Statement on the
Consultation for the Life-time Extension of
the French 1300 MW nuclear reactors

Insufficient transboundary participation and the risk of French nuclear power plants for European countries

The 20 reactors of the 1300 MW fleet were originally designed for operation of 40 years. The scope of the lifetime extension program concerning core melt accidents is not in compliance with current safety requirements – even after performing the envisaged lifetime extension program, a considerable gap between the safety level of the 1300 MW reactor and new reactor types like the EPR will persist. For the 1300 MW reactors a core melt accident with a major release is possible today and will remain possible after the implementation of the currently envisaged lifetime extension program. Also will the spent fuel pools' vulnerability against extreme impact persist for another 20 years, because no measures are foreseen for this weakness. Releases from the spent fuel pond as consequences of accidents with significant impacts also on other European countries cannot be excluded. It becomes more and more important to prepare against man-made hazards, but the 1300 MW reactors do not have enough protection against an airplane crash. The ASN guidelines regulating protection against flooding are outdated. There are doubts if the Hardened Safety Cors's design against flooding events considers adequately the effects of climate change. Design basis earthquakes need to be defined not only on deterministic methods, this is no longer state-of-the-art[1].

Nuclear risk resulting from the French NPP fleet is unacceptably high. Calculations from the project flexRISK (http://flexrisk.boku.ac.at/en/index.html) show a contamination risk in consequence of a severe accident in the old French NPP fleet for all over Europe.

Until today, no final repositories for spent fuel are in operation. Still a lot of research has to be done and it stays open if there will ever be a final repository that can be considered as safe enough to be operated. Also costs of such a final repository are still unclear. Until the problem of waste management is not solved, no lifetime extensions should be licensed and no new NPP should be built.

When regarding this unacceptably high risk, it is not enough to offer a voluntary consultation only on technological safety aspects like the ongoing ASN consultation is about. The risk to humans and environment resulting from severe accidents and from nuclear waste management has to be assessed and presented to the public, also from other European countries in a **transboundary Strategic Environmental Assessment (SEA).** The lifetime extension program constitutes a prominent part of the French energy policy and therefore falls in the scope of SEA Directive 2001/42/EC; moreover as the French Multi-Annual Energy Plan also was not subjected to a transboundary SEA but only to a voluntary consultation.

If transboundary comments are appreciated, an English version of the consultation website and of all documents should be offered, too.

We demand a transboundary **Environmental Impact Assessment (EIA)** for every lifetime extension of an old NPP beyond the originally foreseen lifetime of 40 years, especially in the lights of the new developments in the framework of the Espoo and Aarhus Convention which clarified the EIA obligation for NPP life-time extensions.

We urge France to prepare for the shut-down of the old NPP fleet and to replace plans for nuclear newbuild with an increased deployment of renewable energies sources.

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[1] These are some of the results of the expert statement of the Austrian Government to the consultation: https://www.umweltbundesamt.at/fileadmin/site/publikationen/rep0915.pdf