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Paleoseismological data derived from the trench Pa-21-II next to the site confirm the existence of faults leading to permanent ground displacement in the site vicinity of Paks II.

#### 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."

### **Conclusion:**

The statement by MVM Paks II Zrt. is not in line with geological evidence described 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, in opinion of the authors of this study, contrary to the principles of good scientific practice.



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# 2.

Paleoseismological data derived from the trench Pa-21-II next to the site confirm the existence of faults leading to permanent ground displacement in the site vicinity of Paks II.

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

**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."

### **Conclusion:**

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 to provide a reliable and 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.



## 3.

A wealth of geological and geophysical data described in the Geological Site Report proofs that the Dunaszentgyörgy-Harta fault zone is active.

NP-032-01, Federal Codes and Standards in the Area of Atomic Energy Applications, Nuclear Power Plant Siting, Main Criteria and Safety Requirements (Russia):

"It is not allowed to locate nuclear power plants:

- on the sites directly situated on active faults ..."

### Conclusion:

Application of Russian nuclear safety requirements would exclude the construction of an NPP at the Paks II site.

*Background:* Public information indicates that the nuclear island and the new reactors of Paks II will be supplied by the Russian provider Nizhny Novgorod Engineering Company Atomenergoproekt.



