# Table of responses

**DOCUMENTATION FOR THE PURPOSES OF THE TRANSBOUNDARY IMPACT ASSESSMENT PROCEDURE**

**for the Project involving the construction and operation of the First Nuclear Power Plant in Poland with a capacity of up to 3,750MWe, in the territory of the following communes: Choczewo, or Gniewino and Krokowa**

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## Table of responses to the remarks of the Affected Parties submitted at the scoping stage

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| **Sweden** | | | | | |
| **Kalmar County Administrative Board (Länsstyrelsen Kalmar)** | **1** | 1) The Kalmar County Administrative Board (Länsstyrelsen Kalmar) has looked at the documentation, and has no comments on the proposed scope of the environmental impact assessment report with regard to the description of the transboundary effects. Nevertheless, the Administrative Board would like to stress the importance of a precise description of the specific risks relating to the new nuclear power plant and to climate changes, such as rising water levels or resulting flooding, etc., which may be experienced by the sites identified in the environmental impact assessment report. | 1) As indicated in Chapter 12.8.1. of the PIS, the EIA report will take into account the impact of climate change on the environment, the economy and the effects and methods for reducing them, as well as the development of adaptation activities to new environmental conditions and important areas of economic life, including the construction and operation of nuclear power plants. The works on the EIA Report will take into account e.g. the results of the KLIMAT and KLIMADA projects in which climate scenarios describing the trends and the extent of climate variability to be taken into account in economic activities in selected locations over the next few decades have been developed for the selected meteorological elements (air temperature, precipitation, cloudiness, air humidity) for the area of Poland. In addition, in accordance with Chapter 12.6 of the PIS, the EIA will take into account e.g.: Flood risk management plans and the Environmental Protection Programme of the Pomorskie Voivodeship for the years 2013-2016 with a perspective until 2020. In the scope of analyses of the Project's impact on the climate as a result of the scoping decision, it will be specified which absolute and relative analyses of greenhouse gas emissions (carbon footprint analyses) will be carried out. Similarly, in terms of the Project's resilience to climate change, analyses of exposure, sensitivity and susceptibility to the currently observed climate variability as well as forecasted climate change and appropriate risk analysis, as well as analysis and assessment of adaptation variants will be carried out. In this regard, it should be pointed out that external threats affecting nuclear safety and radiation and physical protection will be fully identified and assessed at the stage of the Location Permit. It is necessary to distinguish between issues related to the assessment of the Project's impact on the environment (including climate), the results of which will be included in the EIA Report, and the impact of the environment (including climate changes) on nuclear safety, which will be included in the EIA Report to the extent that making it possible to assess e.g. the impact of climate changes on the Project. The latter will in particular be the subject of the Site Evaluation Report, which is an obligatory part of the application for obtaining a Location Permit for a nuclear facility. The scope of the Site Evaluation Report is specified in the Location Regulation, taking into account the necessity to ensure nuclear safety, radiological protection and psychical protection during commissioning, operation and decommissioning of the nuclear facility, and also to conduct efficient emergency conduct in the case of occurrence of a radiation event, and taking into account relevant recommendations of the International Atomic Energy Agency. The assessment of the site designated for the location of a nuclear facility will demonstrate e.g. an assessment of the flood risk of the location of the nuclear facility. The preparation of the Site Evaluation Report is preceded by a 24-month campaign of site surveys, which will be correlated with environmental surveys for the purposes of the EIA Report. It should also be pointed out that due to the stages nature of the Project's environmental impact assessment, during the obligatory repeated EIA as part of the procedure for issuing a construction permit, design details will be verified, as well as other decisions, including administrative ones, including the location permit (after issuing of the DEC) with the provisions of the DEC issued for the bounding conditions envelope. Therefore, there will be no situation in which, after the issuance of the DEC, risks and impacts will be identified in the investment process which will not be identified and assessed in the course of investment for the NPP. | This will be included in the EIA Report | **<u>Transboundary Documentation</u>**<br>**In Part 4 Excerpt from Volume II of the EIA Report:**<br>**1)** **Chapter II.11.3.2** "Analysis of the vulnerability of the Project to extreme events, phenomena and natural conditions, with particular focus on primary and secondary effects of climate change";<br>**2)** **Appendix II.11.3-1** "Results of the analysis of impact from extreme natural events, phenomena and conditions on NPP safety together with adaptive (preventive) measures";<br>**3)** **Chapter II.11.4.3** "Risk of a natural disaster" (Flood hazards – NPP site flooding and inundation). In this chapter, maximum ground elevations for both sites are presented, in determination of which the storm surge sea level has been used with probability at 1 per 10,000 years, combined with wave height and change of the sea level in the climate change perspective until 2180.<br><br>**<u>Including in the Non-Technical Summary in Part 2</u>**<br>**1)** **Chapter VI.3.3.2** "Climate";<br>**2)** **Chapter VI.4.3** "Impact of the Project on climate, and impact of climatic factors on the Project".<br><br>**<u>EIA Report</u>**<br>**In Volume II:**<br>**1)** **Chapter II.11.3.2** "Analysis of the vulnerability of the Project to extreme events, phenomena and natural conditions, with particular focus on primary and secondary effects of climate change";<br>**2)** **Appendix II.11.3-1** "Results of the analysis of impact from extreme natural events, phenomena and conditions on NPP safety together with adaptive (preventive) measures";<br>**3)** **Chapter II.11.4.3** "Risk of a natural disaster" (Flood hazards – NPP site flooding and inundation). In this chapter, maximum ground elevations for both sites are presented, in determination of which the storm surge sea level has been used with probability at 1 per 10,000 years, combined with wave height and change of the sea level in the climate change perspective until 2180.<br>**In Volume III:**<br>**1)** **Chapter III.3.2** "Climate";<br>**2)** **Appendix III.3.2.-1** "Technical note on climate change scenarios".<br>**In Volume IV:**<br>**1)** **Chapter IV.3** "Impact of the Project on the climate (and microclimate) and climatic factors on the Project"; |

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| | | | | | 2) **Appendix IV.3-1** "Methodology of determination of the Project effect on microclimate and local climate";<br>3) **Appendix IV.3-2** "SACTI2 modelling results – cooling towers (sub-variants 2A and 2B)";<br>4) **Appendix IV.3-3** "SACTI2 modelling results – cooling towers (sub-variants 1B and 1C)";<br>5) **Appendix IV.3-4**"Carbon footprint analysis". |
| **Skåne County Administrative Board** | **2** | 2.a) With regard to external infrastructure related to radioactive waste management – a deeper and more thorough explanation of the management of nuclear waste from a nuclear power plant. A plan should be included taking into account the places and means of safe and long-term storage of nuclear waste, taking into account the safety of maritime transport, as regards radioactive waste and fuel. Moreover, the last two points should be included both in the risk assessment and in the environmental impact report. | 2.a) Referring to the comment a): issues related to the external infrastructure (in relation to the nuclear power plant) associated with radioactive waste management, including the place and method of storage of nuclear waste do not fall within the scope of the Project consisting in the construction of the first Polish nuclear power plant. They are separate projects, the construction plans and guidelines of which are set out in the NPRWSFM (in accordance with Chapter 5.5.3 of the PIS). The construction of landfills will be subject to a separate environmental impact procedure. In connection with the above, the EIA Report will describe the radioactive waste management system at the power plant site, including e.g. classification of radioactive waste, expected amounts of low- and intermediate-level waste radioactive waste, high-level radioactive waste and spent nuclear fuel, radioactive waste treatment systems, characteristics of temporary storage facilities, etc. based on the bounding conditions envelope. These descriptions shall be in accordance with the Regulation on Radioactive Waste and Spent Nuclear Fuel. In addition, the EIA Report will present, as best as possible at a given stage, a full fuel cycle with a description of the waste storage options known at a given stage. In the case of potential cumulative impacts with external infrastructure related to radioactive waste management (including cumulative impacts), they will be subject to an appropriate cumulative assessment. It should be noted that the issue of choosing the fuel cycle is related to the choice of a specific reactor technology and the policy of the Republic of Poland in this area, the plans of which are currently included in Article 4 of the NPRWSFM. With regard to the transport of radioactive waste, the EIA Report submitted in the procedure for issuing the DEC will present the legal conditions and requirements related to the transport of this waste and spent nuclear fuel (including maritime transport if such transport is not excluded), but to the extent that it is possible at a given stage of the investment process for the NPP and taking into account the circumstances that the construction of radioactive waste landfills is not an element of the Project (for which the proceedings regarding the issuance of the DEC are being conducted). At the same time, PGE EJ 1 sp. z o.o. informs that in accordance with Article 61 of the Atomic Law: "Requirements and conditions for transport in organisational units that produce, process, use, warehouse and store nuclear materials, sources of ionising radiation, excluding devices generating ionising radiation, radioactive waste and spent nuclear fuel are specified by the President of the Agency in the permit''. On the other hand, the conditions for the transport of nuclear material in Poland are regulated by the Regulation of the Council of Ministers of 20 February 2007 on the conditions for import into the territory of the Republic of Poland, export from the territory of the Republic of Poland and transit through this territory of nuclear materials, radioactive sources and equipment containing such sources (Journal of Laws, no. 131, item 911) and the Act of 19 August 2011 on the transport of dangerous goods (Journal of Laws no. 227, item 1367, as amended) transporting the provisions of the European Agreement on the International Carriage of Dangerous Goods by Road, which is subject to periodic updating. At the same time, in accordance with Article 114 of the Atomic Law, the transport of nuclear materials and radioactive waste may be carried out by a Radioactive Waste Disposal Plant or another economic entity that has received a permit from the President of the PAA to perform this type of activity. To sum up, in the opinion of PGE EJ 1 sp. z o.o., the elements referred to in the position of the Affected Country will be mostly included in the EIA Report, taking into account the limitations in the available knowledge at the stage of preparing the report and the fact that radioactive waste landfills are not part of the Project and PGE EJ 1 sp. z o.o. is not responsible for their implementation. Responses to selected questions can also be found in the cited NPRWSFM and the regulation on radioactive waste and spent nuclear fuel. | This will be included in the EIA Report. | At present, marine transport of radioactive waste and spent fuel is not planned; according to the Polish law, radioactive waste will be collected by a national institution established for this purpose. The collection and management of radioactive waste and spent fuel is the responsibility of *Zakład Unieszkodliwiania Odpadów Promieniotwórczych* [Radioactive Waste Management Plant], which has been established for this purpose under the Atomic Law Act of 29 November 2000. The radioactive waste will be transported by land. Radioactive waste and spent fuel management is determined in the "National Plan of Management of Radioactive Waste and Spent Nuclear Fuel".<br><br>**<u>Transboundary Documentation</u>**<br>**In Part 1 Introduction:**<br>1) **Chapter 6** "Possible transboundary radiological impacts on the environment";<br>2) **Appendix V.4-1** "MATCH model results";<br>3) **Appendix V.4-2** "FDMT model results".<br>**In Part 4 Excerpt from Volume II of the EIA Report:**<br>1) **Chapter II.10.6.2** "Spent (nuclear) fuel";<br>2) **Chapter II.10.6.3** "Radioactive waste";<br>**Appendix II.10.6-1** "Sources of radioactive waste and radioactive waste management during Operational phase";<br>3) **Chapter II.10.4** "Discharge of radioactive sewage";<br>4) **Chapter II.11.3** "External events that may endanger the safety of a nuclear power plant";<br>5) **Appendix II.11.3-1** "Results of the analysis of impact from extreme natural events, phenomena and conditions on NPP safety together with adaptive (preventive) measures".<br>**In Part 7 Excerpt from Volume V of the EIA Report:**<br>1) **Chapter V.7.11.2** "Radioactive waste and spent nuclear fuel".<br><br>**<u>Including in the Non-Technical Summary in Part 2</u>**<br>1) **Chapter VI.2.10** "Predicted types and volumes of emissions, including waste, resulting from the implementation of the Project";<br>2) **Chapter VI.2.11** "Hazards and severe accidents";<br>3) **Chapter VI.5.7.11** "Waste management".<br><br>**<u>EIA Report</u>**<br>**In Volume II:** |

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| | **3** | 2.b) With regard to radiological effects in emergency states, there is a need to specify the description of safety zones in the event of extensive emergencies, including the systems for notification of accidents to neighbouring countries. The safety zones for the planned nuclear power plant should be described on the basis of the distance used, for example, by Sweden [PGE EJ 1 sp. z o.o. - distances are not specified in the comment]. In this context, an example was indicated to perform calculations based on the worst-case scenario, as the disaster at the Fukushima nuclear power plant in Japan. | 2 b) With regard to comments b) the conditions related to the designation of the area of limited use and the contingency planning zone (which is understood as "safety zones" indicated in the comment) are regulated under the Atomic Law, the Design Regulation and the Regulation of the Council of Ministers of 27 April 2004 on values of intervention levels for particular types of intervention measures and criteria for revoking these measures (Journal of Laws of 2004, no. 88, item 986). These zones relating to design failures and extended design conditions are described in Chapter 10.3 of the PIS and will be described in detail in the EIA Report. In addition, the above-mentioned issues regarding planning and preparation in the event of an accident will be implemented in accordance with Polish regulations, which will take into account the latest IAEA requirements in this respect taking into account the conclusions of the Fukushima accident (document no. GSR Part 7).<br>In order to estimate the radiological impact on the territory of Poland and potentially affected countries (in particular for the purposes of contingency planning), the EIA Report will identify and assess the radiological effects of a severe NPP failure determined in accordance with the applicable regulations in this respect, including relevant international recommendations, taking into account the adopted bounding conditions envelope. It is worth emphasising that the basic conclusions from the "stress tests" of European nuclear power plants (regarding ensuring reliable electrical power supply for systems important for safety and heat dissipation after shutdown to the final heat outlet) have been included in the Polish design regulation.<br>The legal and organisational conditions relating to the early notification of a nuclear accident to neighbouring countries resulting e.g. from the Convention on Early Notification of a Nuclear Accident, signed at Vienna of 26 September 1986, will also be described. (Journal of Laws of 1988, no. 31, item 216) and Article 77 of the Atomic Law. Pursuant to Article 72 of the Atomic Law, the President of the PAA makes a systematic assessment of the radiological situation of the country, and on the basis of Article 77 of the same Act, "the President of the Agency establishes national contact points, performing tasks resulting from the international system of notification of radiological events in the field of early notification of a nuclear accident, assistance in the event of a nuclear accident or radiological emergency, physical protection of nuclear material and illicit trade in these materials, and, in carrying out the obligations of the Republic of Poland under bilateral international agreements". The tasks and responsibilities of the national contact points and the handling of radiological incidents will be described in the EIA Report. | This will be included in the EIA Report | **<u>Transboundary Documentation</u>**<br>**In Part 1 Introduction:**<br>1) **Chapter 6** "Possible transboundary radiological impacts on the environment";<br>2) **Appendix V.4-1** "MATCH model results";<br>3) **Appendix V.4-2** "FDMT model results".<br>**In Part 4 Excerpt from Volume II of the EIA Report:**<br>1) **Chapter II.11.3** "External events that may endanger the safety of a nuclear power plant";<br>2) **Appendix II.11.3-1** "Results of the analysis of impact from extreme natural events, phenomena and conditions on NPP safety together with adaptive (preventive) measures".<br>**In Part 6 Excerpt from Volume IV of the EIA Report:**<br>1) **Chapter IV.17.1.2.5** "The legal requirements related to the development of internal and external contingency plans and procedures as well as early notification of neighbouring countries in case of an accident".<br>**In Part 7 Excerpt from Volume V of the EIA Report:**<br>1) **Chapter V.6** "Anticipated extent of the planned restricted use area".<br><br>**<u>Including in the Non-Technical Summary in Part 2</u>**<br>1) **Chapter VI.2.11** "Hazards and severe accidents";<br>2) **Chapter VI.4.17** "Determining the projected environmental impact in the event of a severe accident";<br>3) **Chapter VI.5.4** "Possible transboundary environmental impacts";<br>4) **Chapter VI.5.6** "**Indication whether it is necessary to establish a Restricted Use Area for the planned Project**"<br><br>**<u>EIA Report</u>**<br>**In Volume II:**<br>1) **Chapter II.11.3** "External events that may endanger the safety of a nuclear power plant";<br>2) **Appendix II.11.3-1** "Results of the analysis of impact from extreme natural events, phenomena and conditions on NPP safety together with adaptive (preventive) measures".<br>**In Volume IV:**<br>1) **Chapter IV.17.1.2.5** "The legal requirements related to the development of internal and external contingency plans and procedures as |

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| | **4** | 2.c) With regard to the potential impact zones of the Project - the transboundary impact on the environment and the worst-case scenario should be described in more detail. | 2 c) With regard to comment c), it will be taken into account in the work on the EIA Report. Transboundary impacts, including in particular radiological interactions, will be identified and evaluated. In order to estimate the radiological impact on the territory of Poland and potentially affected countries (in particular for the purposes of contingency planning), the EIA Report will identify and assess the radiological effects of a severe NPP failure determined in accordance with the applicable regulations in this respect, including relevant international recommendations, taking into account the adopted bounding conditions envelope. | This will be included in the EIA Report | **Transboundary Documentation**<br>**In Part 1 Introduction:**<br>**1) Chapter 6** "Possible transboundary radiological impacts on the environment";<br>**2) Appendix V.4-1** "MATCH model results";<br>**3) Appendix V.4-2** "FDMT model results".<br><br>**Including in the Non-Technical Summary in Part 2**<br>**1) Chapter VI.5.4** "Possible transboundary environmental impacts".<br><br>**EIA Report**<br>**In Volume V:**<br>**1) Chapter V.4.1** "Possible transboundary radiological environmental impact";<br>**2) Appendix V.4-1** "MATCH model results";<br>**3) Appendix V.4-2** "FDMT model results". |
| | **5** | 2.d) With regard to adaptation to climate change, the models used should be clarified and the risk of elevated sea levels should be described in the short and long term, i.e. the worst-case scenario. | 2.d) With regard to comment d), the response regarding the Project's impact on climate and adaptation to climate changes has been given in relation to comment 1) of the Kalmar County Administrative Board (Länsstyrelsen Kalmar) submitted as part of Sweden's comments. By complementing this answer, PGE EJ 1 sp. z o.o. indicates that the models used in this respect will be described in the EIA Report. When choosing the options, the methodology of "Non-paper Guidelines for Project Managers: Making vulnerable investments climate resilient" should be followed in matters related to resilience and adaptation to climate changes, and in matters related to greenhouse gas emissions, i.e. the methodology in accordance with the EC CBA Manual. However, the choice of methodologies will take place after the issuance of the scoping decision by the General Directorate for Environmental Protection. | This will be included in the EIA Report | **Transboundary Documentation**<br>**In Part 4 Excerpt from Volume II of the EIA Report**<br>**1) Chapter II.11.3.2** "Analysis of the vulnerability of the Project to extreme events, phenomena and natural conditions, with particular focus on primary and secondary effects of climate change";<br>**2) Chapter II.11.4.3** "Risk of a natural disaster" item 2 Flood hazards – NPP site flooding and inundation. In this chapter, maximum ground elevations for both sites are presented, in determination of which the storm surge sea level has been used with probability at 1 per 10,000 years, combined with wave height and change of the sea level in the climate change perspective until 2180;<br>**3) Appendix II.11.3-1** "Results of the analysis of impact from extreme natural events, phenomena and conditions on NPP safety together with adaptive (preventive) measures".<br><br>**Including in the Non-Technical Summary in Part 2:**<br>**1) Chapter VI.2.11.3** "Risk of accident resulting in environmental contamination";<br>**2) Chapter VI.3.3.2** "Climate";<br>**3) Chapter VI.4.3** "Impact of the Project on climate, and impact of climatic factors on the Project".<br><br>**EIA Report** |

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| | **6** | 2.e) Evaluation and justification of this project based on Directive 2009/28/EC. | 2.e) In the opinion of PGE EJ 1 sp. z o.o., the remark is not justified because the analysis of the legitimacy of the implementation of the NPP in relation to alternative technologies for electricity generation (including renewable sources) was the subject of already adopted strategic documents of the national level, i.e. PEP2030 and the PNPP, which are in line with the objectives of the documents on the European level (e.g. climate and energy package; European Energy Policy, Energy Road Map 2050; Baltic Energy Market Interconnection Plan). It should be noted that both PEP 2030 and the PNPP were the subject of proceedings on strategic environmental impact assessment conducted in the years 2011-2014 (the Swedish side participated in the transgenic proceedings as part of the above-mentioned strategic environmental impact assessment). | At the time of responding to remarks, information was not declared in the EIA Report, but eventually the issue was undertaken in the EIA Report. | The EIA Report addresses the relation of the planned construction of the First NPP in Poland to the legislation framework and strategies developed for Poland and the European Union. The issues in question were discussed also in the transboundary report:<br><br>**<u>Transboundary Documentation</u>**<br>**In Part 1 Introduction:**<br>1) **Chapter 3** "Justification for the Project execution".<br>**In Part 3 Excerpt from Volume I of the EIA Report:**<br>1) **Chapter I.6** "Justification for the Project execution";<br>2) **Chapter I.7** "The Project in the context of strategic documents".<br><br>**<u>Including in the Non-Technical Summary in Part 2:</u>**<br>1) **Chapter VI.1.5** "VI.1.5 Justification for the implementation of the Project"<br>2) **Chapter VI.1.6** "The Project in the context of strategic documents".<br><br>**<u>EIA Report</u>**<br>**In Volume I:**<br>1) **Chapter I.6** "Justification for the Project execution"; |

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| | | | | | 2) **Chapter I.7** "The Project in the context of strategic documents". |
| **Swedish Geological Institute** | **7** | 3) Chapter 12.3 of the PIS on geological structure lacks the necessary additional information relating to the location of the proposed sites of nuclear power plants in relation to the existing faults and paleoseismological complex. Specifically, it lacks a description of the region's recent seismic activity. This is an important issue bearing in mind the earthquakes of 5.0 Mw that occurred in the Kalingrad Oblast in 2004. The seismic hazard is a safety issue, but given the fact that a seismic event can damage a nuclear installation, the environment is also at risk. The IAEA report, "Seismic Hazards in Site Evaluation for Nuclear Installations (SSG-9), provides recommendations and instructions for seismic hazard assessment for nuclear installation sites. | 3) First of all, attention should be paid to the general nature of the PIS, which is to enable the scoping process with the participation of competent authorities and stakeholders to define detailed requirements as to the scope and methodology of conducting an environmental impact assessment of the First Polish Nuclear Power Plant. In addition, it is the first official document presenting the basic assumptions of the planned investment in a comprehensive manner, in a form widely available to all stakeholders. Therefore, too detailed and technical approach would make it difficult for stakeholders to get acquainted with the assumptions of the project, i.e. with the main purpose of the document. Nevertheless, the EIA Report will take into account the aspect of ensuring environmental protection in the context of threats to nuclear safety caused by seismic shocks. At the same time, the impacts associated with the occurrence of emergency conditions caused by external factors (including earthquakes) and human activity will be assessed. In accordance with Polish law (§ 40 of the Regulation on safety analyses), seismic shocks and fault activity will be included in the probabilistic safety analysis, which will be performed at the stage of development of the PSAR. The EIA Report will refer to the above issues. It should be noted here that a number of aspects related to the seismic safety of the site of nuclear power plants are issues which PGE EJ 1 analyses in the context of the development of the Location Report and the PSAR. In order to provide information on tectonics and seismicity in relation to the proposed nuclear power plant sites, numerous geological, geographical and monitoring studies (seismic monitoring) have been planned, the results of which will allow to construct a very detailed structural and tectonic model and determine the risk of occurrence of earthquake for the surveyed area. All scheduled studies shall take into account the recommendations and instructions for seismic hazard assessment for the location of nuclear plants as set out in the IAEA reports. It should be emphasised that the potential sites of the Project are located in an area with low seismicity, and standard projects of generation III/III+ nuclear power plants provide very large seismic safety reserves compared to the magnitude of seismic hazards in this area, taking into account both natural seismicity and human-induced seismicity. | This will be partially included in the EIA Report | Issues related to the geological structure were described both in the transboundary report and non-technical summary. Detailed information of the facility safety will be described in the Site Evaluation Report, which according to the Polish legislation is the subsequent report to be prepared upon obtaining the decision on environmental conditions. The Site Evaluation Report will address the facility safety in a much greater detail, in terms of both geology and seismicity.<br><br>**<u>Transboundary Documentation</u>**<br>**In Part 4 Excerpt from Volume II of the EIA Report:**<br>1) **Chapter II.11.3.3.4** "Hazards related to human-induced seismic conditions";<br>2) **Chapter II.11.4.3** "Risk of a natural disaster".<br><br>**<u>Including in the Non-Technical Summary in Part 2:</u>**<br>1) **Chapter VI.2.11** "Hazards and severe accidents";<br>2) **Chapter VI.3.3.3** "Geological structure".<br><br>**<u>EIA Report</u>**<br>**In Volume II:**<br>1) **Chapter II.11.4.3** "Risk of a natural disaster".<br>**In Volume III:**<br>1) **Chapter III.3.3** "Geological structure". |
| **Housing and Development Office (Boverket)** | **8** | 4.a) No information is given on the number of reactors or the technology chosen. Therefore, the Authority considers that there is a need to use the least secure technology and to compare it with the safest solution. The report should also take into account the cost differences associated with the use of specific technologies, as well as estimate the costs of removing the effects of the most serious potential emergency event that may occur in Sweden. | 4.a) With regard to the comment a) the approach to EIA based on the bounding conditions envelope (i.e. the set of parameters for the reactor technologies under consideration) and the most far-reaching scenario is consistent with the concept set out in the PIS and the IAEA guidelines no. NG-T-3.11 "Managing Environmental Impact Assessment for Construction and Operation in New Nuclear Power Programmes". In the opinion of PGE EJ 1 sp. z o.o., however, there is no need to compare the most far-reaching scenario with the "safest" scenario because only the first one will be subject to an environmental impact assessment. It is important that the finally applied design solutions fit into the bounding conditions envelope, i.e. cause lower emissions/disturbances than those assessed within the envelope. Compliance with the bounding conditions envelope will be verified at the stage of a new EIA carried out as part of the procedure for issuing a construction permit.<br>The authors in their comment raise the issue of the costs of technology and the costs of removing the most serious potential emergency event. With regard to the costs of the technology, its selection will take place in an integrated procedure (see: Chapter 6.4 of the PIS), in which the supplier of nuclear power plant technology, the designer and general contractor for the construction of the NPP - the so-called EPC contractor, nuclear fuel supplier, supplier of support services in the area of operation and maintenance of NPP, potential strategic partner or business partners providing capital funds and support in the obtaining debt financing from the Export Credit Agency and commercial banks.<br>With regard to the costs of disaster recovery, the EIA will assess all potential transboundary impacts and their impacts on the environment and human health and life, taking into account mitigation measures. On the other hand, determination of the costs of removing the effects of the most far-reaching potential emergency scenario is, in the opinion of PGE EJ 1 sp. z o.o., unjustified if not impossible to perform due to the enormity of factors, uncertainties associated with them and the subjectivity of such an assessment, especially in relation to social costs. It should be noted that the issues of the person responsible for nuclear damage are strictly regulated in Chapter 12 Civil Liability for Nuclear Damage of the Atomic Law and e.g. the Act of 13 April 2007 on the Prevention and Repair of Environmental Damage (i.e. Journal of Laws of 2014, item 1789, as amended). | At the time of responding to remarks, supplementation of the information was not declared in the EIA Report, but eventually the issue was undertaken in part. | The EIA Report provides information about the number of reactors, and specifies the reference technology. Therefore, there was no need to describe the least safe technology or compare it to the safest solution.<br><br>**<u>Transboundary Documentation</u>**<br>**In Part 3 Excerpt from Volume I of the EIA Report:**<br>1) **"Introduction".**<br>**In Part 4 Excerpt from Volume II of the EIA Report:**<br>1) **Chapter II.1.2** "Selection of nuclear technology";<br>2) **Chapter II.2** "Description of the NPP technology and infrastructure".<br><br>**<u>Including in the Non-Technical Summary in Part 2:</u>**<br>1) **Chapter VI.1.1** "Introduction and details of the Applicant (Investor)";<br>2) **Chapter VI.2.1** "Project description";<br>3) **Chapter VI.2.2.2** "Description of the NPP technology and infrastructure".<br><br>**<u>EIA Report</u>**<br>**In Volume I:**<br>1) **"Introduction".**<br>**In Volume II:**<br>1) **Chapter II.1.2** "Selection of nuclear technology";<br>2) **Chapter II.2** "Description of the NPP technology and infrastructure". |

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| | **9** | 4.b) The EIA Report shall describe the management of nuclear waste. Methods for the management of nuclear waste should also be developed and potential consequences identified. It should be clearly stated whether Poland plans to dispose of nuclear waste on its own. It is also necessary to describe the risk of radioactive substances entering the Baltic Sea ecosystem, and to specify the risk levels for each specific storage of such waste. | 4.b) With regard to the comment b) As part of the EIA Report, PGE EJ 1 sp. z o.o. will describe in as many details as possible at a given stage, the entire fuel cycle with a description of the variants of waste storage known at a given stage. Impacts related to the management of radioactive waste and spent nuclear fuel, which are part of the Project, including the treatment of low- and intermediate-level waste and high-level waste, as well as their storage at the power plant site will be described in detail and will be subject to a detailed analysis as part of the EIA, taking into account the assessment of the risk of radioactive substances entering the marine environment. On the other hand, radioactive waste and spent fuel management systems not implemented by the investor, including collection, transport, storage, possible processing (outside the NPP area) and storage will be the subject of cumulative impact analyses, to the extent that it will be possible at the stage of preparing the EIA Report for the NPP. According to the Atomic Law, "storage of radioactive waste" means the deposit of radioactive waste in a radioactive waste storage site without the intention of re-extracting it. Therefore, in the NPP area one should talk about the storage and storage facilities of radioactive waste and spent nuclear fuel. In accordance with Chapter 6.4.4. of the PIS, there are plans to build a periodic fuel (wet or dry) storage facility that will be able to accommodate spent fuel from the entire period of operation of the planned power plant, i.e. from a period of 60 years.<br>Issues related to the management of waste outside the nuclear facility, including the storage of radioactive waste, will be described in the EIA Report, bearing in mind that the construction of radioactive waste landfills is only planned in accordance with the NPRWSFM and is not part of the Project, which is described in the PIS in Chapter 5.5.3. With regard to the determination of risk levels for each specific method of waste storage, such an assessment will be possible for storage facilities that are part of the Project. In the case of landfills, an analysis of cumulative impacts will be carried out, taking into account the assumptions and environmental objectives of the NPRWSFM. | This will be included in the EIA Report | <u>**Transboundary Documentation**</u><br>**In Part 4 Excerpt from Volume II of the EIA Report:**<br>**1) Chapter II.10.4** “Discharge of radioactive sewage”;<br>**2) Chapter II.10.6.2** “Spent (nuclear) fuel”;<br>**3) Appendix II.10.6-1** “Sources of radioactive waste and radioactive waste management during Operational phase”;<br>**4) Chapter II.10.6.3** “Radioactive waste”;<br>**In Part 7 Excerpt from Volume V of the EIA Report:**<br>**1) Chapter V.7.11.2** “Radioactive waste and spent nuclear fuel”.<br><br><u>**Including in the Non-Technical Summary in Part 2:**</u><br>**1) Chapter VI.2.10** “Predicted types and volumes of emissions, including waste, resulting from the implementation of the Project”.<br><br><u>**EIA Report**</u><br>**In Volume II:**<br>**1) Chapter II.10.6.2** “Spent (nuclear) fuel”;<br>**2) Appendix II.10.6-1** “Sources of radioactive waste and radioactive waste management during Operational phase”;<br>**3) Chapter II.10.4** “Discharge of radioactive sewage”;<br>**4) Chapter II.10.6.3** “Radioactive waste”.<br>**In Volume V:**<br>**1) Chapter V.7.11.2 “Radioactive waste and spent nuclear fuel”.** |
| **Swedish Board of Agriculture** | **10** | 5.a) The EIA report should include an analysis of the procedure for dropping [PGE EJ1 - correctly "discharge"] of cooling water from an open cooling system. The process of dropping [PGE EJ1 – correctly "discharge"] of cooling water can have both physical and biological consequences for the aquatic environment and fisheries. The analysis carried out should take into account the magnitude of such effects. | 5.a) The comment will be taken into account in the work on the EIA Report. As part of the environmental impact assessment of the Project, detailed thermal analyses of discharges will be carried out, i.e. the geographical characteristics of hot water plume discharged from the power plant will be determined. The impact of changes in thermal conditions on habitats and fauna and flora in local terms, as well as in terms of the ecosystem, will be assessed based on the analysis of related impacts, i.e. covering the chain of all impacts that may occur in the ecosystem as a result of the occurrence of an impact on one of its elements. | This will be included in the EIA Report | With respect to determination of a geographical characteristics of the discharged water plume.<br><br><u>**Transboundary Documentation**</u><br>**In Part 6 Excerpt from Volume IV of the EIA Report:**<br>**1) Chapter IV.8.3.1.5.4** “Effect of discharges on the ambient water temperature” for Variant 1 Lubiatowo-Kopalino site;<br>**2) Chapter IV.8.3.2.3.11** “Impacts of discharges on water temperature” for Variant 2 Żarnowiec site;<br>**3)** With respect to the effect of the water discharge on natural components: **Chapter IV.2.3** “Impacts on natural (biotic) components – marine environment”.<br><br><u>**Including in the Non-Technical Summary in Part 2:**</u><br>**1) Chapter VI.4.2.3** “Impact on natural components – marine environment. Variant 1 – Lubiatowo-Kopalino site”;<br>**2) Chapter VI.4.2.4** “Impact on natural components – marine environment. Variant 2 – Żarnowiec site”;<br>**3) Chapter VI.4.8.** “Impacts on marine surface waters”. |

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| | **11** | 5.b) The report should be supplemented with an illustration of hazards to agriculture both in Poland and in neighbouring countries, which are associated with various types of nuclear events and weather conditions, both standard and extreme, including the release of radioactive nuclides into the environment. The illustration should be in the form of a map showing radioactive fallout zones of at least caesium 134, caesium 137 and iodine 131. The level of precipitation shall be determined on the basis of $Bq/m^2$. Furthermore, the transfer of released radioactive nuclides to different cereals should be estimated in order to assess whether the concentration level of individual nuclides exceeds the EU limit for commercially traded food products. This is an extremely important issue, as the limit values are very low, which means that even a small release of radioactive nuclides can have serious consequences for agriculture. | 5.b) With regard to comment b), as indicated in the PIS (see: Chapter 10.5), contingency events that may cause transboundary impacts, including major failures, will be fully identified and evaluated in the EIA Report, which will also present the results of modelling of dispersions of radioactive substances and doses (also in a transboundary context). For the estimation of the radiological impact on the territory of Poland and potentially affected countries (in particular for the purposes of contingency planning), the EIA Report will present the radiological effects of a severe NPP failure, determined in accordance with the applicable legal provisions and taking into account relevant international recommendations. Modelling will be carried out on the basis of proven software, and the methodologies described in the EIA Report. Modelling will cover all routes of exposure to radiation, taking into account the transport of radioactive substances in the food chain. The form of presentation of the modelling results will be adapted to the purpose, scope and results of modelling.<br>The EIA Report will also refer the results of modelling in the field of dispersion of radioactive substances and radiation doses to legal requirements (intervention levels) resulting from Polish and EU law for food products on the market, if as a result of the assessment of the considered emergency states there is a risk of exceeding these requirements. It should be noted here that the assessment of the impact of emergency conditions on the environment must, on the one hand, show the effects of such an accident, and on the other hand the conclusions, including the assessment of whether the impact is significant and should also take into account the probability of their occurrence in accordance with the general EIA methodology described in the PIS. | This will be included in the EIA Report | Criteria of the extent of specific areas (the restricted use area, emergency planning zones and distances, and intervention activities) were determined, considering effects and possible extent of a specific NPP accident. The conduct was determined, including in the case of agriculture, for the long-term prohibition of consumption. Maps included in the chapter present the maximum zones of intervention activities in case of a severe accident with a core melt for the Lubiatowo-Kopalino site and Żarnowiec site. The zone area was determined in the tables for the chapter, and the criteria were adopted according to the Polish law and GSR Part 7.<br><br>**<u>Transboundary Documentation</u>**<br>**In Part 6 Excerpt from Volume IV of the EIA Report:**<br>**1) Chapter IV.17** "Determining the projected environmental impact in the event of a severe accident".<br><br>**<u>Including in the Non-Technical Summary in Part 2</u>**<br>**1) Chapter VI.4.17** "Determining the projected environmental impact in the event of a severe accident".<br><br>**<u>EIA Report</u>**<br>**In Volume IV:**<br>**1) Chapter IV.17** "Determining the projected environmental impact in the event of a severe accident". |
| | **12** | 5.c) It is also worth providing an analysis of the potential situation and condition of the agricultural sector in the event of an emergency event involving the release of radioactive substances into the environment. | 5.c) The EIA Report will contain the results of the assessment of the impact of the Implementation of the Project on the agricultural sector. | This will be included in the EIA Report | For agriculture, long-term restrictions on the consumption of contaminated food were determined - restrictions pertaining to feeding animals, activity concentrations of Cs-134 and Cs-137 isotopes in animal feed, activity concentrations of various radionuclides in food and potable water for humans, effective dose from the consumption of contaminated food and potable water within the first year following an accident, or the total equivalent dose to the foetus, were determined both for the Lubiatowo-Kopalino site and Żarnowiec site.<br><br>**<u>Transboundary Documentation</u>**<br>**In Part 6 Excerpt from Volume IV of the EIA Report:** |

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| **Swedish Meteorological and Hydrological Institute** | **13** | 6) An environmental impact report should be added to Chapter 10.5, "Possible transboundary impact on the environment", i.e. an analysis based on emergency events at the power plant. The analysis should include a dispersion model for short- and long-distance transport, in the case of different weather conditions. | 6) Appropriate modelling will be carried out based on archival and current meteorological data, the results of which will be presented in the EIA Report. The modelling range shall be adapted to the characteristics of releases of radioactive substances during operating states and during degraded conditions under consideration, including severe failures. | It will be included in the EIA Report. | Extreme emergency events in the categories of accidents with and without core melt were analysed. The calculations were conducted separately for the zone up to 30 km and beyond 30 km, which show the effect of the potential accident on potentially affected countries as transboundary impacts. The analysis methodology takes into account various weather conditions which were determined on the basis of historical data and the data collected directly in the site area as part of the meteorogical monitoring.<br><br>**<u>Transboundary Documentation</u>**<br>**In Part 6 Excerpt from Volume IV of the EIA Report:**<br>1) **Chapter IV.17** "Determining the projected environmental impact in the event of a severe accident";<br>2) **Appendix IV.17-1** "MATCH model results";<br>3) **Appendix IV.17-2** "FDMT model results".<br><br>**In Part 7 Excerpt from Volume V of the EIA Report:**<br>1) **Chapter V.4.1** "Possible transboundary radiological environmental impact";<br>2) **Appendix V.1.13-1** "Description of models used for radiological impact analyses";<br>3) **Appendix V.1.16-1** "Description of models used for radiological impact analyses under emergency conditions".<br><br>**<u>Including in the Non-Technical Summary in Part 2</u>**<br>1) **Chapter VI.4.17** "Determining the projected environmental impact in the event of a severe accident";<br>2) **Chapter VI.5.4** "Possible transboundary environmental impacts".<br><br>**<u>EIA Report</u>**<br>**In Volume IV:** |

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| **Swedish National Council for Nuclear Waste** | **14** | 7) In order to meet the requirements of the EC Directive on the environmental impact [PGE EJ 1 sp. z o.o. - Directive 2014/52/EU], as well as the Directive establishing a Community framework for the responsible and safe management of spent fuel and radioactive waste [PGE EJ 1 sp. z o.o. - Directive 2011/70/Euratom], it is necessary to prepare a detailed analysis of the potential environmental impact in relation to management of spent nuclear fuel and radioactive waste arising as a result of the operation of power plant. The Council considers that the environmental impact assessment report on the new reactor should include a proposal to address the issue of waste management and spent fuel from the reactor. This applies both to spent nuclear fuel, operational waste and waste resulting from the decommissioning of a nuclear power plant. Moreover, the report should take into account the responsibilities at the various stages of the whole process, including a description of the impact of potential releases of radioactive substances during long-distance transport. | 7) According to the explanation provided in relation to the comments of the Board of Housing, Building and Planning (Boverket), issues related to waste management outside the NPP area will be excluded from the EIA for the NPP, but will be subject to a separate assessment. This also applies to the decommissioning phase, as explained in Chapter 5.4. of the PIS. Details in this regard were provided in response to the comments of the Skåne County Administrative Board. PGE EJ 1 sp. z o.o. informs that it will comply with the suggested applicable legislation and IAEA guidelines, taking into account the appropriate approach to environmental impact assessment at the stage of the first EIA under the DEC. The impact assessment on the NPP covers issues related to waste management in the NPP area, while the management of radioactive waste and spent nuclear fuel outside the NPP site, including transport, processing and storage, will be subject to a separate EIA, as described in Chapter 5.5.3 of the PIS. The NPRWSFM is of key significance in this regard, on the basis of which future landfills of radioactive waste from the NPP will be created. The EIA Report will present the options for solutions in the field of radioactive waste and spent nuclear fuel management known at the stage of work on the report. Radioactive waste, i.e. low- and intermediate-level "operational" waste, will be subject to at least partial treatment at the nuclear power plant in special containers suitable for their transport and, if suitable for this, also storage in a national radioactive waste landfill. Finally, the waste will be directed to the final storage in the national landfill, while the NPP will also provide for the possibility of temporary storage of this waste. In contrast, spent nuclear fuel, after discharge from the reactor core, will initially be stored and cooled in a water pool located near the reactor. Further proceedings will depend on the adopted strategy of dealing with spent fuel. The NPRWSFM assumes that spent fuel will not be subject to processing - however, this plan allows for a decision on reprocessing it in the future, if it is justified. If the fuel is not subject to processing, after the storage period in the reactor pool, it will be transferred to a temporary storage facility (wet or dry) on the site of the power plant, the capacity of which will be sufficient for the entire expected life of the power plant. The spent fuel from this storage facility shall then be transferred to a deep storage site for high-level radioactive waste; domestic - which will be built in the future, or foreign - which is made possible by the provisions of Article 4 of Directive 2011/71/Euratom and Article 57 b of the Atomic Law. The detailed Polish requirements for radioactive waste management and spent nuclear fuel management are included in the Regulation on radioactive waste and spent fuel. Issues related to liability for nuclear damage are governed e.g. in Chapter 12 [Civil Liability for Nuclear Damage] of the Atomic Law and the Act of 13 April 2007 on the Prevention and Repair of Environmental Damage (consolidated text of Journal of Laws of 2014, item 1789, as amended). It should be noted that the Project does not cover the transport of nuclear fuel and radioactive waste and spent nuclear fuel. Legal conditions, including the scope of liability, will be indicated in the EIA Report. | This will be included in the EIA Report. | **<u>Transboundary Documentation</u>**<br>**In Part 4 Excerpt from Volume II of the EIA Report:**<br>1) **Chapter II.10.4** "Discharge of radioactive sewage";<br>2) **Chapter II.10.6.2** "Spent (nuclear) fuel";<br>3) **Appendix II.10.6-1** "Sources of radioactive waste and radioactive waste management during Operational phase";<br>4) **Chapter II.10.6.3** "Radioactive waste".<br>**In Part 7 Excerpt from Volume V of the EIA Report:**<br>1) **Chapter V.7.11.2** "Radioactive waste and spent nuclear fuel".<br><br>**<u>Including in the Non-Technical Summary in Part 2</u>**<br>1) **Chapter VI.2.10** "Predicted types and volumes of emissions, including waste, resulting from the implementation of the Project".<br><br>**<u>EIA Report</u>**<br>**In Volume II:**<br>1) **Chapter II.10.4** "Discharge of radioactive sewage";<br>2) **Chapter II.10.6.2** "Spent (nuclear) fuel";<br>3) **Appendix II.10.6-1** "Sources of radioactive waste and radioactive waste management during Operational phase";<br>4) **Chapter II.10.6.3** "Radioactive waste".<br>**In Volume V:**<br>1) **Chapter V.7.11.2** "Radioactive waste and spent nuclear fuel". |
| **Swedish Radiation Safety Authority** | **15** | 8.a) It is recommended to treat the programme for the development of nuclear power in Poland and the utilisation of radiation waste and spent fuel as a single whole, which will be described in the report on the impact on the environment. The EIA Report should take into account all stages of the power plant's life cycle (i.e. location, operation and demolition). | 8.a) The conditions resulting from the PNPP and the NPRWSFM and other relevant strategies, policies and plans will be presented in the EIA Report. It will also present environmental objectives relating to the NPP. All stages of the life cycle of the power plant, i.e. the development stage, implementation, commissioning, operation and decommissioning will be described in the EIA Report, while the impacts related to the last stage, i.e. decommissioning, will be (in the future - before the intended decommissioning) the subject of a separate EIA. Bearing in mind that the decommissioning of the facility will probably take place at the earliest in 70 years from the first commissioning of a nuclear power unit, it is not possible to provide sufficiently precise decommissioning technologies and procedures that could be subject to an environmental impact assessment at this stage. Nevertheless, the EIA Report will identify potential impacts related to this stage. | This will be included in the EIA Report | **<u>Transboundary Documentation</u>**<br>**In Part 4 Excerpt from Volume II of the EIA Report:**<br>1) **Chapter II.10.6.2** "Spent (nuclear) fuel";<br>2) **Appendix II.10.6-1** "Sources of radioactive waste and radioactive waste management during Operational phase";<br>3) **Chapter II.10.6.3** "Radioactive waste".<br><br>**<u>Including in the Non-Technical Summary in Part 2</u>**<br>1) **Chapter VI.2.10** "Predicted types and volumes of emissions, including waste, resulting from the implementation of the Project".<br><br>**<u>EIA Report</u>**<br>**In Volume II:** |

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| | | | | | 1) **Chapter II.10.6.2** "Spent (nuclear) fuel";<br>2) **Appendix II.10.6-1** "Sources of radioactive waste and radioactive waste management during Operational phase";<br>3) **Chapter II.10.6.3** "Radioactive waste". |
| | **16** | 8.b) Indicates that the use of the best available technology (BAT) should be demonstrated in order to minimise the risk of release of radioactive substances from the reactor not only during standard operation but also in emergency situations. The need to use the best available technology also applies to the choice of the type of reactor, taking into account the risk of release of the substance into the environment and, consequently, the exposure of residents and neighbouring countries. The Helsinki Convention makes it clear that the best available technology should be applied to the release of radioactive nuclides into the Baltic Sea. | 8.b) With regard to comment b) the intention of PGE EJ 1 sp. z o.o., which is indicated in the PNPP, is to ensure the highest level of safety of the Project, which is manifested, e.g. by the requirement to use only proven generation III/III+ nuclear reactors in Poland. Undoubtedly, issues related to nuclear safety and the release of radioactive substances into the environment will be analysed in detail and only effective and safe technologies will be considered. The obligation to use the best available technology (hereinafter referred to as "BAT") is regulated by Polish law and depends on the need to obtain an integrated permit for the Project, which results from Article 204 of the Act of 27 April 2001, Environmental Protection Law (consolidated text of Journal of Laws of 2013, item 1232, as amended; hereinafter referred to as the "EPL" Act). However, it should be borne in mind that the EIA Report will present the environmental impact characteristics for the envelope of qualified nuclear power plant technologies. However, the final selection of reactor technology for the first Polish nuclear power plant will take place on the basis of a multi-criteria analysis and evaluation. | This will be partially included in the EIA Report | **<u>Transboundary Documentation</u>**<br>**In Part 4 Excerpt from Volume II of the EIA Report:**<br>1) **Chapter II.2.1.2** "Nuclear safety concept and basic safety systems of the AP1000 reactor";<br>2) **Chapter II.3** "Comparison of the proposed technology with the best available technology (BAT)".<br><br>**<u>Including in the Non-Technical Summary in Part 2</u>**<br>1) **Chapter VI.2.3** "Comparison of the proposed solution with the best available technique (BAT)".<br><br>**<u>EIA Report</u>**<br>**In Volume II:**<br>1) **Chapter II.2.1.2.** "Nuclear safety concept and safety systems of the AP1000 reactor";<br>2) **Chapter II.3** "Comparison of the proposed technology with the best available technology (BAT)". |
| | **17** | 8.c) Points out that it is extremely important to include in the EIA Report the impact on the environment and on the inhabitants of Sweden. This applies to both standard operation and emergency situations, including events with a very low probability level ($10^{-6}$ per year). The emergency preparedness system shall also be described. | 8.c) With regard to comment c), it is in line with the PIS and the assumptions of the EIA approach and will therefore be taken into account in the work on the EIA Report. | This will be included in the EIA Report | **<u>Transboundary Documentation</u>**<br>**In Part 4 Excerpt from Volume II of the EIA Report:**<br>1) **Chapter II.11** "Hazards and severe accidents";<br>2) **Appendix II.11.3-1** "Results of the analysis of impact from extreme natural events, phenomena and conditions on NPP safety together with adaptive (preventive) measures".<br><br>**In Part 6 Excerpt from Volume IV of the EIA Report:**<br>1) **Chapter IV.14** "Impacts related to ionising radiation".<br><br>**<u>Including in the Non-Technical Summary in Part 2</u>**<br>1) **Chapter VI.2.11** "Hazards and severe accidents";<br>2) **Chapter IV.4.14** "Impact related to ionising radiation".<br><br>**<u>EIA Report</u>**<br>**In Volume II:**<br>1) **Chapter II.11** "Hazards and severe accidents";<br>2) **Appendix II.11.3-1** "Results of the analysis of impact from extreme natural events, phenomena and conditions on NPP safety together with adaptive (preventive) measures".<br>**In Volume IV:**<br>1) **Chapter IV.14** "Impacts related to ionising radiation". |

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| **Swedish NGO Office for Nuclear Waste Review (MKG)** | **18** | 10) It is unacceptable that the Project Information Sheet deliberately omits the issue of management and disposal of radioactive waste generated by a nuclear power plant. The organisation points out that the decision regarding the construction of a nuclear reactor in the country cannot be made unless it is certain that the radioactive waste generated by the reactor will be managed in accordance with the environment and in a sustainable way, in the long term. For other countries, the issue of construction of facilities for the disposal of radioactive waste has proved to be a major challenge. | 10) PGE EJ 1 sp. z o.o. does not agree with the position of the Office for Nuclear Waste Review. The conditions related to external infrastructure associated with radioactive waste management are described in Chapter 5.5.3. As indicated in the previous fragments of the letter, PGE EJ1 is not responsible for the construction of landfills and as part of the EIA Report it can only refer to variants known in this respect at the stage of work on the Report. Given that no landfill for radioactive waste originating from the NPP has been designated at this stage, in accordance with Chapter 6.4.4. of the PIS, there are plans to build a periodic fuel storage facility that will be able to accommodate spent fuel from the entire period of operation of the planned power plant, i.e. from a period of 60 years. In the company's opinion, this period is sufficient for the construction and commissioning of appropriate landfills. | This will be partially included in the EIA Report | **<u>Transboundary Documentation</u>**<br>**In Part 4 Excerpt from Volume II of the EIA Report:**<br>**1) Chapter II.10.6.2** “Spent (nuclear) fuel”;<br>**2) Appendix II.10.6-1** “Sources of radioactive waste and radioactive waste management during Operational phase”;<br>**3) Chapter II.10.6.3** “Radioactive waste”.<br><br>**<u>Including in the Non-Technical Summary in Part 2</u>**<br>**1) Chapter VI.2.10** “Predicted types and volumes of emissions, including waste, resulting from the implementation of the Project”.<br><br>**<u>EIA Report</u>**<br>**In Volume II:**<br>**1) Chapter II.10.6.2** “Spent (nuclear) fuel”;<br>**2) Appendix II.10.6-1** “Sources of radioactive waste and radioactive waste management during Operational phase”;<br>**3) Chapter II.10.6.3** “Radioactive waste”. |
| **Greenpeace** | **19** | 9.a) The participation of residents is necessary at the stage of preparing the Project Information Sheet, | 9.a) With regard to comment a), in the first place it should be noted that the issues of public participation in the procedure for issuing the DEC are strictly regulated by the EIA Act. On the other hand, the body conducting proceedings for the NPP and at the same time responsible for public participation is the General Directorate for Environmental Protection (GDOŚ).<br>In the opinion of PGE EJ 1 sp. z o.o., public participation at the scoping stage has been sufficiently ensured, taking into account the legal requirements resulting from the EIA Act (including the EIA Directive 2011/92/EU transposed into Polish law) and the IAEA guidelines, both in relation to the social side in Poland and in affected countries. This was achieved through the formal actions of the authority (e.g. the publication of a decision on the initiation of proceedings in coastal communes and a transboundary procedure) as well as activities carried out by PGE EJ 1 sp. z o.o. (meetings with local communities, educational programmes, publications, etc. described in Chapter 16 of the PIS). PGE EJ 1 sp. z o.o. would like to point out here that the key stage of public participation should be public consultations at the stage of the EIA Report, when a complete set of information on the considered options / variants will be available, supported by the results of the annual campaign of environmental research as well as analyses and modelling. This will ensure an appropriate level of discussion, while maintaining all open options and effective participation of the social side in accordance with Article 6(4) of the Aarhus Convention of 25 June 1998 on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters (Journal of Laws of 2003, no. 78, item 706) (hereinafter referred to as the "Aarhus Convention").<br>The comments made in Greenpeace's position are addressed in detail below.<br>That position refers to an excerpt from the IAEA guidelines (NG-T-3.11) Chapter 4.3.3 Stakeholder involvement in the environmental scoping report: 'In that sense, public participation in the process is recommended after the governmental organisations have provided their initial input". However, the author of the position did not refer to the further part of the Chapter, which is important for maintaining the context: "The level of public participation depends on the practices and regulations in the particular constant". In the opinion of PGE EJ 1 sp. z o.o., the General Directorate for Environmental Protection fully fulfilled the legal requirements resulting from the EIA Act and this stage was carried out in accordance with the practice of proceedings in the EIA case used in Poland. At the same time, in order to meet social expectations and bearing in mind the importance of the scoping stage, PGE EJ 1 sp. z o.o. conducted a number of consultations described in detail in Chapter 16 of the PIS, among others:<br>Nationwide level: 1. educational and information programme "Knowingly about Atom", 2. "Atom for science" programme, 3. atomic Bus, 4. provision of access to the PIS through publication on the website of PGE EJ 1 sp. z o.o.<br>Local level: 1. meetings with the local community, 2. publication entitled "Location and environmental research - questions and answers" 3. exhibition of research plans with experts on duty, 4. launch of the Local Information Point before the start of environmental research (in accordance with the Atomic Law, the Investor creates a Local Information Centre only at the stage of submitting an application for a permit to build a nuclear facility), 5. | This remark is unjustified. It does not introduce a response to the comment at the stage of the EIA Report, either. | |

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|---|---|---|---|---|---|
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| | | | educational activities (e.g. visits to the Experyment Science Centre, the Pomeranian Science and Technology Park), 6. organisation of study visits to nuclear power plants abroad, etc.<br>Public participation has therefore been ensured (as evidenced by Greenpeace's submission of its positions) also at the scoping stage to the extent corresponding to the requirements at this stage. Greenpeace's position also cites the provision of Directive EIA 2011/92/EU as amended by Directive 2014/52/EU "The public concerned shall be given early and effective opportunities to participate in the environmental decision-making procedures referred to in Article 2(2) and, to that end, shall be entitled to express comments and opinions when the competent authority or authorities have all the options before a decision is taken on the application for permit for the investment." In its position, Greenpeace suggests that only the scoping stage is the stage of the EIA where all options are open. It should be noted that the cited provision does not formally specify the moment when all options of the Project are open.<br>On the basis of the EIA Act, the General Directorate for Environmental Protection has all the tools, in accordance with EU law, under which it ensures public participation in the EIA procedure. In the opinion of PGE EJ 1 sp. z o.o., this stage of the EIA (after submitting the EIA Report) in which public participation and the transboundary procedure are guaranteed is a stage in which not only are all options still open in accordance with the aforementioned provision of the Directive, but above all a complete set of information on the considered options / variants is available, supported by the results of a minimum annual campaign of environmental research and analysis.<br>Importantly, the authority conducting the proceedings, after receiving comments and conclusions from the public, has the right to call the investor to refer to the comments and possibly analyse additional options for the implementation of the Project. This confirms the correctness of the assumption that at the EIA stage (after submitting the EIA Report) all options are open.<br>In its position, Greenpeace alleges that the participation of the Polish public at the scoping stage has not been ensured, unlike the society in countries affected under the transboundary procedure]. Taking into account the formal actions consisting in the publication of a decision (in the usual manner) on the initiation of proceedings for the issuance of a decision on DEC for the First Polish Nuclear Power Plant and making the PIS available by: 1. coastal communes, 2. the Marshal's Office of the Pomorskie Voivodeship, 3. Voivodeship Office of the Pomorskie Voivodeship, 4. the Maritime Office in Gdynia, 5. the General Directorate for Environmental Protection and informal activities carried out by PGE EJ 1 sp. z o.o., Greenpeace's allegation should be considered unfounded.<br>To sum up, in the opinion of PGE EJ 1 sp. z o.o., public participation at the scoping stage was ensured at a sufficient level through formal actions of the authority and the company, thus ensuring at least twofold participation of the Polish society and societies of the countries affected. Importantly, the scoping stage does not close the way to public participation in the procedure for issuing the DEC. At the stage of the EIA Report, a complete set of information on the considered options/variants will be available and at this stage it will be necessary to ensure public participation, providing everyone with the opportunity to submit their comments / opinions when no "decision on the application for the permit for investments" has yet been made (in accordance with Directive 2011/92/EU). | | |

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|---|---|---|---|---|---|
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| | **20** | 9.b) The explanations set out in the Sheet are unacceptable, lack key information, contain distorted data and should therefore be reassessed. | 9.b) In the opinion of PGE EJ 1 sp. z o.o., the comments in Greenpeace's position are devoid of substantive and formal and legal basis. The main remark in Greenpeace's position regarding the scope of the PIS concerns the issue of covering the decommissioning stage of the NPP and external infrastructure related to radioactive waste management and accompanying investments with separate proceeding concerning the DEC. This approach is not only in accordance with Polish law, but is also justified due to the nature of the investment, which is manifested by a very long period of operation, as well as the need to expand the national infrastructure which is the responsibility of external entities. PGE EJ 1 sp. z o.o. would like to point out that the EIA Report will present, as best as possible at a given stage, variants of radioactive waste storage. The presented nuclear safety and radiological protection requirements related to the stage of decommissioning of nuclear installations are contained in the Atomic Law (Articles 38b, 38c and 38d) and in the implementing provisions to this Act (Regulation of the Council of Ministers of 11 February 2013 on nuclear safety and radiological protection requirements for the decommissioning stage of nuclear installations and the content of the report on the decommissioning of a nuclear installation (Journal of Laws of 2013, item 270) and the Regulation on safety analyses). In particular, it is required to develop a nuclear decommissioning programme and submit it for approval to the President of the PAA together with the application for a construction permit, and to describe the aspects of the decommissioning of a nuclear installation in chapter 15 of the Preliminary Safety Analysis Report (PSAR). In addition, it is required to update the decommissioning programme of a nuclear installation in the course of its operation (at least once every five years), and to submit an updated decommissioning programme with a forecast of decommissioning costs for approval by the President of the PAA.<br>As part of the EIA, cumulative (impacts resulting from the implementation of the above projects (external infrastructure related to radioactive waste management and accompanying investments) will be thoroughly identified and assessed. For the decommissioning stage, it is not possible to provide sufficiently precise decommissioning technologies and procedures that could be subject to an environmental impact assessment at this stage. Nevertheless, after selecting the technology for the first Polish NPP - in accordance with the requirements of Polish law mentioned above - a decommissioning programme for the power plant will be developed, and a description of the concept of its decommissioning will also be presented in the PSAR - both of these documents must be submitted together with the application for permit from the President of the PAA for the construction of a nuclear power plant.<br>PGE EJ 1 sp. z o.o. would like to make it clear, however, that for external infrastructure related to waste management, for the decommissioning stage of the NPP and for associated investments (eligible for projects that may have significant impact on the environment - Regulation of the Council of Ministers of 9 November 2010 on projects which may have a significant impact on the environment (Journal of Laws of 2016, item 71) (hereinafter referred to as the "EIA Regulation") a separate EIA will be carried out taking into account cumulative impacts in relation to the NPP. As part of individual proceedings for the issuance of a DEC, public participation will also be ensured, in accordance with the provisions of the EIA Act. Therefore, there is no risk that any significant impact on the above projects will not be analysed in the investment process. | Remark unfounded | |

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|---|---|---|---|---|---|
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| | | | In its position, Greenpeace also points out that subjecting the above projects to separate EIA procedures deprives the public of the opportunity to assess the so-called "zero option". In the first place, PGE EJ 1 sp. z o.o. points out that a failure to undertake the Project does not constitute a variant of the project in accordance with Article 66(1)(4) and (5) of the EIA Act;<br>"The Environmental Impact Assessment Report should contain:<br>[...]<br>4) description of the expected environmental impact in the event of the Project is not implemented,<br>5) a description of the variants analysed, including:<br>a) variant proposed by the applicant and a reasonable alternative variant,<br>b) variant most favourable for the environment, along with reasoning for their choice."<br>To the extent related to the remark indicating the need to supplement the PIS, PGE EJ 1 sp. z o.o. informs that the PIS submitted to the General Directorate for Environmental Protection contains the information required at this stage resulting from legal conditions, including IAEA guidelines for the management of the environmental impact assessment process for nuclear power plants (IAEA Nuclear Energy Series No. NG-T-3.11 Managing Environmental Impact Assessment for Construction and Operation in New Nuclear Power Programmes, 2014), also in terms of information on possible variants of the Project, as well as the alternative options under consideration, which will be the subject of the assessment.<br>Chapter 7 of the PIS indicated the rational economically and technically feasible variants of the Project considered by the Investor. These can be site, technological or other variants.<br>The purpose of the scoping report (ESR - environmental scoping report) corresponding under the Polish law to the PIS, is to provide a package of information known at a given stage about the Project, the environment and the needs for supplementing knowledge, creating a sort of guide to the environmental impact assessment procedure, allowing for the correct and complete preparation of the EIA Report in the next stage of the EIA procedure.<br>The law (Article 66 of the EIA Act) clearly indicates that information on the justification for choosing a given variant, together with a comparison of the impact on the environment, should be included in the EIA Report.<br>For this reason, PGE EJ 1 sp. z o.o. indicates that providing a description of reasonable alternative solutions (for example related to the Project's design, technology, site, size and scale) considered by the contractor, which are relevant to the proposed Project and its characteristics, and giving reasons for choosing a given variant, together with a comparison of the environmental impact, will take place in detail in the EIA Report.<br><br>PGE EJ 1 points out that all the sites under consideration were the subject of a multi-criteria analysis assessing the technical, environmental, social and economic possibilities of locating a nuclear power plant carried out by the Company in 2011. All locations were also indicated in the governmental PNPP document being the subject of a strategic environmental impact assessment. Importantly, the so-called "zero variant", i.e. the situation in which the Project is not implemented at all, is not an obligatory element of the variant analysis referred to in Article 66(1)(5) and (6) and Article 81 of the EIA Act. It is not another variant, but only a situation in which the implementation of the Project was abandoned. Such a situation, regardless of the variant, should always be described in the report.<br>The legislator requires that the EIA Report also contains a description of the expected effects on the environment in the event the Project is not implemented. However, the "zero variant" is not an additional variant of the implementation of the Project. For each of the above projects (NPP and associated investments) the consequences of not undertaking them in accordance with the EIA Act will be presented. At the same time, the mere fact of obtaining a DEC for a NPP does not legally mean automatic consent to issue a DEC for associated investments in the event of significant impacts. For this reason, for each of the projects (NPP and associated investments), at the stage of separate proceedings on the DEC, applicants will have to take into account the fact that in the event of significant negative impacts on the environment or human health and life (taking into account the cumulative impacts from the NPP), the authority may refuse to issue a DEC or agree on an alternative variant (in a specific factual and legal situation). | | |
| | **21** | 9.c) the PIS does not provide key information on the zero variant and other variants, such as the development of renewable energy or energy efficiency | 9.c) With regard to comment c) Greenpeace refers to the Espoo Convention, the Aarhus Convention and the EU Directives with regard to the need to analyse variants taking into account other energy generation technologies. It should be noted that none of the cited legal acts, i.e. the Espoo Convention, Directive 2011/92/EU and Directive 2014/52/EU amending it, indicate that alternative variants for energy production and energy saving should be described and evaluated as part of the EIA Report.<br>According to the Espoo Convention: | At the time of responding to remarks, supplementation of the information was not declared in the EIA Report, but eventually | In the EIA Report, both the Project implementation variants and scenarios of the national energy sector development were addressed. Assumptions of national strategies, such as the Polish Nuclear Power Programme and Energy Policy of Poland until 2040 were mostly referred to. I addition to the above strategies, it was also assessed how the Project |

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| | | | "APPENDIX II CONTENT OF THE ENVIRONMENTAL IMPACT ASSESSMENT DOCUMENTATION. The information to be included in the environmental impact assessment documentation shall include, in accordance with Article 4, at least: (a) a description of the proposed activity and its purpose,<br>(b) a description, where appropriate, of reasonable alternatives (for example, locational or technological) to the proposed activity and also the no-action alternative, [...]"<br>According to Directive 2011/92/EU;<br>"Annex IV INFORMATION REFERRED TO IN ARTICLE 5(1) [...] 2. An outline of the main alternatives studied by the developer and an indication of the main reasons for this choice, taking into account the environmental effects. [...]"<br>According to Directive 2014/52/EU:<br>"Annex IV INFORMATION REFERRED TO IN ARTICLE 5(1) (INFORMATION FOR THE ENVIRONMENTAL IMPACT ASSESSMENT REPORT) [...]<br>2. A description of the reasonable alternatives (for example in terms of project design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects. [...]"<br>As can be seen from the above provisions, the EIA Report should contain a description of reasonable alternative solutions, for example related to location or technology, and the consequences of not undertaking the Project; these elements will be included in the EIA Report. The EIA Report will therefore refer to the environmental objectives under strategic documents significant from the point of view of the implementation of the Project. On the other hand, issues related to other energy generation technologies and energy efficiency will be included in those parts of the EIA Report where it will be necessary to assess the environmental impact, e.g. climate impact or adaptation to climate change.<br>With regard to the consequences of failure to implement the investment, the EIA Report, in accordance with the provision of Article 66(1)(4) of the EIA Act and the provisions of the PIS Chapter 7, will contain a description of the expected effects on the environment in the event of failure to undertake the Project. The assessment of these environmental impacts will relate to both micro and macro impacts. Failure to implement the Project will result in no changes in the environment at the local and regional level, assuming the lack of development in the analysed area of other, alternative ways of energy development, or further development of socio-economic functions in the analysed area. Referring to the assessment of environmental impacts on a macro scale, this failure to implement the Project will adversely affect the rate of reduction of greenhouse gases in Poland, which – like other member states, has been obliged to reduce them as part of the implementation of the EU climate policy.<br>In its position, Greenpeace points out that the EIA Report should carry out an EIA of individual reactor technologies in order to compare different technologies and to ensure that the relevant authorities and the investor have influence through the EIA on the selection of the most environmentally optimal technology. According to Greenpeace, the envelope nature of the Project is insufficient in this respect. In the opinion of PGE EJ 1 sp. z o.o., the remark does not take into account the procedural and investment conditions of the NPP construction process. One of the objectives of the method of selecting a technology supplier adopted by PGE EJ 1 sp. z o.o. as part of the integrated procedure is to maintain competitive and impartial access to the procedure for all technology suppliers under consideration, while at the same time being able to carry out an environmental impact assessment based on the bounding conditions envelope and the most far-reaching scenarios (see Chapter 6.4 of the PIS). If the approach referred to in Greenpeace's position is applied, it would be advisable to give preference to one technology chosen as a variant for implementation during the proceedings and in the DEC, which would expose the entire procedure to accusations from the European Commission and countries affected to a lack of competitiveness and impartiality. It should be noted that the results of the environmental studies will contribute to the integrated procedure, therefore the environmental components is also taken into account during selection of a supplier, but this choice will be made on the basis of a multi-criteria analysis and evaluation. This approach is in line with IAEA guidelines. As part of the DEC, the General Directorate for Environmental Protection has the possibility to limit the of the bounding parameters of the technical envelope, thus ensuring the implementation of the investment in a way that is safe for the environment and human health and life (regardless of the choice of the final technology). It should also be noted that the Project will be subject to a new EIA at the stage of the construction permit, during which the compliance of the selected technology with the bounding conditions envelope for which the DEC was issued will be verified. | the issue was undertaken. | supported the strategies of the European Union. Various development scenarios were also considered in the assessment of the Project impact on climate and its changes.<br><br>**<u>Transboundary Documentation</u>**<br>**In Part 1 Introduction:**<br>**1) Chapter 3** "Justification for the Project execution".<br>**In Part 3 Excerpt from Volume I of the EIA Report:**<br>**1) Chapter I.6** "Justification for the Project execution";<br>**2) Chapter I.7** "The Project in the context of strategic documents".<br><br>**<u>Including in the Non-Technical Summary in Part 2:</u>**<br>**1) Chapter VI.1.5** "VI.1.5 Justification for the implementation of the Project";<br>**2) Chapter VI.1.6** "The Project in the context of strategic documents";<br>**3) Chapter VI.2.11** "Hazards and severe accidents";<br>**4) Chapter VI.3.3.2** "Climate";<br>**5) Chapter VI.4.3** "Impact of the Project on climate, and impact of climatic factors on the Project".<br>**<u>EIA Report</u>**<br>**In Volume I:**<br>**1) Chapter I.6** "Justification for the Project execution";<br>**2) Chapter I.7** "The Project in the context of strategic documents".<br>**In Volume II:**<br>**1) Chapter II.11.3.2** "Analysis of the vulnerability of the Project to extreme events, phenomena and natural conditions, with particular focus on primary and secondary effects of climate change";<br>**2) Chapter II.11.4.3** "Risk of a natural disaster" item 2 Flood hazards – NPP site flooding and inundation. In this chapter, maximum ground elevations for both sites are presented, in determination of which the storm surge sea level has been used with probability at 1 per 10,000 years, combined with wave height and change of the sea level in the climate change perspective until 2180;<br>**3) Appendix II.11.3-1** "Results of the analysis of impact from extreme natural events, phenomena and conditions on NPP safety together with adaptive (preventive) measures".<br>**In Volume III:**<br>**1) Chapter III.3.2** "Climate";<br>**2) Appendix III.3.2.-1** "Technical note on climate change scenarios".<br>**In Volume IV:**<br>**1) Chapter IV.3** "Impact of the Project on climate, and impact of climatic factors on the Project". |

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| | **22** | 9.d) The PIS does not contain significant scenarios of emergency events that may have serious consequences on a local and regional scale, | 9.d) With regard to comment d), Chapter 10.5 of the PIS indicated that severe failures, although their probability is very small, will be recognised and assessed in the EIA Report due to the significance of possible consequences. In addition, "Identification of very unlikely events and effects that may occur as a result of such an event will be an important factor analysed as part of the work on the EIA Report".<br>The role of the PIS (or the "scoping document") is not to provide a complete set of information on potential anticipated operating events and emergency conditions of the planned power plant. The purpose of the PIS, as described in Chapter 2 of this document, is to provide a package of information known at a given stage about the Project, the environment and the needs for supplementing knowledge, creating a sort of guide to the environmental impact assessment procedure, allowing for the correct and complete preparation of the EIA Report in the next stage of the EIA.<br>In its position, Greenpeace refers to Article 6(6)(b) of the Aarhus Convention, according to which a Party shall provide the public concerned with: "(b) a description of the significant effects of the proposed activity on the environment."<br>In addition, as the main recommendation, Greenpeace pointed that the analyses should include extended design conditions that will lead to early releases of large amounts of radioactive substances in the range of several to 50 percent of iodine, caesium and strontium present in the area of the power plant, and should take into account the interactions for the simulation of real weather conditions. In addition, the analyses should indicate how the sequence of level five safety will function under the above conditions and should take into account the estimated health, economic and environmental impacts for such scenarios. As indicated in Chapter 10.5 of the PIS, the EIA Report will identify and assess severe failures with a very low probability of occurrence. Analyses and evaluations will be carried out taking into account applicable laws and international guidelines, as well as the resulting requirements for safety systems, which in practice will exclude or minimise the risk of failures, and in the event of their occurrence will allow them to be controlled and the external effects of them be limited in time and space. Such requirements - in accordance with the latest international recommendations (in particular WENRA recommendations for new reactors), standards (in particular IAEA SSR-2/1 Rev. 1) and requirements (in particular the amended Directive 2014/87/Euratom on nuclear safety) - have been implemented in Polish nuclear safety regulations - in the Atomic Law Act (in particular Chapter 4) and implementing acts (in particular in the Design Regulation). It should be pointed out that one of the essential requirements of nuclear safety is to ensure the "practical exclusion" of the sequence of serious accidents (related to the meltdown of the reactor core) that could lead to early and/or large releases of radioactive substances into the environment (see Article 36c(2) of the Atomic Law).<br>For the estimation of the radiological impact on the territory of Poland and potentially affected countries (in particular for the purposes of contingency planning), the EIA Report will present the radiological effects of a severe NPP failure, determined in accordance with the applicable Polish regulations and taking into account relevant international recommendations.<br>In its position, Greenpeace also points out that not all initiating events, including e.g. related to human activities (terrorist acts and sabotage) are considered in the probabilistic security analysis (PSA). PGE EJ 1 sp. z o.o. indicates that the scope of PSA is governed by the Regulation on safety analyses. Among the postulated initiating events, security analyses include both natural and human-related events, including terrorist acts and sabotage, with the list of considered postulated external events being defined as specific to a specific facility and site.<br>In its position, Greenpeace refers to the modelling of radioactive nuclides dispersions carried out by the University of Vienna with the postulate that they should be included in the work on the EIA Report. PGE EJ 1 sp. z o.o. will analyse these studies at the stage of work on the EIA Report. Nevertheless, dedicated modelling will be carried out in order to take into account the current conditions of the investment, the technologies under consideration, meteorological data and environmental conditions.<br>Importantly, it should be noted that Greenpeace in the presented simulations assumes unrealistic releases of radioactive substances in quantities exceeding the volume of releases even during the Chernobyl and Fukushima accidents, while assuming extremely unfavourable conditions for radioactive nuclides dispersion. In particular, the Greenpeace's opinion adopted a release of radioactive substances equivalent to 125.2 PBq Cs137, which from more than 10 times to more than 20 times (depending on the source of assessment) exceeds the total emissions from the four (4.) reactors in Fukushima and about 1.5 times the emissions in Chernobyl (see: International Journal of Radiology, Radiation Oncology and Ali Related Sciences. 2012 Sept. Table 1 [http://www.ncbi.nlm.nih.gov/pmc/articles/PMC3487052/table/bjr-85-1222-t001/]). It should be borne in mind that for the reactors of generation III/III+ considered for use in the first Polish nuclear power plant, the probability of an accident that may lead to the release of a large amount of radioactive substances, which in European | This will be included in the EIA Report | **<u>Transboundary Documentation</u>**<br>**In Part 4 Excerpt from Volume II of the EIA Report:**<br>**1) Chapter II.11.** “Hazards and severe accidents”;<br>**2) Appendix II.11.3-1** “Results of the analysis of impact from extreme natural events, phenomena and conditions on NPP safety together with adaptive (preventive) measures”.<br>**In Part 6 Excerpt from Volume IV of the EIA Report:**<br>**1) Chapter IV.14** “Impacts related to ionising radiation”.<br>**<u>Including in the Non-Technical Summary in Part 2:</u>**<br>**1) Chapter VI.2.11.** “Hazards and severe accidents”;<br>**2) Chapter IV.4.14** “Impact related to ionising radiation”.<br>**<u>EIA Report</u>**<br>**In Volume II:**<br>**1) Chapter II.11.** “Hazards and severe accidents”;<br>**2) Appendix II.11.3-1** “Results of the analysis of impact from extreme natural events, phenomena and conditions on NPP safety together with adaptive (preventive) measures”.<br>**In Volume IV:**<br>**1) Chapter IV.14** “Impacts related to ionising radiation”. |

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| | | | countries (including Scandinavia) is understood as the release of 100 TBq Cs137 due to the postulated initiating events, the following categories may be distinguished: predicted operational events, design failures, extended design conditions (complex sequences and severe failures without damaging the reactor containment) and hypothetical severe failures with damage to the original reactor containment. As indicated earlier, the EIA will analyse severe accidents determining the need for transboundary proceedings.<br>At the same time, it should be noted that Greenpeace's remark refers only to a fragment of a part of a paragraph in the PIS, without noticing a further explanation of the issue raised. | | |
| | **23** | 9. e) The PIS does not refer to all aspects of radioactive waste management as well as associated investments such as transmission lines or transformer stations. | 9 e) With regard to comment e), PGE EJ 1 sp. z o.o. indicates that issues related to external infrastructure related to waste management and associated investments will be the subject of separate procedures for issuing a DEC and EIAs carried out within their framework. PGE EJ 1 sp. z o.o. would like to make it clear, however, that for external infrastructure related to waste management, for the decommissioning stage of the NPP and for associated investments (eligible for projects that may have significant impact on the environment - EIA Regulation) a separate EIA will be carried out taking into account cumulative impacts in relation to the NPP. Therefore, there is no risk that any significant impact on the above projects will not be analysed. In its position, Greenpeace also points out that in the case of separate implementation of external infrastructure related to radioactive waste management and the decommissioning stage of the NPP after the construction of the nuclear power plant, the society is deprived of the so-called zero option (or otherwise colloquially known as the "zero variant"), which would be contrary to the Aarhus Convention 6(4) "Each Party shall provide for early public participation, when all options are open and effective public participation can take place". As shown earlier (page 71 of this position) according to Polish law, but also according to the Aarhus Convention, the "zero option" is not a variant of the implementation of the Project.<br>At the same time, it has also been shown that at the stage of the EIA Report, all options are open and public participation can be effective. | At the time of responding to remarks, the information was not declared in the EIA Report, but eventually the issue was undertaken in part. | **<u>Transboundary Documentation</u>**<br>**In Part 4 Excerpt from Volume II of the EIA Report:**<br>**1)** **Chapter II.12** "Associated infrastructure not covered in the application for the Decision on environmental conditions (in the transboundary documentation, the chapter includes solely general information and description of power connections)";<br>**2)** **Chapter II.10.6.2** "Spent (nuclear) fuel";<br>**3)** **Appendix II.10.6-1** "Sources of radioactive waste and radioactive waste management during Operational phase";<br>**4)** **Chapter II.10.6.3** "Radioactive waste".<br><br>**<u>Including in the Non-Technical Summary in Part 2:</u>**<br>**1)** **Chapter VI.2.10.** "Predicted types and volumes of emissions, including waste, resulting from the implementation of the Project";<br>**2)** **Chapter VI.2.12.** "Associated infrastructure not covered in the application for the Decision on environmental conditions."<br><br>**<u>EIA Report</u>**<br>**In Volume II:**<br>**1)** **Chapter II.12** "Associated infrastructure not covered in the application for the Decision on environmental conditions (full scope)";<br>**2)** **Chapter II.10.6.2** "Spent (nuclear) fuel";<br>**3)** **Appendix II.10.6-1** "Sources of radioactive waste and radioactive waste management during Operational phase";<br>**4)** **Chapter II.10.6.3** "Radioactive waste". |
| | **24** | 9.f) The Sheet does not sufficiently define the areas of the environment that are subject to protection. | 9.f) With regard to the remark f) indicating that the environmental areas to be protected have not been sufficiently defined, PGE EJ 1 sp. z o.o. indicates that the provisions of Council Directive 2009/147/EC of 30 November 2009 on the conservation of wild birds (OJ L 20, 26.1.2010, as amended) (hereinafter referred to as the "Birds Directive") and Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora (OJ L 206, 22.7.1992, as amended) (hereinafter referred to as the "Habitats Directive") have been transposed into Polish legislation e.g. under the Act of 16 April 2004 on Nature Protection (consolidated text of Journal of Laws of 2015, item 1651, as amended) and the EIA Act. At the same time, PGE EJ 1 sp. z o.o. indicates that the assessment impact on Natura 2000 sites will be carried out in accordance with Polish and European Union law and after conducting the necessary environmental studies, including a detailed natural inventory in the area of potential impact of the Project. | This will be included in the EIA Report | Spatial conditions regarding protected areas have been discussed at length in the EIA Report. In the transboundary report, the focus was on the assessment of the effect on marine areas, for which potential transboundary impacts were assessed.<br><br>**<u>Transboundary Documentation</u>**<br>**In Part 6 Excerpt from Volume IV of the EIA Report:**<br>**1)** **Chapter IV.1.** "Impacts on protected areas and qualifying features (land and sea)";<br>**2)** **Chapter IV.1.4** "Impacts on protected areas and features – marine environment". |

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| | | | | | **<u>Including in the Non-Technical Summary in Part 2</u>**<br>**1) Chapter VI.3.2.** "Description of natural (biotic) elements of the environment for the analysed Variants in the Project impact area (land, transitional and marine areas)";<br>**2) Chapter VI.4.1.** "Impacts on protected areas and qualifying features (land and sea)".<br><br>**<u>EIA Report</u>**<br>**In Volume III:**<br>**For the Lubiatowo-Kopalino site:**<br>**1) Chapter III.2.1.4** "Protected areas designated based on the Nature Conservation Act";<br>**2) Chapter III.2.1.5** "Protected areas designated based on the provisions of international law".<br>**For the Żarnowiec site:**<br>**1) Chapter III.2.2.4** "Protected areas designated based on the Nature Conservation Act";<br>**2) Chapter III.2.2.5** "Protected areas designated based on the provisions of international law".<br><br>**In Volume IV:**<br>**1) Chapter IV.1** "Impacts on protected areas and features (land and sea)". |
| | **25** | 9.g) It is recommended to prepare a new and more detailed Project Information Sheet. Residents should be given all opportunities to act before the Project Information Sheet becomes the basis for the final environmental impact assessment. | 9.g) With regard to remark g) indicating that it is recommended to prepare a new and more detailed PIS, in the opinion of PGE EJ 1 sp. z o.o. it was shown in this position that the PIS does not need to be changed and meets the requirements and objectives of Polish and EU law and IAEA guidelines. The aim of the PIS is to present the information known at the current stage in order to determine in the scoping process with the participation of competent authorities and stakeholders the detailed requirements as to the scope and methodology of conducting an environmental impact assessment of the First Polish Nuclear Power Plant and to present the basic assumptions of the planned investment to stakeholders. Detailed information on the Project, its impacts, planned mitigation activities, etc. will be presented in the EIA Report. | This remark is unjustified. It does not introduce a response to the comment at the stage of the EIA Report, either. | |

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| **Austria** | | | | | |
| **Federal Ministry of Agriculture, Forestry, Environment and Water Management** | **1** | 1) The conduct of the current scoping procedure does not involve the participation of the public. Of the planned four stages of the consultation, the first three turned out to be informal, "formal public consultations" are to take place only in the last stage. Even if it is not mandatory under Polish law on environmental impact assessment, it would nevertheless be advisable to include public participation in the early stages as well as in the scoping report. | 1) In the opinion of PGE EJ 1 sp. z o.o., the content of the comment is not consistent with the facts, because at the scoping stage, actions were carried out to take into account e.g. potential parties to the proceedings (having a substantive and legal interest) and the image of public opinion. In Chapter 16 of the Project Information Sheet (hereinafter referred to as the "PIS"), the issues related to social communication and public participation at various stages of the project are described in detail. With regard to the scoping stage, not only the activities already implemented in the PIS are indicated, i.e. meetings with municipal authorities, participation in meetings of the municipal councils; organisation of information meetings with residents of selected villages; preparation of information materials about the activities carried out; cooperation with local media in order to inform about the work carried out, development of dedicated articles, broadcasts, but also planned activities: development of a dedicated tab on the corporate website of the company www.pgeej1.pl; continuation of information meetings in the villages, ongoing notification of the municipal authorities about the progress of work; development of information materials, in accordance with the information needs of residents and making them available at Local Information Points, during municipal events, etc.; development of a cyclical newsletter and its distribution (printed and electronic version) to the municipal authorities; site and opinion leaders; continuation of cooperation with the media in order to inform about the status of work (press conferences, dedicated articles and broadcasts). All the elements indicated above fit into the concept of social dialogue, which includes not only obtaining public opinions in relation to the Project and information about possible social conflicts (such a role was fulfilled e.g. by meetings with municipal authorities, meetings in village councils), but also information and educational activities, allowing the public to follow the progress of work on an ongoing basis and actively participate in subsequent stages of planning of the Project. It should be noted that the activities presented above go beyond the statutory obligation to consult the public as part of the procedure for issuing a decision on environmental conditions. Realising the scale and importance of the Project for the general public, PGE EJ 1 sp. z o.o. decided to take additional actions which, due to their optional nature and the applicable legal system in Poland, are usually informal, but their results are and will be fully taken into account as part of the investment process for the Project. With regard to informing the public in potentially affected countries, the PIS documentation has been translated and sent to the relevant authorities in those countries. It should be noted that in accordance with Article 3(8) of the Convention on Environmental Impact Assessments in a Transboundary Context done at Espoo on 25 February 1991, (Journal of Laws of 1999, no. 96, item 1109 and item 1110) (hereinafter referred to as the "Espoo Convention"), the Parties concerned shall ensure that the public of the Affected Party in the areas likely to be affected is informed of the planned activities and that it is given the opportunity to express its comments or objections to the planned activity and that it is given the opportunity to communicate those comments or objections to the competent authority of the Party of origin either directly or, where appropriate, through the Party of origin.'' By providing the translated PIS to potentially affected countries, the General Director for Environmental Protection (hereinafter referred to as "GDOŚ") will therefore enable, on the one hand, the possibility of participating in the transboundary procedure and notifying the society of this Country already at the stage of scoping. It should also be noted that the Espoo Convention was transposed to the Polish legal order e.g. by guaranteeing, as part of the procedure of public participation, "everyone" (including public opinion of the affected countries) access to information and submitting comments as part of public consultations at the stage of the Environmental Impact Assessment Report (hereinafter referred to as the "EIA Report"). Therefore, equal access of public opinion in Poland and potentially affected countries has been guaranteed. | This remark is unjustified. It does not introduce a response to the comment at the stage of the EIA Report, either. | |

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| | | 2) The environmental impact assessment report should present alternatives to energy production that comply with the assumptions of the environmental impact assessment indicated in the European Union Directive on Environmental Impact Assessment or the Espoo Convention. The alternatives in the environmental impact assessment procedure concern, on the one hand, the types of reactors and site variants and, on the other hand, the different power generation technologies. Possible alternatives also include energy saving opportunities. The zero variant, in turn, is to describe the situation when the implementation of the Project does not take place at all. The scoping report does not indicate whether alternative variants for power generation and energy saving are to be presented in the environmental impact assessment report, on the basis of which a decision on the choice of the variant will then be made. | 2) In the opinion of PGE EJ1 sp. z o.o., the remark is unfounded because the analysis of alternative technologies for generating electricity in relation to nuclear energy was the subject of key national strategic documents, including: Energy Policy of Poland until 2030 - Appendix to Resolution no. 202/2009 of the Council of Ministers of 10 November 2009 on "Energy Policy of Poland until 2030", (Monitor Polski [M.P.] of 2009 no. 2 item 11) (hereinafter referred to as "PEP2030") and the Polish Nuclear Power Programme – Appendix to Resolution no. 15/2014 of the Council of Ministers of 28 January 2014 on the multi-annual programme under the name "Polish Nuclear Power Programme" (Monitor Polski [M.P.] of 2014, item 502). (hereinafter referred to as the "PNPP"). PEP2030 also includes plans to improve energy end-use efficiency and energy services, resulting from Directive 2006/32/EC of the European Parliament and of the Council of 5 April 2006 on energy end-use efficiency and energy services and repealing Council Directive 93/76/EEC (OJ L 114, of 2006, p. 64, as amended). In addition, PGE EJ 1 was established as a special purpose vehicle to carry out the investment process of the construction of the First Polish Nuclear Power Plant, not other projects. The above-mentioned documents were subjected to a strategic environmental impact assessment as part of which appropriate analyses were carried out. It should also be noted that the construction of a nuclear power plant (hereinafter referred to as the "NPP"), in accordance with the PNPP, is an essential element of the diversification of electricity generation sources - the direction of a more sustainable "energy mix", also taking into account the significant share of renewable energy sources (hereinafter referred to as "RES") and the programme of necessary modernisation of the Polish power industry. Importantly, one of the elements of the EIA Report will be the reference to the environmental objectives under strategic documents significant from the point of view of the implementation of the Project. The EIA Report, in accordance with Article 66(1)(4) of the Act of 3 October 2008 on providing access to information about the environment and its protection, participation of the public in the environmental protection and the environmental impact assessments (consolidated text of Journal of Laws of 2013, item 1235, as amended) (hereinafter referred to as the "EIA Act") and the provisions of the PIS, Chapter 7, will include the description of the predicted effects to the environment in the case the Project is not implemented. It should also be noted that none of the legal acts referred to in the opinion of the affected country, i.e. the Espoo Convention, Directive 2011/92/EU of 13 December 2011 on the assessment of the effects of certain public and private projects on the environment (OJ L 26, 2012, p. 1) (hereinafter referred to as Directive 2011/92/EU) and Directive 2014/52/EU of the European Parliament and of the Council of 16 April 2014 amending Directive 2011/92/EU on the assessment of the effects of certain public and private projects on the environment (OJ L 124, p. 1) (hereinafter referred to as Directive 2014/52/EU) does not indicate that, as part of the EIA Report, it was necessary to describe and assess the alternative variants for energy generation (from other sources). In accordance with the Espoo Convention: APPENDIX II CONTENT OF THE ENVIRONMENTAL IMPACT ASSESSMENT DOCUMENTATION — The information to be included in the environmental impact assessment documentation shall include, in accordance with Article 4, at least: (a) a description of the proposed activity and its purpose,(b) a description, where appropriate, of reasonable alternatives (for example, locational or technological) to the proposed activity and also the no-action alternative, [...]" In accordance with Directive 2011/92/EU Annex IV INFORMATION REFERRED TO IN ARTICLE 5(1) […] 2. An outline of the main alternatives studied by the developer and an indication of the main reasons for this choice, taking into account the environmental effects. [...]" In accordance with Directive 2014/52/EU ANNEX IV INFORMATION REFERRED TO IN ARTICLE 5(1) (INFORMATION FOR THE ENVIRONMENTAL IMPACT ASSESSMENT REPORT) [...] 2. A description of the reasonable alternatives (for example in terms of project design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects. [...]" As can be seen from the above provisions, the EIA Report should contain a description of reasonable alternative solutions, for example related to location or technology. The authors of the opinion of the potentially affected country based on the interpretation of the general provisions of Directive 2011/92/EU, which was amended and clarified in this respect by Directive 2014/52/EU. Bearing in mind the above, the description (and prior analysis) of the expected effects of methods of energy production based on other sources, e.g. hard coal or energy saving, different from nuclear power) does not constitute an obligatory element of the variant analysis referred to in Article 66(1)(5) and (6) and Article 81 of the EIA Act (transposing the provisions of the above-mentioned directives). This does not mean that the EIA Report for the Project will not include an analysis referring to different energy generation scenarios (e.g. in the scope of relevant analyses of scenarios regarding climate impact and adaptation to climate change). Importantly, the assessment of the environmental impacts in the case the Project is not implemented will relate to both micro and macro impacts. Failure to implement the Project will result in no changes in the environment at the local and regional level, assuming the lack of development in the analysed area of other, alternative ways of energy development, or further development of socio-economic functions in the analysed area. Referring to the assessment of environmental impacts on a macro scale, this failure to implement the Project will adversely affect the rate of reduction of greenhouse gases in Poland, which – like other member states, has been obliged to reduce them as part of the implementation of the EU climate policy. | At the time of responding to remarks, the information was not declared in the EIA Report, but eventually the issue was undertaken. | In the EIA Report, both the Project implementation variants and scenarios of the national energy sector development were addressed. Assumptions of national strategies, such as the Polish Nuclear Power Programme and Energy Policy of Poland until 2040 were mostly referred to. I addition to the above strategies, it was also assessed how the Project supported the strategies of the European Union. Various development scenarios were also considered in the assessment of the Project impact on climate and its changes, including a zero scenario without undertaking any investment activities.<br>**<u>Transboundary Documentation</u>**<br>**In Part 1 Introduction:**<br>**1) Chapter 3** "Justification for the Project execution".<br>**In Part 3 Excerpt from Volume I of the EIA Report:**<br>**1) Chapter I.6** "Justification for the Project execution";<br>**2) Chapter I.7** "The Project in the context of strategic documents".<br><br>**<u>Including in the Non-Technical Summary in Part 2:</u>**<br>**1) Chapter VI.1.5** "VI.1.5 Justification for the implementation of the Project";<br>**2) Chapter VI.1.6** "The Project in the context of strategic documents";<br>**3) Chapter VI.2.11** "Hazards and severe accidents";<br>**4) Chapter VI.3.3.2** "Climate";<br>**5) Chapter VI.4.3** "Impact of the Project on climate, and impact of climatic factors on the Project".<br>**<u>EIA Report</u>**<br>**In Volume I:**<br>**1) Chapter I.6** "Justification for the Project execution";<br>**2) Chapter I.7** "The Project in the context of strategic documents".<br>**In Volume II:**<br>**1) Chapter II.11.3.2** "Analysis of the vulnerability of the Project to extreme events, phenomena and natural conditions, with particular focus on primary and secondary effects of climate change";<br>**2) Chapter II.11.4.3** "Risk of a natural disaster" item 2 Flood hazards – NPP site flooding and inundation. In this chapter, maximum ground elevations for both sites are presented, in determination of which the storm surge sea level has been used with probability at 1 per 10,000 years, combined with wave height and change of the sea level in the climate change perspective until 2180;<br>**3) Appendix II.11.3-1** "Results of the analysis of impact from extreme natural events, phenomena and conditions on NPP safety together with adaptive (preventive) measures".<br>**In Volume III:**<br>**1) Chapter III.3.2** "Climate";<br>**2) Appendix III.3.2.-1** "Technical note on climate change scenarios".<br>**In Volume IV:**<br>**1) Chapter IV.3** "Impact of the Project on climate, and impact of climatic factors on the Project". |

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| | **3** | 3) The environmental impact report should always contain the following information so that it can be verified whether confirmation of waste disposal is available:<br>Radioactive waste:<br>• How is radioactive waste classified? What types of waste and in what quantities should be expected?<br>• How will radioactive waste be conditioned? Where are the landfills located?<br>• By when is the planned low- and intermediate-level waste (LILW) landfill to be set up, what volume is to be used, what technology will be used?<br>• Where is the final storage of low- and intermediate-level waste to take place in the future?<br>Spent nuclear fuel:<br>• What amounts of spent fuel are expected for the different types of reactors under consideration?<br>• What are the capacities of storage pools at the planned nuclear power plant? For how many years of operation are they planned?<br>• What is the timetable for the creation of a temporary spent fuel storage site and what capacity should it have? What technology will be used?<br>• What design and timetable is envisaged for the creation of a deep spent fuel storage site?<br>It would also be desirable to know whether– and if so what – alternative solutions are being considered for deep geological storage of waste in Poland.<br>In addition, the environmental report should include information on how the disposal of spent fuel and radioactive waste affects the decision to estimate the environmental impact. | 3) PGE EJ 1 sp. z o.o. points out that the words 'landfill/storage' were erroneously used in translating the comment of a potentially affected country, whereas it refers to 'storage facility/storage'. In the further part of the position, PGE EJ 1 sp. z o.o. refers to the comment, assuming that the author's intention was to refer to storage facility/storage.<br>In the opinion provided by the affected country, many different issues concerning radioactive waste and spent fuel are raised. Some of them concern the construction of radioactive waste landfills, which are not part of the Project and will be implemented in accordance with Resolution no. 195 of the Council of Ministers of 16 October 2015 on the "National Plan for Radioactive Waste and Spent Fuel Management" (Monitor Polski [M.P.] of 2015, item 1092) (hereinafter referred to as the "NPRWSFM"), which has been described in the PIS in Chapter 5.5.3. The construction of landfills will be subject to a separate environmental impact procedure.<br>In accordance with Article 48a of the Act of 29 November 2000 – the Atomic Law (consolidated text: Journal of Laws of 2014, item 1512; hereinafter referred to as the "Atomic Law") each organisational unit in which radioactive waste or spent fuel is generated is obliged to ensure the possibility of managing radioactive waste and spent nuclear fuel, including to ensure its financing from the moment of its creation until its disposal for storage, including financing of landfilling.<br>In accordance with the PIS, the EIA Report will describe the radioactive waste management system at the power plant site, including e.g. classification of radioactive waste, expected amounts of low- and intermediate-level radioactive waste, high-level radioactive waste and spent nuclear fuel, radioactive waste treatment systems, characteristics of storage facilities, etc. based on the bounding conditions envelope. These descriptions will be in accordance with the Regulation of the Council of Ministers of 14 December 2015 on radioactive waste and spent fuel (Journal of Laws of 2015, item 2267) (hereinafter: "Regulation on radioactive waste and spent fuel"). In addition, the EIA Report will present, as best as possible at a given stage, a full fuel cycle with a description of the waste storage options known at a given stage.<br>In the event of cumulative impacts, they will be subject to an appropriate assessment. It should be noted that the issue of choosing the fuel cycle is related to the choice of a specific reactor technology and the policy of the Republic of Poland in this area, the plans of which are currently included in the NPRWSFM.<br>It should be noted here that taking into account the specificity of the investment process for the construction of a nuclear power plant, both at the current stage as well as at the stage of preparation of the EIA Report, not all technical and technological solutions will be possible to specify. Therefore, the environmental impact assessment of the Project will be carried out on the basis of the bounding conditions envelope (see: Chapter 9.1. of the PIS).<br>To sum up, in the opinion of PGE EJ 1 sp. z o.o., the elements referred to in the position of the Affected Country will be mostly included in the EIA Report, which results from the provisions of the PIS, taking into account the limitations in the available knowledge at the stage of preparing the report and the fact that radioactive waste landfills are not part of the Project and PGE EJ 1 sp. z o.o. is not responsible for their implementation. Responses to selected questions can also be found in the cited NPRWSFM and the regulation on radioactive waste and spent nuclear fuel. | For the most part, the answer to the remark will be given in the EIA Report. | **<u>Transboundary Documentation</u>**<br>**In Part 1 Introduction:**<br>**1) Chapter 4 "Description of nuclear fuel cycle"**<br>**In Part 4 Excerpt from Volume II of the EIA Report:**<br>**2) Chapter II.10.4** "Discharge of radioactive sewage";<br>**3) Chapter II.10.6.2** "Spent (nuclear) fuel";<br>**4) Appendix II.10.6-1** "Sources of radioactive waste and radioactive waste management during Operational phase".<br>**5) Chapter II.10.6.3** "Radioactive waste".<br>**In Part 7 Excerpt from Volume V of the EIA Report:**<br>**1) Chapter V.7.11.2** "Radioactive waste and spent nuclear fuel".<br><br>**<u>Including in the Non-Technical Summary in Part 2</u>**<br>**1) Chapter VI.2.10** "Predicted types and volumes of emissions, including waste, resulting from the implementation of the Project".<br><br>**<u>EIA Report</u>**<br>**In Volume II:**<br>**1) Chapter II.10.6.2** "Spent (nuclear) fuel";<br>**2) Chapter II.10.6.3** "Radioactive waste";<br>**3) Appendix II.10.6-1** "Sources of radioactive waste and radioactive waste management during Operational phase";<br>**4) Chapter II.10.4** "Discharge of radioactive sewage".<br>**In Volume V:**<br>**1) Chapter V.7.11.2** "Radioactive waste and spent nuclear fuel". |
| | **4** | 4) Information on potential incidents and accidents of a planned nuclear power plant in Poland in the scoping document on the environmental impact assessment is incomplete. There is a lack of data on triggering events [PGE EJ1 - correctly "initiating"], safety requirements to be taken into account, the results of probabilistic safety analysis (PSA) including the values of radioactive materials released and the results of pollution dispersion calculations. | 4) The role of the PIS (or the "scoping document") is not to provide a complete set of detailed information on potential anticipated operating events and emergency conditions of the planned power plant. The purpose of the PIS, as described in Chapter 2 of this document, is to provide a package of information known at a given stage about the Project, the environment and the needs for supplementing knowledge, creating a sort of guide to the environmental impact assessment procedure, allowing for the correct and complete preparation of the EIA Report in the next stage of the environmental impact assessment procedure (hereinafter referred to as the "EIA"). It should also be noted that the role of the PIS is not to provide a complete set of information for probabilistic security analysis (hereinafter referred to as the "PSA"). The scope and methodology of PSA implementation is regulated by the Regulation of the Council of Ministers of 31 August 2012 on the scope and manner of conducting safety analyses carried out before applying for a permit to construct a nuclear facility (Journal of Laws of 2021, item 1043) (hereinafter referred to as the "Regulation on safety analyses"). As indicated in the PIS (see: Chapter 10.5), contingency conditions that may cause transboundary impacts, including major failures, will be fully identified and evaluated in the EIA Report, which will also present the results of modelling of dispersions of radioactive substances and doses. Severe failures will be determined in accordance with the applicable Polish legal provisions and taking into account relevant requirements and international recommendations. Importantly, Polish regulations set the highest standards of nuclear energy safety, currently adopted in the world in accordance with the latest international requirements (in particular, safety objectives for new generation reactors contained in the | This will be partially included in the EIA Report | **<u>Transboundary Documentation</u>**<br>**In Part 4 Excerpt from Volume II of the EIA Report:**<br>**1) Chapter II.11.** "Hazards and severe accidents";<br>**2) Appendix II.11.3-1** "Results of the analysis of impact from extreme natural events, phenomena and conditions on NPP safety together with adaptive (preventive) measures".<br>**In Part 6 Excerpt from Volume IV of the EIA Report:**<br>**1) Chapter IV.14** "Impacts related to ionising radiation".<br><br>**<u>Including in the Non-Technical Summary in Part 2</u>**<br>**1) Chapter VI.2.11.** "Hazards and severe accidents";<br>**2) Chapter IV.4.14** "Impact related to ionising radiation".<br><br>**<u>EIA Report</u>** |

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| | | | document of the International Atomic Energy Agency (hereinafter "IAEA") SSR-2/1 and in the WERNA statement on Safety Objectives for New Nuclear Power Plants of November 2010), also taking into account the requirements of the "EUR" document (European Utility Requirements) and the conclusions from the Accident at the Fukushima Dai-ichi nuclear power plant and from the "stress tests" of European nuclear power plants. The safety requirements contained in Polish regulations are not limited to establishing probabilistic criteria. The safety objectives for the new generation of reactors, which have been adopted in the Polish regulations, concern the practical exclusion (deterministic, through the use of appropriate design solutions) of accidents with melting of the reactor core, which could lead to early damage to the reactor containment or to very large releases of radioactive substances into the environment, and to limit the effects of failures with melting of the core, which have not been excluded, to such an extent to significantly reduce the need for intervention activities to protect the health of the population to a limited area and time. | | **In Volume II:**<br>**1) Chapter II.11.** "Hazards and severe accidents";<br>**2) Appendix II.11.3-1** "Results of the analysis of impact from extreme natural events, phenomena and conditions on NPP safety together with adaptive (preventive) measures".<br>**In Volume IV:**<br>**1) Chapter IV.14** "Impacts related to ionising radiation". |
| | **5** | 5) The Environmental Impact Assessment Report should include the presentation of potential non-design failures [PGE EJ 1 - correctly "failures more severe than those included in the extended design conditions"] regardless of the probability of their occurrence. | 5) In order to estimate the radiological impact on the territory of Poland and potentially affected countries (in particular for the purposes of contingency planning), the EIA Report will identify and assess the radiological effects of a severe NPP failure determined in accordance with the applicable regulations in this respect, including relevant international recommendations, taking into account the adopted bounding conditions envelope. It should be noted that the assessment of the impact of such events must, on the one hand, show the effects of such an accident, and on the other hand the conclusions, including the assessment of whether the impact is significant and should also take into account the probability of their occurrence in accordance with the general EIA methodology described in the PIS. | For the most part, the answer to the remark will be given in the EIA Report | **<u>Transboundary Documentation</u>**<br>**In Part 4 Excerpt from Volume II of the EIA Report:**<br>**1) Chapter II.11** "Hazards and severe accidents";<br>**2) Appendix II.11.3-1** "Results of the analysis of impact from extreme natural events, phenomena and conditions on NPP safety together with adaptive (preventive) measures".<br>**In Part 6 Excerpt from Volume IV of the EIA Report:**<br>**1) Chapter IV.14** "Impacts related to ionising radiation".<br><br>**<u>Including in the Non-Technical Summary in Part 2</u>**<br>**1) Chapter VI.2.11** "Hazards and severe accidents";<br>**2) Chapter IV.4.14** "Impact related to ionising radiation";<br>**3) Chapter VI.4.17** "Determining the projected environmental impact in the event of a severe accident".<br><br>**<u>EIA Report</u>**<br>**In Volume II:**<br>**1) Chapter II.11.** "Hazards and severe accidents";<br>**2) Appendix II.11.3-1** "Results of the analysis of impact from extreme natural events, phenomena and conditions on NPP safety together with adaptive (preventive) measures".<br>**In Volume IV:**<br>**1) Chapter IV.14** "Impacts related to ionising radiation";<br>**2) Chapter IV.17** "Determining the projected environmental impact in the event of a severe accident". |
| | **6** | 6) Consequently, the environmental impact assessment report should contain the following information in order to properly assess the potential impacts on Austria:<br>• Results of research on probabilistic safety analysis (levels 1, 2 and 3) for each potential reactor option:<br>• probability/frequency of core damage (CDF) and major failures with (early) significant releases (LRF or LERF) including probability distribution (quantiles);<br>• information on the participation of internal and | 6) Referring to the indication of the inclusion of the results in the EIA Report, PSA PGE EJ 1 sp. z o.o. informs that PSA levels 1 and 2 must be compulsorily carried out, which results from the provisions of the Polish law (PSA at level 3 is not required by Polish law). However, the scope of inclusion of PSA in the EIA will be adapted to the level of knowledge at a given stage of the investment process, to the extent that it is possible at this stage of the advancement of the investment process (supplemented at subsequent stages of the environmental impact assessment). It should be noted that nuclear power plants are one of a special type of project for which the procedure for analysis, assessment and selection of location is based on successive steps on increasingly precise scales using site evaluation criteria: exclusion, conditional and acceptance. Various factors and criteria, reflecting the characteristics of individual site variants, will be the subject of multi-criteria analyses in the subsequent stages of the environmental impact assessment. It should be noted that nuclear power plants are one of a special type of project for which the procedure for analysis, assessment and selection of location is based on successive steps on increasingly precise scales using site evaluation criteria: exclusion, conditional and acceptance. Various factors and | For the most part, the answer to the remark will be given in the EIA Report | **<u>Transboundary Documentation</u>**<br>**In Part 4 Excerpt from Volume II of the EIA Report:**<br>**1) Chapter II.11.** "Hazards and severe accidents";<br>**2) Appendix II.11.3-1** "Results of the analysis of impact from extreme natural events, phenomena and conditions on NPP safety together with adaptive (preventive) measures";<br>**In Part 6 Excerpt from Volume IV of the EIA Report:**<br>**1) Chapter IV.14** "Impacts related to ionising radiation". |

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| | | external events in relation to CDF, LRF and LERF;<br>• information on the most important accident scenarios, including accidents in spent fuel pools;<br>• a detailed presentation of the measures taken to control major accidents or mitigate their consequences;<br>• the quantity and composition of radioactive products released from a nuclear power plant for the most important categories of releases including releases from pools for the storage of spent fuel.<br>Clear and understandable presentation of the calculation of the dispersion of pollutants, as well as the determination of the radiation dose for incidents and failures:<br>• information on the methods and programmes selected for the calculation of dispersion of pollutants;<br>• information on the output parameters used in the calculation of pollutant dispersion (quantity and composition of radioactive products released, altitude and duration of release, meteorological data) and their justification;<br>• information on the results of calculations of dispersion of pollutants in the form of doses of radiation and soil contamination (in particular nuclides Cs-137 and I-131);<br>• presentation of the probability distribution of the results, and not just the calculation of average values.<br>Information on potential external impacts in a given location:<br>• results of current observations of tendencies of earthquakes, floods and extreme weather conditions;<br>• methodology for determining significant external events;<br>• a list of external events to be considered and their characteristics;<br>• information on the combinations of external events under consideration;<br>• information on the required safety margins for the design of a nuclear power plant.<br>In addition, there should be information on which international documents (IAEA, WENRA, EUR) must be used for the Project. The objectives of the Project defined in Poland (regarding CDF and LRF values, as well as maximum radiation doses) should also be given. | criteria, reflecting the characteristics of individual site variants, will be the subject of multi-criteria analyses in the subsequent stages of the environmental impact assessment. Due to the fact that the environmental impact assessment for the First Polish Nuclear Power Plant is of a staged nature, i.e. assuming an obligatory second assessment as part of the procedure for issuing the construction permit (hereinafter referred to as the re-EIA) in accordance with Article 82(1)(4a) of the EIA Act, the specification of design safety requirements at the design level (but within the framework of the first EIA completed with the issuance of the Decision on environmental conditions, hereinafter referred to as the "DEC") will take place as part of the re-EIA. Importantly, the content of the EIA Report submitted at the stage of the so-called re-EIA is specified in Article 67 of the EIA Act: "The Environmental Impact Assessment Report prepared as part of the environmental impact assessment of the project constituting part of the procedure for issuing the decisions referred to in Article 72(1)(1), (10), (16) and (18) should: 1) contain the information referred to in Article 66, determined in detail and with accuracy in accordance with the data available resulting from the construction project and other information obtained after the issuance of the decisions on environmental conditions and decisions referred to in Article 72(1)(2)-(9), (11-13) and (15-18a), if they have already been issued for a given project; 2) determine the degree and manner of taking into account the requirements for environmental protection contained in the decision on environmental conditions and decisions referred to in Article 72(1)(2)(9), (11-13) and (15-18a), if they have already been issued for a given project''. A set of design information will be available at the stage of the so-called Re-EIA, at which stage the design details resulting from the selection of the technology supplier will be verified, as well as administrative decisions, including in particular the permit for the construction of a nuclear facility with the provisions of the DEC issued for the bounding conditions envelope. To sum up, the EIA Report postponed as part of the procedure for issuing of the DEC will present the results of PSA level 1 and 2 analyses (provided by technology suppliers) relating to the genetic designs of the considered reactor technologies within the envelope. The presented data on the core damage frequency (CDF), large release frequency (LRF) and the large early release frequency (LERF) will be available for the considered NPP technologies. On the other hand, as part of the EIA Report submitted under the so-called re-EIA, the results of the PSA as part of the preliminary safety report (hereinafter "PSAR'' developed in accordance with the regulation on safety analyses) will be taken into account. Importantly, Polish regulations set the highest standards for nuclear energy safety, which was presented earlier in response to remark no. 4) from Austria. With regard to the presentation in the EIA Report the calculations of pollutant dispersion and radiation doses for the expected operating states and emergency conditions, the methodologies of the above models will be described in the EIA Report, whereby their scope, type of model and method of presenting the results will be adapted to the purpose they are to serve, i.e. to assess the impact of the effects of the expected operating states and emergency conditions on the environment, including human health and life. The EIA report submitted as part of the procedure for issuing a DEC will also contain information on potential external impacts in a given location, while it should be noted that the EIA Report is aimed at determining potential impacts and their assessment on the environment, including human health and life. A detailed analysis of the risk of accidents related to the occurrence of external events is an element of the Location Report necessary to obtain a location permit, and the scope of which was specified in the Regulation of the Council of Ministers of 10 August 2012 on the detailed scope of assessment of the area intended for the location of a nuclear facility, cases excluding the possibility of recognising the site as meeting the requirements for the location of a nuclear facility (Journal of Laws of 2012, item 1025) (hereinafter referred to as the "Location regulation"). Work on the Location Report will be carried out almost in parallel to the EIA Report, which will take into account the current results of the Location Report. With regard to the information that international documents (IAEA, WENRA, EUR) must be used for the project, PGE EJ 1 sp. z o.o. is obliged to comply with the provisions of Polish law that take into account the most important international requirements and recommendations (in particular the WENRA recommendations regarding the new NPP), the requirements (in particular: Council Directive 2009/71/Euratom of 25 June 2009 establishing a Community framework for the nuclear safety of nuclear installations, Directive 2014/87/Euratom), the IAEA safety standards (in particular SF-1 and SSR-2/1 Rev.1) and the European Utility Requirements. The relevant requirements of the Polish nuclear safety regulations will be referred to in the EIA Report, where they apply. | | **<u>Including in the Non-Technical Summary in Part 2</u>**<br>**1)** **Chapter VI.2.11.** “Hazards and severe accidents”;<br>**2)** **Chapter VI.3.3.2.** “Climate”;<br>**3)** **Chapter IV.4.14** “Impact related to ionising radiation”;<br>**4)** **Chapter VI.4.17** “Determining the projected environmental impact in the event of a severe accident”.<br><br>**<u>EIA Report</u>**<br>**In Volume II:**<br>**1)** **Chapter II.11.** “Hazards and severe accidents”;<br>**2)** **Appendix II.11.3-1** “Results of the analysis of impact from extreme natural events, phenomena and conditions on NPP safety together with adaptive (preventive) measures”.<br>**In Volume III:**<br>**1)** **Chapter III.2** “Climate”;<br>**2)** **Chapter III.3.3** “Geological structure”;<br>**3)** **Chapter III.3.6** “Surface waters (land part)”;<br>**4)** **Chapter III.3.7** “Surface waters (marine part)”.<br>**In Volume IV:**<br>**1)** **Chapter IV.14** “Impacts related to ionising radiation”;<br>**2)** **Chapter IV.16.2** “Radioactive waste and spent nuclear fuel”;<br>**3)** **Chapter IV.17** “Determining the projected environmental impact in the event of a severe accident”;<br>**4)** **Appendix IV.17-1** “MATCH model results”;<br>**5)** **Appendix IV.17-2** “FDMT model results”.<br>**In Volume V:**<br>**1)** **Chapter V.1.13** “Ionising radiation”. |
| | **7** | 7) The Environmental Impact Assessment Report should include the following issues regarding potential terrorist attacks and sabotage activities: - What requirements exist for the planned nuclear power plant in terms of protection against the possibility of deliberate | 7) The EIA Report will describe, e.g. the design requirements resulting from the provisions of Polish law, including the Atomic Law and the Regulation of the Council of Ministers of 31 August 2012 on nuclear safety requirements (Journal of Laws of 2012, item 1048) (hereinafter referred to as the Design Regulation) to the extent that the assumptions for environmental impact assessment can be presented and in the extent of details allowed by the current stage of project implementation, taking into account the assessment approach based on the most far-reaching scenario and bounding conditions envelope for the reactor technologies under consideration. Protection | This will be partially included in the EIA Report | **<u>Transboundary Documentation</u>**<br>**In Part 4 Excerpt from Volume II of the EIA Report:**<br>**1)** **Chapter II.11.3** “External events that may endanger the safety of a nuclear power plant”;<br>**2)** **Chapter II.11.3.1** “Types of external events”; |

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| | | crashing of a passenger aircraft? - Which of the reactor variants under consideration meet these requirements according to today's level of knowledge (not only according to information from the supplier, but on the basis of relevant permits issued by licencing authorities in other countries)? - What are the requirements for the planned nuclear power plant in terms of protection against the threat of cyber attacks? - Is the level of protection of a nuclear power plant and a temporary spent fuel storage site a factor that influences the choice of supplier or technology? | of nuclear power plants against a possible sabotage and terrorist attack is a task that requires the use of a number of organisational, planning and technical measures, guaranteeing adequate physical, personal and ICT protection, as well as preparing emergency scenarios and response plans in the event of possible terrorist attacks on the NPP. Importantly, Polish regulations set the highest standards for nuclear energy safety, which was presented earlier in response to remark no. 4) from Austria for the NPP regarding the impact of a large civilian aircraft. It should be noted that nuclear power plants are one of a special type of project for which the procedure for analysis, assessment and selection of location is based on successive steps on increasingly precise scales using site evaluation criteria: exclusion, conditional and acceptance. Various factors and criteria, reflecting the characteristics of individual site variants, will be the subject of multi-criteria analyses in the subsequent stages of the environmental impact assessment. Due to the fact that the environmental impact assessment for the First Polish Nuclear Power Plant is of a staged nature, i.e. assuming an obligatory re-EIA in accordance with Article 82(1)(4a) of the EIA Act, the specification of design safety requirements at the design level (but within the framework of the first EIA completed with the issuance of the DEC) will take place as part of the re-EIA. Although the EIA Report under the DEC will be prepared in the pre-design phase (planning phase - design assumptions), this report will contain a description of legal conditions and design requirements resulting from legal requirements and guidelines and recommendations, also referring to events resulting from human activity (terrorist attacks and sabotage activities) in the scope and in the extent of details reflecting the Investor's knowledge at a given stage of investment implementation and enabling the EIA to be carried out at the stage of the DEC. In accordance with Article 67(1) of the EIA Act, the EIA Report submitted at the stage of the so-called re-EIA should: "[...] 1) contain the information referred to in Article 66, determined in detail and with accuracy in accordance with the data available resulting from the construction project and other information obtained after the issuance of the decisions on environmental conditions and decisions referred to in Article 72(1)(2)-(9), (11-13) and (15-18a), if they have already been issued for a given project". A set of design information will be available at the stage of the re-EIA (to the extent taking into account the need to preserve sensitive information, in particular security systems, as confidential or secret), at which stage the design details resulting from the selection of the technology supplier will be verified, as well as other decisions, including administrative ones, including the permit for the construction of a nuclear facility with the provisions of the decision on environmental conditions issued for the bounding conditions envelope. However, due to its sensitivity, this information will be classified. This issue will be appropriately addressed in the EIA procedure. With regard to external initiating events resulting from human activities (including terrorist attacks and sabotage), they will be included in the safety analysis prepared for the nuclear facility in accordance with the Regulation on Safety Analyses. The safety analysis, in turn, is necessary to obtain a permit for the construction of a nuclear facility in accordance with Article 36d(1) and (2) of the Atomic Law "before the investor applies to the President of the National Atomic Energy Agency for nuclear facility construction permit, the investor shall carry out safety analyses in the field of nuclear safety, taking into account the technical and environmental factor, and subject them to verification, in which entities involved in the development of a nuclear facility design may not participate. Based on the results of safety analyses, the Investor develops a design for a nuclear facility. On the basis of results of safety analyses, the Investor prepares a preliminary safety analysis report and presents it to the President of the Agency along with the application for the construction permit." As can be seen from the above, the issues raised by the Austrian side will be identified in detail in the course of the investment process, including as part of individual environmental impact assessments for the Project. Due to the fact that the Project will be a key element of the state's critical infrastructure, security issues (including comprehensive protection against terrorist attacks) will be a priority in their design, construction and operation, and must be consistent with the internal security strategy for nuclear power. However, due to its sensitivity, this information will be classified. This issue will be appropriately addressed in the EIA procedure. | | 3) **Appendix II.11.3-1** "Results of the analysis of impact from extreme natural events, phenomena and conditions on NPP safety together with adaptive (preventive) measures".<br><br>**<u>Including in the Non-Technical Summary in Part 2</u>**<br>1) **Chapter VI.2.11.** "Hazards and severe accidents".<br><br>**<u>EIA Report</u>**<br>**In Volume II:**<br>1) **Chapter II.11.3** "External events that may endanger the safety of a nuclear power plant";<br>2) **Chapter II.11.3.1** "Types of external events";<br>3) **Appendix II.11.3-1** "Results of the analysis of impact from extreme natural events, phenomena and conditions on NPP safety together with adaptive (preventive) measures". |

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| | **8** | 8) As in environmental impact assessment procedures for other nuclear power plant projects, the environmental impact assessment report should consider at least the following types of reactors (generation III/III+):<br>AP 1000, EPR, AES 2006, EU-APWR, ATMEA1, APR1400.<br>The types of reactors as well as the level of safety of the proposed reactor options should be described substantively, so that the data are comparable. The environmental impact assessment report should also include more detailed data on the safety of the types of reactors under consideration in relation to the earthquake and the requirements for protection systems.<br>The description of the reactor types should contain at least the following information: technical description of the equipment, information on the current state of development (current presentation of the equipment under construction/operation, available certificates, etc.), basic data on the operation of the equipment (service life, fuel cycle, potential availability, burn-up, etc.), detailed description of the protection systems, list of design failures, detailed presentation of actions taken to control major failures or mitigating their consequences, the results of the probabilistic PSA safety analysis. The environmental impact assessment report should also decide whether the types of reactors under consideration meet European and international standards (WENRA, IAEA, EUR). In addition, the recommendations for the stress test should also be taken into account. | 8) As indicated in Chapter 6.4 of the PIS, due to the need to maintain impartiality throughout the process of the integrated procedure leading to the selection of a reactor technology supplier, the Investor may not indicate or describe in detail specific technological solutions that could indicate the preferences of specific suppliers. The EIA will therefore be carried out on the basis of the bounding conditions envelope (Chapter 9.1. of the PIS) for types of reactor technology selected as part of the multi-criteria analysis, which will meet the requirements of Polish law and relevant legal requirements and international recommendations. The EIA report will contain a description of each of the technologies considered (on this basis, the bounding conditions envelope will be developed), with the scope and level of detail being adapted to the purpose of the procedure, which is the EIA, including determination of the nature and type of impacts as well as their size and importance. The elements indicated by the Affected Party will be considered in the work on the EIA Report. It should be remembered, however, that elements related to nuclear safety, although they will be an important element of the EIA Report, will be subject to verification and regulation at a later stage of planning the Project, including in particular as part of the procedure for issuing a construction permit issued by the President of the National Atomic Energy Agency Poland (hereinafter referred to as "PAA"). At the stage of the re-EIA, as part of the procedure for issuing a construction permit, decisions, resolutions, permits, arrangements, opinions (including a construction permit issued by the President of the PAA) that were issued between the EIA issued under the EIA and the re-EIA will be taken into account. Importantly, the Polish regulations set the highest standards for the safety of nuclear power, which was referred to taking into account the answers in the response to comment 4. from Austria. They comply with the latest international requirements, recommendations and safety standards, which are listed in response to comment 6. from Austria. | At the time of responding to remarks, supplementation of the information was not declared in the EIA Report, but eventually the issue was undertaken in part. | There has been a change, because currently a reference technology is indicated in the EIA Report.<br><br>**<u>Transboundary Documentation</u>**<br>**In Part 1 Introduction:**<br>**1) Chapter 4 "Description of nuclear fuel cycle"**<br>**In Part 3 Excerpt from Volume I of the EIA Report:**<br>**1) Chapter I.6.3** "Technological aspects".<br>**In Part 4 Excerpt from Volume II of the EIA Report:**<br>**1) Chapter II.1.2** "Selection of nuclear technology";<br>**2) Chapter II.2** "Description of the NPP technology and infrastructure".<br><br>**<u>Including in the Non-Technical Summary in Part 2:</u>**<br>**1) VI.2.1** "Project description";<br>**2) VI.2.2.2** "Description of the NPP technology and infrastructure".<br><br>**<u>EIA Report</u>**<br>**In Volume II:**<br>**1) Chapter I.6.3** "Technological aspects".<br>**In Volume II:**<br>**1) Chapter II.1.2** "Selection of nuclear technology";<br>**2) Chapter II.2** "Description of the NPP technology and infrastructure". |
| | **9** | (9) The implementation of procedures for the effective management of the life cycle and ageing of facilities is essential for the long-term operation of a nuclear power plant. These processes have the effect of reducing the likelihood of anomalies and incidents and ensuring the proper condition of device components important for security and incident control. The Environmental Impact Assessment Scoping Document does not contain any opinions on the subject. Against this background, the report on the impact of the Project on the environment should contain the following information: - At what stage of the project should the basis for life cycle management and ageing of facilities be implemented? - In addition, the basis for the relevant programmes should be approximated. - It should also be presented whether, or possibly in what form, the aspects of ageing management of the facility should be | 9) Issues related to the aging management of the facility are governed by Polish law and should be part of the safety analysis in accordance with § 2(3)(4) of the Regulation on safety analyses. In accordance with the legal basis cited: "The safety analyses of a nuclear installation shall assess in particular whether: [...] 4) the design of the nuclear installation has identified long-term ageing mechanisms of the nuclear installation that may result in a reduction in its reliability, and whether they have been monitored and appropriate remedial measures have been provided". In accordance with article 36d(2) of the Atomic Law on the basis of results of safety analyses, the Investor prepares a PSAR and presents it to the President of the Agency along with the application for the construction permit. The issues of ageing of NPP systems, structures and equipment and the management of this aspect of NPP operation which is very important for nuclear safety and radiological protection will be presented - for a specific NPP technology - first in the PSAR (at the stage of the procedure for issuing a construction permit), and then described in detail in the operational safety report (at the stage of applying for an operating permit) and in the relevant operational documentation of the NPP (maintenance and repair plan, relevant diagnostic and maintenance and repair procedures). It is not planned to describe this issue in detail in the EIA Report submitted as part of the procedure for issuing the DEC, because it is both premature (the NPP technology will not be released yet) and not justified (the Polish supervisory authorities - the Office of Technical Inspection and Nuclear Supervision). The EIA Report will present the general legal and procedural conditions related to the management of the ageing of the facility as an element important for maintaining nuclear safety. | At the time of responding to remarks, supplementation of the information was not declared in the EIA Report, but eventually the issue was undertaken in part. | In the EIA Report, only general conditions related to aging of a nuclear power plant are presented. The risks associated with the process of NPP decommissioning will be identified and analysed, including the measures for mitigating them, in the Safety Report that will be developed for the decommissioning phase. They will also be included in the Decommissioning Programme of the NPP, one of the parts of which will be the Decommissioning Plan. The decommissioning plan will be developed in accordance with the IAEA recommendations, considering in particular measures applied to mitigate a number of risks, such as the risk associated with the aging of barriers preventing the spread of radioactive substances.<br><br>**<u>Transboundary Documentation</u>**<br>**In Part 4 Excerpt from Volume II of the EIA Report:**<br>**1) Chapter II.3** "Comparison of the proposed technology with the best available technology (BAT)"; |

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| | | taken into account in the process of selecting a supplier or technology, e.g. on the basis of the following criteria: - international experience in the operation of previous equipment of a given manufacturer, - evaluation of a given choice of material and processes due to their susceptibility to the effects of ageing; - assessment of a given structure due to the included reserves and the possibility of testing the implementation. The environmental impact assessment report should also explain how the compliance of safety confirmations and requirements and specifications in the area of ageing management of the facility will be ensured, always in accordance with the current state of science and technology. | | | 2) **Chapter II.11.4.5.2.2** "Prevention of a severe accident in a nuclear context" - Operational phase;<br>3) **Chapter II.11.4.5.3.2** "Prevention of a severe accident in a nuclear context" - Decommissioning phase.<br><br>**Including in the Non-Technical Summary in Part 2:**<br>1) **Chapter VI.2.3** "Comparison of the proposed solution with the best available technique (BAT)".<br><br>**EIA Report**<br>**In Volume II:**<br>1) **Chapter II.3** "Comparison of the proposed technology with the best available technology (BAT)";<br>2) **Chapter II.4.5.3.2** "Prevention of a severe accident in a nuclear context";<br>3) **Chapter II.11.4.5.2.2** "Prevention of a severe accident in a nuclear context". |
| **The Netherlands** | | | | | |
| **The Authority for Nuclear Safety and Radiation Protection (ANVS)** | **1** | 1) The Dutch side would like to pay special attention to the issue related to the analysis of the most far-reaching scenarios related to emergency states due to the potential consequences for its country, taking into account the distance between Poland and the Netherlands. | 1) This remark will be included in works on the EIA Report. For the estimation of the radiological impact on the territory of Poland and potentially affected countries (in particular for the purposes of contingency planning), the radiological effects of a severe NPP failure, determined in accordance with the applicable legal provisions and taking into account relevant international recommendations will be presented. The results of modelling the dispersion of radioactive substances and dose distributions will also be presented. Methodologies of the above models will be described in the EIA Report. | This remark will be included in the EIA Report | **Transboundary Documentation**<br>**In Part 4 Excerpt from Volume II of the EIA Report:**<br>1) **Chapter II.11.3** "External events that may endanger the safety of a nuclear power plant";<br>2) **Chapter II.11.3.1** "Types of external events";<br>3) **Appendix II.11.3-1** "Results of the analysis of impact from extreme natural events, phenomena and conditions on NPP safety together with adaptive (preventive) measures".<br>**In Part 6 Excerpt from Volume IV of the EIA Report:**<br>1) **Chapter IV.17** "Determining the projected environmental impact in the event of a severe accident";<br>2) **Appendix IV.17-1** "MATCH model results";<br>3) **Appendix IV.17-2** "FDMT model results".<br><br>**Including in the Non-Technical Summary in Part 2:**<br>1) **Chapter VI.2.11.** "Hazards and severe accidents";<br>2) **Chapter VI.4.17**"Determining the projected environmental impact in the event of a severe accident".<br><br>**EIA Report**<br>**In Volume II:**<br>1) **Chapter II.11.3** "External events that may endanger the safety of a nuclear power plant";<br>2) **Chapter II.11.3.1** "Types of external events";<br>3) **Appendix II.11.3-1** "Results of the analysis of impact from extreme natural events, phenomena and conditions on NPP safety together with adaptive (preventive) measures". |

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| **Finland** | | | | | |
| **Ministry of Environment** | **1** | 1) The EIA Report shall consider possible transboundary impact caused by severe accidents. | 1) This remark will be included in works on the EIA Report. In accordance with the provisions of Chapter 10.5 of the PIS, it is expected that the Project at the construction stage, during operational states, as well as during emergency conditions, as well as in the event of extended design conditions, will not cause impacts of greater than local or regional scope (not exceeding the borders of the country). Nevertheless, due to the need to define a contingency planning zone and the possibility of transboundary impacts, the EIA Report will present the radiological consequences of a severe NPP failure determined in accordance with Polish regulations and taking into account relevant international requirements and recommendations. | This will be included in the EIA Report | **<u>Transboundary Documentation</u>**<br>**In Part IV Excerpt from Volume II of the EIA Report:**<br>**1) Chapter II.11.3** "External events that may endanger the safety of a nuclear power plant";<br>**2) Chapter II.11.3.1** "Types of external events";<br>**3) Appendix II.11.3-1** "Results of the analysis of impact from extreme natural events, phenomena and conditions on NPP safety together with adaptive (preventive) measures".<br>**In Part VI Excerpt from Volume IV of the EIA Report:**<br>**1) Chapter IV.17** "Determining the projected environmental impact in the event of a severe accident";<br>**2) Appendix IV.17-1** "MATCH model results";<br>**3) Appendix IV.17-2** "FDMT model results".<br><br>**<u>Including in the Non-Technical Summary in Part 2:</u>**<br>**1) Chapter VI.2.11.** "Hazards and severe accidents";<br>**2) Chapter VI.4.17**"Determining the projected environmental impact in the event of a severe accident".<br><br>**<u>EIA Report</u>**<br>**In Volume II:**<br>**1) Chapter II.11.3** "External events that may endanger the safety of a nuclear power plant";<br>**2) Chapter II.11.3.1** "Types of external events";<br>**3) Appendix II.11.3-1** "Results of the analysis of impact from extreme natural events, phenomena and conditions on NPP safety together with adaptive (preventive) measures".<br>**In Volume IV:**<br>**1) Chapter IV.17** "Determining the projected environmental impact in the event of a severe accident";<br>**2) Appendix IV.17-1** "MATCH model results";<br>**3) Appendix IV.17-2** "FDMT model results". |
| | **2** | 2) The EIA report should consider the impacts on the Baltic Sea (which is a joint marine environment) both resulting from proper operation and in emergency states (e.g. emissions, impact on populations) | 2) This remark will be included in works on the EIA Report. The EIA Report will identify and assess all potential emissions and related impacts and their impact on elements of living and inanimate nature e.g. of the marine environment for the most far-reaching scenarios of the types of technologies under consideration, resulting from both operational states and emergency conditions, which is in accordance with the provisions of Chapter 15.4.2 of the PIS | This will be included in the EIA Report | **<u>Transboundary Documentation</u>**<br>**In Part 6 Excerpt from Volume IV of the EIA Report:**<br>**1) Chapter IV.1** "Impacts on protected areas and features (land and sea)";<br>**2) Chapter IV.1.4** "Impacts on protected areas and features – marine environment";<br>**3) Chapter IV.8.1** "Anticipated emissions to marine waters"; |

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| | | | | | 4) **Chapter IV.8.3** "Impact on marine surface waters";<br>5) **Chapter IV.19.4** "Marine waters".<br><br>**<u>Including in the Non-Technical Summary in Part 2:</u>**<br>1) **Chapter VI.3.2** "Description of natural (biotic) elements of the environment for the analysed Variants in the Project impact area (land, transitional and marine areas)";<br>2) **Chapter VI.4.1** "Impacts on protected areas and qualifying features (land and sea)";<br>3) **Chapter VI.4.8** "Impacts on surface waters";<br>4) **Chapter VI.4.19** "Cumulative impacts".<br><br>**<u>EIA Report</u>**<br>**In Volume III:**<br>**For the Lubiatowo-Kopalino site:**<br>1) **Chapter III.2.1.4** "Protected areas designated based on the Nature Conservation Act";<br>2) **Chapter III.2.1.5** "Protected areas designated based on the provisions of international law".<br><br>**For the Żarnowiec site:**<br>1) **Chapter III.2.2.4** "Protected areas designated based on the Nature Conservation Act";<br>2) **Chapter III.2.2.5** "Protected areas designated based on the provisions of international law".<br><br>**In Volume IV:**<br>1) **Chapter IV.1** "Impacts on protected areas and features (land and sea)";<br>2) **Chapter IV.1.4.** "Impacts on protected areas and qualifying features – marine environment";<br>3) **Chapter IV.8.1** "Anticipated emissions to marine waters";<br>4) **Chapter IV.8.3** "Impact on marine surface waters";<br>5) **Chapter IV.19** "Cumulative Impact". |
| | **3** | 3) The EIA Report should include a summary of mandatory legal regulations in Poland limiting the risk of serious accidents and their consequences. Finland requests that the above regulations be provided in English. | 3) The EIA report will contain a summary of the most important legal regulations relating to the requirements of nuclear safety and radiological protection to be taken into account by the design of the nuclear installation. The above summary, together with the entire EIA Report, will be translated into English. Due to the fact that the EIA Report will contain a complete description of the legal conditions necessary to carry out the EIA, there is no provision for a separate translation of individual laws and regulations on the basis of which the said report will be prepared. | This will be partially included in the EIA Report | There is no such detailed information in the EIA Report, it is described in the Atomic Law Act of 29 November 2000 Article 36c<br>2) Take into consideration the sequence of security levels ensuring that the occurrences of deviations from the normal operation conditions, anticipated operational occurrences, design-basis accidents and severe accidents beyond design-basis accidents are prevented, and if such deviations, occurrences or accidents cannot be prevented – that they are controlled, and that the radiological outcomes of an accident are minimised.<br>Article 36f. 2. A restricted use area established around a nuclear facility shall cover the land outside of which:<br>1) Annual effective dose for all paths of exposure does not exceed 0.3 milisiverts (mSv) when the nuclear facility operational state is normal operation or an anticipated |

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| | | | | | operational occurrence;<br>2) Annual effective dose for all paths of exposure does not exceed 10 milisiverts (mSv) in the event of an accident without core melt. |
| | **4** | 4) Finland requests that the EIA Report be provided in Finnish. | 4) Pursuant to Article 108(4) of the EIA Act, the applicant is obliged to translate the documentation referred to in Article 108(1)(3) of the EIA Act into the language of the country whose territory the Project may affect. By the decision of 22 September 2015 (file no. DOOŚ-tos. 440.8.2015.JA.dts1), the General Director for Environmental Protection, taking into account the number of potentially affected countries, as well as the extensive material requiring translation, obliged the applicant - PGE EJ 1 sp. z o.o. to translate into selected languages those parts of the EIA Report that allow countries, whose territory the planned Project may affect, to assess possible significant transboundary impact on the environment. In addition to the translation into English as the official language of the EU, the General Directorate for Environmental Protection obliged the applicant to translate documents to the extent resulting from international agreements, i.e. into German and Lithuanian. PGE EJ 1 sp. z o.o. does not provide for the translation of the EIA Report into Finnish due to the potentially high costs of such translation. Moreover, given the official and universal nature of the English language, there is no legal justification for incurring the costs of such translations and is not necessary for an effective transboundary procedure. | This remark is unjustified. It does not introduce a response to the comment at the stage of the EIA Report, either. | |
| **Denmark** | | | | | |
| **Ministry of Environment and Food.<br>Nature Agency** | **1** | 1) There is concern on Bornholm about the possible consequences of the construction and operation of a nuclear power plant for the island and the surrounding waters of the Baltic Sea due to the small distance of about 120 km. For this reason, BRK wants a thorough explanation of the impact of heated cooling water on the Baltic Sea, including an assessment of the consequences for, e.g. spawning sites and habitats of cod, herring and salmon, as well as other Baltic fauna and flora. | 1) PGE EJ 1 sp. z o.o. informs that the EIA Report will include an appropriate analysis of the impact of discharge of cooling water on the biotic components of the marine environment and inland waters, with particular emphasis on the difference in water temperatures and chemical treatment of cooling water. Thermal impacts on the terrestrial and marine environment, surface water and air need to be assessed using models of the spread of thermal contamination, the impact of which on the environment will be analysed in the EIA Report. | This will be partially included in the EIA Report | **<u>Transboundary Documentation</u>**<br>**In Part 6 Excerpt from Volume IV of the EIA Report:**<br>**1)** **Chapter IV.1** "Impacts on protected areas and features (land and sea)";<br>**2)** **Chapter IV.1.4** "Impacts on protected areas and features – marine environment";<br>**3)** **Chapter IV.2** "Impacts on natural (biotic) components";<br>**4)** **Chapter IV.2.3** "Impacts on natural (biotic) components – marine environment";<br>**5)** **Chapter IV.2.7** "Impact assessment – Sub-Variant 1A - Lubiatowo-Kopalino: open cooling system";<br>**6)** **Chapter IV.2.8** "Impact assessment – Sub-Variant 1C - Lubiatowo-Kopalino: closed cooling system using desalinated seawater";<br>**7)** **Chapter IV.2.9** "Impact assessment – Sub-Variant 1B - Lubiatowo-Kopalino: closed cooling system using seawater";<br>**8)** **Chapter IV.2.11** "Impact assessment – Sub-Variant 2A - Żarnowiec: closed cooling system";<br>**9)** **Chapter IV.2.12** "Impact assessment – Sub-Variant 2B - Żarnowiec: closed cooling system using desalinated seawater";<br>**10)** **Chapter IV.8.3** "Impact on marine surface waters". |

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| | | | | | **In Part 7 Excerpt from Volume V of the EIA Report:**<br>**1)** **Chapter V.3** "Description of anticipated mitigation activities (avoidance, prevention, reduction or offsetting)" - **subchapter V.3.1.1** "Natural environment" and **subchapter V.3.1.5** "Marine surface water";<br>**2)** **Chapter V.4** "Possible transboundary environmental impact".<br><br>**<u>Including in the Non-Technical Summary in Part 2:</u>**<br>**1)** **Chapter VI.4** "Impact assessment";<br>**2)** **Chapter VI.4.1.3** "Impacts on protected areas and objects – marine environment. Variant 1 – Lubiatowo-Kopalino site";<br>**3)** **Chapter VI.4.1.4** "Impacts on protected areas and objects – marine environment. Variant 2 – Żarnowiec site";<br>**4)** **Chapter VI.4.2** "Impacts on natural (biotic) elements";<br>**5)** **Chapter VI.4.8** "Impacts on surface waters";<br>**6)** **Chapter VI.5.3** "Description of anticipated minimising measures (avoidance, prevention, reduction or compensation)".<br>**7)** **Chapter VI.5.4** "Possible transboundary environmental impacts";<br><br>**<u>EIA Report</u>**<br>**In Volume IV:**<br>**1)** **Chapter IV.2.7** "Impact assessment – Sub-Variant 1A - Lubiatowo-Kopalino: Open cooling system";<br>**2)** **Chapter IV.2.8** "Impact assessment – Sub-Variant 1C - Lubiatowo-Kopalino: closed cooling system using desalinated seawater";<br>**3)** **Chapter IV.2.9** "Impact assessment – Sub-Variant 1B - Lubiatowo-Kopalino: closed cooling system using seawater";<br>**4)** **Chapter IV.2.11** "Impact assessment – Sub-Variant 2A - Żarnowiec: closed cooling system";<br>**5)** **Chapter IV.2.12** "Impact assessment – Sub-Variant 2B - Żarnowiec: closed cooling system using desalinated seawater";<br>**6)** **Chapter IV.8.3.1.5.4** "Effect of discharges on the ambient water temperature";<br>**7)** **Chapter IV.8.3.2.3.11** "Impacts of discharges on water temperature".<br>**In Volume V:**<br>**1)** **Chapter V.3** "Description of anticipated mitigation activities (avoidance, prevention, reduction or offsetting)" - **subchapter V.3.1.1** "Natural environment" and **subchapter V.3.1.5** "Marine surface water";<br>**2)** **Chapter V.4** "Possible transboundary environmental impact". |

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| | **2** | 2) According to the BRK (Bornholms Regionskommune), the assessment of the transboundary environmental impact of an existing material is not sufficiently profound. The consequences of the absolute worst-case scenario should be described in a broader scope and both short-term and more long-term effects should be dealt with extensively. | 2) PGE EJ 1 sp. z o.o. informs that the purpose of the scoping report (ESR - environmental scoping report) corresponding under the Polish law to the PIS, is to provide a package of information known at a given stage about the Project, the environment and the needs for supplementing knowledge, creating a sort of guide to the environmental impact assessment procedure, allowing for the correct and complete preparation of the environmental impact assessment report in the next stage of the EIA procedure. In the EIA Report, the issues of the possibilities of impacts determining the transboundary impact will be described and analysed in more detail along with the analysis of the most far-reaching scenario, which will be defined in the EIA Report. For the estimation of the radiological impact (with the highest potential range) on the territory of Poland and potentially affected countries (in particular for the purposes of contingency planning), the EIA Report will present the radiological effects of a severe NPP failure, determined in accordance with the applicable legal provisions and taking into account relevant requirements and international recommendations. | This will be included in the EIA Report | **<u>Transboundary Documentation</u>**<br>**In Part 6 Excerpt from Volume IV of the EIA Report:**<br>**1) Chapter IV.17** "Determining the projected environmental impact in the event of a severe accident";<br>**2) Appendix IV.17-1** "MATCH model results";<br>**3) Appendix IV.17-2** "FDMT model results".<br><br>**<u>Including in the Non-Technical Summary in Part 2:</u>**<br>**1) Chapter VI.4.17** "Determining the projected environmental impact in the event of a severe accident".<br><br>**<u>EIA Report</u>**<br>**In Volume IV:**<br>**1) Chapter IV.17** "Determining the projected environmental impact in the event of a severe accident";<br>**2) Appendix IV.17-1** "MATCH model results";<br>**3) Appendix IV.17-2** "FDMT model results". |
| | **3** | 3) In the event of a spill into the Baltic Sea, local contamination is certain. How radioactive substances spread in marine waters will depend on wind, weather conditions, sea currents, etc. Nevertheless, such a situation can undoubtedly have serious consequences for the plant and animal world, e.g. fish populations. The effects of contamination can therefore also affect the waters surrounding Bornholm. | 3) PGE EJ 1 sp. z o.o. informs that among the factors related to the radiological impact on the environment, the dispersion conditions of radioactive nuclides in the environment, transmitted via air or in the aquatic environment, are analysed. Possible migration routes and conditions for the deposition of radioactive nuclides in ecosystems are important. Radioactive substances released from the NPP can reach the population and contaminate the environment both directly and indirectly. Therefore, meteorological and hydrological surveys and measurements will be carried out to obtain a realistic assessment of the parameters determining dispersion (spread of pollutants), in particular in the atmosphere and waters. The EIA Report will present the radiological effects of a severe NPP failure (including the possible release of radioactive substances to sea waters), determined in accordance with the applicable legal provisions and taking into account relevant requirements and international recommendations. | This will be included in the EIA Report | **<u>Transboundary Documentation</u>**<br>**In Part 4 Excerpt from Volume II of the EIA Report**<br>**1) Chapter II.11** "Hazards and severe accidents";<br>**2) Chapter II.11.3** "External events that may endanger the safety of a nuclear power plant";<br>**3) Appendix II.11.3-1** "Results of the analysis of impact from extreme natural events, phenomena and conditions on NPP safety together with adaptive (preventive) measures";<br>**In Part 6 Excerpt from Volume IV of the EIA Report:**<br>**1) Chapter IV.17** "Determining the projected environmental impact in the event of a severe accident".<br><br>**<u>Including in the Non-Technical Summary in Part 2:</u>**<br>**1) Chapter VI.2.11** "Hazards and severe accidents";<br>**2) Chapter VI.4.17** "Determining the projected environmental impact in the event of a severe accident".<br><br>**<u>EIA Report</u>**<br>**In Volume II:**<br>**1) Chapter II.11.3** "External events that may endanger the safety of a nuclear power plant";<br>**2) Appendix II.11.3-1** "Results of the analysis of impact from extreme natural events, phenomena and conditions on NPP safety together with adaptive (preventive) measures".<br>**In Volume IV:**<br>**1) Chapter IV.17 "Determining the projected environmental impact in the event of a severe accident".** |

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| | **4** | 4) It is also important to estimate the consequences for example for tourism, fisheries, agriculture, settlement, etc., in a situation where a minor accident would cause even short-term restrictions in relatively large areas. The socio-economic impact on an island like Bornholm could be significant, as uncertainty about its status as a safe holiday destination and the safety of the food produced here could persist among tourists and consumers for a long time after the real threat has disappeared. We therefore want the EIA programme to include simulations of the assessment of the consequences of the worst-case scenario materialising in terms of the issue described above. | 4) PGE EJ 1 sp. z o.o. informs that the EIA Report will also contain an analysis of socio-economic determinants and an analysis of the socio-economic situation along with a forecast of changes related to the implementation of the planned Project. | This will be included in the EIA Report | **<u>Transboundary Documentation</u>**<br>**In Part 6 Excerpt from Volume IV of the EIA Report:**<br>**1) Chapter IV.17** “Determining the projected environmental impact in the event of a severe accident”;<br>**2) Appendix IV.17-1** “MATCH model results”;<br>**3) Appendix IV.17-2** “FDMT model results”.<br><br>**<u>Including in the Non-Technical Summary in Part 2:</u>**<br>**1) Chapter VI.4.17** “Determining the projected environmental impact in the event of a severe accident”.<br><br>**<u>EIA Report</u>**<br>**In Volume IV:**<br>**1) Chapter IV.17** “Determining the projected environmental impact in the event of a severe accident”;<br>**2) Appendix IV.17-1** “MATCH model results”;<br>**3) Appendix IV.17-2** “FDMT model results”. |
| **Lithuania** | | | | | |
| **Ministry of Environment of the Republic of Lithuania** | **1** | 1) The report on the assessment of the impact of planned activities on the environment (hereinafter referred to as PAV) should state how spent fuel is intended to be handled, i.e. whether the spent fuel will be processed (closed fuel cycle strategy) or stored unprocessed in a deep-sea storage landfill (open fuel cycle strategy). | 1) PGE EJ 1 sp. z o.o. informs that the EIA Report will include an appropriate analysis regarding the management of nuclear fuel and the management of radioactive waste and spent nuclear fuel. PGE EJ 1 sp. z o.o. indicates the provision of Chapter 6 of the PIS, which states that "The EIA Report will describe in detail and assess the system of radioactive waste management at the power plant in terms of impacts on the environment and human health. Further management of spent fuel will be in accordance with the currently proceeded National Plan for Radioactive Waste and Spent Fuel Management (NPRWSFM)".<br>PGE EJ 1 sp. z o.o. therefore maintains its position and indicates that the EIA Report, submitted under the procedure for issuing the DEC, will describe in detail and assess the system of radioactive waste and spent nuclear fuel management at the power plant in terms of impacts on the environment and human health. At the same time, the EIA Report will refer to the environmental objectives resulting from the strategic documents, e.g. the NPRWSFM (this document has already been adopted by Resolution no. 195 of the Council of Ministers of 16 October 2015 on the "National Plan for Radioactive Waste and Spent Fuel Management" (Monitor Polski [M.P.] of 2015, item 1092). | This will be included in the EIA Report | Conditions governing the collection of radioactive waste, the manner of its preparation and securing will be defined in detail and determined in a bilateral agreement with an operator responsible for the collection of waste and spent nuclear fuel. Further conduct, depending on the option selected for the final disposal of spent nuclear fuel or high level radioactive waste from the fuel reprocessing, will be set out during further analyses and upon the construction of a deep radioactive waste repository. A plan for Poland related to handling radioactive waste and spent nuclear fuel was determined for the years 2020-2050 in the “National Plan of Management of Radioactive Waste and Spent Nuclear Fuel”. The decision whether the fuel cycle will be open or closed will be made at a later stage of operation.<br><br>**<u>Transboundary Documentation</u>**<br>**In Part 4 Excerpt from Volume II of the EIA Report:**<br>**1) Chapter II.10.6.2** “Spent (nuclear) fuel”;<br>**2) Chapter II.10.6.3** “Radioactive waste”;<br>**3) Appendix II.10.6-1** “Sources of radioactive waste and radioactive waste management during Operational phase”.<br>**In Part 7 Excerpt from Volume V of the EIA Report:**<br>**1) Chapter V.7.11.2** “Radioactive waste and spent nuclear fuel”.<br><br>**<u>Including in the Non-Technical Summary in Part 2</u>**<br>**1) Chapter VI.2.10** “Predicted types and volumes of emissions, including waste, resulting from the implementation of the Project”. |

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| | | | | | **<u>EIA Report</u>**<br>**In Volume II:**<br>**1) Chapter II.10.6.2** "Spent (nuclear) fuel";<br>**2) Chapter II.10.6.3** "Radioactive waste";<br>**3) Appendix II.10.6-1** "Sources of radioactive waste and radioactive waste management during Operational phase". |
| | **2** | 2) We propose that the PAV report should state how radioactive waste will be processed and additionally examine the environmental impact of radioactive waste processing at the nuclear power plant. | 2) PGE EJ 1 sp. z o.o. therefore maintains its position and indicates that the EIA Report, submitted under the procedure for issuing the DEC, will describe in detail and assess the system of radioactive waste and spent nuclear fuel management at the power plant in terms of impacts on the environment and human health. At the same time, given the above, the EIA Report will refer to the environmental objectives resulting from the strategic documents, e.g. the NPRWSFM. Moreover, when comparing the variants, the environmental impact of management of radioactive waste and spent nuclear fuel and the use of the technologies or substances concerned will be taken into account. | This will be included in the EIA Report | It should be mentioned that low and intermediate level waste will be transported by the NPP on an on-going basis to the entity responsible for the collection of radioactive waste in Poland (ZUOP). Conditions governing the collection of radioactive waste, the manner of its preparation and securing will be defined in detail and determined in a bilateral agreement. Further conduct, depending on the option selected for the final disposal of spent nuclear fuel or high level radioactive waste from the fuel reprocessing, will be set out during further analyses and upon the construction of a deep radioactive waste repository. At present, Poland does not plan a long-distance transport. Low and intermediate level radioactive waste will be provided to ZUOP under an agreement concluded, while the spent nuclear fuel will be stored at the NPP site.<br><br>**<u>Transboundary Documentation</u>**<br>**In Part 4 Excerpt from Volume II of the EIA Report:**<br>**1) Chapter II.10.6.2** "Spent (nuclear) fuel";<br>**2) Chapter II.10.6.3** "Radioactive waste";<br>**3) Appendix II.10.6-1** "Sources of radioactive waste and radioactive waste management during Operational phase".<br><br>**<u>Including in the Non-Technical Summary in Part 2</u>**<br>**1) Chapter VI.2.10** "Predicted types and volumes of emissions, including waste, resulting from the implementation of the Project";<br>**2) Chapter VI.4.14** "Impact related to ionising radiation".<br><br>**<u>EIA Report</u>**<br>**In Volume II:**<br>**1) Chapter II.10.6.3** "Radioactive waste".<br>**In Volume IV:**<br>**1) Chapter IV.16.2** "Radioactive waste and spent nuclear fuel";<br>**2) Appendix II.10.6-1** "Sources of radioactive waste and radioactive waste management during Operational phase". |
| | **3** | 3) Chapter 6.4.4 of the information document does not specify the amount of high-level waste. We propose to clarify this information. | 3) In the first place, PGE EJ 1 sp. z o.o. indicates that information on radioactive waste management, including information on spent nuclear fuel, is included in Chapter 5.5.3. of the PIS. It should be noted that spent nuclear fuel accounts for the majority of high-level radioactive waste. Due to the early stage of the investment and the general nature of the PIS, PGE EJ 1 sp. z o.o. does not consider it justified to specify the amount of high-level radioactive waste that is not spent nuclear fuel in the PIS. Specification of the amount of low- and intermediate-level waste and high-level radioactive waste (including spent nuclear fuel) will take place in the EIA Report. | This will be included in the EIA Report | **<u>Transboundary Documentation</u>**<br>**In Part 4 Excerpt from Volume II of the EIA Report:**<br>**1) Chapter II.10.6** "Radioactive waste and spent (nuclear) fuel";<br>**2) Chapter II.10.6.2** "Spent (nuclear) fuel";<br>**3) Chapter II.10.6.3** "Radioactive waste".<br><br>**<u>Including in the Non-Technical Summary in Part 2</u>** |

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| | | | | | 1) **Chapter VI.2.10** "Predicted types and volumes of emissions, including waste, resulting from the implementation of the Project";<br>2) **Chapter VI.4.14** "Impact related to ionising radiation".<br><br>**EIA Report**<br>**In Volume II:**<br>1) **Chapter II.10.6.2** "Spent (nuclear) fuel";<br>2) **Chapter II.10.6.3** "Radioactive waste". |
| | **4** | 4) To provide information about the generation of waste, we suggest using the Classification of Radioactive Waste (IAEA Safety Standards series No GSG-1, 2009) recommended by TATENA. Otherwise, a national classification system for radioactive waste would have to be provided. | 4) PGE EJ 1 sp. z o.o. indicates that the EIA Report will use the classification of waste in accordance with the Regulation on radioactive waste and spent fuel, while the reference of the Polish classification system to the IAEA classification will also be presented. 2009 - Classification of radioactive waste. General Safety Guide. IAEA Safety Standards for protecting people and the environment, GSG-1: 1-52 | This will be included in the EIA Report | **Transboundary Documentation**<br>**In Part 4 Excerpt from Volume II of the EIA Report:**<br>1) **Chapter II.10.6** "Radioactive waste and spent (nuclear) fuel".<br><br>**Including in the Non-Technical Summary in Part 2**<br>1) **Chapter VI.2.10** "Predicted types and volumes of emissions, including waste, resulting from the implementation of the Project".<br><br>**EIA Report**<br>In Volume II:<br>1) **Chapter II.10.6.1** "Classification of radioactive waste in Poland";<br>2) **Chapter II.10.6.3** "Radioactive waste". |
| | **5** | 5) Chapter 6 of the information document "Description of the project" states that the project of the nuclear power plant will be implemented on three possible sites: Żarnowiec, Choczewo and Lubiatowo-Kopalino. The document "Strategic Environmental Assessment Report for the Polish NPP" provided by Polish specialists in 2011, describes in detail the possible construction sites of a nuclear power plant. In the above document, the ranking of sites was given: the construction site in Żarnowiec was rated the highest, the construction sites in Choczewo and Lubiatowo-Kopalino received an average rating. It is not clear why such alternatives were chosen. We propose to supplement the information document with information on the motives for the selection of construction sites, and to provide in the EIA report an analysis of alternative places specified in the information document. | 5) PGE EJ 1 sp. z o.o. informs that the PIS contains the information required at this stage resulting from legal conditions, including IAEA guidelines for the management of the environmental impact assessment process for nuclear power plants (IAEA guidelines Nuclear Energy Series No. NG-T-3.11 Managing Environmental Impact Assessment for Construction and Operation in New Nuclear Power Programmes, 2014), also in terms of information on possible variants of the Project, as well as the alternative options under consideration, which will be the subject of the assessment. Chapter 7 of the PIS indicated the rational (economically and technically feasible) variants of the Project considered by the Investor. These can be site, technological or other variants. Taking into account legal and methodological conditions, it is not necessary to include in the PIS information relating in detail to the selection criteria. The purpose of the scoping report (ESR - environmental scoping report) corresponding under the Polish law to the PIS, is to provide a package of information known at a given stage about the Project, the environment and the needs for supplementing knowledge, creating a sort of guide to the environmental impact assessment procedure, allowing for the correct and complete preparation of the EIA Report in the next stage of the EIA procedure. The law (Article 66 of the EIA Act) clearly indicates that information on the justification for choosing a given variant, together with a comparison of the impact on the environment, should be included in the EIA Report. For this reason, PGE EJ 1 sp. z o.o. indicates that providing a description of reasonable alternative solutions (for example related to the Project's design, technology, site, size and scale) considered by the contractor, which are relevant to the proposed Project and its characteristics, and giving main reasons for choosing a given variant, together with a comparison of the environmental impact, will take place in detail in the EIA Report. PGE EJ 1 points out that all the sites under consideration were the subject of a multi-criteria analysis assessing the technical, environmental, social and economic possibilities of locating a nuclear power plant carried out by PGE EJ 1 sp. z o.o. in 2011. Therefore, all locations were also indicated in the governmental PNPP document being the subject of a strategic environmental impact assessment. In addition, according to the IAEA guidelines Nuclear Energy Series no. NG-T-3.11 Managing Environmental Impact Assessment for Construction and Operation in New Nuclear Power Programmes, 2014: "4.3.2.4. In many cases, during the period of preparation of the ESR Report or the EIA Report, neither the supplier of the nuclear power plant technology, nor the size of the power plant, nor even its location will yet be decided. However, the environmental assessment process may be continued using the PPE principle described in Chapter 2.4." "2.4. In order to address the specific issue of uncertainty related to the final form of the power plant technology, especially since the technology supplier may not yet be determined at the time of preparation of the EIA Report, the concept of plant parameter envelope (PPE) has been constructed. In the concept of the limit parameters of the plant, all the technologies considered are taken into account and in each | This will be included in the EIA Report | **Transboundary Documentation**<br>**In Part 3 Excerpt from Volume I of the EIA Report:**<br>1) **Chapter I.9** "Project variants under consideration".<br>**In Part 7 Excerpt from Volume V of the EIA Report:**<br>1) **Chapter V.2** "Selection of the variant proposed by the Investor, rational variant most favorable for the environment, and rational alternative variant, together with reasons for their selection".<br><br>**Including in the Non-Technical Summary in Part 2**<br>1) **Chapter VI.1.8** "Considered Project variants";<br>2) **Chapter VI.5.2** "Selection of the variant proposed by the Investor, rational variant most favorable for the environment, and rational alternative variant, along with reasoning for their selection"<br><br>**EIA Report**<br>**In Volume I:**<br>1) **Chapter I.9** "Project variants under consideration".<br><br>**In Volume V:**<br>1) **Chapter V.2** "Selection of the variant proposed by the Investor, rational variant most favorable for the environment, and rational alternative variant, together with reasons for their selection".<br>2) **Appendix V.2-1** "Selection of the variant proposed by the Investor, rational variant most favorable for the environment, and rational |

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| | | | technology a value is assigned to specific aspects that are associated with the potential impact on the environment. The PPE method for the plants (technologies) under consideration includes relevant physical and chemical parameters that may affect the environment (e.g. water environment requirements, land use or emissions) and identifies those parameters that involve the greatest impact or the greatest range of impacts in each aspect. These "maximum parameters" are included in the limit parameters of the plant and are then used for analysis in the EIA process." In the present case, the PIS contains information about the adoption of the above-mentioned concept of limit parameters of the plant (see Chapter 6.1. of the PIS). The project for which the PIS was carried out and which is covered by the application for a decision on environmental conditions, consists in the construction and operation of a nuclear power plant with a capacity of up to 3,750 MWe. The project will be implemented in the area of the communes of Choczewo, or Gniewino and Krokowa in the Pomorskie Voivodeship, in one of two specific site variants ("Żarnowiec" or "Lubiatowo-Kopalino") selected at the stage of the environmental impact assessment and confirmed at the stage of the decision to determine the site of the nuclear facility. At this stage, each of the considered sites presented above is treated equally by the Investor. The variant selected for implementation will be indicated during the procedure for environmental impact assessment of the Project. The Investor, after completing the analysis of environmental conditions, including the type and scale of the Project's impact on the environment (including health and living conditions of people) in the sites under consideration and technological variants, as well as after taking into account technical, economic and organisational conditions, will indicate the option selected for implementation in the EIA Report. The remaining sites currently under consideration may be presented in the EIA Report as alternative options, provided that the environmental impact assessment carried out confirms their rationality and therefore technical, economic, environmental and legal feasibility. At this stage, the Investor may not indicate or describe in detail specific technological solutions that could indicate the preferences of specific suppliers. Therefore, individual technologies will not be treated as technological variants, out of which, at the stage of the EIA Report, the Investor would have to indicate the option chosen for implementation and alternative variants, but as a set of technologies taken into account, on the basis of which the bounding conditions envelope was created. The envelope, describing the parameters of the most far-reaching technological scenarios, i.e. those that may cause the greatest impact on individual elements of the environment, will be the subject of an environmental impact assessment. The conclusions of the assessment will indicate the thresholds of environmental sensitivity to particular types of impacts and on their basis determine the permissible individual parameters and/or emissions and disturbances that the planned Project may cause in the assessed sites. | | alternative variant, along with reasoning for their selection”. |
| | **6** | 6) We propose to provide information in the EIA Report on the selection and analysis of the reactor technology of the nuclear power plant, on the impact of the nuclear power plant under normal operating conditions, in the event of design failures and severe accidents and their possible transboundary impact. | 6) PGE EJ 1 sp. z o.o. informs that the EIA Report will include an analysis of the impact of the considered set of all technologies considered by the investor at a given stage on the environment, based on the assessment of the environmental impact of the most far-reaching scenarios of potential impacts. Neither at the current stage, nor at the stage of the EIA Report, the Investor may indicate or describe in detail a specific technology, as it will be selected in the integrated procedure referred to in Chapter 6.4 of the PIS, after obtaining the DEC. Therefore, individual nuclear technologies will not be treated as technological variants, out of which, at the stage of the EIA Report, i.e. before the resolution of the integrated procedure, the Investor would have to indicate the option chosen for implementation and alternative variants, but as a set of technologies taken into account, on the basis of which the bounding conditions envelope was created. The envelope, describing the parameters of the most far-reaching technological scenarios, i.e. those that may cause the greatest impact on individual elements of the environment, will be the subject of an environmental impact assessment. The conclusions of the assessment will indicate the thresholds of environmental sensitivity to particular types of impacts and on their basis determine the permissible individual parameters and/or emissions and disturbances that the planned Project may cause in the assessed sites. The EIA Report will perform an analysis under normal operating conditions, in cases of design failures and severe failures and their possible transboundary impact. | This will be included in the EIA Report | **<u>Transboundary Documentation</u>**<br>**In Part 4 Excerpt from Volume II of the EIA Report:**<br>**1) Chapter II.11** “Hazards and severe accidents”;<br>**2) Appendix II.11.3-1** “Results of the analysis of impact from extreme natural events, phenomena and conditions on NPP safety together with adaptive (preventive) measures”.<br>**In Part 6 Excerpt from Volume IV of the EIA Report:**<br>**1) Chapter IV.14** “Impact related to ionising radiation”.<br>**<u>Including in the Non-Technical Summary in Part 2</u>**<br>**1) Chapter VI.2.11** “Hazards and severe accidents”;<br>**2) Chapter VI.4.14** “Impact related to ionising radiation”.<br><br>**<u>EIA Report</u>**<br>**In Volume II:**<br>**1) Chapter II.11** “Hazards and severe accidents”;<br>**2) Appendix II.11.3-1** “Results of the analysis of impact from extreme natural events, phenomena and conditions on NPP safety together with adaptive (preventive) measures”.<br>**In Volume IV:**<br>**1) Chapter IV.14** “Impact related to ionising radiation”. |

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| **Germany** | | | | | |
| **Minister for the Interior and Sport of Mecklenburg-Vorpommern** | **1** | 1) The impact of a radiological event at a landfill site (a landfill for fuel elements and a landfill for low- and intermediate-level radioactive waste) should be assessed, taking into account a plane crash and possible terrorist attacks. | 1) PGE EJ 1 sp. z o.o. informs that the issue concerns the construction of radioactive waste landfills, which are not part of the Project and will be implemented in accordance with the NPRWSFM, as described in the PIS in Chapter 5.5.3. For this reason, the construction of landfills will be subject to a separate procedure for obtaining the DEC and the environmental impact assessment carried out as part of it. As part of a separate procedure, appropriate analyses of radiological incidents at landfill sites will be carried out. The main limitation at this stage is the lack of information on the external elements of the radioactive waste and spent fuel management system from the NPP, including e.g. location and characteristics of the new radioactive waste surface storage site and the deep radioactive waste landfill (in accordance with the NPRWSFM). As part of the EIA Report, PGE EJ 1 sp. z o.o. will describe in as many details as possible at a given stage, the principles of handling low- and intermediate-level radioactive waste, high-level radioactive waste and spent nuclear fuel, along with a description of the variants for storage and landfilling known at a given stage. In the event of cumulative impacts, they will be subject to an appropriate assessment. The EIA Report will describe and assess the system of radioactive waste and spent fuel management at the power plant in terms of impacts on the environment and human health. Polish regulations require (§33 of the Design Regulation) that in the event of impact of a large civil aircraft, the integrity of the spent fuel pool in a nuclear power plant be maintained. In addition, the regulations require that when assessing the site for a nuclear facility, including a spent fuel storage, the potential risks of air disasters are assessed (§2 (5a) of the Location Regulation). | At the time of responding to remarks, supplementation of the information was not declared in the EIA Report, but eventually the issue was undertaken in part. - explanation without the assessment of impact on the radioactive waste repository | In the procedure in question, regarding the issuance of the environmental decision for the NPP, the repository for radioactive waste and spent nuclear fuel is not considered because a separate procedure will be carried out for that investment to be decided by the Government of the Republic of Poland; the NPP Operator will not be responsible for the radioactive waste repository.<br>The conduct in the event of a terrorist attack will be taken into account in the On-Site Emergency Plan.<br>The hazards arising from storing low, intermediate and high level radioactive waste (spent nuclear fuel) in temporary storage facilities are considered in the hazard estimation in the EIA Report - effects of the hazard arising from a terrorist attack will not have a greater extent than those previously described and estimated in the EIA Report.<br>The EIA Report addresses issues concerning the impact of the nuclear power plant in question on the environment, while impacts external to the nuclear power plant are not analysed (it only refers to climate changes, and adaptation of the NPP facilities to changes). The issues that are of interest for the German Party will be discussed at length in the Site Evaluation Report, where the security of the nuclear facility to external factors will be analysed, including the risk of a terrorist attack at the nuclear installation.<br><br>**<u>Transboundary Documentation</u>**<br>**In Part 4 Excerpt from Volume II of the EIA Report**<br>**1)** **Chapter II.11.3.3** “Description of selected human-induced hazards”;<br>**2)** **Chapter II.11.3.4** “Combinations of external events”.<br><br>**<u>Including in the Non-Technical Summary in Part 2</u>**<br>**1)** **Chapter VI.2.11.1** “External events that may endanger the safety of a nuclear power plant”.<br><br>**<u>EIA Report</u>**<br>In **Volume II**, some part of the issue was taken into account:<br>**1)** **Chapter II.11.3.3** “Description of selected human-induced hazards”;<br>**2)** **Chapter II.11.3.4** “Combinations of external events”;<br>**3)** **Chapter VI.2.11.1** “External events that may endanger the safety of a nuclear power plant”. |

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| | **2** | 2) The impact of terrorist attacks on reactor installations and how should their impact on protected goods be assessed? You suggest radiological environmental impact based on the maximum design failures, which does not imply what maximum design failures are taken into account. I would also ask you to take into account the possible consequences of terrorist activities with the deliberate downfall of a liner aircraft. In the assessment of the Chernobyl and Fukushima disasters, the results of "load tests" should also be taken into account. From this point of view, the assessment of the impact on the environmental and protected goods is hampered by the lack of a decision on a specific technology for a nuclear power plant. | 2) PGE EJ 1 sp. z o.o. informs that protection of nuclear power plants against a possible terrorist attack and its impact on protected goods is a task whose fulfilment results from the applicable law and will be the subject of safety analyses assessed by nuclear supervision. The issuance of a permit for the construction of a nuclear power plant requires the submission of an appropriate draft of the physical protection system.<br>It should be noted that nuclear power plants are one of a special type of project for which the procedure for analysis, assessment and selection of location is based on successive steps on increasingly precise scales using site evaluation criteria: exclusion, conditional and acceptance. Various factors and criteria, reflecting the characteristics of individual site variants, will be the subject of multi-criteria analyses in the subsequent stages of the environmental impact assessment.<br>Due to the fact that the environmental impact assessment for the Project is of a staged nature, i.e. assuming an obligatory re-EIA in accordance with Article 82(1)(4a) of the EIA Act, the specification of design safety requirements at the design level (but within the framework of the first EIA completed with the issuance of the DEC) will take place as part of the re-EIA.<br>Although the EIA Report under the DEC will be prepared in the pre-design phase (planning phase - design assumptions), this report will contain a description of legal conditions and design requirements, also referring to events resulting from human activity in the scope and in the extent of details reflecting the Investor's knowledge at a given stage of investment implementation and enabling the EIA to be carried out at the stage of the DEC.<br>However, a set of information will be available at the stage of the Re-EIA, at which stage the design details resulting from the selection of the technology supplier will be verified, as well as other administrative decisions (especially in terms of environmental protection), including in particular the permit for the construction of a nuclear facility with the provisions of the DEC for the bounding conditions envelope.<br>Importantly, the content of the EIA Report submitted at the stage of the re-EIA is specified in Article 67 of the EIA Act, in accordance with which: "The Environmental Impact Assessment Report prepared as part of the environmental impact assessment of the project constituting part of the procedure for issuing the decisions referred to in Article 72(1)(1), (10), (16) and (18) should: 1) contain the information referred to in Article 66, determined in detail and with accuracy in accordance with the data available resulting from the construction project and other information obtained after the issuance of the decisions on environmental conditions referred to in Article 72(1)(2)-(9), (11-13) and (15-18a), if they have already been issued for a given project; 2) determine the degree and manner of taking into account the requirements for environmental protection contained in the decision on environmental conditions and decisions referred to in Article 72(1)(2)(9), (11-13) and (15-18a), if they have already been issued for a given project''.<br>This approach makes it possible to carry out an EIA at a stage where not all information is known to the Investor and a specific reactor technology has not yet been selected. In the opinion of PGE EJ 1 sp. z o.o., not all the information indicated in the position of the German side will be available at the stage of preparing the EIA Report submitted in the procedure for obtaining a DEC, which results from the method adopted by PGE EJ 1 sp. z o.o. for the selection of a technology supplier in the integrated procedure described in Chapter 6.4 of the PIS.<br>In principle, external initiating events resulting from human activities (including terrorist acts) will be the subject of a safety analysis prepared for a nuclear facility in accordance with the Regulation on safety analyses. The safety analysis, in turn, is necessary to obtain a permit for the construction of a nuclear facility in accordance with Article 36d(1) and (2) of the Atomic Law "before the investor applies to the President of the National Atomic Energy Agency for nuclear facility construction permit, the investor shall carry out safety analyses in the field of nuclear safety, taking into account the technical and environmental factor, and subject them to verification, in which entities involved in the development of a nuclear facility design may not participate. On the basis of results of safety analyses, the Investor prepares a preliminary safety analysis report and presents it to the President of the Agency along with the application for the construction permit."<br>As can be seen from the above, the issues raised by the German side will be identified in detail during the investment process, including as part of individual environmental impact assessments for the NPP. Due to the fact that the NPP will be a key element of the state's critical infrastructure, security issues (including comprehensive protection against terrorist attacks) will be a priority in their design, construction and operation, and must be consistent with the internal security strategy for nuclear power.<br>Moreover, PGE EJ 1 sp. z o.o. informs that Polish regulations set the highest standards of nuclear energy safety, currently adopted in the world in accordance with the latest international requirements (in particular, safety objectives for new generation reactors contained in the document of the International Atomic Energy Agency SSR-2/1 and in the WERNA statement on Safety Objectives for New Nuclear Power Plants of November 2010), also taking into account the requirements of the "EUR" document and the conclusions from the accidents at the | This will be included in the EIA Report | **<u>Transboundary Documentation</u>**<br>**In Part 4 Excerpt from Volume II of the EIA Report:**<br>**1)** **Chapter II.11** "Hazards and severe accidents";<br>**2)** **Chapter II.11.3** "External events that may endanger the safety of a nuclear power plant";<br>**3)** **Appendix II.11.3-1** "Results of the analysis of impact from extreme natural events, phenomena and conditions on NPP safety together with adaptive (preventive) measures".<br>**In Part 6 Excerpt from Volume IV of the EIA Report:**<br>**1)** **Chapter IV.14** "Impact related to ionising radiation".<br>**In Part 7 Excerpt from Volume V of the EIA Report:**<br>**1)** **Chapter V.4.1** "Possible transboundary radiological environmental impact";<br>**2)** **Appendix V.4-1** "MATCH model results";<br>**3)** **Appendix V.4-2** "FDMT model results".<br><br>**<u>Including in the Non-Technical Summary in Part 2</u>**<br>**1)** **Chapter VI.2.11** "Hazards and severe accidents";<br>**2)** **Chapter IV.4.14** "Impact related to ionising radiation";<br>**3)** **Chapter VI.4.17** "Determining the projected environmental impact in the event of a severe accident".<br><br>**<u>EIA Report</u>**<br>**In Volume II:**<br>**1)** **Chapter II.11** "Hazards and severe accidents";<br>**2)** **Appendix II.11.3-1** "Results of the analysis of impact from extreme natural events, phenomena and conditions on NPP safety together with adaptive (preventive) measures";<br>**3)** **Chapter II.11.3** "External events that may endanger the safety of a nuclear power plant";<br>**In Volume IV:**<br>**1)** **Chapter IV.14** "Impact related to ionising radiation".<br>**In Volume V:**<br>**1)** **Chapter V.4.1** "Possible transboundary radiological environmental impact";<br>**2)** **Appendix V.4-1** "MATCH model results";<br>**3)** **Appendix V.4-2** "FDMT model results". |

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| | | | Chernobyl and Fukushima Dai-ichi nuclear power plants and from the "stress tests" of European nuclear power plants. The safety requirements contained in Polish regulations are in no manner limited to establishing probabilistic criteria. The mentioned safety objectives for the new generation of reactors, which have been adopted in the Polish regulations, concern in particular the practical exclusion (deterministic, through the use of appropriate design solutions) of accidents with melting of the reactor core, which could lead to early damage to the reactor containment or to very large releases of radioactive substances into the environment, and to limit the effects of failures with melting of the core, which have not been excluded, to such an extent to significantly reduce the need for intervention activities to protect the health of the population to a limited area and time. In particular, with regard to the safety risks associated with a potential aircraft impact, Polish regulations (§33 of the Design Regulation) require ensuring the resilience of nuclear power plant facilities to the impact of a large civil aircraft. The EIA Report will present the results of analyses of external threats characteristic of a specific location - both caused by natural forces and human activity.<br><br>It should be noted that in the area of the sites under consideration such extreme seismic events and tsunamis that led to the Fukushima accident are impossible. It is a region with low seismicity, and the sites are located at the relatively shallow Baltic Sea or Lake Żarnowieckie. It should also be borne in mind that in the case of the Chernobyl reactor (channel-type, graphite-moderated and cooled with light water), the failure resulted from reactivity leading to an uncontrolled increase in power caused by prompt neutrons. The occurrence of this type of accident is physically excluded in the third generation water reactors (considered for nuclear power plants in Poland) with fundamentally different designs. A reactivity failure (associated with positive reactivity feedback) in PWR reactors leading to an uncontrolled increase in power on prompt neutrons is not possible due to built-in safety features that automatically limit the increase in power so as to prevent fuel damage. It is worth pointing out here that the Polish regulations on the safety of nuclear facilities (§ 4(1)(2); § 7; § 34 (2); § 51 of the Design Regulation) contain unambiguous requirements for ensuring self-control and stability of the reactor operation using built-in safety features.<br>For the estimation of the radiological impact on the territory of Poland and potentially affected countries (in particular for the purposes of contingency planning), the EIA Report will present the radiological effects of a severe NPP failure, determined in accordance with the applicable legal provisions and taking into account relevant requirements and international recommendations. | | |
| | **3** | 3) The issue of shipments of radiological waste is completely ignored. From this point of view, it is necessary to assess their possible effects in the control procedure. | 3) PGE EJ 1 sp. z o.o. informs that the EIA Report will include an appropriate analysis regarding the management of nuclear fuel and the management of radioactive waste. At the same time, the statement that the PIS completely omits the issue of transport of radioactive waste is inconsistent with the content of the PIS, because it should be noted that the indications regarding waste management are contained in the PIS e.g. in Chapter 6.4.4. entitled Spent fuel storage and other internal infrastructure related to radioactive waste management: "The investor and future operator of the nuclear power plant will be responsible for the design and operation of the nuclear power plant taking into account the possible reduction of the amount of radioactive waste generated, appropriate containment and treatment, transport, and the classification of waste in the appropriate category and subcategory on the basis of the criteria indicated in the relevant legislation. Radioactive waste generated by a nuclear power plant shall be stored in accordance with the law in such a way as to ensure the protection of persons and the environment against the effects of ionising radiation under normal conditions as well as in situations causing danger, in particular by protecting them against spillage, dispersion or release.'' In addition, PGE EJ 1 sp. z o.o. points out that Chapter 6 of the PIS indicates that: "The EIA Report will describe in detail and assess the system of radioactive waste management at the power plant in terms of impacts on the environment and human health. Further management of spent fuel will be in accordance with the currently proceeded National Plan for Radioactive Waste and Spent Fuel Management (NPRWSFM)". The EIA Report submitted in the procedure for issuing the DEC will present the procedures related to the transport of radioactive waste, but to the extent that it is possible at a given stage of the investment process for the NPP and taking into account the circumstances that the construction of radioactive waste landfills is not an element of the Project. For radioactive waste landfills, a separate procedure will be conducted on the DEC. The EIA Report will include a reference to the environmental objectives resulting from the NPRWSFM, the legal acts related to the EIA Act, e.g. the Atomic Law and the applicable implementing acts to the Atomic Law: - Regulation of the Council of Ministers of 20 February 2007 on the conditions for import into the territory of the Republic of Poland, export from the territory of the Republic of Poland and transit through this territory of nuclear materials, radioactive sources and equipment containing such sources (Journal of Laws of 2007, item 911); - Regulation of the Council of Ministers of 21 October 2008 on the authorisation and approval for import into the territory of the Republic of Poland, export from the territory of the | This will be included in the EIA Report | **<u>Transboundary Documentation</u>**<br>**In Part 4 Excerpt from Volume II of the EIA Report:**<br>**1) Chapter II.10.6.2** "Spent (nuclear) fuel";<br>**2) Chapter II.10.6.3** "Radioactive waste";<br>**3) Appendix II.10.6-1** "Sources of radioactive waste and radioactive waste management during Operational phase".<br>**In Part 6 Excerpt from Volume IV of the EIA Report:**<br>**1) Chapter IV.16.2** "Radioactive waste and spent nuclear fuel";<br>**In Part 7 Excerpt from Volume V of the EIA Report:**<br>**1) Chapter V.7.11.2** "Radioactive waste and spent nuclear fuel".<br><br>**<u>Including in the Non-Technical Summary in Part 2</u>**<br>**1) Chapter VI.2.10** "Predicted types and volumes of emissions, including waste, resulting from the implementation of the Project";<br><br>**<u>EIA Report</u>**<br>**In Volume II:**<br>**1) Chapter II.10.6.2** "Spent (nuclear) fuel";<br>**2) Chapter II.10.6.3** "Radioactive waste";<br>**3) Appendix II.10.6-1** "Sources of radioactive waste and radioactive waste management during Operational phase". |

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| | | | Republic of Poland and transit through this territory radioactive waste and spent nuclear fuel (Journal of Laws of 2008, item 1402). At the same time, PGE EJ 1 sp. z o.o. informs that in accordance with Article 61 of the Atomic Law: "Requirements and conditions for transport in organisational units that produce, process, use, warehouse and store nuclear materials, sources of ionising radiation, excluding devices generating ionising radiation, radioactive waste and spent nuclear fuel are specified by the President of the Agency in the permit". On the other hand, the transport of radioactive waste may be carried out by the State Enterprise "Radioactive Waste Disposal Plant" (ZUOP) or another economic entity that has received a permit from the President of the PAA to perform this type of activity. Issues related to the assessment of the effects of the transport of radioactive waste will be described in the EIA Report to the extent that it allows the assessment of the possible effects of such transport from the angle of the requirements set by law, including the Atomic Law and the NPRWSFM. | | **In Volume IV:**<br>**1) Chapter IV.16.2** "Radioactive waste and spent nuclear fuel".<br>**In Volume V:**<br>**1) Chapter V.7.11.2 "Radioactive waste and spent nuclear fuel".** |
| | **4** | 4) From the point of view of assessing the ingress of conventional harmful substances into the return of the cooling water and thus into the Baltic Sea. The basis here must be discharge of water during the normal operation of the reactor. | 4) In the first place, PGE EJ 1 sp. z o.o. informs that the remark is not fully understood (it is not clear from what point of view the ingress of conventional harmful substances into the return of cooling water should be assessed). Nevertheless, the author of the comment had in mind the necessity to assess the possible effects on the environment of the ingress of conventional harmful substances into the return of the cooling water and thus into the Baltic Sea and the relevant analysis in this regard will be included in the EIA Report. The EIA Report will include an analysis of the impact of discharge of cooling water on the biotic components of the marine environment and inland waters, with particular emphasis on the difference in water temperatures and chemical treatment of cooling water. The evaluation methodology will be adopted in accordance with the indications of the General Directorate for Environmental Protection. | This will be included in the EIA Report | **<u>Transboundary Documentation</u>**<br>**In Part 6 Excerpt from Volume IV of the EIA Report:**<br>**1) Chapter IV.1** "Impacts on protected areas and features (land and sea)";<br>**2) Chapter IV.1.4** "Impacts on protected areas and features – marine environment";<br>**3) Chapter IV.2** "Impacts on natural (biotic) components";<br>**4) Chapter IV.8.3** "Impact on marine surface waters".<br>**In Part 7 Excerpt from Volume V of the EIA Report:**<br>**1) Chapter V.3** "Description of anticipated mitigation activities (avoidance, prevention, reduction or offsetting)".<br>**2) Chapter V.3.1** "Mitigation activities";<br>**3) Chapter V.3.1.1** "Natural environment";<br>**4) Chapter V.3.1.5** "Marine surface water";<br>**5) Chapter V.3.2** "Compensation";<br>**6) Chapter V.3.2.1** "Natural environment".<br><br>**<u>Including in the Non-Technical Summary in Part 2:</u>**<br>**1) Chapter VI.4** "Impact assessment";<br>**2) Chapter VI.4.1.3** "Impacts on protected areas and objects – marine environment. Variant 1 – Lubiatowo-Kopalino site";<br>**3) Chapter VI.4.1.4** "Impacts on protected areas and objects – marine environment. Variant 2 – Żarnowiec site";<br>**4) Chapter VI.4.2** "Impacts on natural (biotic) elements";<br>**5) Chapter VI.4.8.2** "Impacts on marine surface waters".<br><br>**<u>EIA Report:</u>**<br>**In Volume IV:**<br>**1) Chapter IV.1.4** "Impacts on protected areas and features – marine environment";<br>**2) Chapter IV.2.3** "Impacts on natural (biotic) components – marine environment";<br>**3) Chapter IV.8.1.2** "Anticipated emissions to marine waters;"<br>**4) Chapter IV.8.3** "Impact on marine surface waters";<br>**5) Chapter IV.19** "Cumulative Impact"; |

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| | | | | | 6) **Chapter IV.19.2.2** "Marine area (within the Natural environment)";<br>7) **Chapter IV.19.4** "Marine waters";<br>**In Volume V:**<br>1) **Chapter V.3** "Description of anticipated mitigation activities (avoidance, prevention, reduction or offsetting)".<br>2) **Chapter V.3.1.1** "Natural environment";<br>3) **Chapter V.3.1.5** "Marine surface water". |
| | **5** | 5) However, the omission of staking out the routes of overhead high-voltage lines (supplying and dissipating energy) during the current procedure is in significant relation with the construction of the installation. Therefore, it should be assessed already at this stage. | 5) In the opinion of PGE EJ 1 sp. z o.o., staking out the routes of overhead lines will not affect transboundary impacts and as such should not be the subject of transboundary consultations. However, in relation to the issue, PGE EJ 1 sp. z o.o. informs that the EIA Report for the NPP will include a relevant analysis regarding the cumulative impact of overhead HV lines (supplying and dissipating energy). The EIA Report in this procedure will describe possible variants of the connection infrastructure route considered at the EIA stage and indicate potential connection points to the national power system (hereinafter referred to as the "NPS") and an analysis of the cumulative impact on the environment of both investments will be carried out, taking into account individual variants. However, the DEC for a nuclear power plant cannot indicate a specific connection option, as the connection infrastructure will be subject to a separate procedure for obtaining a DEC after obtaining the connection conditions for the power plant. At different levels of detail, reference will be made to the elements of the environment that will be within the range of NPP impacts and the elements that will be affected by associated investments. At the stage of assessment of cumulative impacts, it will not be possible not to take into account the revenues of associated investments (power infrastructure corridors). | This will be partially included in the EIA Report | **<u>Transboundary Documentation</u>**<br>**In Part 4 Excerpt from Volume II of the EIA Report:**<br>1) **Chapter II.12.3** "Power infrastructure".<br><br>**In Part 6 Excerpt from Volume IV of the EIA Report:**<br>2) **Chapter IV.19** "Cumulative Impact".<br><br>**<u>Including in the Non-Technical Summary in Part 2:</u>**<br>1) **Chapter VI.2.12** "Associated infrastructure not covered in the application for the Decision on environmental conditions."<br>2) **Chapter VI.4.19** "Cumulative impacts".<br><br>**<u>EIA Report</u>**<br>**In Volume II:**<br>1) **Chapter II.12.3** "Power infrastructure";<br>**In Volume IV:**<br>1) **Chapter IV.19 "Cumulative Impact".** |
| | **6** | 6) It is impossible to identify whether, due to the missing decision on a specific technology, it is possible to accurately assess the impact of the power plant on the environment and protected goods. | 6) PGE EJ 1 sp. z o.o. informs that in accordance with the IAEA guidelines Nuclear Energy Series no. NG-T-3.11 Managing Environmental Impact Assessment for Construction and Operation in New Nuclear Power Programmes, 2014, 4.3.2.4. In many cases, during the period of preparation of the ESR Report or the EIA Report, neither the supplier of the nuclear power plant technology, nor the size of the power plant, nor even its location will yet be decided. However, the environmental assessment process may be continued using the PPE principle described in Chapter 2.4." "2.3. In order to address the specific issue of uncertainty related to the final form of the power plant technology, especially since the technology supplier may not yet be determined at the time of preparation of the Report, the concept of plant parameter envelope (PPE) has been constructed. In the concept of the limit parameters of the plant, all the technologies considered are taken into account and in each technology a value is assigned to specific aspects that are associated with the potential impact on the environment. The PPE method for the plants (technologies) under consideration includes relevant physical and chemical parameters that may affect the environment (e.g. water environment requirements, land use or emissions) and identifies those parameters that involve the greatest impact or the greatest range of impacts in each aspect. These "maximum parameters" are included in the limit parameters of the plant and are then used for analysis in the EIA process." In the present case, the PIS contains information about the adoption of the above-mentioned concept of limit parameters of the plant (see Chapter 6.1. of the PIS). At this stage, the Investor may not indicate or describe in detail specific technological solutions that could indicate the preferences of specific suppliers. This would be equivalent to breaking the principle of impartiality. Therefore, individual technologies will not be treated as technological variants, out of which, at the stage of the EIA Report, i.e. before the resolution of the integrated procedure (see Chapter 6.4 of the PIS), the Investor would have to indicate the option chosen for implementation and alternative variants, but as a set of technologies taken into account, on the basis of which the bounding conditions envelope was created. The envelope describing the parameters of the most far-reaching technological scenarios, i.e. those that may cause the greatest impact on individual components of the environment, will be the subject of the assessment, but the conclusion will indicate the thresholds of environmental sensitivity to particular types of impacts and on their basis determine the permissible individual parameters and/or emissions and disturbances that the planned Project may cause in the assessed sites. | This will be included in the EIA Report | In the report in question, one nuclear technology is considered, described as the reference technology. The impact assessment described in the report concerns impacts determined for that technology.<br><br>**<u>Transboundary Documentation</u>**<br>**In Part 4 Excerpt from Volume II of the EIA Report:**<br>1) **Chapter II.2** "Description of the NPP technology and infrastructure";<br>2) **Chapter II.2.1** "Nuclear power plant description".<br>**In Part 6 Excerpt from Volume IV of the EIA Report:**<br>1) **Volume IV** "Impact Assessment".<br><br>**<u>Including in the Non-Technical Summary in Part 2:</u>**<br>1) **Chapter VI.2** "Characteristics of the Project and emissions";<br>2) **Chapter VI.4** "Impact assessment".<br><br>**<u>EIA Report</u>**<br>1) **Volume II** "Characteristics of the Project and emissions", including specifically **Chapter II.2** "Description of the NPP technology and infrastructure";<br>2) **Volume IV** "Impact Assessment". |

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| | **7** | (7) In principle, some matters (such as immobilisation, intermediate and final landfilling) are generally omitted and a time frame of 50 to 70 years is referred to. Also with regard to the temporary and final storage of waste, there must in principle be the location and assessment of the sites designated for this purpose. The submitted information bulletin refers in many places to the next environmental impact assessment aimed at closing landfills; since the obligation to carry out such an assessment, which is compatible with European law, covers, in addition to the construction and operation of a nuclear power plant, its dismantling and decommissioning (Annex I (2)(b) of Directive 2011/92/EU), such situations should already be included in the environmental impact assessment documentation. | 7) PGE EJ 1 sp. z o.o. informs that it will meet the suggested requirements of the applicable legislation and IAEA guidelines, taking into account the appropriate approach to environmental impact assessment at the stage of the first EIA under the DEC. At the same time, PGE EJ 1 sp. z o.o. informs that the EIA Report will take into account the phases of implementation, operation and decommissioning, including staged development. The phase of shutdown and decommissioning of a nuclear installation will also be subject to separate environmental procedures and decisions. For the decommissioning phase, the basic issues such as estimating the amount of waste generated, determining the possibilities of its management and the possibilities and conditions for dealing with various groups due to the level of their nuisance, the level of radioactive contamination and others, will be performed as part of the EIA Report submitted as part of the procedure for issuing a DEC for the NPP. The estimation will take place on the basis of the bounding conditions envelope (the most far-reaching scenarios). The nuclear safety and radiological protection requirements are contained in the Atomic Law Act (Articles 38b, 38c and 38d) and in the implementing provisions to this Act (Regulation of the Council of Ministers of 11 February 2013 on nuclear safety and radiological protection requirements for the decommissioning stage of nuclear installations and the content of the report on the decommissioning of a nuclear installation (Journal of Laws of 2013, item 270) and the Regulation on safety analyses). In particular, it is required to develop a nuclear decommissioning programme and submit it for approval to the President of the PAA together with the application for a construction permit, and to describe the aspects of the decommissioning of a nuclear installation in chapter 15 of the PSAR. In addition, it is required to update the decommissioning programme of a nuclear installation in the course of its operation (at least once every five years), and to submit an updated decommissioning programme with a forecast of decommissioning costs for approval by the President of the PAA. In accordance with the requirements of Directive 2011/92/EU (taking into account the change resulting from Directive 2014/52/EU) and the EIA Act, an analysis regarding waste management - including radioactive waste management, taking into account all legislation on radioactive waste management will be carried out in the EIA Report. In this respect, it should be borne in mind that each Member State of the European Union is required to draw up an appropriate national waste and spent fuel management plan. The Polish Government has satisfied this requirement by Resolution no. 195 of the Council of Ministers of 16 October 2015 on the "National Plan for Radioactive Waste and Spent Fuel Management" (Journal of Laws of 2015, item 1092). The detailed Polish requirements for radioactive waste management and spent nuclear fuel management are included in the Regulation on spent nuclear fuel. It should be borne in mind that as part of the EIA Report submitted in the proceedings for the issuance of a DEC, reference will be made to the objectives and requirements set by the NPRWSFM. With regard to the raised issues of the intermediate and final storage of waste as regards the location and assessment of the sites for storage (transitional) and storage (final disposal), there must in principle be the location and assessment of the sites designated for that purpose. PGE EJ 1 sp. z o.o. indicates that the main limitation at this stage is the lack of information on the external elements of the radioactive waste and spent fuel management system from the nuclear power plant, including e.g. location and characteristics of the new radioactive waste surface storage site and the deep radioactive waste storage (in accordance with the NPRWSFM). Some of the issues raised by the affected country concern the construction of radioactive waste landfills, which are not part of the Project and will be implemented in accordance with the NPRWSFM, as described in the PIS in Chapter 5.5.3. For this reason, the construction of landfills will be subject to a separate procedure for obtaining the DEC and the environmental impact assessment carried out as part of it. Nevertheless, as part of the EIA Report, PGE EJ 1 sp. z o.o. will describe in as many details as possible at a given stage, the fuel cycle with a description of the variants of waste storage known at a given stage. In the event of cumulative impacts, they will be subject to an appropriate assessment. At this stage, it is assumed that the storage facility for low- and intermediate-level waste on the premises of the nuclear power plant will have the capacity to store unprocessed and processed radioactive waste resulting from operation of the NPP for a period that makes it impossible to process the waste and wait for transportation. The spent fuel storage to be built on the site of the planned power plant will be used for periodic storage of spent nuclear fuel until it is transferred in the future to a deep storage site or for processing. Spent fuel, unless it is subjected to processing – will be transferred to a periodic storage facility, where it can be stored for 40-60 years. Depending on the chosen technology, the construction of a wet or dry periodic fuel storage is considered (this will be specified in the EIA Report). There are plans to build a periodic fuel storage facility that will be able to accommodate spent fuel from the entire period of operation of the planned power plant, i.e. from a period of 60 years. Further procedure of management of spent fuel will be consistent with the NPRWSFM. Each organisational unit in which radioactive waste or spent fuel is generated is obliged to ensure the possibility of managing this waste and its financing from the moment of its creation until its disposal for storage, including financing of landfilling. It should be noted here that taking into account the specificity of the investment process for the construction of a nuclear power plant, both at the current | At the time of responding to remarks, supplementation of the information was not declared in the EIA Report, but eventually the issue was undertaken in part. | Waste management was described at length both in the Transboundary Documentation and in the EIA Report. However, the issues concerning the final disposal of spent nuclear fuel are to be decided by the Government of the Republic of Poland; they were described e.g. in the "National Plan of Management of Radioactive Waste and Spent Nuclear Fuel" which was determined for the years 2020-2050 - Resolution No. 154 of the Council of Ministers of 21 October 2020. The construction of such a repository will be subject to a separate procedure for issuance of a decision on environmental conditions, and the entity responsible for this investment project will be its future operator chosen by the government authorities.<br><br>**<u>Transboundary Documentation</u>**<br>**In Part 1 Introduction:**<br>**1) Chapter 4** "Description of nuclear fuel cycle".<br>**In Part 4 Excerpt from Volume II of the EIA Report:**<br>**1) Chapter II.10.6** "Radioactive waste and spent (nuclear) fuel".<br>**In Part 6 Excerpt from Volume IV of the EIA Report:**<br>**1) Chapter IV.16.2** "Radioactive waste and spent nuclear fuel";<br>**In Part 7 Excerpt from Volume V of the EIA Report:**<br>**1) Chapter V.7.11.2** "Radioactive waste and spent nuclear fuel".<br><br>**<u>Including in the Non-Technical Summary in Part 2</u>**<br>**1) Chapter VI.5.7.11** "Waste management";<br>**2) Chapter VI.2.10** "Predicted types and volumes of emissions, including waste, resulting from the implementation of the Project".<br><br>**<u>EIA Report</u>**<br>**In Volume II:**<br>**1) Chapter II.10.6** "Radioactive waste and spent (nuclear) fuel";<br>**In Volume IV:**<br>**1) Chapter IV.16.2** "Radioactive waste and spent nuclear fuel";<br>**In Volume V:**<br>**1) Chapter V.7.11.2** "Radioactive waste and spent nuclear fuel". |

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| | | | stage as well as at the stage of preparation of the EIA Report, not all technical and technological solutions will be possible to specify. Therefore, the environmental impact assessment of the Project will be carried out on the basis of the bounding conditions envelope (see: Chapter 9.1. of the PIS). The actual amount of spent fuel will be known after the selection of technology and data on the amount of radioactive waste and spent fuel generated during operation. The calculations used in the EIA Report will be based on the bounding conditions envelope. According to this approach, all considered technical and technological solutions and their maximum design parameters with the highest impact value will be evaluated. This also applies to all potential waste management methods considered at this stage, their stages as well as the maximum amounts of waste. The assessment of the possibilities of processing spent nuclear fuel was left to the next stage of the procedure for obtaining the DEC. Moreover, when comparing the variants, the environmental impact of waste management and the use of the technologies or substances concerned will be taken into account. | | |
| | **8** | 8) On the basis of the newsletter, it is apparent that different options for the location of the power plant are being verified. Therefore, it is not possible to review other relevant and tested options for solutions and to give reasons for their choice in relation to the environmental impact of the power plant. | 8) PGE EJ 1 sp. z o.o. informs that Chapter 7 of the PIS indicated the rational (economically and technically feasible) variants of the Project considered by the Investor. These can be site, technological or other variants. Taking into account legal and methodological conditions, it is not necessary to include in the PIS information relating in detail to the selection criteria. The purpose of the scoping report (ESR - environmental scoping report) corresponding under the Polish law to the PIS, is to provide a package of information known at a given stage about the Project, the environment and the needs for supplementing knowledge, creating a sort of guide to the environmental impact assessment procedure, allowing for the correct and complete preparation of the assessment impact report in the next stage of the EIA procedure. The law (Article 66 of the EIA Act) clearly indicates that information on the justification for choosing a given variant, together with a comparison of the impact on the environment, should be included in the EIA Report. For this reason, PGE EJ 1 sp. z o.o. indicates that providing a description of reasonable alternative solutions (for example related to the Project's design, technology, site, size and scale) considered by the contractor, which are relevant to the proposed Project and its characteristics, and giving reasons for choosing a given variant, together with a comparison of the environmental impact, will take place in detail in the EIA Report. At the PIS stage, each of the considered locations presented above is treated equally by the Investor. The variant selected for implementation will be indicated during the procedure for environmental impact assessment of the Project. The Investor, after completing the analysis of environmental conditions, including the type and scale of the Project's impact on the environment and the society in the sites under consideration and technological variants, as well as after taking into account technical, economic and organisational conditions, will indicate the option selected for implementation in the EIA Report. | This will be included in the EIA Report | **<u>Transboundary Documentation</u>**<br>**In Part 3 Excerpt from Volume I of the EIA Report:**<br>**1) Chapter I.9** “Project variants under consideration”.<br>**In Part 7 Excerpt from Volume V of the EIA Report:**<br>**1) Chapter V.2** “Selection of the variant proposed by the Investor, rational variant most favorable for the environment, and rational alternative variant, together with reasons for their selection”.<br><br>**<u>Including in the Non-Technical Summary in Part 2</u>**<br>**1) Chapter VI.1.8** “Considered Project variants”;<br>**2) Chapter VI.5.2** “Selection of the variant proposed by the Investor, rational variant most favorable for the environment, and rational alternative variant, along with reasoning for their selection”.<br><br>**<u>EIA Report</u>**<br>**In Volume I:**<br>**1) Chapter I.9** “Project variants under consideration”;<br>**In Volume V:**<br>**1) Chapter V.2** “Selection of the variant proposed by the Investor, rational variant most favorable for the environment, and rational alternative variant, together with reasons for their selection”;<br>**2) Appendix V.2-1** “Selection of the variant proposed by the Investor, rational variant most favorable for the environment, and rational alternative variant, along with reasoning for their selection”. |

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| **Slovakia** | | | | | |
| **MINISTRY OF ENVIRONMENT SLOVAK REPUBLIC**<br><br>**Department of Environmental Impact Assessment and Control. Department of Environmental Impact Assessment** | **1** | 1) Due to the proposed 3 variants of the location for the NPP on the Baltic Sea coast, we assume that the impact of the proposed activity can reach our country only in the event of a failure in the extended design conditions, the probability of which is $1x10^{-6}$ per year. Although such an eventuality is highly unlikely, it should be included in the evaluation report and analysed because of the extent of its potential implications. | 1) The EIA report will present the results of the analysis in operating states and in emergency conditions involving severe failures, taking into account their possible transboundary impact. As indicated in the PIS, contingency conditions that may cause transboundary impacts, including major failures, will be fully identified and evaluated in the EIA Report, which will also present the results of modelling of dispersions of radioactive substances and doses. They will be determined in accordance with the applicable Polish legal provisions and taking into account relevant requirements and international recommendations. It should be noted that the assessment of the impact of such events must, on the one hand, show the effects of such an accident, and on the other hand the conclusions, including the assessment of whether the impact is significant and should also take into account the probability of their occurrence in accordance with the general EIA methodology described in the PIS. At the same time, PGE EJ 1 sp. z o.o. is of the opinion that in relation to the provisions of the PIS, there is no need to determine the probability limit in relation to failures and assess their consequences, which should be assessed in the EIA Report | This will be included in the EIA Report | **<u>Transboundary Documentation</u>**<br>**In Part 4 Excerpt from Volume II of the EIA Report:**<br>**1)** **Chapter II.11** "Hazards and severe accidents";<br>**2)** **Chapter II.11.3** "External events that may endanger the safety of a nuclear power plant";<br>**3)** **Appendix II.11.3-1** "Results of the analysis of impact from extreme natural events, phenomena and conditions on NPP safety together with adaptive (preventive) measures".<br>**In Part 6 Excerpt from Volume IV of the EIA Report:**<br>**1)** **Chapter IV.14** "Impact related to ionising radiation".<br>**In Part 7 Excerpt from Volume V of the EIA Report:**<br>**1)** **Chapter V.4.1** "Possible transboundary radiological environmental impact";<br>**2)** **Appendix V.4-1** "MATCH model results";<br>**3)** **Appendix V.4-2** "FDMT model results".<br><br>**<u>Including in the Non-Technical Summary in Part 2</u>**<br>**1)** **Chapter VI.2.11** "Hazards and severe accidents";<br>**2)** **Chapter VI.4.17** "Determining the projected environmental impact in the event of a severe accident";<br>**3)** **Chapter VI.4.14** "Impact related to ionising radiation".<br><br>**<u>EIA Report</u>**<br>**In Volume II:**<br>**1)** **Chapter II.11** "Hazards and severe accidents";<br>**2)** **Chapter II.11.3** "External events that may endanger the safety of a nuclear power plant";<br>**3)** **Appendix II.11.3-1** "Results of the analysis of impact from extreme natural events, phenomena and conditions on NPP safety together with adaptive (preventive) measures".<br>**In Volume IV:**<br>**1)** **Chapter IV.14** "Impact related to ionising radiation".<br>**In Volume V:**<br>**1)** **Chapter V.4.1** "Possible transboundary radiological environmental impact";<br>**2)** **Appendix V.4-1** "MATCH model results";<br>**3)** **Appendix V.4-2** "FDMT model results". |
| | **2** | 2) It is necessary to supplement the information on whether the future source of nuclear energy will be used to cover own consumption in Poland or part of it will be intended for export. | 2) PGE EJ 1 sp. z o.o. informs that the EIA Report will include issues related to the impact of the Project on the social and economic situation regarding protected goods, including on the power system. One of the elements of the description of the planned Project will be the presentation of its objectives and functions. It should be noted that the purpose of the procedure for issuing the DEC for the first Polish power plant is not to analyse the impact of the investment on foreign power systems or energy markets. The issues of the impact of the development of the power system and the related construction of new generation capacities (including the NPP) are primarily the subject of the adopted strategic documents at the national level, i.e. PEP2030 and the PNPP, which are in line with the objectives of the European-level documents (e.g. climate and energy package; European Energy Policy, Energy Road Map 2050; Baltic Energy Market Interconnection Plan). It should be noted that both PEP 2030 and the PNPP were the subject of proceedings on strategic environmental impact assessment conducted in the years 2011-2014. | This will be partially included in the EIA Report | The nuclear power plant planned to be built will be connected to the National Power System and will constitute a source of energy supplies primarily for the domestic needs. Furthermore, Poland has international connections with power systems of the neighbouring countries, that is, of Sweden, Germany (x2), Czechia, Slovakia and Lithuania. In the situation when the supply of electricity in Poland is not balanced with demand, energy is imported through interconnectors from the neighbouring countries. In a |

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| | | | In conclusion, due to the purpose of the EIA Report, the comment can be taken into account only to the extent that it will serve to assess the impact on the environment and human health and life as well as protected (material) goods. | | situation when the Polish power system has capacity reserves and the neighbouring countries report demand for electricity, Poland becomes electricity exporter under the rules determined in trade agreements. Therefore it can be assumed that some part of the electricity generated in the Polish nuclear power plant would be potentially exchanged on the international market.<br><br>The relevant information can be also found in the Announcement of 2 March 2021 by the Minister of Climate and Environment on the energy policy of the State until 2040. |
| | **3** | 3) In the case of the zero variant, an emission analysis shall be developed using alternative means of producing the electricity needed (gas, coal, etc.). | 3) PGE EJ 1 sp. z o.o. informs that the analysis of the expected effects of methods of energy production based on other sources different from nuclear power (understood by PGE EJ 1 sp. z o.o. as variants based on other energy sources, e.g. hard coal) does not constitute an obligatory element of the variant analysis referred to in Article 66(1)(5) and (6) and Article 81 of the EIA Act. This does not mean, however, that the EIA Report for the NPP will not include an analysis referring to different energy generation scenarios (e.g. in the scope of relevant analyses of scenarios regarding climate impact and adaptation to climate change). The environmental impact assessment in the event of non-implementation of the Project will include an analysis of greenhouse gas emissions and the impact on climate change, taking into account the existing generation structure of the National Power System, in which the most numerous are sources based on fossil fuels. Importantly, the so-called "zero variant", i.e. the situation in which the Project is not implemented at all, is not an obligatory element of the variant analysis referred to in Article 66(1)(5) and (6) and Article 81 of the EIA Act. It is not another variant, but only a description of a situation (scenario) in which the implementation of the Project was abandoned. Such a situation, regardless of the variant, should always be described in the report. The legislator requires that the EIA Report also contains a description of the expected effects on the environment in the event the Project is not implemented. However, the "Zero variant" does not constitute an additional variant of Project implementation. A more detailed discussion with regard to comment 9) from Sweden. | This will be partially included in the EIA Report | **<u>Transboundary Documentation</u>**<br>**In Part 3 Excerpt from Volume I of the EIA Report:**<br>**1) Chapter I.6.2** "Economic aspects – Polish Nuclear Power Programme";<br>**2) Chapter I.9.4** "Description of the projected environmental impacts in the event that the Project is not implemented".<br>**In Part 6 Excerpt from Volume IV of the EIA Report:**<br>**1) Chapter IV.3.6.1** "Carbon footprint";<br>**2) Appendix IV.3-4** "Carbon footprint analysis".<br><br>**Including in the Non-Technical Summary in Part 2**<br>**1) Chapter VI.1.5** "The Project in the context of strategic documents";<br>**2) Chapter VI.1.9 "**Legal framework for the Project";<br>**3) Chapter VI.4.3.** "Impact of the Project on climate, and impact of climatic factors on the Project."<br><br>**<u>EIA Report</u>**<br>**In Volume I:**<br>**1) Chapter I.6.2** "Economic aspects – Polish Nuclear Power Programme";<br>**2) Chapter I.9.4** "Description of the projected environmental impacts in the event that the Project is not implemented".<br>**In Volume IV:**<br>**1) Chapter IV.3.6.1** "Carbon footprint";<br>**2) Appendix IV.3-4** "Carbon footprint analysis". |
| | **4** | 4) The EIA Report should include information on how to monitor the impact of the proposed activity on the environment and on the health of citizens, taking into account the way in which neighbouring countries are notified about the results of the monitoring. | 4) PGE EJ 1 sp. z o.o. explains that in accordance with Article 66(1)(16) of the EIA Act, the EIA Report will contain "presentation of a proposal for monitoring the impact of the planned project at the stage of its construction and operation or use, in particular on the objectives and subject area of protection of the Natura 200 site and the integrity of this site". This will also apply to radiological monitoring. The issues of notification of neighbouring countries are governed by the Atomic Law. Pursuant to Article 72 of the Atomic Law, the President of the PAA makes a systematic assessment of the radiological situation of the country, and on the basis of Article 77 of the Atomic Law Act, "the President of the Agency establishes national contact points, performing tasks resulting from the international system of notification of radiological events in the field of early notification of a nuclear accident, assistance in the event of a failure or radiological emergency, physical protection of nuclear material and illicit trade in these materials, and, in carrying out the obligations of the Republic of Poland under bilateral international agreements". The tasks and responsibilities of the national contact points and the handling of radiological incidents will be described in the EIA Report. | This will be included in the EIA Report | **<u>Transboundary Documentation</u>**<br>**In Part 4 Excerpt from Volume II of the EIA Report**<br>**1) Chapter II.11.3.2** "Analysis of the vulnerability of the Project to extreme events, phenomena and natural conditions, with particular focus on primary and secondary effects of climate change".<br>**In Part 7 Excerpt from Volume V of the EIA Report:**<br>**1) Chapter V.7 "**Proposed scope of monitoring for individual components of the environment".<br><br>**Including in the Non-Technical Summary in Part 2**<br>**1) Chapter VI.5.7 "**Proposed scope of monitoring for individual components of the environment". |

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| | | | | | **<u>EIA Report</u>**<br>**In Volume II:**<br>**1) Chapter II.11.3.2** "Analysis of the vulnerability of the Project to extreme events, phenomena and natural conditions, with particular focus on primary and secondary effects of climate change".<br>**In Volume V:**<br>**1) Chapter V.5.5.3** "Operational phase";<br>**2) Chapter V.7 "**Proposed scope of monitoring for individual components of the environment";<br>**3) Appendix V.7-1** "Description of the draft regulation of the Council of Ministers of February 26, 2020 on the scope of the environmental radiation monitoring program developed and implemented by organizational units classified in risk category I or II". |
| **5** | 5) It is necessary to complete the information on possible emergencies and risks associated with the implementation and conduct of the proposed activity and describe how neighbouring countries are notified; the EIA Report should also take into account low-probability contingencies, taking into account failures in extended design conditions. Due to the potential consequences, it is necessary to collect and analyse these aspects in the EIA Report, while the design should assume that the countries at risk of impact, in the event of a failure in extended design conditions, are countries within 1000 km of the Polish borders. | 5) The role of the PIS (or the "scoping document") is not to provide detailed information on potential events and failures of the planned power plant. The purpose of the PIS, as described in Chapter 2 of this document, is to provide a package of information known at a given stage about the Project, the environment and the needs for supplementing knowledge, creating a sort of guide to the environmental impact assessment procedure, allowing for the correct and complete preparation of the EIA Report in the next stage of the EIA procedure. As indicated in the PIS (see: Chapter 10.5), contingency conditions that may cause transboundary impacts, including major failures, will be fully identified and evaluated in the EIA Report, which will also present the results of modelling of dispersions of radioactive substances and doses. They will be determined in accordance with the applicable Polish legal provisions and taking into account relevant requirements and international recommendations. | This will be included in the EIA Report | **<u>Transboundary Documentation</u>**<br>**In Part 4 Excerpt from Volume II of the EIA Report**<br>**1) Chapter II.11.4** "Risk of a severe accident resulting in contamination of the environment";<br>**2) Chapter II.11.4.2** "Risk of a severe accident in a nuclear context";<br>**3) Appendix II.11.3-1** "Results of the analysis of impact from extreme natural events, phenomena and conditions on NPP safety together with adaptive (preventive) measures".<br>**In Part 6 Excerpt from Volume IV of the EIA Report:**<br>**1) Chapter IV.17** "Determining the projected environmental impact in the event of a severe accident";<br>**2) Appendix IV.17-1** "MATCH model results";<br>**3) Appendix IV.17-2** "FDMT model results".<br><br>**<u>Including in the Non-Technical Summary in Part 2</u>**<br>**1) Chapter VI.2.11** "Hazards and severe accidents";<br>**2) Chapter VI.4.17** "Determining the projected environmental impact in the event of a severe accident".<br><br>**<u>EIA Report</u>**<br>**In Volume II:**<br>**1) Chapter II.11.4** "Risk of a severe accident resulting in contamination of the environment";<br>**2) Chapter II.11.4.2** "Risk of a severe accident in a nuclear context";<br>**3) Appendix II.11.3-1** "Results of the analysis of impact from extreme natural events, phenomena and conditions on NPP safety together with adaptive (preventive) measures".<br>**In Volume IV:**<br>**1) Chapter IV.17** "Determining the projected environmental impact in the event of a severe accident"; |

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| | | | | | **2)** **Appendix IV.17-1** "MATCH model results";<br>**3)** **Appendix IV.17-2** "FDMT model results". |
| | **6** | 6) It is necessary to supplement the concept of the Polish side about the deep-sea storage site for spent fuel, or to describe whether Poland is considering participation in the construction of the so-called regional storage, to supplement the information on the processing and neutralisation of radioactive waste generated during the operation of the NPP. It is necessary to assess the impact of these technologies in order to select the best alternatives and assess the transboundary impacts of the considered technologies for the treatment and neutralisation of radioactive waste. | 6) In the EIA Report, in accordance with the requirements of Directive 2011/92/EU (taking into account the change resulting from Directive 2014/52/EU) and the EIA Act, an analysis will be carried out regarding waste management - including radioactive waste management, taking into account all legislation on radioactive waste management. In this respect, it should be borne in mind that each Member State of the European Union is required to draw up an appropriate national waste and spent fuel management plan.<br>The Polish Government has satisfied this requirement by Resolution no. 195 of the Council of Ministers of 16 October 2015 on the "National Plan for Radioactive Waste and Spent Fuel Management" (Journal of Laws of 2015, item 1092).<br>It should be borne in mind that as part of the EIA Report, reference will be made to the objectives and requirements set by the NPRWSFM.<br>With regard to the raised issues of the intermediate and final storage of waste as regards the location and assessment of the sites for storage (transitional) and storage (final disposal), there must in principle be the location and assessment of the sites designated for that purpose. PGE EJ 1 sp. z o.o. indicates that the main limitation at this stage is the lack of information on the external elements of the radioactive waste and spent fuel management system from the nuclear power plant, including e.g. location and characteristics of the new radioactive waste surface storage site and the deep radioactive waste landfill (in accordance with the NPRWSFM). Some of the issues raised by the affected country concern the construction of radioactive waste landfills, which are not part of the NPP Project and will be implemented in accordance with the NPRWSFM, as described in the PIS in Chapter 5.5.3. For this reason, the construction of landfills will be subject to a separate procedure for obtaining the DEC and the environmental impact assessment carried out as part of it. Nevertheless, as part of the EIA Report, PGE EJ 1 sp. z o.o. will describe in as many details as possible at a given stage, the fuel cycle with a description of the variants of waste storage known at a given stage. The EIA Report will describe in detail and assess the system of radioactive waste and spent nuclear fuel management at the power plant in terms of impacts on the environment and human health. In the event of cumulative impacts, they will be subject to an appropriate assessment. Importantly, each organisational unit in which radioactive waste or spent fuel is generated is obliged to ensure the possibility of managing this waste and its financing from the moment of its creation until its disposal for storage, including financing of landfilling.<br>It should be noted here that taking into account the specificity of the investment process for the construction of a nuclear power plant, both at the current stage as well as at the stage of preparation of the EIA Report, not all technical and technological solutions will be possible to specify. Therefore, the environmental impact assessment of the Project will be carried out on the basis of the bounding conditions envelope (see: Chapter 9.1. of the PIS). The actual amount of spent fuel will be known after the selection of technology and transfer of the data by the future technology supplier on the amount of radioactive waste and spent fuel generated during operation. The calculations used in the EIA Report will be based on the bounding conditions envelope. According to this approach, all considered technical and technological solutions and their maximum design parameters with the highest impact value will be evaluated. This also applies to all potential radioactive waste management methods considered at this stage, their stages as well as the maximum amounts of this waste. The assessment of the possibility of processing of spent fuel was left to the next stage of the procedure for obtaining a DEC and an environmental impact assessment. The decision in this matter will depend on the choice of reactor technology and the conditions of a possible offer of the technology supplier for the processing of fuel and the storage of high-level waste (in accordance with the provisions of Article 4 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 (OJ L 199, p. 48) (hereinafter referred to as "Directive 2011/70/Euratom") and Article 57b of the Atomic Law). At the same time, the EIA Report should refer to the environmental objectives resulting from the strategic documents, e.g. the NPRWSFM. When comparing the variants, the environmental impact of waste management and the use of the technologies or substances concerned will be taken into account. | This will be included in the EIA Report | Plans related to the construction of a deep repository of radioactive waste are determined in the "National Plan of Management of Radioactive Waste and Spent Nuclear Fuel" which was determined for the years 2020-2050 - Resolution No. 154 of the Council of Ministers of 21 October 2020. The construction of such a repository will be subject to a separate transboundary procedure. The construction of the repository will be the responsibility of its future operator chosen by the government authorities.<br><br>**<u>Transboundary Documentation</u>**<br>**In Part 1 Introduction:**<br>**1)** **Chapter 4** "Description of nuclear fuel cycle".<br>**In Part 4 Excerpt from Volume II of the EIA Report:**<br>**1)** **Chapter II.10.6** "Radioactive waste and spent (nuclear) fuel".<br>**In Part 6 Excerpt from Volume IV of the EIA Report:**<br>**1)** **Chapter IV.16.2** "Radioactive waste and spent nuclear fuel".<br>**In Part 7 Excerpt from Volume V of the EIA Report:**<br>**1)** **Chapter V.7.11.2** "Radioactive waste and spent nuclear fuel".<br><br>**<u>Including in the Non-Technical Summary in Part 2</u>**<br>**1)** **Chapter VI.5.7.11** "Waste management";<br>**2)** **Chapter VI.2.10** "Predicted types and volumes of emissions, including waste, resulting from the implementation of the Project".<br><br>**<u>EIA Report</u>**<br>**In Volume II:**<br>**1)** **Chapter II.10.6** "Radioactive waste and spent (nuclear) fuel".<br>**In Volume IV:**<br>**1)** **Chapter IV.16.2** "Radioactive waste and spent nuclear fuel".<br>**In Volume V:**<br>**1)** **Chapter V.7.11.2** "Radioactive waste and spent nuclear fuel". |

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| | **7** | 7) Information should be provided on how the Polish side plans to solve the stabilisation of the network in the event of a power outage in the power plant, as well as the possible restart of the power plant after the failure, because it is a relatively large source with a capacity of 3,750 MWe. The question is related to recently adopted legislation in the field of nuclear safety (Directive 2014/87/Euratom, Article 8a) in conjunction with the IAEA Convention on Nuclear Safety [PGE EJ 1 - Convention on Nuclear Safety. Vienna, 20 September 1994 (Journal of Laws of 1997, no. 42 item 262)]. We are interested in what types of reactors the Polish side is considering in order to meet the condition of preventing early releases (or large releases) of radioactive substances that require external emergency protection. | 7) PGE EJ 1 sp. z o.o. informs that in accordance with the requirements of Directive 2011/92/EU (taking into account the change resulting from Directive 2014/52/EU) and the EIA Act, an analysis regarding the impact on the protected goods will be carried out under the EIA Report. As part of the transmission network analyses related to the determination of the conditions for connection and cooperation of the nuclear power plant with the national transmission system, variant simulations and analyses of transient states in the transmission system related to various disturbances, including the shutdown of nuclear power units and their island operation, will be carried out. Once the NPP technology has been selected, the description and results of these analyses will be presented in the preliminary safety report (PSAR) (chapter 6.5. Electrical systems), which will be submitted with an application to the President of the PAA for a construction permit. Subsequently, these circumstances will be taken into account in the EIA report submitted as part of the so-called re-EIA. | This will be included in the EIA Report | On 25 April 2018, Polskie Sieci Elektroenergetyczne SA (PSE SA), the power transmission system operator in Poland provided PEJ, at its request, with a declaration of readiness to connect the first nuclear power plant in Poland to the transmission grid. The company will apply for conditions of connecting the generation source to the transmission grid only upon obtaining the Location Decision for the NPP. However, already in the currently processed grid development plan for the years 2023–2032 (after consultations), PSE indicated the location of the point of the NPP connection to the National Power System (KSE). At the stage of preparation of the above grid development plan, the effect of the new generation source on the power system stability in various emergency conditions was assessed. It should be noted that each nuclear power unit will operate independently and will be considered a separate power source in the system.<br>The number of generating units kept on standby in the power system to increase the electricity production, and the number of international connections with the countries neigbouring Poland, ensure reliable operation of the power system even in the case of a loss of the entire source of capacity up to 3,750 MWe. For emergencies related to shutdowns of nuclear power units, the nuclear power plant will be equipped with several sources of back-up power supply. The first back-up power supply will be provided by 400 kV unit lines that evacuate power from the NPP, where through an autotransformer, the voltage will be transferred to the switchyard of house needs of each nuclear power unit. In the event of a shut-down of 400 kV unit lines, or even all 400 kV lines that evacuate power from the NPP to the NPS, the back-up power supply will be provided by two independent 100 kV lines, each of which is supported from separate supply directions: 1) "Żarnowiec" hydropower plant (716 MW), 2) Poland – Sweden direct current connection (600 MW). However, in the event of a total loss of external power supply, two independent, medium-voltage diesel generators of 5.2 MW capacity each are provided to operate redundantly for the house needs of each nuclear power unit. Additionally, two low voltage diesel generators of 160 kW total capacity will be placed in each reactor building.<br><br>**<u>Transboundary Documentation</u>**<br>**In Part 4 Excerpt from Volume II of the EIA Report:**<br>**1)** **Chapter II.2.1** "Nuclear power plant description";<br>**2)** **Chapter II.10** "Projected types and quantities of emissions, including waste, resulting from the Project implementation";<br>**3)** **Chapter II.11.3.4** "Combinations of external events";<br>**4)** **Appendix II.11.3-1** "Results of the analysis of impact from extreme natural events, |

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| | | | | | phenomena and conditions on NPP safety together with adaptive (preventive) measures".<br><br>**<u>Including in the Non-Technical Summary in Part 2</u>**<br>**1)** **Chapter VI.2.2.2** "Description of the NPP technology and infrastructure";<br>**2)** **Chapter VI.2.10** "Predicted types and volumes of emissions, including waste, resulting from the implementation of the Project";<br>**3)** **Chapter VI.2.11** "Hazards and severe accidents".<br><br>**<u>EIA Report</u>**<br>**In Volume II:**<br>**1)** **Chapter II.2.1** "Nuclear power plant description";<br>**2)** **Chapter II.10** "Projected types and quantities of emissions, including waste, resulting from the Project implementation";<br>**3)** **Chapter II.11.3.4** "Combinations of external events";<br>**4)** **Appendix II.11.3-1** "Results of the analysis of impact from extreme natural events, phenomena and conditions on NPP safety together with adaptive (preventive) measures". |
| | **8** | 8) In the next phases of the project, it should be proven that the designed NPP will meet the current requirements and applicable standards of the EU, IAEA, WERNA, Nuclear Safety Agreement [PGE EJ 1 sp. z o.o. - Convention on Nuclear Safety. Vienna, 20 September 1994 (Journal of Laws of 1997, no. 42, item 262)] and the Joint Convention on the Safety of Spent Fuel Management and the Safety of Radioactive Waste Management [PGE EJ 1 sp. z o.o. - Joint Convention on the Safety of Spent Fuel Management and on the Safety of Radioactive Waste Management. Vienna, 5 September 1997 (Journal of Laws of 2002, no. 202, item 1704)]. | 8) PGE EJ 1 sp. z o.o. informs that the EIA Report will include appropriate analyses of safety systems and an assessment of the impact on protected goods, but to the extent that it is possible at a given stage of the investment process for the NPP. The indicated information will be presented for each of the considered site variants and for technological variants covered by the technical envelope.<br>Due to the fact that the environmental impact assessment for the Project is of a staged nature, i.e. assuming an obligatory re-EIA under the procedure for issuing the construction permit in accordance with Article 82(1)(4a) of the EIA Act, the specification of safety requirements at the design level (but within the framework of the first EIA completed with the issuance of the DEC) will take place as part of the re-EIA.<br>Although the EIA Report under the DEC will be prepared in the pre-design phase (planning phase - design assumptions), this report will contain a description of legal conditions and design requirements, also referring to events resulting from human activity in the scope and in the extent of details reflecting the Investor's knowledge at a given stage of investment implementation and enabling the EIA to be carried out at the stage of the DEC.<br>Importantly, the content of the EIA Report submitted at the stage of the re-EIA is specified in Article 67 of the EIA Act: "The Environmental Impact Assessment Report prepared as part of the environmental impact assessment of the project constituting part of the procedure for issuing the decisions referred to in Article 72(1)(1), (10), (16) and (18) should: 1) contain the information referred to in Article 66, determined in detail and with accuracy in accordance with the data available resulting from the construction project and other information obtained after the issuance of the decisions on environmental conditions referred to in Article 72(1)(2)-(9), (11-13) and (15-18a), if they have already been issued for a given project; 2) determine the degree and manner of taking into account the requirements for environmental protection contained in the decision on environmental conditions and decisions referred to in Article 72(1)(2)(9), (11-13) and (15-18a), if they have already been issued for a given project''.<br>As can be seen from the above, the issues raised by the Slovak side will be identified in detail during the investment process, including as part of individual environmental impact assessments for the NPP. Due to the fact that the NPP will be a key element of the state's critical infrastructure, security issues (including comprehensive protection against terrorist attacks) will be a priority in their design, construction and operation, and must be consistent with the internal security strategy for nuclear power.<br>PGE EJ 1 sp. z o.o. is obliged to comply with the provisions of Polish law that take into account the international recommendations (in particular the WENRA recommendations regarding the new NPP), the requirements (in particular: Council Directive 2009/71/Euratom and Directive 2014/87/Euratom), the IAEA safety standards (in particular SF-1 and SSR-2/1 Rev.1) and the European Utility Requirements.<br>It should be noted that Polish regulations set the highest standards of nuclear energy safety, currently adopted in the world in accordance with the latest international requirements (in particular, safety objectives for new generation reactors contained in the document of the International Atomic Energy Agency SSR-2/1 and in the WERNA statement on | This will be included in the EIA Report | **<u>Transboundary Documentation</u>**<br>**In Part 4 Excerpt from Volume II of the EIA Report:**<br>**1)** **Chapter II.10.6** "Radioactive waste and spent (nuclear) fuel".<br>**In Part 6 Excerpt from Volume IV of the EIA Report:**<br>**1)** **Chapter IV.16.2** "Radioactive waste and spent nuclear fuel".<br>**In Part 7 Excerpt from Volume V of the EIA Report:**<br>**1)** **Chapter V.7.11.2** "Radioactive waste and spent nuclear fuel".<br><br>**<u>Including in the Non-Technical Summary in Part 2</u>**<br>**1)** **Chapter VI.5.7.11** "Waste management";<br>**2)** **Chapter VI.2.10** "Predicted types and volumes of emissions, including waste, resulting from the implementation of the Project".<br><br>**<u>EIA Report</u>**<br>**In Volume II:**<br>**1)** **Chapter II.10.6** "Radioactive waste and spent (nuclear) fuel".<br>**In Volume IV:**<br>**1)** **Chapter IV.16.2** "Radioactive waste and spent nuclear fuel".<br>**In Volume V:**<br>**1)** **Chapter V.7.11.2** "Radioactive waste and spent nuclear fuel". |

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| | | | Safety Objectives for New Nuclear Power Plants of November 2010), also taking into account the requirements of the "EUR" document and the conclusions from the accident at Fukushima Dai-ichi nuclear power plants and from the "stress tests" of European nuclear power plants. Polish regulations also govern the management of spent fuel and radioactive waste. Relevant legal conditions will be referred to in the EIA Report, where they will apply to environmental impact assessment (including human health and life). | | |
| **Latvia** | | | | | |
| **State Bureau of Environmental Protection of the Republic of Latvia** | **1** | 1) The Project is planned in the vicinity of the Baltic Sea; in the event of a failure or an accident, the negative effects may be of a transboundary nature. It is therefore important that Latvia, as a potential affected party, obtains scientifically sound information on the potential risks in the event of accidents or failures, in particular on the risk of water pollution. Action plans will be drawn up for such a situation. | 1) The scope of information indicated in the comment will be presented in the EIA Report. As indicated in the PIS (see: Chapter 10.5), this report will present the radiological consequences of a serious accident that may cause transboundary impacts. This failure will be determined in accordance with Polish regulations and taking into account relevant international recommendations. To assess potential hazards, the results of modelling the dispersion of radioactive substances and calculating effective doses will also be presented. In particular, the potential risks associated with contamination of the waters of the Baltic Sea will also be taken into account. Modelling will be carried out on the basis of proven software, and the methodologies will be described in the EIA Report.<br>A description of the general aspects of the contingency procedure for the commissioning and operation stage of a nuclear installation in accordance with the requirements of Polish law is required at the stage of submitting an application for a permit to construct a nuclear power plant, while the "Contingency Plan" is required only at the stage of submitting an application for a permit to operate a nuclear power plant. The "Emergency Plan" is created in accordance with Polish law and taking into account international standards. Due to the fact that the environmental impact assessment for the Project is of a staged nature, i.e. assuming an obligatory re-EIA in accordance with Article 82(1)(4a) of the EIA Act, the specification of safety requirements at the design level (but within the framework of the first EIA completed with the issuance of the DEC) will take place as part of the re-EIA. Importantly, the content of the EIA Report submitted at the stage of the re-EIA is specified in Article 67 of the EIA Act: "The Environmental Impact Assessment Report prepared as part of the environmental impact assessment of the project constituting part of the procedure for issuing the decisions referred to in Article 72(1)(1), (10), (16) and (18) should: 1) contain the information referred to in Article 66, determined in detail and with accuracy in accordance with the data available resulting from the construction project and other information obtained after the issuance of the decisions on environmental conditions referred to in Article 72(1)(2)-(9), (11-13) and (15-18a), if they have already been issued for a given project; 2) determine the degree and manner of taking into account the requirements for environmental protection contained in the decision on environmental conditions and decisions referred to in Article 72(1)(2)(9), (11-13) and (15-18a), if they have already been issued for a given project".<br>Detailed information on the "Contingency Plan" will be available at the stage of the re-EIA, at which stage the EIA Report will take into account the conditions resulting from these plans. | This will be included in the EIA Report | **<u>Transboundary Documentation</u>**<br>**In Part 6 Excerpt from Volume IV of the EIA Report:**<br>**1)** **Chapter IV.8.3** "Impact on marine surface waters";<br>**2)** **Chapter IV.17** "Determining the projected environmental impact in the event of a severe accident".<br>**In Part 7 Excerpt from Volume V of the EIA Report:**<br>**1)** **Chapter V.3.1.5** "Minimising measures - Marine surface waters";<br>**2)** **Chapter V.4** "Possible transboundary environmental impact";<br>**3)** **Appendix IV.17-1** "MATCH model results";<br>**4)** **Appendix IV.17-2** "FDMT model results".<br><br>**<u>Including in the Non-Technical Summary in Part 2</u>**<br>**1)** **Chapter VI.4.8.2** "Impacts on marine surface waters";<br>**2)** **Chapter VI.4.17** "Determining the projected environmental impact in the event of a severe accident";<br>**3)** **Chapter VI.5.3.1** "Minimising measures (marine surface waters)";<br>**4)** **Chapter VI.5.4** "Possible transboundary environmental impacts".<br><br>**<u>EIA Report</u>**<br>**In Volume IV:**<br>**1)** **Chapter IV.8.3** "Impacts on marine surface waters";<br>**2)** **Chapter IV.17** "Determining the projected environmental impact in the event of a severe accident";<br>**3)** **Appendix IV.17-1** "MATCH model results";<br>**4)** **Appendix IV.17-2** "FDMT model results".<br>**In Volume V:**<br>**1)** **Chapter V.3.1.5** "Marine surface waters" as part of **Chapter V.3** "Description of anticipated mitigation activities (avoidance, prevention, reduction or offsetting)";<br>**2)** **Chapter V.4** "Possible transboundary environmental impact". |
| | **2** | 2) As part of the implementation of the Project, radioactive waste will be generated and solutions for their storage will be needed. Even if the environmental assessment report states that the construction of such landfills is not covered by | 2) Impacts related to the management of radioactive waste and spent nuclear fuel, which are part of the Project, including the storage treatment of waste at the nuclear power plant site will be subject to a detailed analysis as part of the EIA. According to the provision of Article 48a of the Atomic Law, each organisational unit in which radioactive waste or spent fuel is generated is obliged to ensure the possibility of managing this waste and its financing from the moment of its creation until its disposal for storage, including financing of landfilling. | This will be included in the EIA Report | Plans related to the construction of a radioactive waste repository are included in the "National Plan of Management of Radioactive Waste and Spent Nuclear Fuel" - Resolution No. 154 of the Council of Ministers of 21 October 2020. |

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| | | this EIA and will be treated as separate projects, the management of waste is environmentally related to the Project and cannot be completely separated from the scope of assessment. It is important that the Project EIA report with due diligence covered aspects of predicted residues, emissions and waste generation, as well as the waste disposal/recovery management system. | On the other hand, radioactive waste and spent fuel management systems not implemented by the investor (Article 56 of the Atomic Law), including collection, transport, storage, processing and storage will be the subject of cumulative impact analyses, to the extent that it will be possible at the stage of preparing the EIA Report for the nuclear power plant.<br>In accordance with the methodology of environmental impact assessment presented in the PIS (15.4.6 of the PIS), cumulative impacts occurring in combination with other impacts related to the development of other projects which concern the same environmental resources will be analysed. In this case, the construction of radioactive waste landfills is a separate project, independent of the construction of a nuclear power plant and, in accordance with Polish law, will be subject to a separate environmental impact assessment in accordance with the classification as projects that may have a significant impact on the environment (see Chapter 5.5.3 of the PIS).<br>In accordance with the requirements of Directive 2011/92/EU (taking into account the change resulting from Directive 2014/52/EU) and the EIA Act, an analysis regarding waste management - including radioactive waste management, taking into account all legislation on radioactive waste management will be carried out in the EIA Report. In this respect, it should be borne in mind that each Member State is required to draw up an appropriate national waste and spent fuel management plan.<br>The Polish Government has satisfied this requirement by Resolution no. 195 of the Council of Ministers of 16 October 2015 on the "National Plan for Radioactive Waste and Spent Fuel Management" (Journal of Laws of 2015, item 1092). This issue is also governed by the Regulation on Radioactive Waste and Spent Fuel.<br>The objectives and scope of activities related to the construction of infrastructure for the storage of radioactive waste from a nuclear power plant have been defined in the NPRWSFM. It should be borne in mind that as part of the EIA Report submitted in the proceedings for the issuance of a DEC, reference will be made to the objectives and requirements set by the NPRWSFM.<br>The main limitation at this stage is the lack of information on the external elements of the radioactive waste and spent fuel management system from the nuclear power plant, including e.g. location and characteristics of the new radioactive waste surface storage site and the deep radioactive waste landfill (in accordance with the NPRWSFM). Therefore, as part of the EIA Report for the Project, the fuel cycle will be described as fully as possible at a given stage of the investment process for the NPP, with a description of the waste storage options known at a given stage and a reference to the environmental objectives set out in the NPRWSFM. At the same time, it should be made clear that projects involving external (in relation to the NPP) infrastructure related to the management of radioactive waste and spent fuel will be covered by the EIA and, as projects implemented after the completion of the EIA for the NPP, should take into account the cumulative impacts with those originating from the nuclear power plant. | | **<u>Transboundary Documentation</u>**<br>**In Part 1 Introduction:**<br>**1) Chapter 4** “Description of nuclear fuel cycle”.<br>**In Part 4 Excerpt from Volume II of the EIA Report:**<br>**1) Chapter II.10.2** “Emission of radioactive pollutants into the air”;<br>**2) Chapter II.10.4** “Discharge of radioactive sewage”;<br>**3) Chapter II.10.6.2** “Spent (nuclear) fuel”;<br>**4) Chapter II.10.6.3** “Radioactive waste”;<br>**5) Appendix II.10.6-1** “Sources of radioactive waste and radioactive waste management during Operational phase”.<br>**In Part 7 Excerpt from Volume V of the EIA Report:**<br>**1) Chapter V.7.11.2** “Radioactive waste and spent nuclear fuel”.<br><br>**<u>Including in the Non-Technical Summary in Part 2</u>**<br>**1) Chapter VI.2.10** “Predicted types and volumes of emissions, including waste, resulting from the implementation of the Project”.<br><br>**<u>EIA Report</u>**<br>**In Volume II:**<br>**1) Chapter II.10.6** “Radioactive waste and spent (nuclear) fuel”;<br>**2) Chapter II.10.2** “Emission of radioactive pollutants into the air”;<br>**3) Chapter II.10.4** “Discharge of radioactive sewage”;<br>**4) Appendix II.10.6-1** “Sources of radioactive waste and radioactive waste management during Operational phase”. |
| | **3** | 3) The environmental coverage report shows that a negative impact on vulnerable areas within the European Natura 200 network is possible. We recommended to envisage that the possible negative impact of the local scale on the integrity and conservation of objectives of Natura 2000 sites is at the centre of attention and assessment, finding the construction site with the least impact, including biodiversity in general and the ecosystem of the Baltic Sea. | 3) Impacts on Natura 2000 sites are and will remain a very important element of the Project's environmental impact assessment. The fact that due to the inability to exclude a significant impact on the Natura 2000 Special Area of Conservation "Białogóra" in connection with the site of "Choczewo", PGE EJ 1 sp. z o.o. decided to resign from this site variant. As indicated in the PIS (see Chapter 15.4.12) "the assessment of the impact on the integrity, coherence and subject of protection of Natura 2000 sites will be an immanent part of the environmental impact assessment for the NPP". This chapter provides a detailed description of the methodology for assessing the impact on Natura 2000 sites. The subject of the assessment will also be related impacts, i.e. covering the chain of all interactions that may occur in the ecosystem. To sum up, the subject of the comments will be taken into account at the stage of work on the EIA Report. | This will be included in the EIA Report | **<u>Transboundary Documentation</u>**<br>**In Part 6 Excerpt from Volume IV of the EIA Report:**<br>**1) Chapter IV.1** “Impacts on protected areas and features (land and sea)”;<br>**2) Chapter IV.1.4** “Impacts on protected areas and features – marine environment”;<br>**3) Chapter IV.2** “Impacts on natural (biotic) components”;<br>**4) Chapter IV.2.3** “Impacts on natural (biotic) components – marine environment”;<br>**5) Chapter IV.2.7** “Impact assessment – Sub-Variant 1A - Lubiatowo-Kopalino: Open cooling system”;<br>**6) Chapter IV.2.8** “Impact assessment – Sub-Variant 1C - Lubiatowo-Kopalino: closed cooling system using desalinated seawater”;<br>**7) Chapter IV.2.9** “Impact assessment – Sub-Variant 1B - Lubiatowo-Kopalino: closed cooling system using seawater”;<br>**8) Chapter IV.2.11** “Impact assessment – Sub-Variant 2A - Żarnowiec: closed cooling system”; |

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| | | | | | 9) **Chapter IV.2.12** "Impact assessment – Sub-Variant 2B - Żarnowiec: Closed cooling system using desalinated seawater".<br>**In Part 7 Excerpt from Volume V of the EIA Report:**<br>1) **Chapter V.3** "Description of anticipated mitigation activities (avoidance, prevention, reduction or offsetting)".<br>2) **Chapter V.3.1** "Mitigation activities";<br>3) **Chapter V.3.1.1** "Natural environment";<br>4) **Chapter V.3.1.5** "Marine surface water";<br>5) **Chapter V.3.2** "Compensation";<br>6) **Chapter V.3.2.1** "Natural environment";<br>7) **Chapter V.4** "Possible transboundary environmental impact".<br><br>**<u>Including in the Non-Technical Summary in Part 2:</u>**<br>1) **Chapter VI.4** "Impact assessment";<br>2) **Chapter VI.4.1.3** "Impacts on protected areas and objects – marine environment. Variant 1 – Lubiatowo-Kopalino site";<br>3) **Chapter VI.4.1.4** "Impacts on protected areas and objects – marine environment. Variant 2 – Żarnowiec site";<br>4) **Chapter VI.4.2** "Impacts on natural (biotic) elements".<br><br>**<u>EIA Report</u>**<br>**In Volume IV:**<br>1) **Chapter IV.1** "Impacts on protected areas and features (land and sea)";<br>2) **Chapter IV.2** "Impacts on natural (biotic) components";<br>3) **Chapter IV.1.4** "Impacts on protected areas and features: Variant 1 – Lubiatowo-Kopalino site";<br>**In Volume V:**<br>1) **Chapter V.4** "Possible transboundary environmental impact". |
| | **4** | 4) It is planned to use water from the Baltic Sea in cooling systems. It is important to assess thermal pollution and its impact on habitats both locally and on the Baltic ecosystem. | 4) Heat emissions to the waters of the Baltic Sea from the cooling system of power plant components and related impacts have been identified and described in the PIS (see Chapters 10.1 and 10.2.2.). As part of the environmental impact assessment of the Project, detailed thermal analyses of discharges will be carried out, i.e. the geographical characteristics of hot water plume discharged from the power plant will be determined. The impact of changes in thermal conditions on habitats and fauna and flora in local terms, as well as in terms of the ecosystem, will be assessed based on the analysis of related impacts, i.e. covering the chain of all impacts that may occur in the ecosystem as a result of the occurrence of an impact on one of its elements. In conclusion, the subject of the comment will therefore be taken into account in the EIA Report. | This will be included in the EIA Report | **<u>Transboundary Documentation</u>**<br>**In Part 6 Excerpt from Volume IV of the EIA Report:**<br>1) **Chapter IV.1** "Impacts on protected areas and features (land and sea)";<br>2) **Chapter IV.1.4** "Impacts on protected areas and features – marine environment";<br>3) **Chapter IV.2** "Impacts on natural (biotic) components";<br>4) **Chapter IV.8** "Assessment of impacts on surface waters";<br>5) **Chapter IV.8.3** "Impact on marine surface waters".<br>**In Part 7 Excerpt from Volume V of the EIA Report:**<br>1) **Chapter V.3** "Description of anticipated mitigation activities (avoidance, prevention, reduction or offsetting)".<br>2) **Chapter V.3.1** "Mitigation activities";<br>3) **Chapter V.3.1.1** "Natural environment"; |

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| | **5** | 5) There are also aspects of impact that go beyond the immediate environmental scope, but are interrelated and have transboundary | 5) The EIA Report will take into account issues related to the impact of the Project on the socio-economic situation in terms of the impact on the health and life of people who are part of the environment in a broader perspective of this term. However, the purpose of the procedure for issuing the DEC for the Project is not to analyse the impact of | This will be partially included in the EIA Report | The EIA Report addresses the relation of the planned construction of the First NPP in Poland to the legislation framework and strategies developed for Poland and the |

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| | | economic and social significance. A strategic assessment of the Project's impact on the electricity market in the Baltic and Latvian regions is important. | the investment on foreign power systems or energy markets. The issues of the impact of the development of the power system and the related construction of new generation capacities (including the NPP) are primarily the subject of the adopted strategic documents at the national level, i.e. PEP2030 and the PNPP, which are in line with the objectives of the European-level documents (e.g. climate and energy package; European Energy Policy, Energy Road Map 2050; Baltic Energy Market Interconnection Plan). It should be noted that both PEP 2030 and the PNPP were the subject of proceedings on strategic environmental impact assessment conducted in the years 2011-2014, from which Latvia withdrew its participation. In conclusion, the EIA Report will refer to the environmental objectives set out in the relevant strategic documents. | | European Union. The issues in question were discussed also in the transboundary report:<br><br>**<u>Transboundary Documentation</u>**<br>**In Part 1 Introduction:**<br>**1) Chapter 3** "Justification for the Project execution".<br>**In Part 3 Excerpt from Volume I of the EIA Report:**<br>**1) Chapter I.6** "Justification for the Project execution";<br>**2) Chapter I.7** "The Project in the context of strategic documents".<br><br>**<u>Including in the Non-Technical Summary in Part 2:</u>**<br>**1) Chapter VI.1.5** "Justification for the implementation of the Project";<br>**2) Chapter VI.1.6** "The Project in the context of strategic documents".<br><br>**<u>EIA Report</u>**<br>**In Volume I:**<br>**1) Chapter I.6** "Justification for the Project execution";<br>**2) Chapter I.7** "The Project in the context of strategic documents". |
| **Ukraine** | | | | | |
| **Ministry of Ecology and Natural Resources of Ukraine** | **1** | 1) The documents presented do not take into account the transboundary transfer, including to Ukraine. In the event of a major consequence of an accident, it is limited to a distance of 2400 m from the NPP and amounts to 350 mSv (Table 14, "Parameters of radiation impact on society and the environment in emergency conditions '', 78). Given that the minimum distance of the nuclear power plant to the border with Ukraine is about 500 km, it can be provisionally concluded that the major accidents analysed in the report will be within the limits set by national regulatory documents. However, definitive conclusions can only be drawn if the environmental impact assessment documents justify that the analysed major failures are conservative in terms of their environmental impact.<br>Therefore, the environmental impact assessment document should provide an additional justification for radioactive releases in the event of serious failures and calculations of the exposure rates of the population at long distances from the nuclear power plant, taking into account realistic meteorological scenarios. | There was no response as written explanation was not requested. | This will be included in the EIA Report | **<u>Transboundary Documentation</u>**<br>**In Part 4 Excerpt from Volume II of the EIA Report:**<br>**1) Chapter II.11** "Hazards and severe accidents";<br>**2) Appendix II.11.3-1** "Results of the analysis of impact from extreme natural events, phenomena and conditions on NPP safety together with adaptive (preventive) measures".<br>**In Part 6 Excerpt from Volume IV of the EIA Report:**<br>**1) Chapter VI.4.14** "Impact related to ionising radiation";<br>**2) Chapter IV.17** "Determining the projected environmental impact in the event of a severe accident";<br>**3) Appendix IV.17-1** "MATCH model results";<br>**4) Appendix IV.17-2** "FDMT model results".<br>**In Part 7 Excerpt from Volume V of the EIA Report:**<br>**1) Chapter V.7.8** "Ionising radiation";<br>**2) Chapter V.7.11.2 "**Radioactive waste and spent nuclear fuel".<br><br>**<u>Including in the Non-Technical Summary in Part 2:</u>**<br>**1) Chapter VI.4.17** "Determining the projected environmental impact in the event of a severe accident";<br>**2) Chapter VI.4.14** "Impact related to ionising radiation".<br><br>**<u>EIA Report</u>** |

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| | | | | | **In Volume II:**<br>**1)** **Chapter II.11** "Hazards and severe accidents", subchapter II.11.3 "External events that may endanger the safety of a nuclear power plant"; subchapter II.11.4.2 "Risk of a severe accident in a nuclear context";<br>**2)** **Appendix II.11.3-1** "Results of the analysis of impact from extreme natural events, phenomena and conditions on NPP safety together with adaptive (preventive) measures".<br>**In Volume IV:**<br>**1)** **Chapter IV.14** "Impact related to ionising radiation";<br>**2)** **Chapter IV.17** "Determining the projected environmental impact in the event of a severe accident";<br>**3)** **Appendix IV.17-1** "MATCH model results";<br>**4)** **Appendix IV.17-2** "FDMT model results".<br>**In Volume V:**<br>**1)** **Chapter V.4.1** "Possible transboundary radiological environmental impact";<br>**2)** **Appendix V.4-1** "MATCH model results";<br>**3)** **Appendix V.4-2** "FDMT model results". |
| | **2** | 2) In order to implement a project of construction of a nuclear power plant, additional information should be provided taking into account the provisions of EU Directive 2014/87/Euratom, which replaces Council Directive 2009/71/Euratom, with regard to the safety of nuclear installations, in particular compliance with the safety objectives of the nuclear power plant (including the elimination of early and large radioactive releases). | There was no response as written explanation was not requested. | This will be included in the EIA Report | **Transboundary Documentation**<br>**In Part 4 Excerpt from Volume II of the EIA Report:**<br>**1)** **Chapter II.2.1.2** "Nuclear safety concept and basic safety systems of the AP1000 reactor";<br>**2)** **Chapter II.11.1.2** "Plant states".<br><br>**Including in the Non-Technical Summary in Part 2:**<br>**1)** **Chapter VI.2.1** "Project description";<br>**2)** **Chapter VI.2.11** "Hazards and severe accidents".<br><br>**EIA Report**<br>**In Volume II:**<br>**1)** **Chapter II.2.1.2** "Nuclear safety concept and basic safety systems of the AP1000 reactor";<br>**2)** **Chapter II.11.1.2** "Plant states". |
| | **3** | 3) Given that extreme man-made and natural hazards have the potential to lead to loss of safety functions and radioactive releases, it is recommended to include information on the consideration of extreme hazards and their combinations, hazard characteristics and safety margins in the documents submitted. | There was no response as written explanation was not requested. | This will be included in the EIA Report | **Transboundary Documentation**<br>**In Part 4 Excerpt from Volume II of the EIA Report:**<br>**1)** **Chapter II.11** "Hazards and severe accidents".<br>**In Part 6 Excerpt from Volume IV of the EIA Report:**<br>**1)** **Chapter IV.17** "Determining the projected environmental impact in the event of a severe accident".<br><br>**Including in the Non-Technical Summary in Part 2:**<br>**1)** **Chapter VI.4.17** "Determining the projected environmental impact in the event of a severe accident".<br><br>**EIA Report**<br>**Volume II**<br>**1)** **Chapter II.11** "Hazards and severe accidents".<br>**Volume IV** |

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| | | | | | 1) **Chapter IV.17** "Determining the projected environmental impact in the event of a severe accident". |
| **Hungary** | | | | | |
| **Ministry of Agriculture, Department of Environmental Protection** | **1** | 1. A detailed analysis and assessment of the radiological impact on the environment, for normal operating conditions, design and non-design failures and major accidents shall be carried out. Calculations of the environmental dose and the determination of radiological areas (as shown in the maps) shall be provided, also taking into account serious accidents. | There was no response as written explanation was not requested. | This will be included in the EIA Report | **Transboundary Documentation**<br>**In Part 4 Excerpt from Volume II of the EIA Report:**<br>1) **Chapter II.11** "Hazards and severe accidents";<br>2) **Appendix II.11.3-1** "Results of the analysis of impact from extreme natural events, phenomena and conditions on NPP safety together with adaptive (preventive) measures".<br>**In Part 6 Excerpt from Volume IV of the EIA Report:**<br>1) **Chapter IV.14** "Impact related to ionising radiation";<br>2) **Chapter IV.17** "Determining the projected environmental impact in the event of a severe accident";<br>3) **Appendix IV.17-1** "MATCH model results";<br>4) **Appendix IV.17-2** "FDMT model results".<br>**In Part 7 Excerpt from Volume V of the EIA Report:**<br>1) **Chapter V.4.1** "Possible transboundary radiological environmental impact";<br>2) **Appendix V.4-1** "MATCH model results";<br>3) **Appendix V.4-2** "FDMT model results".<br><br>**Including in the Non-Technical Summary in Part 2:**<br>1) **Chapter VI.5.4** "Possible transboundary environmental impacts";<br>2) **Chapter VI.4.17** "Determining the projected environmental impact in the event of a severe accident";<br>3) **Chapter VI.4.14** "Impact related to ionising radiation".<br><br>**EIA Report**<br>**In Volume II:**<br>1) **Chapter II.11** "Hazards and severe accidents";<br>2) **Chapter II.11.3** "External events that may endanger the safety of a nuclear power plant";<br>3) **Appendix II.11.3-1** "Results of the analysis of impact from extreme natural events, phenomena and conditions on NPP safety together with adaptive (preventive) measures";<br>4) **Chapter II.11.4.2** "Risk of a severe accident in a nuclear context".<br>**In Volume IV:**<br>1) **Chapter IV.14** "Impact related to ionising radiation";<br>2) **Chapter IV.17** "Determining the projected environmental impact in the event of a severe accident";<br>3) **Appendix IV.17-1** "MATCH model results";<br>4) **Appendix IV.17-2** "FDMT model results". |

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| | | | | | **In Volume V:**<br>1) **Chapter V.4.1** "Possible transboundary radiological environmental impact";<br>2) **Appendix V.4-1** "MATCH model results";<br>3) **Appendix V.4-2** "FDMT model results". |
| | **2** | 2. The structure and functioning of the emission and environmental monitoring systems at the site shall be described in detail (e.g. sampling frequency, sample preparation, measurement methods, measuring instruments and their performance characteristics, efficiency and detection limits, method for evaluating measurement results, data transmission and reporting obligations, etc.). | There was no response as written explanation was not requested. | This will be included in the EIA Report | **<u>Transboundary Documentation</u>**<br>**In Part 1 Introduction:**<br>1) **Chapter 6.1**"Possible transboundary radiological environmental impact";<br>2) **Appendix V.4-1** "MATCH model results";<br>3) **Appendix V.4-2** "FDMT model results";<br>**In Part 4 Excerpt from Volume II of the EIA Report:**<br>1) **Chapter II.10.6.2** "Spent (nuclear) fuel";<br>2) **Chapter II.10.6.3** "Radioactive waste";<br>3) **Appendix II.10.6-1** "Sources of radioactive waste and radioactive waste management during Operational phase";<br>4) **Chapter II.10.4** "Discharge of radioactive sewage".<br>**In Part 7 Excerpt from Volume V of the EIA Report:**<br>1) **Chapter V.7.11.2** "Radioactive waste and spent nuclear fuel".<br><br>**<u>Including in the Non-Technical Summary in Part 2:</u>**<br>1) **Chapter VI.2.10** "Predicted types and volumes of emissions, including waste, resulting from the implementation of the Project".<br><br>**<u>EIA Report</u>**<br>**In Volume V:**<br>1) **Chapter V.7.8** "Ionising radiation";<br>2) **Appendix V.7-1** "Description of the draft regulation of the Council of Ministers of February 26, 2020 on the scope of the environmental radiation monitoring program developed and implemented by organizational units classified in risk category I or II". |
| | **3** | 3. The activity concentration values occurring at the borders of Hungary for the highest expected emission of radioactivity (serious accident) and the expected dose levels shall be provided. The expected effects and consequences of exposure of radiation on the environment and health should be assessed. With regard to the event, it is necessary to describe its characteristics and factors and processes, emissions of radioactivity, sources and analytical methods used, etc. | There was no response as written explanation was not requested. | This will be included in the EIA Report | **<u>Transboundary Documentation</u>**<br>**In Part 1 Introduction:**<br>1) **Chapter 6.1**"Possible transboundary radiological environmental impact";<br>2) **Appendix V.4-1** "MATCH model results";<br>3) **Appendix V.4-2** "FDMT model results".<br>**In Part 4 Excerpt from Volume II of the EIA Report:**<br>1) **Chapter II.10.6.2** "Spent (nuclear) fuel";<br>2) **Chapter II.10.6.3** "Radioactive waste";<br>3) **Appendix II.10.6-1** "Sources of radioactive waste and radioactive waste management during Operational phase";<br>4) **Chapter II.10.4** "Discharge of radioactive sewage";<br>5) **Chapter II.11.3** "External events that may endanger the safety of a nuclear power plant";<br>6) **Appendix II.11.3-1** "Results of the analysis of impact from extreme natural events, phenomena |

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| | | | | | and conditions on NPP safety together with adaptive (preventive) measures".<br>**In Part 7 Excerpt from Volume V of the EIA Report:**<br>**1) Chapter V.4** "Possible transboundary environmental impact";<br>**2)** Chapter V.7.11.2 "Radioactive waste and spent nuclear fuel".<br><br>**<u>Including in the Non-Technical Summary in Part 2:</u>**<br>**1) Chapter VI.2.10** "Predicted types and volumes of emissions, including waste, resulting from the implementation of the Project".<br><br>**<u>EIA Report</u>**<br>**In Volume V:**<br>**1) Chapter V.4** "Possible transboundary environmental impact";<br>**2) Appendix V.4-1** "MATCH model results";<br>**3) Appendix V.4-2** "FDMT model results". |
| | **4** | 4. Compliance of the research methodology used, the initial and basic data used to carry out these analyses and calculations and the partial results with international standards and practices shall be demonstrated. | There was no response as written explanation was not requested. | This will be included in the EIA Report | **<u>Transboundary Documentation</u>**<br>**In Part 7 Excerpt from Volume V of the EIA Report:**<br>**1) Chapter V.1.13** "Ionising radiation";<br>**2) Chapter V.1.14** "Human health and life".<br><br>**<u>Including in the Non-Technical Summary in Part 2:</u>**<br>**1) Chapter VI.4.14** "Impact related to ionising radiation".<br><br>**<u>EIA Report</u>**<br>**In Volume V:**<br>**1) Chapter V.1** "Description of the forecasting methods used";<br>**2) Chapter V.1.13** "Ionising radiation";<br>**3) Appendix V.1.13-1** "Description of models used for radiological impact analyses". |
| | **5** | 5. Basic radiological data shall be provided on the basis of a survey covering all elements of the environment of the investment site and the following shall be determined with regard to emissions of radioactive isotopes and radioactive materials during normal operation of a nuclear power plant: location and mode of generation, resulting operations, emission mode, location and path of emission, characteristics of the radioactive materials emitted, including radioactivity, concentration of activity, physical and chemical properties, changes in emissions over time, mass and volumetric emission flow rates, planned emission levels. | There was no response as written explanation was not requested. | This will be included in the EIA Report | **<u>Transboundary Documentation</u>**<br>**In Part 1 Introduction:**<br>**1) Chapter 6.1**"Possible transboundary radiological environmental impact";<br>**2) Appendix V.4-1** "MATCH model results";<br>**3) Appendix V.4-2** "FDMT model results".<br>**In Part 4 Excerpt from Volume II of the EIA Report:**<br>**1) Chapter II.10.2** "Emission of radioactive pollutants into the air";<br>**2) Chapter II.10.4** "Discharge of radioactive sewage";<br>**3) Chapter II.10.6.2** "Spent (nuclear) fuel";<br>**4) Chapter II.10.6.3** "Radioactive waste";<br>**5) Appendix II.10.6-1** "Sources of radioactive waste and radioactive waste management during Operational phase";<br>**6) Chapter II.11.3** "External events that may endanger the safety of a nuclear power plant";<br>**7) Appendix II.11.3-1** "Results of the analysis of impact from extreme natural events, phenomena |

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| | **6** | 6. It is necessary to describe the planned technological and organisational measures to prevent, respond to and end unusual events (extraordinary radioactive emissions) to mitigate environmental damage and load and, in the event of failure of environmental monitoring and emission systems, monitor the environment and emissions. | There was no response as written explanation was not requested. | This will be included in the EIA Report | **<u>Transboundary Documentation</u>**<br>**In Part 4 Excerpt from Volume II of the EIA Report:**<br>**1) Chapter II.11** "Hazards and severe accidents";<br>**2) Appendix II.11.3-1** "Results of the analysis of impact from extreme natural events, phenomena and conditions on NPP safety together with adaptive (preventive) measures".<br>**In Part 6 Excerpt from Volume IV of the EIA Report:**<br>**1) Chapter IV.14** "Impact related to ionising radiation";<br>**2) Chapter IV.17** "Determining the projected environmental impact in the event of a severe accident";<br>**3) Appendix IV.17-1** "MATCH model results"; |

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| | **7** | 7. The quantities of low- and intermediate-level and high-level waste and spent fuel generated during the operation of the facility, the method of its storage, management and disposal and its impact on the environment should be specified. | There was no response as written explanation was not requested. | This will be included in the EIA Report | **<u>Transboundary Documentation</u>**<br>**In Part 4 Excerpt from Volume II of the EIA Report:**<br>1) **Chapter II.10.6.2** "Spent (nuclear) fuel";<br>2) **Chapter II.10.6.3** "Radioactive waste";<br>3) **Appendix II.10.6-1** "Sources of radioactive waste and radioactive waste management during Operational phase";<br>4) **Chapter II.10.4** "Discharge of radioactive sewage".<br>**In Part 6 Excerpt from Volume IV of the EIA Report:**<br>1) **Chapter IV.14** "Impact related to ionising radiation";<br>**In Part 7 Excerpt from Volume V of the EIA Report:**<br>1) **Chapter V.7.11.2** "Radioactive waste and spent nuclear fuel". |

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| | **8** | 8. The structure and functioning of the planned failure management and safety systems shall be demonstrated. | There was no response as written explanation was not requested. | This will be included in the EIA Report | **<u>Transboundary Documentation</u>**<br>**In Part 1 Introduction:**<br>**1) Chapter 6.1** "Possible transboundary radiological environmental impact".<br>**In Part 4 Excerpt from Volume II of the EIA Report**<br>**1) Chapter II.11** "Hazards and severe accidents";<br>**2) Appendix II.11.3-1** "Results of the analysis of impact from extreme natural events, phenomena and conditions on NPP safety together with adaptive (preventive) measures".<br>**In Part 6 Excerpt from Volume IV of the EIA Report:**<br>**1) Chapter IV.17** "Determining the projected environmental impact in the event of a severe accident";<br>**2) Appendix IV.17-1** "MATCH model results";<br>**3) Appendix IV.17-2** "FDMT model results".<br>**In Part 7 Excerpt from Volume V of the EIA Report:**<br>**1) Chapter V.1.16** "Severe accident".<br><br>**<u>Including in the Non-Technical Summary in Part 2:</u>**<br>**1) Chapter VI.4.16** "Impacts related to waste management";<br>**2) Chapter VI.2.10** "Predicted types and volumes of emissions, including waste, resulting from the implementation of the Project".<br><br>**<u>EIA Report</u>**<br>**In Volume II:**<br>**1) Chapter II.11** "Hazards and severe accidents";<br>**2) Appendix II.11.3-1** "Results of the analysis of impact from extreme natural events, phenomena |

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| | **9** | 9. The possibilities of the decommissioning strategy, the functions of shutdown for protection against radiation (activity, isotope composition, mass balance, contamination, etc.), the planned control of protection against radiation, the expected radioactive emissions and the quantitative characteristics of the resulting radioactive emissions shall be presented. | There was no response as written explanation was not requested. | This will be included in the EIA Report | **<u>Transboundary Documentation</u>**<br>**In Part 4 Excerpt from Volume II of the EIA Report**<br>**1) Chapter II.10.2** "Emission of radioactive pollutants into the air";<br>**2) Chapter II.10.4** "Discharge of radioactive sewage";<br>**3) Chapter II.10.6** "Radioactive waste and spent (nuclear) fuel".<br>**In Part 6 Excerpt from Volume IV of the EIA Report:**<br>**1) Chapter IV.14** "Impact related to ionising radiation";<br>**In Part 7 Excerpt from Volume V of the EIA Report:**<br>**1) Chapter V.6** "Anticipated extent of the planned restricted use area";<br>**2) Chapter V.7.8** "Ionising radiation";<br>**3) Chapter V.7.11.2** "Radioactive waste and spent nuclear fuel".<br><br>**<u>Including in the Non-Technical Summary in Part 2:</u>**<br>**1) Chapter VI.4.16** "Impacts related to waste management";<br>**2) Chapter VI.2.10** "Predicted types and volumes of emissions, including waste, resulting from the implementation of the Project".<br><br>**<u>EIA Report</u>**<br>**In Volume II:**<br>**1) Chapter II.10.2** "Emission of radioactive pollutants into the air";<br>**2) Chapter II.10.4** "Discharge of radioactive sewage";<br>**3) Chapter II.10.6** "Radioactive waste and spent (nuclear) fuel";<br>**4) Appendix II.10.6-1** "Sources of radioactive waste and radioactive waste management during Operational phase".<br>**In Volume III:**<br>**1) Chapter III.3.11** "Ionising radiation background".<br>**In Volume IV:**<br>**1) Chapter IV.14** "Impact related to ionising radiation". |

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| **Czech Republic** | | | | | |
| **Ministry of Environment, Department of EIA and Integrated Prevention**<br><br>CALLA - Association for Preservation of the Environment | **1** | (...) this report:<br><br>a) - does not contain a comparison of the design of the nuclear power plant construction and operation with the potential for electricity generation in Poland, including alternative methods of supplying energy services, based on the energy efficiency and renewable energy sources.<br>- 2 Scope and objective of the Environmental Scoping Report impact, in the definition of the scope of impact, page 12: EIA should not assess only "d) possible project variants" (as is stated in Article 3(1)(5) of the EIA Act (Polish law act of 3 October 2008 on provision of information on the environment and its protection, public participation in environmental protection, and environmental impact assessment (EIA) procedure), but it should also assess a "zero variant" (originally, "zero options" according to the Espoo Convention, Aarhus Convention, and EU Directive), and compare environmental impacts of alternative strategies which can lead to such zero variants. In a situation when "not all options are open", the EIA should enable a comparison between:<br>• various alternative technologies (for example, a strategy focused on improvement of energy efficiency and a higher share pf renewable energy sources);<br>• alternative sites;<br>• alternative nuclear technologies. The above was later confirmed on page 13: "a) types of alternative variants that require investigation", and on page 14: "5) alternative variants under consideration | No response has been given to the remark because it is an opinion. | It will be included in the EIA Report. | In the EIA Report, both the Project implementation variants and scenarios of the national energy sector development were addressed. First of all, assumptions of national strategies, such as the Polish Nuclear Power Programme and Energy Policy of Poland until 2040 were referred to. In addition to the above strategies, it was also assessed how the Project supported the strategies of the European Union. Various development scenarios were also considered in the assessment of the Project impact on climate and its changes, including a zero scenario without undertaking any investment activities. It was described what would happen if no investment activity was undertaken (known as the zero variant), it was also taken into account in the assessment of the Project environmental impact.<br><br>**Transboundary Documentation**<br>**In Part 1 Introduction:**<br>**1) Chapter 3** "Justification for the Project execution";<br>**2) Chapter 4** "Description of nuclear fuel cycle".<br>**In Part 3 Excerpt from Volume I of the EIA Report:**<br>**1) Chapter I.6** "Justification for the Project execution";<br>**2) Chapter I.7** "The Project in the context of strategic documents";<br>**3) Chapter I.9** "Project variants under consideration".<br>**In Part 4 Excerpt from Volume II of the EIA Report:**<br>**1) Chapter II.10.4** "Discharge of radioactive sewage";<br>**2) Chapter II.10.6.2** "Spent (nuclear) fuel";<br>**3) Appendix II.10.6-1** "Sources of radioactive waste and radioactive waste management during Operational phase";<br>**4) Chapter II.10.6.3** "Radioactive waste".<br>**In Part 7 Excerpt from Volume V of the EIA Report:**<br>**1) Chapter V.2** "Selection of the variant proposed by the Investor, rational variant most favorable for the environment, and rational alternative variant, together with reasons for their selection"; |

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| | | that will be subject of the impact assessment, including the so-called zero variant". Based on the above, it should be clear that "project versions" are too limited if no "project alternatives" are considered.<br>- 7 Project variants under consideration, page 46: It is insufficient to describe the alternative zero variant as the non-execution of the project. In order to justify the impact caused by the project, it is necessary that project versions should describe options of the energy policy which should lead to providing services (electricity generation) offered by the project, without the need to execute it. It comprises the energy policy based on the application of clean energy technologies, and energy efficiency. The reference to the Polish Nuclear Power Programme (PNPP) is insufficient. As stated on page 18, the nuclear energy was chosen on the basis of the following argument: "nuclear power is present in all scenarios analysed in the draft Energy Policy until 2050." The nuclear energy is considered indispensable because only scenarios that involved the nuclear energy were assessed. The same must be assessed for various energy concepts which led to the decision to apply the nuclear energy. This flaw, at the energy policy level, must be removed by the introduction of a detailed comparison of options at all levels:<br>• at the policy level (comparison of various energy scenarios, including the zero variant - justification of the nuclear energy selection in comparison to other options);<br>• at the site level (comparison of various possible sites in terms of environmental impact – justification of the site selection in view of the environmental protection);<br>• at the technology level (comparison of different production technologies recommended (power supply for the station), cooling, shut-downs from operation, waste management and its impact on the environment - justification of the technology selected in view of environmental impact).<br>The description in Chapter 7 is very short, it does not meet the requirements of a scoping report and for that reason it should be prepared again. | | | 2) **Chapter V.7.11.2** "Radioactive waste and spent nuclear fuel".<br><br>**<u>Including in the Non-Technical Summary in Part 2:</u>**<br>1) **Chapter VI.1.5** "Justification for the implementation of the Project";<br>2) **Chapter VI.1.6** "The Project in the context of strategic documents";<br>3) **Chapter VI.1.8** "Considered Project variants";<br>4) **Chapter VI.2.10** "Predicted types and volumes of emissions, including waste, resulting from the implementation of the Project";<br>5) **Chapter VI.2.11** "Hazards and severe accidents";<br>6) **Chapter VI.3.3.2** "Climate";<br>7) **Chapter VI.4.3** "Impact of the Project on climate, and impact of climatic factors on the Project";<br>8) **Chapter VI.5.2** "Selection of the variant proposed by the Investor, rational variant most favorable for the environment, and rational alternative variant, along with reasoning for their selection".<br><br>**<u>EIA Report</u>**<br>**In Volume I:**<br>1) **Chapter I.6** "Justification for the Project execution";<br>2) **Chapter I.7** "The Project in the context of strategic documents";<br>3) **Chapter I.9** "Project variants under consideration".<br>**In Volume II:**<br>1) **Chapter II.10.4** "Discharge of radioactive sewage";<br>2) **Chapter II.10.6.2** "Spent (nuclear) fuel";<br>3) **Chapter II.10.6.3** "Radioactive waste";<br>4) **Appendix II.10.6-1** "Sources of radioactive waste and radioactive waste management during Operational phase";<br>5) **Chapter II.11.3.2** "Analysis of the vulnerability of the Project to extreme events, phenomena and natural conditions, with particular focus on primary and secondary effects of climate change";<br>6) **Chapter II.11.4.3** "Risk of a natural disaster" item 2 Flood hazards – NPP site flooding and inundation. In this chapter, maximum ground elevations for both sites are presented, in determination of which the storm surge sea level has been used with probability at 1 per 10,000 years, combined with wave height and change of the sea level in the climate change perspective until 2180;<br>7) **Appendix II.11.3-1** "Results of the analysis of impact from extreme natural events, phenomena and conditions on NPP safety together with adaptive (preventive) measures". |

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| | | | | | **In Volume III:**<br>1) **Chapter III.3.2** "Climate";<br>2) **Appendix III.3.2.-1** "Technical note on climate change scenarios".<br>**In Volume IV:**<br>1) **Chapter IV.3** "Impact of the Project on the climate (and microclimate), and climatic factors on the Project".<br>**In Volume V:**<br>1) **Chapter V.2** "Selection of the variant proposed by the Investor, rational variant most favorable for the environment, and rational alternative variant, together with reasons for their selection";<br>2) **Appendix V.2-1** "Selection of the variant proposed by the Investor, rational variant most favorable for the environment, and rational alternative variant, along with reasoning for their selection";<br>3) **Chapter V.7.11.2** "Radioactive waste and spent nuclear fuel". |
| | **2** | b) It does not deal with "significant effects" (as it was termed in Article 6 of the Aarhus Convention) on the environment and health of inhabitants in the event of a potential accident.<br>- 10 Potential environmental impacts, 10.3 10.3 Radiation impact during accident conditions, page 76: for an accident which has not be considered during the design (Beyond Design-basis Accidents, BDA), "major radiation impact is limited to an area within 800 m from the reactor, while an area within 3 km from the reactor requires temporary intervention". It is a typical "bury your head in the sand" argumentation. According to an analysis carried out by the University of Natural Resources and Life Sciences in Vienna (BOKU), and by the University of Vienna, there is a scenario which considers a risk of a release of several dozen percent of cesium, iodine and radioactive strontium, therefore evacuation and prevention activities in a considerable area will be necessary. Although such an accident is highly unlikely, it can occur, therefore it meets the criteria of a significant effect under Article 6(6)(b) of the Aarhus Convention. The causes can include an enemy attack (sabotage, terrorism, war) or a cumulation of unfavourable atmospheric conditions, technical and human errors, which have not been assessed on the basis of the risk probability (Probabilistic Risk Assessment, PRA) | No response has been given to the remarks because they are opinions. | It will be included in the EIA Report. | **<u>Transboundary Documentation</u>**<br>**In Part 4 Excerpt from Volume II of the EIA Report:**<br>1) **Chapter II.11** "Hazards and severe accidents";<br>2) **Appendix II.11.3-1** "Results of the analysis of impact from extreme natural events, phenomena and conditions on NPP safety together with adaptive (preventive) measures".<br>**In Part 6 Excerpt from Volume IV of the EIA Report:**<br>1) **Chapter IV.14** "Impact related to ionising radiation";<br>2) **Chapter IV.17** "Determining the projected environmental impact in the event of a severe accident".<br><br>**<u>Including in the Non-Technical Summary in Part 2</u>**<br>1) **Chapter VI.2.11** "Hazards and severe accidents";<br>2) **Chapter IV.4.14** "Impact related to ionising radiation";<br>3) **Chapter VI.4.17** "Determining the projected environmental impact in the event of a severe accident".<br><br>**<u>EIA Report</u>**<br>**In Volume II:**<br>1) **Chapter II.11** "Hazards and severe accidents";<br>2) **Appendix II.11.3-1** "Results of the analysis of impact from extreme natural events, phenomena and conditions on NPP safety together with adaptive (preventive) measures".<br>**In Volume IV:**<br>1) **Chapter IV.14** "Impact related to ionising radiation"; |

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| | | and due to that the likelihood of their occurrence is unknown. We emphasise that none of the scenarios which led to the accidents in Three Miles Island, Chornobyl, Windscale, Fukushima or even Tokaimura, Greifswald, and Bohunice A1, was subject to PRA, because all such scenarios were deemed too improbable. It should be noted that the European Utility Requirements (EUR) mentioned in the document determine the requirements of the technology calculated on the basis of the PRA and serve to point attention to technical faults of the execution. However, it has nothing to do with the actual risk of a nuclear accident involving significant emissions of radioactive substances.<br>10 Potential environmental impacts, 10.4 Potential impact areas of the Project, page 80: "In relation to radiation impacts in emergency conditions, which undoubtedly may also have a direct influence on the substantive legal situation of the potential parties, the adopted objectives are of key importance for determining the potential range of the impacts". These conclusions are wrong. It is not "adopted objectives" that determine the potential range of impacts, but the expected actual situation upon the Project execution. The EIA process tasks include the identification of the condition obligatory for the project in the future. Technical criteria in part 10.3 describe solely the criteria on the basis of PRA. However, no potential environmental impact can be predicted on the basis of such criteria. Article 6(6)(b) of the Aahus Convention refers to a "significant effect" which includes effects of severe accidents during which substantial quantities of radioactive substances are released to the atmosphere, irrespective of the reason for such an accident. The public concerned (art. 6(2) of the Aarhus Convention) comprises all the people who are affected by the potential effects. The above members of the public, under Article 9(2) of the Aarhus Convention, have also access to legal assistance, if such erroneous conclusions of the PGE Group are not removed from the scoping report. On the basis of the above it should be concluded that the governing law of the parties to the procedure is defined by the extent of the biggest maximum effects, that is, | | | 2) **Chapter IV.17** "Determining the projected environmental impact in the event of a severe accident". |

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| | | it includes the entities beyond the state borders.<br>- The report should evidence that the operator of new reactors will be able to fully cover potential nuclear damage related to an accident, also in the Czech Republic. | | | |
| | **3** | c) It contains fundamental flaws related to the participation of the public:<br>- 5 Environmental impact assessment procedure (EIA), 5.1 Legal classification of the project, page 26: in this part, the report does not provide information that the project should comply with requirements of the Aarhus Convention and Espoo Convention. According to both of the above conventions, nuclear power plants are types of projects where the participation of the public, or possibly the EIA process, is necessary. Although the Espoo Convention is referred to, there is no mention about the Aarhus Convention, which determines that the public participation (not "public opinion"(!), as was incorrectly stated) is necessary at the stage "when all [selection] options [and all alternatives] are open" (Article 6(4)). | No response has been given to the remarks because they are opinions. | It will be included in the EIA Report. | The Aarhus Convention was specified in the EIA Report as one of the major legal acts regarding the public participation in the assessment of the environmental impact. With respect to the Espoo Convention, Transboundary Documentation was drawn up and translated into English, German and Lithuanian, due to a decision imposed on this investment project regarding the need to carry out a procedure on the transboundary environmental impact, and preparing translations according to bilateral agreements concluded with Lithuania and Germany.<br><br>**<u>Transboundary Documentation</u>**<br>**In Part 3 Excerpt from Volume I of the EIA Report:**<br>**1) Chapter I.10 "**Legal framework for the Project".<br>**In Part 7 Excerpt from Volume V of the EIA Report:**<br>**1) Chapter V.5.5** "Communication activities".<br><br>**<u>Including in the Non-Technical Summary in Part 2:</u>**<br>**1) Chapter VI.5.5** "Analysis of potential social conflicts".<br><br>**<u>EIA Report:</u>**<br>**In Volume I:**<br>**1) Chapter I.10 "**Legal framework for the Project".<br>**In Volume V:**<br>**1) Chapter V.5** "Analysis of possible social conflicts". |
| | **4** | d) It does not contain a realistic and comprehensive analysis of the spent nuclear fuel (SNF) and high level radioactive waste (HLW) management conducted by Poland. There is no description, either, of the length of the SNF and HLW transport, or the specification of the number of inhabitants residing and staying within a specific distance from the transport route, in the event of accidents, if any.<br>- 2 Scope and objective of the Environmental Scoping Report, in the definition of the scope of impact, page 14: Here, "3) lack of knowledge and gaps in knowledge on the environment and possible impact it might exert on the project that need to be filled so as to perform a correct and comprehensive environmental impact assessment" is | No response has been given to the remarks because they are opinions. | It will be included in the EIA Report. | **<u>Transboundary Documentation</u>**<br>**In Part 1 Introduction:**<br>**1) Chapter 4** "Description of nuclear fuel cycle".<br>**In Part 4 Excerpt from Volume II of the EIA Report:**<br>**1) Chapter II.10.6** "Radioactive waste and spent (nuclear) fuel";<br>**2) Chapter II.10.6.2** "Spent (nuclear) fuel";<br>**3) Appendix II.10.6-1** "Sources of radioactive waste and radioactive waste management during Operational phase";<br>**4) Chapter II.11** "Hazards and severe accidents".<br>**In Part 6 Excerpt from Volume IV of the EIA Report:**<br>**1) Chapter IV.16.2** "Radioactive waste and spent nuclear fuel";<br>**2) Chapter IV.17** "Determining the projected environmental impact in the event of a severe accident".<br>**In Part 7 Excerpt from Volume V of the EIA Report:**<br>**1) Chapter V.7.11.2** "Radioactive waste and spent nuclear fuel". |

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| | | specified. It means that the description of radioactive waste and spent nuclear fuel in the report is insufficient. Currently there are big gaps related to knowledge in this respect, in particular concerning the SNF and HLW management. The program recommended in the PNPP is just a speculation to a considerable extent (it is not based on experience supported by scientific research), and the description covers an optimistic scenario only. It is very important that the EIA should assess comprehensively the issues related to the SNF and HLW management, including an impartial description of doubts, gaps in knowledge and information regarding the recommended technologies, and potential effects, assessment of alternative technologies and comprehensive estimations (with 95% of potential uncertainty of investment costs) of the total costs of waste disposal.<br>- 5 Environmental Impact Assessment (EIA), 5.5. Associated Infrastructure – projects not covered by the EIA procedure, 5.5.3 External infrastructure for radioactive waste management, page 31: "The construction of these repositories is not covered by the scope of the first Polish NPP build project. They are treated as separate projects". Such a position is unacceptable. The generation of radioactive waste is an integral and irreversible component at all stages of the nuclear power plant (commissioning, operation and decommissioning). When the power plant is already built, the zero variant of the SNF and HLW management expires. The failure to include the management and disposal of HLW and SNF in the EIA process means that the public will not participate at the moment "when all options are open" and consequently, Article 6(4) of the Aarhus Convention will be violated.<br>- 10. Potential environmental impacts, 10.1. Standard environmental impacts of a nuclear power plant, Table 13: Transportation and traffic, page 72: in column "Areas," supplement "Transportation and traffic of hazardous waste". Due to the fact that the temporary and final repository of HLW and SNF can be situated in various locations in | | | <u>**Including in the Non-Technical Summary in Part 2**</u><br>**1)** **Chapter VI.2.10** "Predicted types and volumes of emissions, including waste, resulting from the implementation of the Project";<br>**2)** **Chapter VI.4.17** "Determining the projected environmental impact in the event of a severe accident";<br>**3)** **Chapter VI.5.7.11** "Waste management".<br><br><u>**EIA Report**</u><br>**In Volume II:**<br>**1)** **Chapter II.10.6** "Radioactive waste and spent (nuclear) fuel";<br>**2)** **Chapter II.10.6.2** "Spent (nuclear) fuel";<br>**3)** **Chapter II.10.6.3** "Radioactive waste";<br>**4)** **Appendix II.10.6-1** "Sources of radioactive waste and radioactive waste management during Operational phase";<br>**5)** **Chapter II.11** "Hazards and severe accidents".<br>**In Volume IV:**<br>**1)** **Chapter IV.16.2** "Radioactive waste and spent nuclear fuel";<br>**2)** **Chapter IV.17** "Determining the projected environmental impact in the event of a severe accident".<br><br>**In Volume V:**<br>**1)** **Chapter V.7.11.2** "Radioactive waste and spent nuclear fuel". |

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| | | Poland, the "Range" column will include items: locally, regionally and nationally. | | | |
| | **5** | e) proposes sites for the nuclear power plant where they partially or fully intrude into zones of occurrence of biotopes or species protected by the Habitats Directive (92/43/EEC) and Birds Directive (92/43/EEC) under Natura 2000. The problem concerns what is known as the shadow list of Natura 2000.<br>- 4 Type and scope of the project, page 21: The EIA should make a thorough assessment of the status of the sites considered, first of all under the above-mentioned Directives about habitats and nesting places, likewise should assess and recommend tasks (including the zero variant) to minimise the process of destroying precious natural sites which are subject to conservation under the above Directives, as well as adequate activities to offset the damage done.<br>7 Project variants under consideration, 7.1 NPP site variants, page 50: the places indicated not only habe an impact on Natura 2000 sites but they also have an effect on nearshore locations of the Natura 2000 sites, including beaches and several hundred meters of the sea, similarly to the areas protected under the Habitats Directive and shadow list of Natura 2000, for example Lubiatowskie Bory Bażynowe.<br>12 Description of the environment, 12.1.2 Choczewo Location Variant, page 93: The level of the groundwater in sandy valleys at this site is different than specified. Additionally, there are biotopes here from Annex 1 of the Habitats Directive, which logically means that the entire area is subject to the Habitats Directive. We require that the details concerning this site should be taken into account in the report. | No response has been given to the remarks because they are opinions. | It will be included in the EIA Report. | **<u>Transboundary Documentation</u>**<br>**In Part 6 Excerpt from Volume IV of the EIA Report:**<br>**1)** **Chapter IV.1** "Impacts on protected areas and features (land and sea)";<br>**2)** **Chapter IV.1.4** "Impacts on protected areas and features – marine environment".<br><br>**<u>Including in the Non-Technical Summary in Part 2:</u>**<br>**1)** **Chapter VI.3.2** "Description of natural (biotic) elements of the environment for the analysed Variants in the Project impact area (land, transitional and marine areas)";<br>**2)** **Chapter VI.4.1** "Impacts on protected areas and objects (land and sea)".<br><br>**<u>EIA Report</u>**<br>**In Volume III:**<br>**For the Lubiatowo-Kopalino site:**<br>**1)** **Chapter III.2.1.4** "Protected areas designated based on the Nature Conservation Act";<br>**2)** **Chapter III.2.1.5** "Protected areas designated based on the provisions of international law".<br>**For the Żarnowiec site:**<br>**1)** **Chapter III.2.2.4** "Protected areas designated based on the Nature Conservation Act";<br>**2)** **Chapter III.2.2.5** "Protected areas designated based on the provisions of international law".<br>**In Volume IV:**<br>**1)** **Chapter IV.1** "Impacts on protected areas and features (land and sea)".<br>**In Volume V:**<br>**1)** **Chapter V.3** "Description of anticipated mitigation activities (avoidance, prevention, reduction or offsetting)";<br>**2)** **Chapter V.3.1.1** "Natural environment". |
| | **6** | f) - 5 Environmental Impact Assessment (EIA), 5.5.2 Other associated investments, page 29: If the associated investments are related to the decision on the construction of the nuclear power plant, they have to be included in the EIA documentation, because in such a case all options are open, including the zero variant. This remark concerns all the issues | No response has been given to the remarks because they are opinions. | It will be included in the EIA Report. | **<u>Transboundary Documentation</u>**<br>**In Part 3 Excerpt from Volume I of the EIA Report:**<br>**1)** **Chapter I.5** "Associated infrastructure necessary for the Project to operate".<br>**In Part 4 Excerpt from Volume II of the EIA Report:**<br>**1)** **Chapter II.2.4** "Description of nuclear power plant facilities and their location"; |

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| | | specified in 5.5.2. The salami tactics is unacceptable in the EIA process. | | | 2) **Appendix II.2.4-3** Land development plans for operational phase - Variant 1 – Lubiatowo-Kopalino site. Marine and land area";<br>3) **Appendix II.2.4-6** Land development plans for operational phase - Variant 2 - Żarnowiec site. Marine and land area";<br>4) **Chapter II.12** "Associated infrastructure not covered in the application for the Decision on environmental conditions (in the transboundary documentation, the chapter includes solely general information and description of power connections)".<br><br>**<u>Including in the Non-Technical Summary in Part 2:</u>**<br>1) **Chapter VI.1.4** "Associated projects necessary for the functioning of the Project";<br>2) **Chapter VI.2.2.2** "Description of the NPP technology and infrastructure";<br>3) **Chapter VI.2.12** "Associated infrastructure not covered in the application for the Decision on environmental conditions".<br><br>**<u>EIA Report</u>**<br>**In Volume I:**<br>1) **Chapter I.5** "Associated infrastructure necessary for the Project to operate".<br>**In Volume II:**<br>1) **Chapter II.2.4** "Description of nuclear power plant facilities and their location";<br>2) **Appendix II.2.4-1** "Land development plans for the development stage - Variant 1 – Lubiatowo-Kopalino site";<br>3) **Appendix II.2.4-2** "Land development plans for the construction stage - Variant 1 – Lubiatowo-Kopalino site. Marine and land area";<br>4) **Appendix II.2.4-3** "Land development plans for the operational phase - Variant 1 – Lubiatowo-Kopalino site. Marine and land area";<br>5) **Appendix II.2.4-4** "Land development plans for the development stage - Variant 2 – Żarnowiec site";<br>6) **Appendix II.2.4-5** "Land development plans for the construction stage - Variant 2 – Żarnowiec site. Marine and land area";<br>7) **Appendix II.2.4-6** "Land development plans for operational phase - Variant 2 - Żarnowiec site. Marine and land area";<br>8) **Chapter II.12** "Associated infrastructure not covered in the application for the Decision on environmental conditions (full scope of the entire infrastructure)"; |

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| | | | | | 9) **Appendix II.12-1** "Associated infrastructure not covered in the application for the Decision on environmental conditions". |
| <u>Deputy Staroste Bc. Pavel Šoltys</u> | **7** | Having analysed the documentation submitted we have found that this project is not contradictory to the basic strategic documents of the Olomouc Region. However, in the event of the project implementation it will be necessary to reduce potential effects of the power plant operation in the area of the Olomouc Region, especially on inhabitants, in the event of an accident, if any. Due to the intricacy of the issues related to the construction of a new nuclear power plant, the Olomouc Region recommends the participation of the Czech Republic in international consultations regarding the project in question. | No response has been given to the remarks because they are opinions. | It will be included in the EIA Report. | **In Part 1 Introduction:**<br>1) **Chapter V.4.1** "Possible transboundary radiological environmental impact";<br>2) **Appendix V.4-1** "MATCH model results";<br>3) **Appendix V.4-2** "FDMT model results".<br><br>**In Part 4 Excerpt from Volume II of the EIA Report:**<br>1) **Chapter II.11** "Hazards and severe accidents";<br>2) **Appendix II.11.3-1** "Results of the analysis of impact from extreme natural events, phenomena and conditions on NPP safety together with adaptive (preventive) measures".<br>**In Part 6 Excerpt from Volume IV of the EIA Report:**<br>1) **Chapter IV.14** "Impact related to ionising radiation";<br>2) **Chapter IV.17** "Determining the projected environmental impact in the event of a severe accident";<br>3) **Appendix IV.17-1** "MATCH model results";<br>4) **Appendix IV.17-2** "FDMT model results".<br>**In Part 7 Excerpt from Volume V of the EIA Report:**<br>1) **Chapter V.7.8** "Ionising radiation";<br>2) **Chapter: V.7.11.2** "Radioactive waste and spent nuclear fuel".<br><br>**<u>Including in the Non-Technical Summary in Part 2:</u>**<br>1) **Chapter VI.4.17** "Determining the projected environmental impact in the event of a severe accident";<br>2) **Chapter VI.4.14** "Impact related to ionising radiation".<br><br>**<u>EIA Report</u>**<br>**In Volume I:**<br>1) **Chapter I.5** "Associated infrastructure necessary for the Project to operate".<br>**In Volume II:**<br>1) **Chapter II.11** "Hazards and severe accidents", subchapter II.11.3 "External events that may endanger the safety of a nuclear power plant"; subchapter II.11.4.2 "Risk of a severe accident in a nuclear context";<br>2) **Appendix II.11.3-1** "Results of the analysis of impact from extreme natural events, phenomena and conditions on NPP safety together with adaptive (preventive) measures".<br>**In Volume IV:**<br>1) **Chapter IV.14** "Impact related to ionising radiation"; |

| Table of responses to the remarks of the Affected Parties submitted at the scoping stage, with an indication of the chapters in the EIA Report | | | | | |
|---|---|---|---|---|---|
| **Author of the remark/comment on the Affected Party Date: 01.02.2016** | **No.** | **Content of the comment (or a summary thereof) of the Affected Party in 2016** | **Response of PGE EJ1 Sp. z o.o. (currently PEJ Sp. z o.o.) at the scoping stage to the remark/comment of the Affected Party in 2016** | **Will the comment be included in the EIA Report?** | **Update of the response of PEJ Sp. z o.o. in 2022, and Chapters/Appendices in the Transboundary Documentation and the EIA Report which address the remark/comment of the Affected Party** |
| | | | | | 2) **Chapter IV.17** "Determining the projected environmental impact in the event of a severe accident";<br>3) **Appendix IV.17-1** "MATCH model results";<br>4) **Appendix IV.17-2** "FDMT model results".<br>**In Volume V:**<br>1) **Chapter V.4.1** "Possible transboundary radiological environmental impact";<br>2) **Appendix V.4-1** "MATCH model results";<br>3) **Appendix V.4-2** "FDMT model results". |