the statement made by the Regional Government of Lower Austria, ÚJD SR as an administrative authority states that the original design of the reactor WWER 440/2013 does not indeed belong to nuclear reactors of generation 3. A number of safety improvements have been made to reactors of Units 3&4, which significantly increase their safety. Reactors of Units 3&4 fully comply with the applicable Slovak legislation, which incorporated the IAEA requirements and reference levels of the Western European Nuclear Regulators Association (hereinafter referred to as "WENRA")." (Page 39)

As of 2020, Slovakia has not transposed 20 out of the 342 WENRA Reference Levels 2014 into the regulatory framework in 2020[9].

> "Ad c.4) Mochovce Nuclear Power Plants (Units 3&4) are secured against the impact of a small aircraft by a separate construction project, as well as documentation describing the activities of personnel in the event of an initiating event – the impact of a small aircraft on a nuclear installation of MO3&4.
> Securing of power plant against the impact of a small aircraft was implemented at the

[9] Lessons not Learned from the Fukushima Accident Risks of the European NPPs 10 years later. Becker/Lorenz 2021

request of the Commission of the European Community pursuant to Article 43 of the Treaty establishing the European Atomic Energy Community (Euratom), cited in the Final Opinion of the EIA of MO3&4 on the proposed activity Mochovce Nuclear Power Plant WWER 4 x 440 MW, Project 3. Dealing with the situation of endangering the power plant by an airliner, according to Section 12 par. 1 (e) of Act No. 575/2001 Coll. on organization of government activities and organization of the central government, as amended (hereinafter the "Act No. 575/2001 Coll.), is under the responsibility of the Ministry of Defence of the Slovak Republic, quote: "Ensuring the **inviolability of the airspace** of the Slovak Republic". Further action by the armed forces related to airspace violation is mentioned in Section 4 of Act No. 321/2002 Coll. on the armed forces of the Slovak Republic as amended (hereinafter only as "Act No. 321/2002 Coll."). The design documentation on securing MO3&4 against the impact of a small aircraft is subject to the regime established by Act No. 215/2004 Coll., therefore it has not been disclosed to the public.
Ad c.5) Mochovce Nuclear Power Plant (Units 3&4) like other operating nuclear units in the Slovak Republic, is equipped with facilities and systems for managing severe accidents. Information on these facilities and their functionality is available on the website of ÚJD SR, e.g. in Stress Test Reports or the PSR of MO3&4 – summary of basic data. Nuclear Units of nuclear power plants in the Slovak Republic have implemented regulations for managing severe accidents, **and there are specialists for managing severe accidents.** In managing severe accidents, a strategy for maintaining and cooling molten khorium in the reactor pressure vessel, which has been validated experimentally, is applied." (Page 40) [emphasis added]

Behind this is hiding the fact that an NPP which is to be licensed for operation in 2021 is not adequately protected against the high number of commercial aircraft regularly crossing over the Mochovce 3 plant. The minimum measures which seem to be consisting of some kind of nets also relies on the correct actions taken by the personnel, which is rather unlikely when taking into account the constantly incoming reports about safety cultures at the plant (OSART, WANO). The other measure referring to government activity and the airspace protection is an attempt to make the public believe that the army would hinder a plane (part of high numbers of planes flying regularly above the plant) from crashing into Mochovce without any kind of warning during a few minutes.
Severe accidents which are the result from e.g. terror acts or natural impact etc. are largely to be contained by personnel either at the plant or by the army, which is exactly the contrary of the Lessons Learned from Fukushima, where improved reliable passive safety systems should be installed rather than mobile equipment and personnel.

"Ad f) As for this statement made by the Regional Government of Lower Austria, ÚJD SR as an administrative authority states that the Slovak Government approved by its Resolution No. 387/2015, the draft National Policy and National Program for the management of SNF and RAW in the Slovak Republic. This document addresses, inter alia, the method how to ensure the safe and sustainable management of SNF and intermediate level radioactive waste (hereinafter referred to as "IM-RAW") that are not acceptable for surface storage in the National Repository of RAW in Mochovce. The long-term strategy

foresees a so called dual pathway, i.e. research and preparation of a deep geological repository for SNF and IM-RAW on the territory of Slovakia, and parallel monitoring of the development of an international repository, and participation in related international projects. Based on geological surveys and planned works in the field of R&D, the final site is expected to be selected in 2030. Between 2030 and 2045, an environmental impact assessment process for the deep geological repository is expected to be carried out. The operation of the deep geological repository itself is foreseen between 2065 and 2115. The possibility of a future reprocessing of SNF remains also open. There is no doubt that the deep geological repository program will not be resolved before the scheduled commissioning of MO3&4, however, until a suitable alternative for storage of SNF and IM-RAW is available, Slovakia will apply a strategy for the long-term safe storage of these materials, for which the technical conditions have been created (expanded storage capacity of the Interim Storage Facility for SNF for the safe long-term storage of SNF and new storage capacity in the Integral RAW storage facility for the safe long-term storage of RAW that cannot be disposed in a surface type of repository), and institutional assumptions in the form of an existing state agency responsible for the operation of those facilities, as well as for activities in the implementation of the deep geological repository program. The situation for the Slovak Republic in the field of deep geological repository is comparable in terms of approach and timetable to many EU countries, including Austria, e.g. in the implementation of the Austrian program for the management of institutional RAW, or of SNF from the operation of research reactors. The Slovak national policy and national program for the management of SNF and RAW, have been duly notified to the European Commission in accordance with the relevant provision of Council Directive 2011/70/ Euratom of 19 July 2011, establishing a Community framework for the responsible and safe management of spent fuel and radioactive waste." (Page 41)

There is no activity in the Slovak Republic concerning the search for a Deep Geological Repository. The international cooperation mentioned is referring to the ERDO project, which is highly unlikely to succeed, because none of the countries is ready to take in other countries' waste. The issue of long-term liability for the other countries' waste stored is most likely unsolvable. Slovakia has a strategy for spent fuel and radioactive waste from 2008, which was updated in 2014. In 2015, another update was conducted to align with the requirements of Directive 2011/70/Euratom. While the first version of the strategy was subjected to a transboundary SEA in 2008, this did not happen with the updated version from 2015. Therefore the public could not participate properly in the preparation of the national programme and facts went unchallenged.

"e) In its statement, GLOBAL 2000 further commented on two other documents supporting the draft decision, the Evaluation of the method of fulfilment of the recommended conditions set out in the Final Opinion on EIA MO3&4 ("**Evaluation of the method of fulfilment of the conditions"**) of 12 December 2019, and Chapter 13 of PSR of MO3&4 concerning environmental impacts of 14 September 2018. According to GLOBAL 2000, this is a failure to provide precise and specific information on how condition 3.4 of the Final Opinion on EIA MO3&4 was met, which reflects the requirements of the European Commission **(development of a reference deterministic scenario for external source, e.g.**

impact of an aircraft, in line with the best international practice). The account of fulfilment of the requirements from the Final Opinion on EIA MO3&4 only indicates that the tests and analyses have been carried out and the safety has been proven. However, since this information is classified in SR as sensitive information, the details were not made available to the public." (Page 42) [emphasis added]

We understand that in this crucial point ÚJD and the Slovak Republic chose to hide behind the possibility of classifying information. However, **best international practice in 2021** certainly refers at least to stress tests, where no small aircraft is mentioned, as the following ENSREG demands confirm:

> In response to the 2011 Fukushima nuclear accident, risk and safety assessments ('stress tests') were carried out on all nuclear power plants in Euratom Member States. "*The aim of the assessments was to check whether the safety standards used when specific power plants received their licences were sufficient to cover unexpected extreme events. Specifically, the tests measured the ability of nuclear facilities to withstand damage from hazards such as earthquakes, flooding, terrorist attacks or aircraft collisions.*"[18]

[10]

Another issue learned from Fukushima is higher protection for spent fuel pools, while Mochovce 3 still has its spent fuel pool outside the containment. This information is of course nowhere to be found in a comprehensible and comparative manner. There is no clear overview for the safety level reached for Mochovce 3 compared to the safety standards foreseen for new reactors in the EU in 2021. How the need for independent and diverse heat removal means has been solved for the Mochovce units has not been explained and in our assessment does not exist.

> "The ÚJD SR published on its website the PSR – a summary of the basic data provided to the public on 189 pages describing the nuclear installation of MO3&4, its area and the surroundings. This document also includes information on the severe accident management systems, including relevant photos. This document contains data on the environmental impact of the operation of MO3&4 nuclear installation. **For the reasons set out above, the ÚJD SR disagrees with the argument of GLOBAL 2000, that the public does not have information on Mochovce Nuclear Power Plant and how it differs from older type of power plants, and how it meets the current safety requirements for mitigating the environmental impact of operations and severe accidents.** The ÚJD SR confronts the MO3&4 Project with the applicable legislative requirements." (Page 48) [emphasis added]

This document (PpBS MO34 zhrnutie základných údajov.pdf)[11] is a textbook on reactors on a very general level and far from explaining the issues such as severe accident management at Mochovce 3,4 compared to current standards, compared to concrete requirements and safety goals as defined e.g. by WENRA RL for new reactors or very concrete the questions on how e.g. the alternative heat sink was introduced for Mochovce 3 or similar measures. Another example can be found in the report "Lessons not Learned" which stated that for Mochovce 1&2 "Only limited measures – the use of mobile equipment – are planned to prevent the total loss of power and/or

[10] https://www.umweltbundesamt.at/fileadmin/site/publikationen/rep0686.pdf

[11] https://www.ujd.gov.sk/ujd/WebStore.nsf/viewKey/_PpBS_MO34/$FILE/PpBS%20MO34%20zhrnutie%20z%C3%A1kladn%C3%BDch%20%C3%BAdajov.pdf

heat removal. Compared to the installation of new bunkered safety systems (e. g. An independent alternate ultimate heat sink (UHS) mobile equipment is less reliable. The issue of severe accidents will remain open because no guarantees are in place to prove that the most important modification (the invessel retention (IVR) concept) can reliably prevent major radioactive releases. A measure commonly installed to prevent major radioactive releases in case of a severe accident – a filtered containment venting system - will not be implemented."[12]
During the ongoing procedure it was not possible for find information whether for Mochovce 3 those measures have been taken. **Our statement in our 2021 submission that the "public does not have information on Mochovce Nuclear Power Plant and how it differs from older type of power plants," remains valid, since again we were not provided with this information.**

> "Ad g) As for this statement made by GLOBAL 2000, ÚJD SR states the following: MO3&4 has a closed circuit of cooling system with cooling towers. The consumption of cooling water, pumped from the river Hron, is relatively low for such a cooling system. The Mochovce NPP has procedures for operating personnel in case of reduction in the amount of water taken from the River Hron, replenishment of water to cooling circuits can be provided from back-up sources to fulfil their safety function. For this purpose, the Mochovce NPP has established procedures that have been tested on Units 1&2 and 3 of Mochovce as part of Stress Tests following the Fukushima accident." (Page 49)

Of course no closed circuit exists, water is discharged into the Hron and new water pumped into the system. However, this was not the issue raised by GLOBAL 2000, but rather (Stanovisko GLOBAL 2000 k dokumentu (bez názvu, začínající 3.1) o plnění podmínek EIA Mochovce 34, 14.9.2018) the following:
We also would like to make clear that our statement dated September 14, 2018 has not been answered concerning the climate impact on the River Hron's water flow leading to higher water temperatures („Chybí jak ve Správě EIA tak v předloženém dokumentu (bez názvu, začínající 3.1) popis podmínek a postupů za dnešních podmínek a prognóza budoucího vývoje především vodnatosti Hronu za aktuálních podmínek a očekávaných klimatických změn (+2° a více), není ani uvedena maximální povolená teplota Hronu a vliv na biotop atd." A dále: V podmínce se uvádí pokles průtoku Hronu za dvacet let (1980-2000) o 20%, ale v odpovědi se žádné nové údaje nenajdou, přesto že již uplynulo skoro dalších dvacet let. Také chybí údaje o dalším vývoji, scénáře pro zásobování elektrárny a dalších odběratelů vody z Hronu atd.)
In this document we raised issues which we mostly have raised in the past steps of the administrative proceedings, but which have not been dealt with accordingly. We ask ÚJD to either respond adequately or acknowledge clearly the facts that Mochovce unit 3 is not a nuclear power plant fulfilling current safety standards for new reactors (WENRA RL for new reactors) and that ÚJD licenses a NPP which is even on paper robust only against the crash of small aircraft and that the WENRA RL for new reactors is not fulfilled. This exercise should also include outlining the differences in nuclear safety reached versus nuclear safety currently envisaged in the EU for new reactors in consequence of the stress tests after Fukushima.

[12] Lessons not Learned from the Fukushima Accident Risks of the European NPPs 10 years later. Becker/Lorenz 2021

The documents and reports available to us do not prove that the Mochovce unit 3 would be in line with current safety demands and highest safety culture, therefore we appeal decision ÚJD No. 156/2021 for NPP Mochovce 3.

Yours sincerely

Mag. Agnes Zauner
[electronic signature]