

Comments on the Preliminary Environmental Assessment of the Lifetime Extension of Paks NPP

General comments:

1. The study could not prove the necessity of plant lifetime extension for the following reasons:
 - (a) The economic comparison of alternatives for electricity production is deficient, inaccurate and is based on false data.
 - (b) The comparison of alternatives from environmental aspects is also unacceptable. The renewable energy sources are discussed in a short paragraph, with a conclusion that there is no chance to replace Paks with renewables. Energy efficiency is not mentioned at all. As alternatives, only individual energy sources are investigated and are compared to nuclear energy, instead of a complex mix of energy sources.
2. It is typical of the whole study that it does not treat certain impacts adequately and seriously enough. Many effects are understated and described as marginal.

According to the study, the planned lifetime extension does not require significant alteration or intervention. However, it is not true; the heat treatment of Unit 1, the induced higher temperature of emergency cooling tanks and other treatments of parts of the primary circle are – and have to be considered as – significant.
3. The possible impact factors are often only just mentioned, not described in the study; the direct and indirect effects are not specified and discussed in detail, and their qualification is not sufficient. Some impacts, which could result in environmental pollution, are only listed, but the extent of the different contaminations is not included at all.
4. Paks Nuclear Power Plant has no elaborated plan to the case if it does not get the license for lifetime extension.

Comments on specific parts of the study

1. As references for plant lifetime extension there are only a number of American reactors listed, none of which are soviet type reactors. No European examples are mentioned (except for two Russian reactors – Kola and Novovoronezh –, which are also not Paks type reactors and only got the license for 5 years).
2. In the chapter dealing with incidents and malfunctions, the possibility of a reactor fracture is not even mentioned, therefore its possible impacts are not discussed either.
3. The cleaning of nuclear fuel rods is not discussed in the study. It is not mentioned, whether Paks plans to carry out such work in the future, or not. If so, it has to be dealt with in the study, as this activity resulted in the biggest incident/accident in the history of Paks, in 2003.
4. The transboundary impacts are considered in the study as non-existent, which will not exist in the future as well. However we do not agree with this, a worst-case scenario should be included in the study.
5. There is no information at all in the study of the effects of extremities in the water level of the Danube, the low waters and floods – which are very frequent nowadays.
6. There are no data on the extent of radioactivity accumulation during the extended lifetime. The fact of accumulation of isotopes is admitted, however, there are no calculations about the extent of the future accumulation by the end of the extended lifetime.

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