To

GDEP – General Directorate for Environmental Protection

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Comments on the EIA scoping procedures for the planned Small Modular Reactors to be sited at Ostrołęka and Włocławek

The signatories hereby comment on the recently started transboundary Environmental Impact Assessment (EIA) procedure for the planned SMR-based new NPPs at the Ostrołęka and Włocławek sites by the company OSGE.

A Strategic Environmental Assessment (SEA) procedure for the overall plan for constructing and operating at least 79 SMR units at 10 new NPP sites needs to be conducted with state-of-the-art public participation standards fulfilled, before an EIA procedure for any first concrete SMR project in the country should start. The Polish Energy Strategy PEP2040 and the Polish Plan for Nuclear Energy PPEJ (combined) have to be updated with the SMR program and subjected to a SEA, also transboundary, before the ongoing EIA for the three projects of OSGE (Stawy Monowskie, Ostrołęka and Włocławek) continue.

Additionally, we demand the following aspects to be included in the scope of the upcoming EIA Report:

1. The Polish government should explain why the BWRX-300 boiling water reactor type was chosen after this technology was excluded by the same government (with a decision of the then-climate ministry) from the planned large-scale fleet of the envisioned reactors within the framework of the revision of the PPEJ completed in late-2020.
2. To enable good practice in participation, the EIA reports for any SMR-based NPPs to be submitted by the developers should be translated into English, and into the official languages of the participating countries, and be made available for the public.
3. A public hearing should be held for the domestic public in Poland; also for the citizens living abroad a transboundary hearing is necessary. If online or hybrid hearings are held, interpretation services at least into English should be offered.
4. The time allowed for comments to be submitted for a public consultation should be sufficient and not fall on public holidays or traditional summer holiday time as was the case with the EIA round held last year for the first planned large-scale NPP in Poland, to be sited in the Pomerania region.

5. Alternative electricity supply options need to be assessed in the EIA report, a $C0_2$ estimate of the entire nuclear chain based on state-of-the-art climate science is necessary, including uranium mining, enrichment and production of the nuclear fuel.
6. Realistic timelines of nuclear project delays and scenarios for alternative supply of electricity in case of such delays have to be taken into account.
7. There are no European safety targets for SMR yet. The EIA report should provide proof that the BWRX-300 fulfils the safety objectives for new NPP, including the practical elimination of large and early releases.
8. It is necessary to discuss what kind of emergency planning will be established and what preparations for severe accidents will be undertaken and how the public will be informed and involved in EP&R (Emergency Preparedness and Response).
9. Combined and cumulative effects, including accidents, of nearby facilities have to be taken into account.
10. Information is required what systems (esp. safety systems) will be shared by the reactors at a site.
11. What safety systems will be reduced compared to the predecessor models from the BWR-construction line?
12. Security issues and safeguards have to be assessed in the EIA report.
13. Poland does not have any NPPs yet. A new legal framework needs to be implemented. The EIA report must assess what steps are necessary to create an adequate regulatory framework.
14. The operator has no experience with nuclear facilities – the EIA report should explain how the nuclear regulator will ensure oversight over the operator´s activity. The operator should provide proof of competence and training. Peer review missions should be planned for support.
15. The EIA report needs to describe not only the expected inventory of radioactive waste, but also the waste management routes of spent fuel and all types of radioactive waste. Poland does not have facilities for nuclear waste management yet – the EIA report needs to discuss all further steps.
16. How will the announced cost reduction be achieved compared to the predecessor model ESBWR? The BWRX-300 is a FOAK reactor that has not been built yet. Who will bear the costs for the downscaling?

We are looking forward receiving information, if and how our recommendations are integrated in the scoping decision.

With best regards